# Mining Operations
# Summary Audit Report

## Granny Smith Gold Mine

## Gold Fields Australia

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## For The International Cyanide Management Code

www.cyanidecode.org

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# Summary Audit Report For Gold Mining Operations

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| Name of mine: | Granny Smith Gold Mine |
| Name of mine owner: | Gold Fields Australia |
| Mine operator: | GSM Mining Company Pty Ltd |
| Responsible Manager: | Neil Lester |
| Address: | GSM Mining Company Pty Ltd<br>Mount Weld Road<br>Laverton, Western Australia 6440 |

## Location detail and description of operation:

Granny Smith Mine (GSM) is located 950 kilometres (km) northeast of Perth and 23 km south of Laverton in the Coolgardie biogeographic region of Australia and within the Archaean Greenstone belts. The general climate of the Granny Smith region is described as arid, receiving erratic rainfall and in a moderate to severe drought risk zone. Long-term climate data have been collected from the Australian Bureau of Meteorology weather station located at Laverton. The average annual rainfall is 220.9 millimetres (mm), most of which falls during the period January to June. Temperatures range from a mean daily maximum of 35.8°C in January to 17.8°C in July.

Granny Smith Mine is part of Gold Fields Limited (GFL). Placer Gold Operations initially developed the mine, which includes several open pits, with mining operations dating back to 1989. The project transitioned ownership to Barrick Gold in 2006 and then to Gold Fields in 2013. Key deposits include the Granny Smith, Goanna, and Windich pits, with additional satellite operations such as Childe Harold, Keringal, Jubilee, and Wallaby. The Wallaby area transitioned to underground mining in 2004 and remains active.

Operations at GSM consist of both refractory and free milling ore types that are mined at Wallaby and processed at the on-site mill. The processing plant has an annual throughput capacity of 3 Mtpa. It consists of a two-stage crushing circuit including closed-circuit screening and a single-stage oxide ore crushing circuit, followed by a semi-autogenous grinding mill in closed circuit with a cone crusher, a ball mill, an agitation leaching and carbon-in-pulp circuit, tailings retreatment plant, a gold recovery plant with elution, carbon reactivation, and a tailings thickener. In 2015, a gravity circuit was installed, which consists of 2 sizing screens and 2 Knelson concentrators that produce a concentrate leached by an Inline Leach Reactor.

| Granny Smith Gold Mine | | 10 October 2025 |
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| Name of Mine | Signature of Lead Auditor | Date |

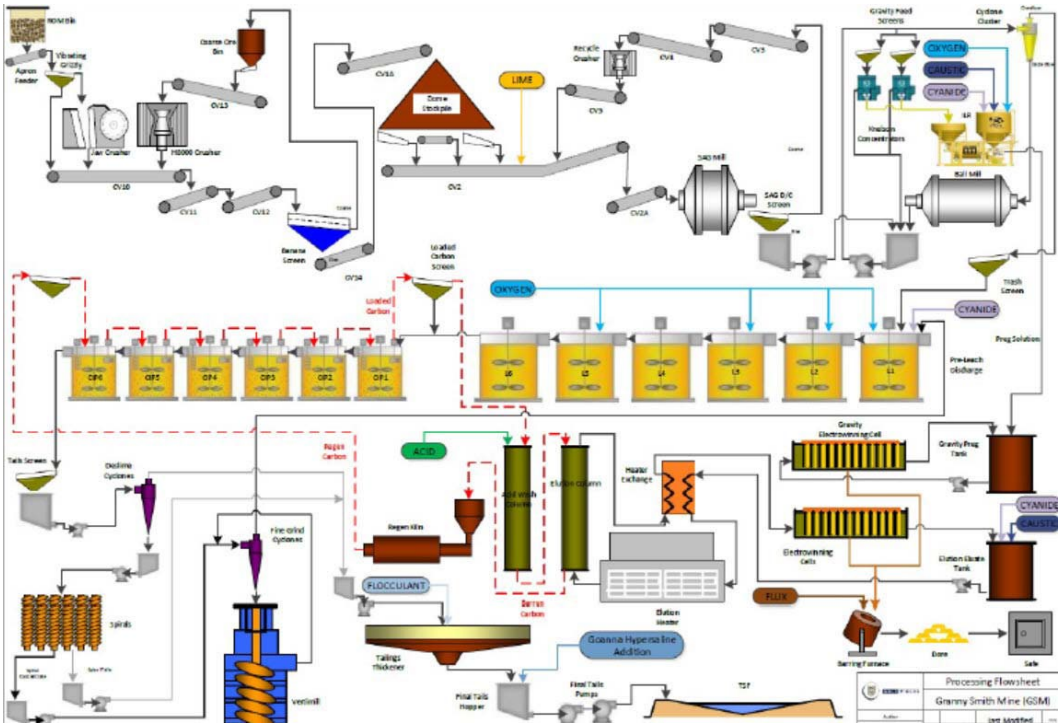


Figure 1: Granny Smith Mine simplified ore processing flowsheet.

Processing of ore at GSM is conducted on a campaign basis, with the processing plant operating for typically about two weeks per month and then shut down for two weeks per month.

The Tailings Storage facility, a multi-celled system, is located due south of the process plant site and occupies an area of approximately 438 ha. Tailings Storage Facility (TSF) cells 1 and 2 have not been operational for a number of years and were not operated during the audit period. TSF Cell 3 and Cell 4 are operational and were used during the audit period. The TSF embankments are approximately 20 to 40 m high above the surrounding terrain and are partially clad in rock armour and topsoil. The TSF is a paddock system with peripheral discharge. Tailing's discharge is managed to create shallow beaches and a centrally located decant pool around the decant finger in the centre of each cell. Central gravity decants are used to collect and remove supernatant water for re-use in the milling circuit. Cells are active for varying lengths of time and are generally used on a rotational basis. Around the perimeter of the TSF is a seepage collection drainage system that pumps water back to the plant. In 2023, three seepage recovery bores were installed to the south of Cell 4 North and South to decrease groundwater levels.

Prior to initial Code certification GSM commissioned a study to determine and implement the processes to achieve certification with hyper-salinity (> 50,000 mg/L Total Dissolved Solids (TDS)) as an alternative measure to meet the objective of Standard of Practice 4.4 even with tailings discharge of above 50 mg/L Weak Acid Dissociable (WAD) cyanide. This was accepted by International Cyanide Management Code (ICMC) auditors and the International Cyanide Management Institute (ICMI) in the initial ICMC audit. The study and peer review reports determined site-specific operating parameters for GSM, which form the alternative Code compliance limits within the TSF for the operation that allowed tailings discharge at a maximum of 83.3 mg/L WAD CN when tailings salinity is greater than 50,000 mg/L Total Dissolved Solids (TDS). This method of compliance with 4.4 has only been used intermittently for short periods of time during this and previous audit periods.

Two new cyanide facilities were constructed or modified during the audit period. TSF Cell 4 Stage 4a was

completed in August 2023, and a wall lift of TSF Cell 3 (Stage 3f) was completed in March 2022.

Sodium cyanide solution for the processing of gold is supplied by Australian Gold Reagents Pty Ltd (AGR) from its Kwinana facility 40km south of Perth. It is transported in isotainers via the AGR Australian Supply Route using road and rail. No solid cyanide is used for processing, and no mixing facilities exist on site.

# Auditor's Finding

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle. This operation has not experienced any compliance issues during the previous three-year audit cycle.

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| Audit Company: | Donato Environmental Services Pty Ltd |
| Audit Team Leader: | David Donato |
| Email: | david@desenvironment.com.au |
| Names and signatures of Technical Expert auditor: |  |
| | Gregory Smith |
| Date(s) of audit: | 24 to 28 February 2025 |

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

Donato Environmental Services Pty Ltd developed tailings storage facility wildlife monitoring regime for the operation, currently conducts wildlife monitoring at the operation on a quarterly basis, and was involved in the wildlife mortality assessment during this audit cycle and consequently an Independent Auditor (Gregory Smith Technical Auditor) conducted those aspects of the audit evaluating wildlife issues, which would have otherwise resulted in a conflict of interest for DES Pty Ltd, as appropriate.

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.

| Granny Smith Gold Mine |  | 10 October 2025 |
|---|---|---|
| Name of Mine | Signature of Lead Auditor | Date |

# Principle 1 | PRODUCTION AND PURCHASE

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

## Standard of Practice 1.1

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

The operation is in X FULL COMPLIANCE with Standard of Practice 1.1

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 1.1: Purchase cyanide from manufacturers employing appropriate practices and procedures to limit the workforce's exposure to cyanide and to prevent the release of cyanide into the environment.

GSM purchased all sodium cyanide solutions from Australian Gold Reagents (AGR) during the audit period. All sodium cyanide solutions purchased during the audit period were manufactured at the Kwinana sodium cyanide production plant operated by AGR.

AGRs Kwinana Facility was recertified in full compliance with the ICMC on 22 September 2020 and then recertified again on 28 August 2023.

The Sodium Cyanide Solution Supply Agreement between AGR and Goldfields Australia Limited; was signed on 10 June 2024. The Commencement Date of the Supply Agreement was nominated as 1 April 2024 for five years. The previous variation to the signed contract between AGR and Goldfields Australia Limited was initially signed on 23 December 2016, with a Commencement Date of 1 January 2017, for five years, signed on 30 March 2017. A variation to the supply agreement contract was signed on 30 April 2019 and extended by three years to 31 March 2024.

Clause 15 of the current Sodium Cyanide Solution Supply Agreement states that AGR 'must at all times fully comply with the current ICMI International Cyanide Management Code'. Previous versions of the signed contract contained the same clause.

Cyanide delivery documents from the audit period were verified, and all identified that AGR delivers the cyanide from their Kwinana Facility.

# Principle 2 | TRANSPORTATION

Protect communities and the environment during cyanide transport.

## Standard of Practice 2.1

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

The operation is in X FULL COMPLIANCE with Standard of Practice 2.1

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

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

The Sodium Cyanide Solution Supply Agreement between AGR and GSM states that AGR is responsible for the transportation of Sodium Cyanide and the unloading of the Sodium Cyanide Solution at the Delivery Point.

AGR supplies sodium cyanide solution to GSM via their Australian Supply Chain, which was re-certified as being in compliance with the Code on 9 November 2022. Qube Bulk is listed as a transporter under AGR's Australian Supply Chain and was the only transporter used for all deliveries to GSM in the audit period. Qube Bulk was re-certified in compliance with the Code on 3 February 2022 and again on 10 March 2025.

GSM has retained chain of custody records and other documentation identifying all transporters and supply chains responsible for transporting cyanide from the producer to the operation. Cyanide delivery dockets identify that the transport contractor/carrier was Qube Bulk Pty Ltd.

The Cyanide Supply Contract between AGR and GSM requires that AGR must at all times comply with the then-current ICMI Code for the production and transport of cyanide. This requirement includes responsibility for safety, security, release prevention, training, and emergency response during the transport of cyanide.

# Principle 3 | HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

## Standard of Practice 3.1

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

The operation is in X FULL COMPLIANCE with Standard of Practice 3.1

Substantial Compliance

Non Compliance

| Granny Smith Gold Mine | | 10 October 2025 |
|---|---|---|
| Name of Mine | Signature of Lead Auditor | Date |

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with 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.

GSM does not use solid cyanide for processing; only liquid sodium cyanide is delivered and used for processing.

The GSM cyanide unloading and storage facilities were designed and constructed in accordance with the Western Australian Dangerous Goods Act and Regulations, the cyanide producers' (AGR) specifications, and Australian Standard AS 4452 for the storage of toxic substances. The GSM cyanide unloading and storage facilities were designed and built by the cyanide supplier (AGR) and have not changed since the previous audit.

GSM has retained a full set of drawings and all construction documentation, and QA – QC records of the cyanide unloading facilities and cyanide storage tank. The documentation is retained electronically on-site and off-site in offices in Perth and was verified on 27 February 2025.

The cyanide unloading and storage facilities are located away from the administration area, plant offices, workshops and surface waters. The cyanide storage tank is located on a solid concrete plinth within concrete bunding that can contain the volume of the storage tank. It is separated from incompatible materials at an appropriate distance to prevent mixing. A fence with a turnstile activated by access swipe cards separates the processing plant from external areas. There has been no change to the cyanide storage tank and secondary containment since the previous audit.

The cyanide unloading facility consists of an unloading bay sufficient for a single isotainer to be accessed from an unloading tower immediately above it. The cyanide unloading facility is located on a bunded concrete pad with rollover bunds located at the entrance and exit to minimise seepage and capture and contain any spilt liquid cyanide solutions or wash-down solutions. The unloading pad has a drain into the cyanide and caustic storage area bund, which can contain the volume of a full isotainer (22,000 litres). A sump pump is located in the sump to pump solutions to the leaching circuit and is remotely operated by mill control. An observer's hut is located adjacent to the cyanide unloading facility and storage compound, and it has a clear view of the unloading facilities. The unloading pad is inspected on a monthly basis by the processing department, which includes checking the integrity of the concrete pad and bunds. An annual audit of the cyanide unloading and storage facilities is conducted by AGR, which includes the integrity of the concrete pad and bunding. Work to address any issues identified by these AGR audits has been completed.

GSM has one cyanide storage tank with a capacity of 94 Kilolitre (kl), which is located within a secure area of the GSM processing plant with a locked gate. It is located on a concrete pad outside in an open-air environment, which prevents the build-up of hydrogen cyanide gas and within a concrete bunding, which can contain the volume of an isotainer. A locked gate controls access to the cyanide storage compound to prevent unauthorised access.

The cyanide storage tank has a level sensor and transmitter for real-time monitoring, with a digital reading at the unloading facility and visual indicators on the tanks. The tank volume is also displayed in Supervisory Control and Data Acquisition (SCADA) on the reagents page. The tanks overflow pipe discharges through a sealed pot to prevent any HCN gas from escaping from the tank at ground level. The tank has a vent on top to prevent the build-up of HCN gas, which is located at least 20 meters from the unloading platform and at least 5 metres above it. Vent gases discharge into a water seal pot.

The GSM Cyanide Delivery Work Instruction identifies that prior to the commencement of unloading, the spotter must check that the level in the storage tank to receive delivery has sufficient capacity to

accept the delivery; the maximum level the cyanide storage tank can accept delivery must be at or below 40%. If there is insufficient capacity, the spotter must not allow unloading to take place. The cyanide delivery dockets require the recording of cyanide tank levels before and after delivery.

High and High-High alarms are configured on the SCADA system at 91 % and 96 %, respectively. The alarms are displayed on the SCADA system. A manual air isolation valve is located at the spotter's hut in the event that the observer needs to stop the unloading process.

A 6-monthly (ICMC) Electrical Inspection Cyanide System is conducted, which covers alarms, cables, emergency buttons, pumps and flow meters. Testing of the high and high-high alarms is simulated during the six monthly Cyanide Bund Area Electrical Inspection, and the alarm is inspected during the internal inspection of the cyanide storage tank. The engineering department conducts a 6-week mechanical inspection of the reagents area. This covers pumps and other infrastructure. Annual audits of the cyanide unloading and storage facilities by the cyanide supplier (AGR) include inspection of the level sensor for functionality and review of evidence that it is calibrated and maintained.

All the pipework and pumps are fitted with double block and bleed lines, and all the drain valves and lines are fitted with blank flanges to meet Dangerous Goods Regulations and Australian Standards.

## 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 is in X FULL COMPLIANCE with Standard of Practice 3.2

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM 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.

Cyanide solutions are delivered solely in isotainers, which are not handled or stacked on-site during the unloading process. The isotainers are removed from the site following cyanide unloading. No other cyanide containers are handled by any other means during cyanide unloading.

Red carmoisine dye is added to all sodium cyanide solutions by AGR prior to delivery to aid in the detection of uncontained cyanide solutions as required by the supply contract.

The AGR delivery driver undertakes the cyanide unloading in accordance with the AGR Procedure for Sodium Cyanide Solution Isotainer Unloading at Mine Sites, which describes the operation of all hoses, valves, and couplings for unloading liquid cyanide.

This procedure provides all the steps required to undertake cyanide unloading, including the operation of all hoses, valves, and couplings for unloading liquid cyanide. A GSM employee acts as a spotter during the unloading process. GSM has a liquid cyanide unloading procedure to govern GSM personnel's activities prior to, during, and following cyanide unloading. All GSM personnel who act as spotters for cyanide deliveries must be trained in this procedure.

Both the AGR and GSM cyanide unloading procedures detail PPE that is required to be worn, including a hard hat, long trousers, rolled-down sleeves, safety glasses, an HCN monitor, and a handheld radio. Additional PPE is located within the PPE cabinet adjacent to the spotter's hut, and includes chemical-

resistant gloves, chemical overalls, goggles, face shields, and oxygen (OxySok).

The GSM spotter is required to complete the pre-unloading checks in accordance with the Cyanide Unloading Checklist, including the available capacity of the cyanide storage tank, seal pots, the emergency stop button, valves, sump pump, spill kit, safety showers and safety equipment. The Cyanide Unloading Checklists are stored electronically on-site.

The GSM observer is not allowed to be on the unloading pad during cyanide unloading and observes the cyanide unloading from the spotter's hut. The observer is located next to the manual shut-off valve to stop unloading in an emergency or if any unloading lines burst or start to leak or the storage tanks begin to overflow. An OxySok (oxygen resuscitator) is located in the PPE cabinet next to the cyanide spotter's hut, along with a full-face shield, chemical-resistant suits and chemical-resistant gloves.

The AGR delivery driver undertakes the cyanide unloading in accordance with the AGR *Procedure for Sodium Cyanide Solution Isotainer Unloading at Mine Sites CSBP-OP-09-04-10*. This procedure provides all the steps required to undertake cyanide unloading, including the operation of all hoses, valves, and couplings for unloading liquid cyanide. Section 5 stipulates that the mine observer has the responsibility to ensure the facility is ready for receiving cyanide, and check for damage to hoses, pipes and valves.

GSM conducts monthly maintenance inspections of the cyanide unloading area under schedule (ICMC) 4Weekly Reagents mech Online Zonal Inspection, where flanges, hoses, and couplings are inspected. The 5 Weekly Planned General Inspection (PGI) -Reagents GRA-PRO-WI053 is implemented, which specifically refers to hose, valve, flange and coupling inspections. *GSM Liquid Cyanide Unloading Procedure* states that a field-level risk assessment of the delivery unloading area must be completed, which includes checking the condition of the equipment. Appendix 3 specifies that the field-level risk assessment must be completed.

The GSM and CSBP Cyanide Unloading Procedures require the delivery driver to wash down the hose nozzles, couplings, and any spills and drips on the isotainer and trailer and wash down the unloading area prior to the tanker leaving the site. Spills outside of a bunded area are managed in accordance with the *Clean-up Minor Spill of Cyanide Procedure*.

# Principle 4 | OPERATIONS

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

## Standard of Practice 4.1

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.1

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in Full COMPLIANCE with 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.

GSM have developed written management and operating plans and procedures for cyanide facilities, including, but not limited to, unloading and storage facilities, leach plants, and tailings impoundments. At GSM, process water is re-used, and the whole wet plant area, including the grinding circuit through to

the Tailings Storage Facility (TSF) and process water pond, are classified as cyanide facilities. No cyanide mixing facilities, Heap leach operations or cyanide regeneration systems exist at GSM.

GSM uses a mixture of plans, manuals, procedures and work instructions that have been developed and implemented to structure cyanide-related activities and describe how specific cyanide-related tasks are undertaken. GSM has a Cyanide Management Plan that guides cyanide management and use.

SharePoint software is used to manage documentation of plans, procedures, task instructions, manuals, area inspections, compliance, and regulations, as well as to ensure current versions are accessible and redundant versions are archived. Documents are accessed through the GSM Sharepoint repository, which is available on work computers through the GSM intranet.

InTuition (INX) was used for most of the audit period to control training documentation, including competencies, job roles, courses and training records. However, this was replaced by Success Factors/LMS in 2024. SAP software is used to administer schedules, requirements, and records of routine preventive maintenance activities and repairs. The CITECT distributed control system (DCS) is used to control automated processing operations.

Key plans and procedures include the following: Cyanide Management Plan; Tailings Management Plan; Management of Change Procedure; Liquid Cyanide Unloading Procedure; Working in Areas where HCN Gas may be Present Procedure; Leaching - Cyanide Titrations and pH Measurement; Flow Sheet for adjusting LT4 Cyanide Setpoint based on WAD Levels; Clean-up Minor Spill of Cyanide Procedure; Leaching - HCN Area Monitoring; Enter & Work in the Cyanide Compound; Confined Space Entry Procedure; Control of Cyanide Deficiency at Tailings Facility; and Metallurgy - Daily Plant Checks.

All Manuals, Procedures, and Work Instructions are reviewed periodically, with Procedures and Work Instructions reviewed every 12, 24, or 48 months, depending on the risks associated with the job or the potential for change to the task as determined by the relevant department. A review can be initiated at any time if a change to the procedure/task is required or if there is a modification to equipment or cyanide facilities.

GSM continues to maintain plans and procedures that identify the assumptions and parameters on which the facility design was based as necessary to prevent or control cyanide releases and exposures consistent with applicable regulatory requirements. Key assumptions and parameters are contained within the Cyanide Management Plan, Tailings Management Plan, and Granny Smith Processing Plant Description and include cyanide concentration targets for Leach Tank LT0 and Leach Tanks LT3; pH targets in Leach Tank LT0; pH and cyanide targets for the elution circuit; WAD cyanide concentrations in the final leach tank (71 to 79 mg/L); WAD cyanide and salinity operating parameters within the TSF; and minimum freeboard of 300 mm in all TSFs and the process water pond to contain a 1 in 100-year recurrence interval, 24-hour duration storm event. Design criteria for cyanide facilities are contained in design documentation and drawings and summarized in the Granny Smith Processing Plant Description (updated February 2025), which is maintained on-site.

GSM implements a Change Management Procedure to review proposed changes, including those to production processes, operating practices, cyanide facilities, training practices, systems and organisational structure, to determine if they may increase the potential for cyanide releases and worker exposures. The Management of Change Procedure outlines the principles and process to manage permanent or temporary changes at GSM and incorporate any measures necessary to protect worker health and safety and the environment. The site Management of Change (MoC) System consists of an overarching guidance document, a Management of Change Procedure (GRA-OHS-PRD060), a Management of Change Proposal form (GRA-OHS-FM069), and an Engineering Change Management Form.

MOC forms require review and sign-off by relevant departments, including Safety and/or Environment Departments, where required. All MOC documentation is stored in INX as an event with the event number noted on the MOC proposal. A number of change management examples were reviewed and signed off on by safety and/or environmental representative.

GSM has cyanide management contingency procedures for nonstandard operating situations that may present a potential for cyanide exposures and releases, such as an upset in the operational water balance that presents a risk of exceeding the design containment capacity; problems identified by facility monitoring or inspection; and temporary closure or cessation of operations.

Procedures, Manual and Management Plans that consider non-standard operating situations and provide response actions include the Cyanide Management Plan, Cyanide Emergency Management Plan, Emergency Management Plan (including Duty Cards); Temporary cessation of operations Cyanide Management Contingency Plan, TSF Emergency Preparedness and Response Plan; Trigger and Response Plan, Clean-up Minor Spill of Cyanide Procedure; Critical Slurry Pump Failure Work Instruction and Decontamination and Decommissioning Plan. These documents consider a range of non-standard operating scenarios, including loss of containment of process solutions, embankment failure, excessive seepage, pipe leakages or failures, pump failure, loss of power, overtopping events at the TSF or process water ponds; and exceedances in operating parameters of the tailings.

The Trigger and Response Plan is used to identify non-normal operating situations for a range of factors such as embankment stability and erosion, freeboard, pipeline spills, decant pond size, rainfall and seepage. The Temporary Cessation of Operations Procedure provides actions for non-emergency, short notice and temporary cessation of operation scenarios. It identifies strategies and procedures to be followed for a short-term and or unplanned shutdown, including Plant shutdown sequence, Operations shutdown required tasks, Processing infrastructure strategies, Processing inspection schedule, Decontamination and equipment decommissioning, Preventative maintenance strategies, Power supply, Staffing levels required and Environmental compliance guidelines. The TSF Management Plan includes emergency action plans for a range of scenarios, including earthquakes, extreme rainfall events, tailings distribution/return water pipeline failure, tailings embankment breach, and power failure.

The GSM Decontamination and Decommissioning Plan (DDP) contains strategies and actions for the decontamination of infrastructure, including all cyanide facilities. This includes cyanide stock reduction, cyanide disposal, processing clean-up, and decontamination of low, medium, and high cyanide areas.

GSM undertakes a broad range of inspections at all cyanide facilities on an established frequency to ensure and document that they are functioning within design parameters. The frequency of inspections is appropriate to assure and document that they are functioning within design parameters. The frequency of inspections is outlined in the Cyanide Management Plan and area operating manuals, and they are scheduled in INX and SAP.

Operational inspections of the processing plant and TSF facilities, including secondary containments, pumps and pipelines, are conducted by the processing department on a daily basis, which is appropriate for the purpose of detecting freeboard in storages, evidence of leaks or spills, and pump flows. Wildlife monitoring at the TSF and process water pond is conducted on a daily basis. Inspections cover integrity and capacity of bunding; condition and evidence of leaks from pipelines, pumps and valves; presence of wildlife and carcasses; available freeboard on the TSF and ponds; and general housekeeping. Planned General Inspections (PGIs) are conducted 4-weekly and cover cyanide facilities within the following cyanide areas: Grinding; Reagents (cyanide unloading and storage facilities); Leach – Carbon in Pulp (CIP) Tanks; Elution; Thickener and Water systems; Elution; and the Tailings Storage Facility. GSM conducts a 6 Monthly General Inspection of Tails Dam, and a third-party annual inspection of the TSF is also

conducted.

All GSM inspections are documented in hard copy or electronically and contain specific items to be inspected to verify the operation and integrity of each piece of equipment or infrastructure being inspected, as well as observed deficiencies. All inspection records are stored electronically either as scans of hard copy documents or as electronic forms for the audit period.

For example the Process Water Ponds leak detection inspections include Elec 6 Month Cyanide System Inspection 400-430-433 that measures tails line flow meters which are used as part of the leak detection system. The Process Water Pond leak detection includes monthly seepage monitoring between the double-layering HDPE process pond, with data retained on a spreadsheet and managed through procedure GRA-PRO-WI349.

Cyanide-bearing processing tanks pre-date cyanide certification and are partially sunken up to a meter below ground level with no impermeable barrier between them and the substrate beneath. GSM has implemented a risk-based inspection program for cyanide-bearing tanks.

The tailings and return water pipelines have telemetry and pressure gauges installed, which are monitored within the SCADA system to detect any leaks.

Groundwater monitoring at four cyanide monitoring bores strategically located throughout the plant is conducted quarterly to detect the presence of process solutions. Quarterly groundwater monitoring is also conducted in a range of monitoring bores around TSF Cells 1 to 4 as well as at bores around the non-operational open pits. Sample analysis is conducted off-site at a National Association of Testing Authorities (NATA)-certified laboratory.

GSM has implemented a comprehensive program of Preventative Maintenance inspections, audits and other activities to ensure that cyanide facilities, equipment and devices function as necessary for safe cyanide management. Preventative Maintenance Inspections cover all tanks holding cyanide solutions for their integrity and signs of corrosion and leakage; secondary containments for their integrity, the presence of fluids and their available capacity, and to ensure that any drains are closed and, if necessary, locked, to prevent accidental releases to the environment; leak detection and collection systems at leach pads and ponds, as required in the design documents; pipelines, pumps and valves for deterioration and leakage; and 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.

The cyanide unloading and storage facilities are inspected during monthly Reagents Area inspections, which cover the cyanide unloading facility and all hoses, valves and couplings used for unloading liquid cyanide. If any equipment requires maintenance, repairs or replacements or there are any other non-compliances, then actions are raised in INX and work requests are raised in SAP. Inspections of the cyanide unloading and storage area are also conducted prior to each unloading event. The cyanide storage tank undergoes external inspection every 12 months and is emptied and refurbished every four years, which is considered appropriate, considering thickness testing and leak detection monitoring. Leach and CIP tanks are inspected internally and externally every four years for their integrity and signs of corrosion and leakage on an annual basis. The thickener undergoes an internal inspection annually. A schedule of tank inspections was produced and was verified to cover the four-year cycle covering all tanks. Tank inspection and refurbishment reports were verified for the audit period.

Additional inspections are conducted by external consultants/organisations, including annual cyanide storage area inspection by the cyanide supplier (AGR); annual TSF audits (conducted by an external Geotechnical Engineer); Cyanide Code Gap Audits and Dangerous Goods Audits, which are conducted approximately every three years. Secondary containments are inspected during daily inspections

conducted by process technicians and during 4-weekly Planned General Inspections (PGIs).

Pipelines, pumps and valves are inspected for leakage and signs of corrosion and deterioration during daily inspections, monthly Planned General Inspections, and Preventative Maintenance inspections. A leak detection and collection system is used at the process water ponds, as required in the design documents.

GSM has assessed to determine that it does not require emergency power resources to operate pumps and other equipment in order to prevent unintentional releases of cyanide solutions and exposures in the event its primary source of power is interrupted. This is achieved through the use of isolation valves and gravity to stop drain-back and manage the potential for overflow.

GSM does however, maintain emergency backup power resources to operate pumps and other equipment to operate pumps, and other equipment for a range of emergency actions and ensure that unintentional releases and exposures are prevented in the event its primary source of power is interrupted. Power is supplied to GSM by a third-party-operated gas power station, and backup diesel generators supply emergency power. The power supply agreement requires that a minimum of 5MW of power capacity is provided at all times and that the backup diesel generators are maintained in good working order. This is sufficient for the operation of pumps and other necessary operational equipment. Backup diesel generators are inspected on a weekly basis.

## Standard of Practice 4.2

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.2

Substantial Compliance

Non Compliance

## Summarize the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 4.2: Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

GSM implements a program to evaluate cyanide use in the processing plant in order to determine appropriate cyanide addition rates and adjust cyanide addition rates as necessary when ore types or processing practices change the cyanide requirements. Cyanide additions are automated based on final leach tank concentrations (CIP 6) in order to achieve target WAD concentrations at the thickener overflow as measured by the WAD analyser. GSM undertakes routine monitoring throughout the leach circuit and tailings to achieve these aims including via an online free cyanide analysis at leach tank 1 (LT1) and leach tank 3 (LT3) for control of cyanide dosing flow rate, online WAD cyanide analysis at the tailings hopper, bottle roll testing of tailing ore and 4-hourly manual titrations of slurry samples at LT0, LT3 and CIP Tank 6. The WAD cyanide set point for LT6 is typically 60– 75 mg/L, which maintains a concentration of 130-150 mg/L free cyanide in LT0. Manual titration log sheets are electronically filled out by operators and maintained by the Metallurgy department.

Cyanide additions to Leach Tank LT0 are via a closed loop automatic control using an instream cyanide analyser unit (Cynoprobe) and a Citect automated valve. Programmable Logic Controllers (PLC) determine the ratio between ore feed (tonnes) and cyanide usage (kg) to achieve the operator-entered cyanide set point. Process operators can make adjustments to cyanide additions based on manual cyanide titration results if necessary.

The cyanide addition rates are reviewed and set by the site metallurgist based on daily plant information, including the Daily Assay Reports, Leach Log sheets and daily mill grind data. The *Work Instruction: Flow Sheet for adjusting LT0 Cyanide Setpoint based on WAD Levels* is also used for guidance to control cyanide throughout the plant and ensure WAD targets of < 70 mg/L WAD cyanide in the final leach tank are achieved.

Bottle roll leach tests of tailings are conducted on a daily basis to determine the amount of leachable gold loss. Results are provided daily to the plant metallurgists via the daily assay report. As ore characteristics change, plant metallurgists determine the appropriate cyanide addition rates, which are then communicated to the process technicians for implementation.

Ore evaluation through metallurgical test work, including standard leach tests, is conducted on each new ore zone from the Wallaby pit and underground and any new sources of ore. Metallurgical test work reports are retained by the Metallurgical Department and were verified during the audit. Periodic testing of ore for cyanide consumption and copper concentrations may also be conducted for specific reasons.

## Standard of Practice 4.3

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.3

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.

GSM continues to implement a comprehensive, probabilistic water balance (PWB) developed by third-party hydrogeological consultants. The modelling software uses the probabilistic Monte Carlo simulation to account for uncertainties in inputs.

The PWB is maintained and run according to the GSM Process Water Balance Work Instruction. The model can run probabilistic simulations and also event-based simulations for defined rainfall events and a scenario of a power outage during the design storm event. The PWB is run on a quarterly basis by the Senior Metallurgist, and a Water Balance Run Report is produced, which provides the results, including TSF pond volume and depth, and process water pond depth for the scenarios modelled. A quarterly survey of the TSFs is conducted by third-party consultants to determine current TSF capacities and heights. These are provided to GSM for inclusion in the PWB model runs. The storm event modelled is a 1 in 100-year 72-hour average recurrence interval (ARI) event (181 mm of rainfall), which is the industry standard used for water balance modelling.

The user views and operates the program using a dashboard and conceptual flow diagram, which shows the water circuitry, including all water and solution storages and water flows.

The GSM probabilistic water balance model was designed to meet Code requirements and considers the following aspects in a reasonable matter as appropriate for the facilities and environment; the rates at which solutions within tailings are deposited into tailings storage facilities; a design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility; the quality of existing precipitation and evaporation data in representing actual site conditions; the amount of precipitation entering a pond or impoundment resulting from surface run-on from the upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground; the model considers solution losses from seepage and evaporation; the effects of potential power outages or pump and other equipment failures for emergency removal of water from a facility.

There is no discharge of process solutions to surface waters at GSM.

Leach pads do not exist at GSM, and freezing and thawing of tailings and process solutions are not applicable to GSM due to its location/climate.

Freeboard at active TSFs (TSF Cells 3 and 4) and the Process Water Pond is maintained at 300 mm in accordance with the Department of Water and Environmental Regulation (DWER) Licence (L8435/2010/3), which is adequate to contain the event of 1 in 100-year 72-hr average recurrence interval (ARI) design event. The Process Water Pond has a level sensor installed, and the pond volume is shown in the SCADA system. The active TSF and process water ponds are inspected at least every 12 hours as required by the DWER Licence, including for the adequacy of the freeboard.

The Engineer of Record conducts annual third-party audits, which include an inspection of the tailings discharge network, decant infrastructure, embankment and walls, and freeboard. The annual report also reviews general TSF management and compliance with DWER licence conditions and Department of Mines, Industry Regulation and Safety (DMIRS) mining lease conditions. A Monthly TSF dashboard is also produced internally, which assesses key performance indicators for elements of all TSFs and identifies concerns and actions. This includes available freeboard in all TSF cells, groundwater level, vibrating wire piezometer (VWP) data, tailings deposition planning, beach profile and rate of rise.

No overtopping of ponds or impoundments has occurred during the recertification period.

PWB model run results are reviewed and compared to design criteria to determine if there will be overflows to the environment. The model results are reviewed within the processing department and sent to the environmental department and GSM Tailings Engineer for review. Rainfall data for the PWB is obtained from the nearest Bureau of Meteorology weather station at Laverton, which is approximately 23 km north of the site. This is appropriate as it provides a quality-controlled data set from a reasonably close location with a similar climate. Rainfall is updated in the water balance model as required.

## Standard of Practice 4.4

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.4

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM 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.

GSM implements measures to restrict access by wildlife and livestock to open waters where WAD cyanide exceeds 50 mg/l.

GSM operates with alternative compliance measures for Standard of Practice 4.4 in accordance with ICMI Mining Guidance. Prior to initial Code certification, GSM demonstrated the use of hypersalinity as a protective mechanism against wildlife cyanosis. This was accepted by Code auditors and the ICMC in the initial ICMC audit and allowed GSM to achieve certification with hyper-salinity (> 50,000 mg/L TDS) as an alternative measure to meet the objective of Standard of Practice 4.4 even with tailings discharge of above 50 mg/L WAD cyanide. Site-specific operating parameters for the hypersaline protective mechanism at GSM are provided in the table below.

| Parameter | Maximum WAD CN (mg/L) | WAD CN - 80 percentile (Cyanide must be below on 80% of days) (mg/L) | Minimum TDS (mg/L) |
|---|---|---|---|
| Spigot | 83.3 | 71.7 | 50,000 |
| Supernatant (Decant) | 40 | N/A | 50,000 |

GSM did not typically operate TSFs in the audit period with WAD cyanide exceeding 50 mg/l. GSM did however, maintain the ability to use hypersalinity as a protective mechanism against wildlife cyanosis

and has the ability to add hypersaline water from the Goanna pit to the tailings discharge to ensure that tailings are hypersaline if discharge increases above 50 mg/L WAD cyanide. During the audit period, this has only been used for short periods (less than a day) until cyanide concentration at the tailings thickener overflow is re-established at below 48 mg/L WAD cyanide.

Since the last re-certification audit, there have been four days where TSF spigot monitoring results were confirmed as above 50 mg/L WAD cyanide when the salinity of the tailings was below 50 000 mg/L TDS. On all of these occasions, WAD cyanide cooperating parameters within the tailings discharge were re-established within 24 hours. The process water pond was maintained at below 50 mg/l WAD cyanide at all times.

GSM maintains good control of cyanide concentrations throughout the processing circuit to achieve WAD cyanide concentrations of less than 50 mg/L WAD cyanide in the final tailings hopper. This is achieved through the control of cyanide additions and monitoring of cyanide throughout the CIP circuit, as described in Standard of Practice (SOP) 4.2. GSM maintains the ability to dilute tailings by adding water to the tailings hopper as required in order to achieve the cyanide discharge target of less than 50 mg/L WAD cyanide.

Cyanide control throughout the plant is managed through the Work Instruction: Flow Sheet for adjusting LT0 Cyanide Setpoint based on WAD Levels (GRA-PRO-WI202) to achieve WAD targets of < 50 mg/L WAD cyanide at tails discharge.

Physical measures to restrict access by wildlife and livestock to all open waters containing cyanide include fencing of the Process Water Pond with a locked gate, minimisation of supernatant on the TSF, removal of vegetation within the TSF cells and seepage trenches.

Maintaining a WAD cyanide concentration of 50mg/l or less in open water is effective in preventing significant wildlife mortality. GSM monitors wildlife on a daily basis at the TSF and process water pond by trained observers even when discharge is not occurring to the TSF. Wildlife monitoring data and observations are recorded on the Wildlife Observation Data Sheet in hard copy, which is then transferred into the GSM Wildlife Monitoring spreadsheet, and the data sheets are scanned and stored electronically. Monitoring data sheets and the Wildlife Monitoring spreadsheets were verified by the auditor to confirm that wildlife monitoring was conducted throughout the audit period. Carcass replication trials (using balloons) were conducted throughout the audit period Wildlife Monitoring Balloons (GRA-ENV-WI004).

Wildlife mortalities are recorded in INX in accordance with the Carcass Detection Procedure (GRA-ENV-PRD004). One wildlife mortality was recorded within the TSF during the audit period, a Welcome Swallow in wet tailings of TSF 3 on 20 June 2023 (INX Reference 185462). Third-party experts (DES) were notified and determined that it was not due to cyanosis.

Wildlife and cyanide monitoring demonstrates that maintaining WAD cyanide concentrations <50 mg/L is effective in preventing wildlife mortalities, as no cyanide-related wildlife mortalities were recorded during this audit period. Third-party wildlife monitoring is carried out on a quarterly basis by DES. It includes monitoring wildlife, carcasses, and bats, reviewing on-site monitoring records, and undertaking training for wildlife monitors as required.

No heap leach operations exist at GSM.

## Standard of Practice 4.5

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.5

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM 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.

GSM does not have direct discharge of cyanide process solutions to surface water from any defined cyanide facility. GSM has a licence to discharge de-watered mine water to the adjacent hypersaline ephemeral lake (Lake Carey). Mine discharge water does not have cyanide in it and is separated from all cyanide facilities. GSM routinely assays this discharge for several analytes, including WAD cyanide concentration, and no cyanide has been recorded. Monitoring results are reported to the applicable legislative jurisdiction and within the GSM Annual Environmental Report.

GSM discharges water collected from the TSF seepage trenches to the disused Goanna pit at times when the plant is not operational, and water from the process water pond is not being used. Department of Water and Environmental Regulation (DWER) Licence conditions for GSM contain a limit of 0.5mg/l WAD CN and 1mg/l total cyanide within Goanna Pit and the adjacent Granny Pit.

Quarterly monitoring of water quality in Goanna and Granny Smith pits is conducted in accordance with the DWER licence, and no exceedance of DWER licence limits occurred during the audit period.

There is no indirect discharge from the operations to natural surface waters.

## Standard of Practice 4.6

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.6

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

GSM implements specific water management or other measures to manage seepage to protect the beneficial use(s) of ground water beneath and/or immediately down gradient of the operation.

GSM monitors for cyanide in groundwater downgradient of the site and can demonstrate that 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 is no beneficial use of groundwater at GSM or downgradient of the GSM Lease.

The numerical standard for cyanide concentration in groundwater established by the applicable jurisdiction, the Western Australian Government Department of Water and Environmental Regulation (DWER), is 0.5 mg/l WAD CN and 1 mg/L Total cyanide.

GSM uses a range of management practices to maintain groundwater quality, including seepage interception trenches and recovery bores to remove seepage, under drainage networks with a downstream drain (TSFs 3 and 4) and a series of seepage collection sump for return to the process water pond. All TSFs have downgradient groundwater monitoring bores, which are monitored for WAD and total cyanide on a quarterly basis by the GSM Environment Department. Statutory monitoring bores are identified in the DWER, and monitoring results are reported to DWER in the Annual Environment Report (AER).

Four groundwater monitoring bores are also located within the plant (CMB01 to CMB04), which are located to detect seepage from the plant and are monitored on a quarterly basis. Groundwater monitoring of these bores is usually not possible as these bores are normally dry.

The process water pond is constructed with two HDPE bottom liners with a leak detection system installed between the HDPE layers, which is monitored on a monthly basis by processing personnel. Tailings and return water pipes are equipped with telemetry systems, which are monitored through the SCADA system to allow for the detection of leaks and failures. They are located within secondary containments sufficient to contain any spill. The TSFs, process ponds and associated pipelines are inspected on a daily basis for leaks. The Engineer of Record conducts annual third-party audits, which include an inspection of the tailings discharge network, decant infrastructure, embankment and walls, and freeboard. TSFs 3 and 4 are active, TSF 1 is inactive, and TSF 2 is inactive with tailings excavation for use in the paste plant.

GSM operates an underground paste plant to produce paste fill using material from the inactive TSF 2. The harvested tailings are sampled on a weekly basis for WAD Cyanide, and the results are stored in the Plant Logsheet. All paste plant samples returned result below 0.5 mg/Kg. GSM has installed fixed HCN detectors at two locations in the Paste Fill Plant, at the Mixer and the Paste Vibrating Screen. Hourly HCN Readings are taken from the Mixing Page on Citect and entered into the Plant Logsheet. The Fixed

Monitors in the paste plant alarm if HCN is detected at 4.7 mg/L or above

GSM has evaluated the potential impacts on worker health and the beneficial uses of ground water in the use of mill tailings as underground backfill and implemented measures as necessary to address them.

## Standard of Practice 4.7

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.7

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 4.7: Provide spill prevention or containment measures for process tanks and pipelines.

Spill prevention or containment measures are provided for all cyanide unloading, storage and process solution tanks at GSM. No cyanide mixing tanks exist at GSM.

All cyanide unloading activity takes place on a bunded and sealed concrete pad. Any spills on the unloading pad drain to a sump in the cyanide storage compound. The cyanide storage tanks sit on a solid concrete plinth within a concrete secondary containment bund.

All process tanks, including Leach tanks, CIP tanks, Elution Tanks, and Tailings Thickeners in the processing plant, are located within secondary concrete containment bunds. Secondary containment bunds were inspected on 25 February 2025 during the audit and found to be in good condition but with small amounts of slurry material. Hosing down of areas underneath the tailings thickener to remove slurry material was observed.

Processing tanks pre-date cyanide certification and are partially sunken up to a meter below ground level with no impermeable barrier between them and the substrate beneath. GSM has achieved Code compliance with this SOP through a Risk-Based Inspection program and groundwater monitoring from four cyanide monitoring bores strategically located throughout the plant.

Risk-based inspections for spill prevention cover all processing tanks and the cyanide storage tank, which consist of annual external inspections and 4-yearly internal inspections conducted by third-party contractors.

Planned General Inspections are conducted monthly in all cyanide areas, and inspections are performed for signs of leakage and integrity of secondary containments. The preventative maintenance inspection program covers all secondary containment bunds and critical equipment, including pumps and pipes. This includes 4-monthly thermographic inspections of pumps and pipes. The cyanide storage area is subject to an external annual audit by the cyanide supplier. Third-party inspections and audits are also conducted of the Tailings Storage Facility.

All process tanks and thickeners are located within concrete secondary containment bunds. Secondary containments for cyanide unloading, storage, and process tanks are sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, with additional capacity for the design storm event.

There have been no changes to the secondary containments since the previous audit. No new tanks or facilities that would change secondary storage volume requirements have been installed during the

audit period.

The cyanide storage tank is alarmed within SCADA to avoid overfilling. The process water pond is operated within the design freeboard of 300 mm and has two HDPE liners to prevent seepage and leak detection between the layers. The volume of the process water pond is monitored in SCADA and inspected daily.

Procedures are in place and are implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. Procedures and plans include the Tailings Management Plan, Cyanide Management Plan, Clean-up Minor Spill of Cyanide Procedure, Cyanide Unloading/Delivery Procedure, Critical Slurry Pump Failure Work Instruction, Tailing Storage Facility – Inspect and Maintain Tailings Storage Facility, Metallurgy - Daily Plant Checks, Trigger Response Plan, and Emergency Stop and Flushing Cyanide Pumps & Ringmain.

Any spills on the unloading pad drain to a sump in the Caustic storage bund, which is within the Cyanide Storage and Caustic Storage bund, which is sized to contain the volume of an isotainer. The sump has a pump that returns water to the process circuit. Spills of process solutions within bunded areas are removed through the use of sumps and sump pumps to the process circuit. All secondary containments have one or more sumps and sump pumps to remove collected solutions. The production crews monitor secondary containment bunds.

Cyanide process solution pipelines to and from the TSF are above ground and within earth bunds. Spill prevention or containment measures are provided for all pipelines to collect leaks and prevent releases to the environment. The TSF pipelines have flow meters and pressure sensors on bond ends, detecting any sudden drop in pressure and relaying the message to the control room.

GSM has an unlined event pond adjacent to the Process Water Pond, which is only used in contingency or emergencies. Process solution spills to the event pond are pumped to the tailings storage facilities using a portable submersible pump. Any non-pumpable material/slurry remaining in the base of the sump is allowed to dry out. At this point, it is physically removed and disposed of in the tailings storage facilities. Clean-up of spillage external to containment or to the Event Pond occurs in accordance with the GSM Clean-up Minor Spill of Cyanide Procedure. Spills occurring outside of the plant are managed in accordance with the Liquid Cyanide Outside Bunded Areas Procedure (Pre-Incident Preparation (PIP 19)), which is contained in the Cyanide Emergency Response Plan.

The Clean-up Minor Spill of Cyanide Procedure, (section 8.3 qand 8.4) to remediate spills to the Event Pond, address sampling the subsurface after the initial excavation and for continued excavation and sampling until a predetermined clean-up concentration of cyanide has been achieved

No reportable spillage events involving process solutions occurred during the audit period. No spillage to the Event Pond occurred during the audit period.

GSM provides spill prevention or containment measures for all cyanide process solution pipelines to collect leaks and prevent releases to the environment. All the cyanide-containing pipelines within the plant and cyanide storage area are located over a concrete secondary containment. The tailings and return water pipelines are placed above ground within earthen bunded culverts, which act as a secondary containment. The pipelines have either concrete culverts or pipe in pipe secondary containments where they cross haul roads. The tailings and return water pipeline have pressure sensors and flow meters to detect any leaks. These are monitored within the SCADA system. The TSF and Return Water Pipeline are inspected for leaks as part of the daily TSF inspections. The pipeline bunds and culverts were verified to be in adequate condition during the site inspections.

Mill scats are produced in low volume and are stored temporarily on a concrete pad adjacent to the mill.

These are emptied once a month or so and taken to an unlined area close to the Granny Smith pit. They are mostly dry but may contain residual process solutions derived from the process water pond and introduced to the mill. Testing of the soils in the storage area for cyanide is done in accordance with the Collecting Scats Stockpile Samples Work Instruction. No detectable cyanides have been recorded.

No areas where pipelines containing process solutions present a risk to surface water have been identified at GSM, as the pipelines are not in close proximity to any potential areas of surface water.

Cyanide tanks and pipelines are constructed of materials compatible with cyanide and high pH conditions. All process tanks, including Leach, CIP, Intensive Leach Reactor (ILR), and Elution tanks, as well as the Tailings Thickener, are constructed of mild steel, typically lined with abrasion and corrosion-resistant synthetic poly coatings. Cyanide-bearing pipes, including the tailings and return water pipelines, are constructed of high-density polyethylene (HDPE) material or mild steel, which are compatible with cyanide and high pH and meets specifications and Australian Standards required for containment of cyanide. Some of the pipework in the cyanide unloading and storage area is made of stainless steel, as recommended by AGR. Pumps and fittings are constructed of mild steel or HDPE.

## Standard of Practice 4.8

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.8

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 4.8: Implement quality control/quality assurance (QA/QC) procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Quality control and quality assurance programs have been implemented during the construction of all new cyanide facilities and modifications to existing facilities, including cyanide unloading, storage, and other cyanide facilities. No cyanide mixing facilities exist at GSM.

Only one cyanide facility was newly constructed or modified during this audit period, the construction of the new TSF 4 in 2023. QA and QC programs were implemented for the construction of TSF 4, and the auditor retained and verified the QA and QC documentation.

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

QA and QC documentation includes the following: compliance testing of materials, field dry density and moisture content measurements, compaction tests in accordance with AS 1289.5.1.1, material classification tests, In-situ permeability tests, weld records and qualifications, technical queries addressed during construction, inspections and test plans.

GSM has retained QAQC documents, design drawings and supporting compliance documentation for all previous QA and QC programs. All documentation has been stored in hard copy and electronically in the project management files as verified by the auditor.

No new cyanide storage tanks or process tanks, ponds or leach pads were constructed during the audit

period.

An appropriately qualified person reviewed the cyanide facility construction and provided documentation that the facility has been built as proposed and approved. Qualified project engineers manage all construction projects at GSM. The TSF Cell 4 Stage 4A Construction Summary Report was prepared by the Senior Civil Engineer and signed off by the Principal Tailings Engineer.

QA and QC documentation for the TSF Cell 4 construction has been signed off by appropriately qualified people, including the Project Manager, Civil Engineer, TSF Superintendent, Project Superintendent, Design Engineer and NATA-accredited Laboratory Manager.

## Standard of Practice 4.9

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

The operation is in X FULL COMPLIANCE with Standard of Practice 4.9

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

GSM has developed and maintained written standard procedures for all groundwater, surface water and wildlife monitoring activities, including the Cyanide Management Plan, TSF Management Plan, Procedure for Environmental Compliance Monitoring at GSM, TSF Groundwater - Seepage Management Plan, Wildlife Monitoring Procedure, Carcass Detection Procedure, and Wildlife Monitoring Balloons Work Instruction.

Sampling and analytical protocols have been developed by appropriately qualified personnel. All personnel who have developed environmental monitoring procedures have a minimum qualification of a Bachelor degree in an environmental discipline. Sign-off of procedures is by appropriately qualified Superintendents and Managers, all of whom have a minimum qualification of a Bachelor degree in an environmental, chemical or metallurgical discipline. Third Party Wildlife Monitoring Regimes have been developed by experts who hold a Bachelor degree in an environmental discipline.

GSM procedures specify how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, cyanide species to be analyzed and quality assurance and quality control requirements for cyanide analyses.

The procedure for Environmental Compliance Monitoring at GSM covers groundwater monitoring, surface water monitoring, soil sampling and other compliance monitoring activities.

Monitoring frequencies relating to the TSF are provided in the Granny Smith Tailings Storage Facility Seepage and Groundwater Management Plan. TSF Monitoring Bore Locations are shown in Appendix C of the Compliance Monitoring Procedure. Chain of Custody forms are completed for each sampling run, and the cyanide species to be analysed are identified. They are retained electronically on-site. Analysis results typically include laboratory QA and QC results. Monitoring results are retained electronically on-site in spreadsheets and stored within Goldfields Australia's Monitor Pro database. Statutory monitoring results are included in the Annual Environment Reports submitted to DWER and DMIRS.

Sampling conditions, including weather, livestock/wildlife activity, anthropogenic influences and

procedures, are documented in writing.

Monitoring is conducted at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner.

Monitoring frequencies for surface water quality, groundwater quality and groundwater standing level are mandated by the DWER Environmental Licence (L8435/2010/3). The TSF supernatant, spigot, and process water pond are all sampled on a daily basis and analysed on-site for WAD cyanide, salinity, and pH. Monitoring is either quarterly or 6-monthly. Various process solution streams are monitored at frequencies required for process purposes – either daily, 4-hourly, or on a continuous basis using online analysers.

Wildlife monitoring is conducted on a daily basis at the active TSF and the process water pond. Third-party experts conduct wildlife verification monitoring at the TSF on a quarterly basis, which is industry best practice.

# Principle 5 | DECOMMISSIONING

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

## Standard of Practice 5.1

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

The operation is in X FULL COMPLIANCE with Standard of Practice 5.1

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 5.1: Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

GSM has developed written procedures to decommission cyanide facilities at the cessation of operations. GSM has developed a site-wide Mine Closure Plan and a Decontamination and Decommissioning Plan for cyanide facilities, which contains an implementation schedule for decommissioning activities, which includes the Process Plant, Tailings Storage Facilities and Cyanide Storage facility.

The GSM Decontamination and Decommissioning Plan includes an implementation schedule for decommissioning activities.

GSM reviews its decommissioning procedures for cyanide facilities during the life of the operation and revises them as needed.

The Decontamination and Decommissioning Plan is reviewed every two years, and the Mine Closure Plan is reviewed every three years.

Associated with these plans are the annual SRK Consulting Granny Smith Closure Cost Estimate 2024, Liberty Industrial Granny Smith 2022 Demolition Study technical documents and the GoldFields Group Mine Closure Management Guideline.

## Standard of Practice 5.2

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

The operation is in X FULL COMPLIANCE with Standard of Practice 5.2

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 5.2: Establish an assurance mechanism capable of fully funding cyanide-related decommissioning activities.

GSM has developed an estimate of the cost to fully fund third-party Standardised Reclamation Cost Estimator implementation of the cyanide-related decommissioning measures as identified in its closure plan.

Annual costings are maintained in a Closure Costs Estimate report and associated Standardised Reclamation Cost Estimator Manual Models Verification spreadsheet.

GSM participate in the financial mechanism required by the applicable jurisdiction, the Mine Rehabilitation Fund, to cover the estimated costs for cyanide-related decommissioning activities as identified in its decommissioning and closure strategy.

GSM participated fully in the Government of Western Australia's Mine Rehabilitation Fund during the audit period by paying annual levies that take into account the degree of disturbance on the GSM leases and closure costs.

# Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

## Standard of Practice 6.1

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

The operation is in X FULL COMPLIANCE with Standard of Practice 6.1

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 6.1: Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

The GSM integrated management system consists of three main levels of documentation: standards, plans, procedures, and work instructions.

GSM has developed procedures describing how cyanide-related tasks such as unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure. These are stored and accessed electronically within the GSM document control system.

All GSM operating procedures and work instructions for cyanide-related activities identify PPE requirements, provide specific PPE instructions where appropriate, and identify hazards and health and safety considerations. Procedures and work instructions include a task preparation section that includes pre-work inspections. The Leaching-Cleanup minor Spill of Cyanide procedure details in Section 2 prerequisite training that being Cyanide Hazard Awareness, Section 3 lists the required PPE, Section 4 Identifies the hazards that include HCN poisoning, and Section 6 requires personal Gas Monitors are mandatory.

The operation has developed effective hazard control measures and is effective in identifying any potential cyanide hazards.

All personnel who work in operational areas are trained in field risk assessment techniques such as Take 5's and Job Hazard Assessments.

GSM solicits and actively considers worker input in reviewing, developing and evaluating health and safety procedures.

This consultation includes discussing the new or reviewed procedures in monthly Site Safety Committee meetings with safety representatives from all departments, management meetings, safety handover

meetings and crew monthly and daily toolbox meetings. Formalised training is required for reviewed and new procedures.

## Standard of Practice 6.2

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

The operation is in X FULL COMPLIANCE with Standard of Practice 6.2

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with 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.

GSM has determined the appropriate pH, 9.9, for limiting the evolution of hydrogen cyanide gas during Carbon-in-Pulp activities. No cyanide mixing facilities exist at GSM.

Daily Specific Gravity (SG) testing of the process water is undertaken to determine the quicklime dosing rates to achieve the appropriate pH in the Carbon-In-Pulp circuit. GSM undertakes routine analysis to optimise pH values and control, including but not limited to the determination of process water salinity, process water specific gravity, alkalinity buffer potential, and lime consumption. The GSM Processing Plant utilises both manual and automatic pH measurement, with automatic pH probes installed within Leach and Carbon-In-Leach tanks. Automated control and lime dosing are implemented via process control instrumentation and dosing valves and displayed within the Mill Control operator interface system. The automated analysis is verified via manual pH determinations.

Access is restricted to the processing plant areas, with no one permitted to enter the processing plant area until the necessary inductions have been completed, which includes the processing plant induction and cyanide awareness training, unless a fully inducted person escorts them.

GSM uses static (ambient) and personal hydrogen cyanide monitors to verify that controls are adequate to limit worker exposure to hydrogen cyanide gas from cyanide reagent-strength solutions, process slurries and tailings slurries and confirm that controls are adequate to limit worker exposure to 10 parts per million on an instantaneous basis and 4.7 parts per million continuously over 8 hours. Red (blue at the carbon elution column) emergency flashing beacons are activated if the measured hydrogen cyanide concentration exceeds 4.7 ppm.

No cyanide dust monitoring is conducted as no solid cyanide is used at GSM.

GSM procedures require a personal hydrogen cyanide monitor to be carried by all workers or visitors entering all areas of the cyanide unloading and processing facility where there is a potential for hydrogen cyanide gas to be present, including on the Carbon-In-Pulp tanks, elution area, trash and carbon safety screens, intensive leach reactor and in the tailings thickener area. Signage mandating personnel that they are entering these restricted areas and must wear the designated PPE. Personal hydrogen cyanide monitors continue to be issued in the process plant and maintenance office and have been set to alarm at 4.7 ppm and 10 ppm for an instantaneous reading.

GSM has identified areas and activities where workers may be exposed to cyanide in excess of 10ppm on an instantaneous basis and 4.7ppm continuously over 8 hours and mandate the use of personal protective equipment in these areas or when performing these activities.

If a personal and static hydrogen cyanide monitor reaches 4.7ppm, an audible alarm is initiated, and the worker is required to notify the Shift Supervisor, investigate the cause (if personal monitor only), and leave the area within 15 minutes. If a personal cyanide monitors show a reading of greater than 10ppm, personnel are required to leave the area immediately, barricade the area to alert all other personnel of HCN hazards in the area, and report to the shift supervisor.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as the manufacturer directs, and records are retained for at least three years.

Static (fixed) hydrogen cyanide monitors are calibrated quarterly as directed by the manufacturer. If units do not pass calibration, they are replaced and sent to the manufacturer for refurbishment and calibration. Spare (three) static HCN monitors were verified in stores. A spreadsheet tracks calibration done onsite by the manufacturer and the actual calibration certificate hardcopy is retain on-site and electronically by the training department. Personal hydrogen cyanide monitors are bump-tested on-site at least once per shift cycle. If a personal hydrogen cyanide monitor fails a calibration test, it is taken out of use and serviced by the manufacturer. The manufacturer's personnel cyanide monitor docking station is tested and calibrated on-site following the manufacturer's directions. Static HCN monitors HCN 4 Tanks and HCN 5 Tails and Screens are connected to Citect.

Warning signs are placed at appropriate locations where cyanide is used. Signage, field verified by auditors, advises workers that cyanide is present, that smoking, open flames and eating and drinking are not allowed, and that, if necessary, suitable personal protective equipment must be worn.

All cyanide solutions delivered to the site contain a Carmoisine red dye added to the solution. Consequently, all high-strength cyanide solutions on site are clearly identifiable by this red dye.

Low-pressure safety showers, eye wash stations, and dry powder fire extinguishers are located strategically throughout the operation and are maintained, inspected, and tested on the required basis.

Unloading, storage, process tanks and piping, thickener and tailing pipelines containing cyanide are labelled or signage to alert workers of their contents, including the designation of the direction of cyanide flow in pipes.

Storage tanks containing high-strength (>1%) cyanide solution are identified by a "CYANIDE" label, UN and HAZCHEM ID numbers and a phone number for CSBP specialist advice.

Cyanide-carrying pipelines are labelled and include an arrow showing the flow direction.

Lower-strength cyanide in process tanks and piping, thickener and tailings pipelines are alerted to workers of their contents and direction of flow via a combination of signage, labelling, training, and inductions.

Safety Data Sheets, first aid procedures or other informational materials on cyanide safety in the language of the workforce, English language, are available in areas where cyanide is used and managed.

Procedures are in place and, when necessary, implemented to investigate and evaluate cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety and to respond to cyanide exposures are adequate or need revising.

In the event of cyanide exposure incidents, GSM incident investigation procedures include the requirement to evaluate and establish the root causes of incidents and the sufficiency of operational controls, including procedures and training materials.

## Standard of Practice 6.3

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

The operation is in X FULL COMPLIANCE with Standard of Practice 6.3

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 6.3: Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

GSM has water, oxygen, a resuscitator, and a radio and alarm system for communication and emergency notification readily available for use at the cyanide unloading and storage locations and elsewhere in the plant.

GSM has a defined raising of emergency procedures. Audible alarms are established through the process plant to raise the alarm if high hydrogen cyanide gas or other emergencies are triggered, as well as local alarm displays within the Plant Control operator interface system. All personnel carry two-way radios so they can readily report on emergencies.

GSM has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide.

Potable water, oxygen, and resuscitators are located in the cyanide unloading and storage area, processing mill control room, and elsewhere in the plant. The cyanide antidote kit, which utilises Hydroxocobalamin, is stored in the nearby administration building medical facility.

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

The Cyanide Kit Checklist is completed on a monthly basis by the Site Paramedic. The medical oxygen cylinders, resuscitators, ambulance equipment, and cyanide kits are checked on a monthly basis.

Cyanide antidote kits are stored in the administration building medical facility in a cabinet as directed by their manufacturer. They are replaced on schedule to ensure that they remain within their expiry date and will be effective when needed.

The oxygen resuscitators located within the processing plant are inspected monthly, and actions are identified as required. All inspection reports are stored in hard copy and/or electronically.

All Resuscitators and medical equipment within the medical centres are serviced on an annual basis by an external medical service provider with relevant certification.

On-call nursing staff are provided with competency-based training in the use of the cyanide antidote kit and external support by phone from Healthwatch and on-call doctor in the administration of cyanide antidotes. The ‘Standing Order for the Treatment of Cyanide Toxicity,’ provided by Health Watch, accompanies the cyanide antidote. This standing order and, the CERP Section 4.1 (PIP20) and Section 6.1, provides the details necessary to respond to cyanide exposure through ingestion, inhalation and absorption through the skin and eyes. The CERP specifically addresses these exposure pathways (Section 3.2, 4.1 (PIP 20) and 6.1).

GSM has developed specific written emergency response plans and procedures to respond to cyanide

exposures.

GSM has a Cyanide Emergency Response Plan (CERP) and a site-wide Crisis Management Plan (CMP), which contain first aid procedures to respond to worker exposure to cyanide.

GSM has a medical facility within the administration building close to the Process Plant. It is a two-bed facility with medications, medical consumables, antidote kits, and advanced airway management kits. A paramedic/registered nurse is on 24-hour call at all times, with ancillary support from Emergency Response Team (ERT) medics with advanced first aid training. The operation's emergency response resources for cyanide exposures include a dedicated ambulance adjacent to the processing facility, which contains a trauma kit, oxygen resuscitator, and also airway adjuncts for medical administration of oxygen by the Registered Nurse and/or paramedics.

The cyanide antidote is Hydroxocobalamin, which is held under the care of the site paramedic in the Medical Centre. The cyanide antidote is only administered under the supervision of the site paramedic and in consultation with nominated off-site support from Health Watch and on-call doctors. GSM also has a document, Standing Orders for the Treatment of Cyanide Exposure, which is to be followed if a cyanide antidote is to be administered.

GSM has developed procedures to transport workers exposed to cyanide to locally available qualified off-site medical facilities.

Transportation of a cyanide-exposure patient to a medical facility is considered in the Cyanide Emergency Response Plan. The procedure addresses the transport of a cyanide exposure casualty to the nearest hospitals, with instructions for both air and road transportation.

GSM has made formalized arrangements with local and regional hospitals so that these providers are aware of the potential need to treat patients for cyanide exposure. The operation is confident that the medical facility has adequate, qualified staff, equipment and expertise to respond to cyanide exposures.

GSM has a formalised arrangement with Laverton, Leonora and Kalgoorlie Hospitals, which has been notified of the potential for cyanide-related exposures. GSM participates in emergency planning with off-site agencies through the Laverton Local Emergency Management Committee (LEMC), of which Laverton St Johns, the Shire of Laverton Police and Fire Service are a part. Meetings are regularly held and attended by GSM representatives.

# Principle 7 | EMERGENCY RESPONSE

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

## Standard of Practice 7.1

*Prepare detailed emergency response plans for potential cyanide releases.*

The operation is in X FULL COMPLIANCE with Standard of Practice 7.1

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.

GSM has developed a Cyanide Emergency Response Plan to address potential accidental cyanide

releases.

GSM has a Cyanide Emergency Response Plan (CERP) and a site-wide Emergency Management Plan (EMP) to guide responses to cyanide emergencies. The Cyanide Emergency Response Plan provides additional details to the Emergency Management Plan specifically for responding to cyanide-related emergencies. GSM also has a Tailings Management Plan, which contains area-specific response planning for cyanide-related emergencies.

The Cyanide Emergency Response Plan considers the following potential cyanide failure scenarios (PIPs) appropriate for its site-specific environmental and operating circumstances: Cyanide Related Injury; Hazardous Energy Isolation for scenario; Transportation Accidents for scenario; Fires Involving Cyanide for scenario; Solid Cyanide Spill Greater Than 20 kg; and Liquid Cyanide Spills Outside of Bunded Areas for scenarios. Concerning the solid cyanide spill scenario, the plan notes that GSM no longer receives or mixes solid cyanide; however, the information is retained on a contingency basis.

Planning for response to transportation-related emergencies considers transportation route(s), the physical and chemical form of the cyanide, the method of transport (e.g., rail, truck), the condition of the road or railway, and the design of the transport vehicle (e.g., single or double walled, top or bottom unloading).

GSM's cyanide supply contracts with AGR specify the responsibilities and response actions for transport-related cyanide emergencies. Emergency response for off-site transportation incidents would be coordinated and conducted by and under the supplier's (AGR-CSBP's) emergency management procedures. Support from GSM may be requested depending on the location of the incident. The CSBP Transport Management Plan for Sodium Cyanide Product provides information on transportation routes, the physical and chemical form of the cyanide, the method of transport, the condition of road and railway and the design of the transport vehicle. GSM has developed and implemented a cyanide transport incident response pre-incident plan for scenarios that may occur once trucks are onsite.

The Emergency Response Plans describe specific response actions (as appropriate for the anticipated emergencies) such as clearing site personnel and potentially affected communities from the area of exposure, use of cyanide antidotes and first aid measures for cyanide exposure, control of releases at their source, and containment, assessment, mitigation and future prevention of releases.

The Tailings Management Plan (GRA-PRO-PL005) contains the following Emergency Response Procedures relating to the Tailing Storage Facility and associated pipes, valves and pumps in Section 4: Over Topping of Water Storage Dams scenario; Tailings and Return Water Line Systems scenario; and Tailings Storage Embankment Failure.

The CERP and Emergency Management Plan are reviewed every annually and have been reviewed and revised where appropriate throughout the certification period.

The EMP, CERP and the Tailings Management Plan describe specific emergency response actions appropriate for the anticipated emergencies, including the clearing site personnel from the area of exposure.

Mitigation and monitoring of cyanide releases are considered in the CERP, which provides a procedure for clean-up and decontamination of areas subject to a cyanide spill. It includes safety considerations and PPE required.

The CERP contains a Pre-Incident Plan for a cyanide-related injury and a Pre-Incident Plan for Liquid Spills Outside a Bunded Area. The use of cyanide antidotes is described in the Standing Orders for the Treatment of Cyanide Exposure, which is located in the Medical Facility.

Future prevention of cyanide releases following an incident is addressed through the GSM Incident Safety and Health Incident Reporting and Investigation Standard, which includes methods to determine the underlying causes of an incident and to implement additional controls or actions to prevent or reduce the likelihood of recurrence.

## Standard of Practice 7.2

*Involve site personnel and stakeholders in the planning process.*

The operation is in X FULL COMPLIANCE with Standard of Practice 7.2

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 7.2: Involve site personnel and stakeholders in the planning process.

GSM has involved its workforce and stakeholders in the cyanide emergency response planning process, including potentially affected communities.

GSM's workforce continues to be involved in the emergency planning process, including participation in annual Emergency Management Plan reviews and mock drill exercises.

GSM also involves workers and provides avenues for feedback and discussion on cyanide emergency response planning in several other ways, including through monthly safety meetings and daily toolbox meetings that discuss cyanide safety and environment incidents reviews of plans and procedures, risk assessment sessions; plant inductions; training in core procedures including cyanide hazard awareness; supervisor training including cyanide emergency first response.

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

Examples of consultation include local community forum meetings, engagement with local Aboriginal groups, and participation in local shire and emergency response committees.

In the cyanide emergency planning and response process, GSM has involved local response agencies, such as outside responders and medical facilities.

GSM is a member of the Laverton Local Emergency Committee, which provides a mechanism for GSM to discuss and seek input in GSM emergency response plans. The Local Emergency Management Committee includes Laverton St Johns, the Shire of Laverton Police and the fire service. Local Emergency Management Committee meetings are held regularly and attended by a representative from GSM, typically the Emergency Services Coordinator.

GSM has a signed Memorandum of Understanding with Laverton, Leonora and Kalgoorlie Hospitals for the treatment of patients suffering from exposure or suspected exposure to cyanide. GSM also has a signed Memorandum of Understanding with the Government of Western Australia Department of Fire and Emergency Services for mutual support in planning and responding to emergency Incidents within the Laverton area and environs.

GSM consults or communicates with stakeholders to keep the Emergency Response Plan current.

GSM engage with the Local Emergency Management Committee membership through quarterly

meetings. The Local Emergency Management Committee includes the Shire of Laverton, Police, Government of Western Australia Department of Fire and Emergency Services, St Johns and other local mining operations.

## Standard of Practice 7.3

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

The operation is in X FULL COMPLIANCE with Standard of Practice 7.3

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 7.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

The GSM Emergency Response Plan and the GSM Cyanide Management Plan, in relation to cyanide elements of the plans, designate primary and alternative emergency response coordinators who have explicit authority to commit the resources necessary to implement the plans, identify emergency response teams, require appropriate training for emergency responders, include call-out procedures and references to 24-hour contact information for the coordinators and response team members; specify the duties and responsibilities of the coordinators and team members; list emergency response equipment, including personal protection gear, on-site; include procedures to inspect emergency response equipment to ensure its availability; and describe the role of outside responders, medical facilities and communities in the emergency response procedures.

GSM has confirmed that outside entities included in the Emergency Response Plan are aware of their involvement and are included as necessary in mock drills or implementation exercises.

Outside entities are familiar with GSM's Cyanide Emergency Response Plan and Emergency Management Plan via the Laverton Emergency Management Committee (LEMC), which includes the Shire of Laverton, police, Department of Fire and Emergency Services (DFES), St Johns and local mining operations. GSM engages with the LEMC membership through regular meetings and communications as required.

GSM continues to involve local response agencies through the Laverton Local Emergency Management Committee and Memorandum of Understanding (MOU)s with Laverton, Leonora and Kalgoorlie Hospitals and the Government of Western Australia Department of Fire and Emergency Services (DFES). The Laverton Local Emergency Management Committee includes Laverton St Johns, the Shire of Laverton, police and fire service. Local Emergency Management Committee meetings are held regularly and attended by a representative from GSM, typically the Emergency Services Coordinator.

## Standard of Practice 7.4

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

The operation is in X FULL COMPLIANCE with Standard of Practice 7.4

Substantial Compliance

Non Compliance

| Granny Smith Gold Mine | | 10 October 2025 |
|---|---|---|
| Name of Mine | Signature of Lead Auditor | Date |

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 7.4: Develop internal and external emergency notification and reporting procedures.

The GSM Emergency Response Plan and the GSM Cyanide Emergency Response Plan include procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency.

The GSM Cyanide Emergency Response Plan contains the process of notifying and communicating with off-site medical facilities such as the Royal Flying Doctor Service (RFDS), Poisons Information Centre and local Hospitals in Pre-Incident Plan 1. Appendix 5 of the CERP contains contact details for external medical such as the RFDS, Poisons Information Centre, HealthWatch, Laverton St Johns and Laverton Hospital. The Emergency Management Plan contains the process for off-site communication and notifying and engaging off-site government and non-government organisations of emergencies, including a cyanide-related emergency.

GSM Emergency Response Plans include procedures and contact information for notifying potentially affected communities of the cyanide-related incident through the Laverton LEMC, as well as any necessary response measures and communication with the media.

GSM Emergency Response Plans contain communication protocols for communication with outside entities, media interaction, and Next-of-Kin notification and management.

Notifications to the Local Emergency Management Committee of an emergency would occur as required in accordance with the mutual aid agreement, which includes the Laverton Shire Council. The MOU with the Government of Western Australia Department of Fire and Emergency Services outlines legislative responsibilities and the Emergency Response and Incident Management Structure.

GSM has a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. The procedure exists within the Cyanide Management Plan as Section 14 ICMI Notification Protocol and also within the Cyanide Emergency Response Plan as Section 10 ICMI Notification Protocol. No significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document, occurred during the audit period.

## Standard of Practice 7.5

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

The operation is in X FULL COMPLIANCE with Standard of Practice 7.5

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with 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.

The GSM Cyanide Emergency Management Plan describes specific remediation measures as appropriate for the likely cyanide release scenarios and includes: Recovery or neutralisation of solutions or solids; decontamination of soils or other contaminated media, and; management and/or disposal of spill clean-up debris. The provision of an alternate drinking water supply is not applicable to the GSM operation. Remediation procedures contained within the CERP and Clean-up Minor Spill of Cyanide Procedure

identify what treatment chemical is to be used and where it is stored; describe how the treatment chemical is to be prepared to the appropriate concentration; define the end point of the remediation, including how samples will be taken, what analysis will be performed, and what final concentration will be allowed in residual soil as evidence that the release has been completely cleaned up.

The GSM Cyanide Emergency Response Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into or near surface water. This plan also identifies the potential need and procedure for environmental monitoring to identify the extent and effects of a cyanide release and include sampling methodologies, parameters and, where practical, possible sampling locations.

## Standard of Practice 7.6

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

The operation is in X FULL COMPLIANCE with Standard of Practice 7.6

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.

GSM reviews and evaluates the cyanide-related elements of its Emergency Response Plan for adequacy on a regular basis.

The GSM Emergency Management Plan and Cyanide Emergency Response Plan are located in Controlled Documents and are reviewed annually. Automated reminders are sent out to the document owner to trigger a review. The current version of the Emergency Management Plan is dated 5 February 2025. The current version of the CERP is dated 5 February 2025, with the next review date of 5 February 2026.

The mock drills are described in completed Mock Exercise Plan templates. In each case they specifically describe the initial emergency callout notification through to the close-out of the response process. GSM conducted mock cyanide emergency drills annually during the audit period as part of the Emergency Response Plan evaluation process. Three cyanide emergency mock drills were conducted, and debrief reports were produced. All mock drill documentation is lodged in INX, including any actions that arise from mock drills.

GSM conducts mock emergency drills annually to test response procedures for various cyanide exposure scenarios. Lessons learned from the drills are incorporated into response planning. The drills involve emergency response personnel, plant personnel and medical staff.

Emergency Response Debriefs are conducted following each drill to identify deficiencies and lessons to be learnt, with subsequent incorporation into response planning. GSM has provisions in place to evaluate and revise the Cyanide Emergency Response Plan and the Crisis Management Plan after any cyanide-related incident or emergency.

The review of procedures and documents following an incident is driven by the incident investigation and reporting process as described in the Hazard / Incident Reporting and Investigation Guideline.

During the audit period, no cyanide-related emergencies required the implementation of the Emergency Response Plan or the Emergency Response Team.

| Granny Smith Gold Mine | | 10 October 2025 |
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| Name of Mine | Signature of Lead Auditor | Date |

| Granny Smith Gold Mine | | 10 October 2025 |
|---|---|---|
| Name of Mine | Signature of Lead Auditor | Date |

# Principle 8 | TRAINING

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

## Standard of Practice 8.1

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

The operation is in X FULL COMPLIANCE with Standard of Practice 8.1

Substantial Compliance

Non Compliance

## Summarize the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

GSM continues to train all personnel who may encounter cyanide in cyanide hazard recognition.

All personnel who undertake work in cyanide areas must complete cyanide awareness training, including short-term contractors. The training uses site-produced training packages. The Cyanide Awareness training includes information on liquid sodium cyanide, the health effects of cyanide, symptoms of cyanide exposure, procedures to follow in the event of exposure and aspects of emergency response.

All employees, visitors and contractors who undertake work in the processing area must undertake the Plant Induction unless escorted. The Processing Induction includes cyanide awareness, first aid, emergency response and hazard recognition.

GSM uses InTuition (INX) and, since February 2024, SF for managing the training records of full-time employees. Contractor training records are managed through InTuition (INX). Cyanide Awareness refresher training is required every 24 months and is triggered through INX and SF with automatically generated emails sent out to personnel whose competency will expire within 30 days. The training department follows up with emails and escalation to supervisors and beyond to management if training is not undertaken as required.

Cyanide awareness training records are retained electronically for the term of employment plus seven years for GSM employees and seven years for contractors.

## Standard of Practice 8.2

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

The operation is in X FULL COMPLIANCE with Standard of Practice 8.2

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 8.2: Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment. GSM conducts operational training for all workers performing cyanide-related tasks, including normal production tasks, including: cyanide delivery, Carbon-In-Pulp and leach operations,

control room operations, water management, tailings management, pump operations, permits to work, isolation and tagging, hydrogen cyanide monitoring, carbon management, elution, cleaning of filter baskets, heat exchanger cleaning, carbon handling and cyanide spill response.

The plant Induction provides an induction to the whole processing area and includes cyanide-related topics such as hazard recognition and management, use of cyanide-specific PPE, signage, and locations of safety showers and initiating an emergency response. The processing area induction provides an understanding of the management of cyanide hazards and risk management that underpins cyanide task training. A written assessment must be passed before the plant can be accessed un-escorted.

Cyanide task training is based on the Buddy system, where trainees are taught to perform cyanide-related tasks by experienced operators. Training materials used at GSM identify the training elements necessary and task steps for each job involving cyanide. Training materials and document templates are accessed electronically by employees and trainers via the GSM Controlled Document Environment.

The training elements required for jobs involving cyanide are identified in the following documents, Handle Reagents Training Resource Manual, Leaching Training Resource Manual, Conduct Elution Resource Manual, Circuit Training Resource Manual, Thickener and Clarification Training Resource Manual, which lists core competencies for each process area that contains cyanide, including general processing, reagents, leach area, and tail thickener.

The core procedure must be completed before an employee can be deemed to be competent and work unsupervised in an area.

The procedures identify the purpose of the procedure, the required PPE, the hazards associated with the task, and the requirements of the procedure. For work instructions, the task is broken down into steps to be completed sequentially.

Training & Assessment Documents are reviewed every 24 to 48 months or on an as-needed basis if required in a shorter time frame.

Refresher training is undertaken every two years for the Plant Induction and for all cyanide-related core procedures. The training Department uses InTuition to manage training requirements and records.

Training is undertaken by an authorised person who has been deemed competent in the procedure being assessed or by a Subject Matter Expert (typically the Supervisor) who holds competency in the procedure.

Upon competition for the training, the supervisor must confirm that the Trainee has the required knowledge and can undertake the task. The supervisor can then authorise new employees to work without direct supervision.

Training occurs on the day shift only.

GSM evaluate the effectiveness of cyanide training by competency testing, task observation, and safety interactions. GSM retain records throughout an individual's employment documenting the training they receive. The records include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials.

## Standard of Practice 8.3

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

The operation is in X FULL COMPLIANCE with Standard of Practice 8.3

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 8.3: Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

Cyanide unloading, production, and maintenance personnel at GSM are trained in the procedures to follow if cyanide is released. Procedures to be followed if cyanide is released are included in the Cyanide Emergency Response Plan, Processing Plant Induction, Plan and Prepare for Mineral Processing Training Manual, Clean-up Minor Spill of Cyanide Procedure, and the Tailings Management Plan.

All staff, employees, or contractors accessing the Mill un-escorted must undergo the Processing Area Induction, which includes directions on how to respond to a chemical spill and the INX reporting requirements. Processing and maintenance personnel are trained in the Clean-up of Minor Spill of Cyanide Procedure.

The Tailings Management Plan contains emergency response procedures in section 4, including a discussion on response actions for small and large tailings embankment failures.

GSM personnel, including unloading, production and maintenance workers, and emergency response personnel, are trained in decontamination and first aid procedures.

GSM receives only sodium cyanide solution. Thus, no cyanide mixing facilities exist at the site.

The Processing Department (including Maintenance workers) had a high compliance rate for the Processing Plan Induction and Clean-up of Minor Spill of Cyanide Procedure. Most of all workers who were not identified as new starters or off-site had a compliant status for both.

All personnel who access the plant require Cyanide Awareness Training, which includes basic cyanide exposure response.

Refresher training is required for all plant personnel members every two years for all cyanide-related procedures, including in relation to cyanide exposures and releases responding to cyanide exposures and releases. This includes the Clean-up Minor Spill of Cyanide Procedure and Cyanide awareness, which covers aspects of cyanide spill response.

Emergency response procedures at GSM require personnel to raise an emergency by radio or phone, make themselves safe, render assistance if safe to do so, or stand by, and wait for instructions. Consequently, process plant personnel and maintenance personnel are trained to apply oxygen and monitor until medical assistance arrives. Staff can are trained in the Provide First Aid procedure. All those involved in cyanide delivery, supervisors were trained and competent in the Provide First Aid procedure.

The operation trains its response personnel, including process and maintenance workers, in the decontamination of cyanide exposure victims in addition to the decontamination of cyanide equipment and facilities.

Emergency Response Coordinators and members of the Emergency Response Team are trained in the

procedures included in the Cyanide Emergency Response Plan, including the use of necessary response equipment.

Weekly Emergency Response Team training includes HAZMAT training sessions. HAZMAT training objectives are consistent with training in the Cyanide Emergency Response Plan emergency response procedures contained in the Cyanide Emergency Response Plan Pre-Incident Plans. It includes annual training in all basic skills required by ERT members and third-party training for Certificate III accreditation in Emergency Response and Rescue. Third-party training courses in emergency response are also held periodically and contribute to Certificate III accreditation. HAZMAT training sessions include cyanide scenarios but also drill other chemical hazard scenarios.

GSM has made off-site Emergency Responders, such as community members, local responders and medical providers, familiar with those elements of the Emergency Response Plan related to cyanide. Local external providers are familiar with GSM's Emergency Management Plan for cyanide emergencies via the Laverton Local Emergency Management Committee (LEMC), which includes the Laverton Shire Council, Laverton Police, Government of Western Australia Department of Fire and Emergency Services (DFES), and Laverton St Johns.

GSM has agreements with Laverton Hospital, Leonora Hospital, Kalgoorlie Hospital and DFES to provide support in the event of a cyanide incident requiring assistance or medical attention.

GSM periodically conducts simulated cyanide emergency drills covering both worker exposures and environmental releases for training purposes. Drills are evaluated from a training perspective to determine if personnel have the knowledge and skills required for effective response. Training procedures are revised if deficiencies are identified.

GSM tests response procedures and training adequacy for various cyanide exposure scenarios through periodic mock cyanide emergency drills, which involve emergency response personnel, plant personnel and medical staff. Three cyanide exposure mock drills were conducted during the audit period and included scenarios for both cyanide exposure and environmental release.

Emergency Response Debriefs are conducted following each drill to identify deficiencies and lessons to be learnt. Recommendations are made and incorporated into training practices based on lessons learnt.

Cyanide Emergency Drill Debrief documentation was produced for each of the drills and typically included the scenario being drilled; participants; action logs for the drill; debrief notes that include the adequacy of the response according to relevant categories: Emergency Communications, Incident Management Team (IMT) Activation, ERT response, rescue equipment status, rescue and recovery; problems identified; recommendations; and notes and comments.

Records are retained documenting the cyanide training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

All documentation of cyanide training is retained electronically or on-site if in hard copy and includes the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

All training records, including documentation of mock drills and weekly ERT training (including HAZMAT training), are stored in INX and retained. All current hard copy records are stored on site however, obsolete records are archived.

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# Principle 9 | DIALOGUE AND DISCLOSURE

Engage in public consultation and disclosure.

## Standard of Practice 9.1

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

The operation is in X FULL COMPLIANCE with Standard of Practice 9.1

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM is in FULL COMPLIANCE with Standard of Practice 9.1: Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

GSM provides the opportunity for stakeholders to communicate concerns and engage in dialogue regarding the management of cyanide.

GSM is in a regional location in Western Australia, and the workforce flies in and out or live in private housing in nearby Laverton. The site is located approximately 23 km south of the nearest communities, Laverton and Mt Margaret. GSM provides the opportunity for stakeholders to communicate issues of concern through direct regular engagement with Native Title holders, including monthly meetings with the Mt Margaret community to inform them about mine activities. The primary potentially affected stakeholders from a cyanide incident would be workers staying in the company camp approximately 1 km from the processing plant. Engagement with workers regarding cyanide management is through Cyanide Awareness and other Site Inductions, Task Training and Toolbox and Safety Meetings.

GSM has produced a “Cyanide Management at Granny Smith Goldmine” – community information poster for the local Sturt Desert Pea community magazine. The information poster also includes a GSM contact email address and states; ‘We Welcome Feedback, Voice a Concern, Make a Suggestion’.

Annual Environment Reports are provided to the WA Department of Mines, Industry Regulation and Safety (DMIRS) as per regulatory requirements. These reports are available to the public once authorities have reviewed and authorised posting to their websites.

GSM representatives regularly attend the Laverton Local Emergency Management Committee meetings, which involve the Laverton Shire Council and emergency service providers.

Goldfields Australia continues to post its annual Sustainability Report, which includes GSM, on its website for public viewing. The report notes reportable cyanide incidents.

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## Standard of Practice 9.2

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

The operation is in X FULL COMPLIANCE with Standard of Practice 9.2

Substantial Compliance

Non Compliance

## Summarise the basis for this Finding/Deficiencies Identified:

GSM has developed written descriptions of how their activities are conducted and how cyanide is managed, and these descriptions are available to communities and stakeholders.

GSM has produced a Cyanide Management at Granny Smith Goldmine – Community Information Poster v7, which is included as an advertisement in the local Sturt Desert Pea community magazine annually. The advertisement also includes a GSM contact email address and states; 'We Welcome Feedback, Voice a Concern, Make a Suggestion'.

There is no significant illiteracy in the local population in the region surrounding the operation. GSM does, however, provide the opportunity for stakeholders to communicate issues of concern through direct engagement with Native Title holders on a regular basis, including monthly meetings with the Mt Margret community to inform on mine activities.

GSM maintain a Gold Fields standard internal and external reporting system for incidents, including those that involve cyanide. Cyanide incidents are reported in GSM's Annual Environmental Report, which is publicly available. Releases (environmental and exposures) that cause applicable limits for cyanide to be exceeded are advised to regulatory authorities as required by the safety and environment incident reporting and investigation procedure. All mining operations within Western Australia are required to report serious occurrences and mining injuries (including cyanide exposures) to the Department of Mines, Industry Regulation and Safety on designated forms. No such incidents occurred during the audit period.

GSM submits an Annual Environmental Report (AER) to the Department of Water and Environmental Regulation (DWER) and the Department of Mines, Industry Regulation and Safety (DMIRS) in accordance with government regulations.

The AER is publicly available and serves as the annual compliance reporting for the operation's licence on the DWER's website. The AER Section 2.1 Environmental Performance details potential environmental incidents, environmental harm, and potential and actual harm to workers, if any, from hazardous chemical releases, and would require notification under Section 72 (DWER).

Appendix B of the AER provides a summary of all environmental incidents that occurred on-site during the year, including incident level, incident description and immediate corrective actions. This includes any cyanide releases, animal deaths due to cyanidation, and tailings spills if there have been any.

The DWER licence requires the department to be notified within 24 hours of any cyanide-related incident that results in the release of cyanide into the mine lease or significant environmental harm. Notification is via the Safety Regulation System (SRS) on the DMIRS website.

Permission from GSM is not required to access the AER and is publicly available.

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# Important information

***The following is important information and limitations concerning the preparation and submission of this Audit Report both in its complete and summarised forms.***

*Kindly take notice of the following important qualifications and limitations in connection with the preparation and submission of this report ("Report").*

1. The Report has been prepared in good faith by the signatory for and on their behalf and as an authorised representative of Donato Environmental Services Pty Ltd ("DES Pty Ltd");
2. The Report is intended for the exclusive use of Gold Fields Australia Pty Ltd ("Client").
3. It is not intended to be relied upon by any party other than the Client.
4. No permission is given by the author for reliance on this Report by any third party, and the author takes no responsibility for publication thereof in any media by others.
5. The Report has been prepared on the basis of instructions, information, and data supplied by the Client, as well as the physical conditions and location of the site at which tests (if any) were undertaken.
6. The author of the Report gives no warranty or guarantee and makes no representation, whether express or implied, with respect to the content of this Report or the completeness or accuracy thereof.
7. No reliance should be placed upon anything other than that which is expressed in this Report.
8. The author of this Report accepts no responsibility or liability for any loss or damage suffered by any party which is incurred in reliance upon the contents of this Report. In particular and without limitation, the author shall not be liable for any loss or damage or economic loss suffered by any party which arises out of any of the contents of this Report or anything which is omitted from the contents of this Report.
9. Readers of this Report are alerted to the possibility that the conditions which existed at the time of the preparation of this Report may have changed both prior to and after the preparation of this Report, and in no way does this Report encompass, take account of or refer to such changed conditions.

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