

International Cyanide Management Code Mining Operation Recertification Audit

Summary Audit Report



Report Prepared for

Haile Gold Mine

OceanaGold

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Report Prepared by



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MVP Project No.: P-OG(HM)2025.87

Haile Gold Mine

International Cyanide Management Code

Initial Certification Summary Audit Report

Haile Gold Mine

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Units of Measurement & List of Abbreviations

AED	Automated external defibrillator
amsl	above mean sea level
ARO	Asset Retirement Obligation
Carbon	Pelletized Activated Carbon
cf	Cubic feet
CIL	Carbon-in-Leach
CN	Cyanide
CN ERP	Cyanide Emergency Response Plan
CPR	Cardiopulmonary resuscitation
CTSP	Cyanide Treatment for Suspected Poisoning
DHEC	Department of Health and Environmental Control
Draslovka	Draslovka Mining Solutions
EAP	Emergency Action Plan
Empire	Empire Express Inc.
EMS	Emergency Management System
EPRP	Emergency Preparedness and Response Plan
gpd	gallons per day
Haile	Haile Gold Mine
Hazmat SRP	Hazardous Materials Management and Spill Response Plan
HAZOP	Hazard and Operability
HCN	Hydrogen cyanide
HDPE	high-density polyethylene
HSE	Health, Safety, and Environment
ICAM	Incident-Cause-Analysis Management
ICMC	International Cyanide Management Code
ICMI	International Cyanide Management Institute
ISO	Specialize containers on truck chassis built to carry liquids
JHC	Job Hazard Assessment
LCRS	Leachate Collection and Recovery System
mg/L	milligrams per liter
MW	Monitoring Well
MSHA	Mine Safety and Health Administration
MUSC	Medical University of South Carolina
NDT	non- destructive testing
OceanaGold	OceanaGold Corporation
OMI	Operation, Maintenance, and Inspection Manual
PMP	Probable Maximum Precipitation
PPE	Personal protective equipment
ppm	Parts per million
QA/QC	Quality Assurance/Quality Control
SAG	Semi-Autogenous Grinding
SC	South Carolina
SDS	Safety Data Sheet(s)
SEIS	Supplemental Environmental Impact Statement
TSF	Tailings Storage Facility
WAD	Weak-acid dissociable

Operational Contact

Mine Operations	Haile Gold Mine
Mine Owner	OceanaGold Corporation
Name of Operator	Haile Gold Mine Inc.
Name of Responsible Manager	Mathew Warner, <i>Asset President</i>
Address and Contact Information	6911 Snowy Owl Road PO Box 128 Kershaw, South Carolina USA

Location and Description of the Operation

The Haile Gold Mine (Haile) was one of the first operating gold mines in the United States. In 1827 gold was discovered by Benjamin Haile and the mine has been in production on and off for nearly 200 years. Haile is located in north-central South Carolina approximately 5 miles to the northeast of the Town of Kershaw, as shown on **Figure 1**. Aerial photographs of the plant and tailings storage facility are shown in **Figure 2** and **Figure 3**.

In 2007, Romarco Minerals, Inc. purchased the Haile property and surrounding land and began the permitting process to reopen the mine. In July of 2015, Romarco Minerals was purchased by OceanaGold Corporation (OceanaGold), a multinational gold and copper producer. In January 2017, gold was poured from the modern Haile mine after OceanaGold acquired the operation in late 2015. In 2024, Haile produced 212,600 ounces of gold.

Haile is a surface mine with four open pits in operation. These pits will be opened and then backfilled in a sequence throughout the life of the mine. Associated mining facilities include an overburden storage area, a growth medium storage area, a storage area for potentially acid-generating rock, and others. Environmental controls on the non-cyanide mining facilities include a mine water treatment plant, water storage ponds, and sediment control ponds.

Gold is processed as follows (**Figure 4**):

- Primary Crushing – Ore is crushed to less than 6 inches by the jaw crusher.
- Grinding (Semi-Autogenous Grinding [SAG] Mill and Ball Mill) – 6 inch ore is ground to the size of a fine powder, about 74 microns in size.
- Rougher Flotation – Ground ore is treated with chemicals to enable the gold-bearing minerals to float to the top of the flotation machines and concentrate as froth. Ore that does not float is pumped to the Carbon-in-Leach (CIL) circuit.
- Regrind – Concentrate of gold-bearing minerals from flotation is ground further to about 13 microns in size in regrind mills.
- Carbon-in-Leach – Reground concentrate slurry is oxidized with air in the pre-aeration tank prior to being treated with sodium cyanide in CIL Tank #1. Dissolved gold is adsorbed onto activated carbon. The discharge from CIL Tank #1 flows by gravity to CIL Tank #2, where it combines with the rougher flotation tailing. The combined streams are treated with sodium cyanide at CIL#2 and CIL #3, and the dissolved gold is adsorbed onto activated carbon in CIL Tanks #2 through #8. The gold-bearing activated carbon particles are removed from the slurry prior to the slurry thickening step for processing in carbon stripping circuit. The discharge from CIL Tank #8 is thickened and the sodium cyanide is returned for use throughout the CIL circuit.
- Cyanide Destruct – Thickened slurry is processed in the cyanide destruct process and the cyanide level, measured as weak acid dissociable (WAD) cyanide, in the effluent to the Tailings Storage Facility (TSF) must be less than 50 milligrams per liter (mg/l) at the spigots.
- Carbon Elution/Regeneration Circuit – Gold-bearing activated carbon is treated with chemicals, including sodium cyanide, to strip the gold from the carbon into pregnant solution. After the gold is removed from the carbon, the carbon is thermally reactivated by heating in a kiln to remove impurities. After reactivation, the carbon is returned to the CIL circuit for reuse.
- Gold Refining and Processing – The gold is removed from the pregnant solution in electrowinning cells where a gold-bearing sludge forms on the cathodes. The gold-bearing sludge is smelted, poured into a mold, and cooled to form a doré bar.

Tailings are pumped from the plant to the Duckwood TSF via a pipeline constructed in 2016. A tailings booster station was constructed in 2020 and is located approximately 2/3 of the distance from the plant to the TSF. The pipeline route passes the Events Pond near the plant, then runs slightly uphill to an overpass over a highway, then slightly downhill to the TSF embankment. The pipeline is contained within a geomembrane-lined channel or pipe-in-pipe segments along its entire length. The booster station has concrete secondary containment. From the high point on the pipeline profile, tailings spills would flow downhill by gravity in the channel to the Events Pond or by gravity to the TSF. The Events Pond is single-lined with geomembrane.

Tailings are deposited in the TSF by spiggotting from the crest of the ring dike embankment, which is lined with geomembrane. An associated underdrain seepage collection pond is double-lined with a leachate collection and recovery system (LCRS). The starter embankment (Stage 1) was completed in 2016 to an elevation of 575 ft above mean sea level (amsl) and was approximately 87 feet high at its maximum section above Camp Branch Creek. The Stage 2 embankment was constructed in 2020 to an elevation of 585 ft amsl. The Stage 3 embankment was constructed in 2021 to an elevation of 600 ft amsl. The Stage 4 embankment was under construction at the time of the field audit and is currently permitted to an elevation of 670 ft amsl.

A Supplemental Environmental Impact Statement (SEIS) was approved in December of 2022, allowing the ultimate TSF to disturb approximately 400 acres with an embankment elevation of 670 ft amsl.

Reclaim water from the supernatant pool is returned to the plant via two electric pumps and two reclaim pipelines. These pipelines run in the same geomembrane-lined channel as the tailings pipeline, and in the event of a spill, would also flow by gravity to the Events Pond or the TSF from the high point in the profile. Reclaim water is blended with fresh water and then reused in the plant.

Haile receives solid cyanide via isotankers from the Draslovka Mining Solutions (Draslovka) plant in Memphis, Tennessee, USA (formerly the Chemours Company). Red dye is added at the plant before transport. The isotankers are transported by Empire Express Inc. (Empire). Both Draslovka and Empire are certified under the Code. Isotankers are parked in a designated area until offloading. Offloading is completed by solid-liquid sparging with closed connections between the isotanker and the mixing tank.

Haile became a signatory to the International Cyanide Management Code (ICMC or Code), administered by the International Cyanide Management Institute (ICMI) in 2012. Haile was initially certified in 2019 and recertified in 2022. This is Haile's second recertification audit.

Cyanide Facilities

The cyanide facilities, defined as those with WAD cyanide greater than 0.5 mg/l, and the significant changes this audit cycle are as follows:

- Area 450 – CIL
- Area 500 – Stripping and Carbon Handling
- Area 600 – Detox and Tailings Systems
- Area 800 – Mixing
- TSF
- TSF Underdrain Pond
- Tailings and Reclaim Water Pipelines
- Process Events Pond

There were no completed cyanide facility modifications during this audit cycle. However, the following was under construction and not yet complete at the time of the field inspection:

- TSF Stage 4 raise

Two other facilities were considered as cyanide facilities, although they do not contain cyanide solutions:

- TSF perimeter diversion channels
- Isotanker laydown yard

The following were not considered cyanide facilities:

- Crushing, conveying, grinding, and flotation circuits (Areas 100, 150/200, 300, and 420, respectively). The primary crusher, SAG mill, ball mill, and flotation circuits do not use process solutions. Cyanide is not used as a reagent in the flotation circuit (Area 420). These circuits use water from the internal reclaim water tank which is a blend of reclaim water from the TSF and fresh water. Haile presented a spreadsheet from the PI operating system that showed concentrations of WAD cyanide in the internal reclaim water tank were less than 0.5 mg/l based on weekly samples throughout the recertification period.
- Carbon fines storage area. Haile provided data during the 2022 recertification audit that showed a maximum concentration of 0.018 mg/l WAD cyanide, and therefore this area was not considered a cyanide facility.
- Laboratories and refinery, as excluded by the Code.

Figure 1 – Project Location



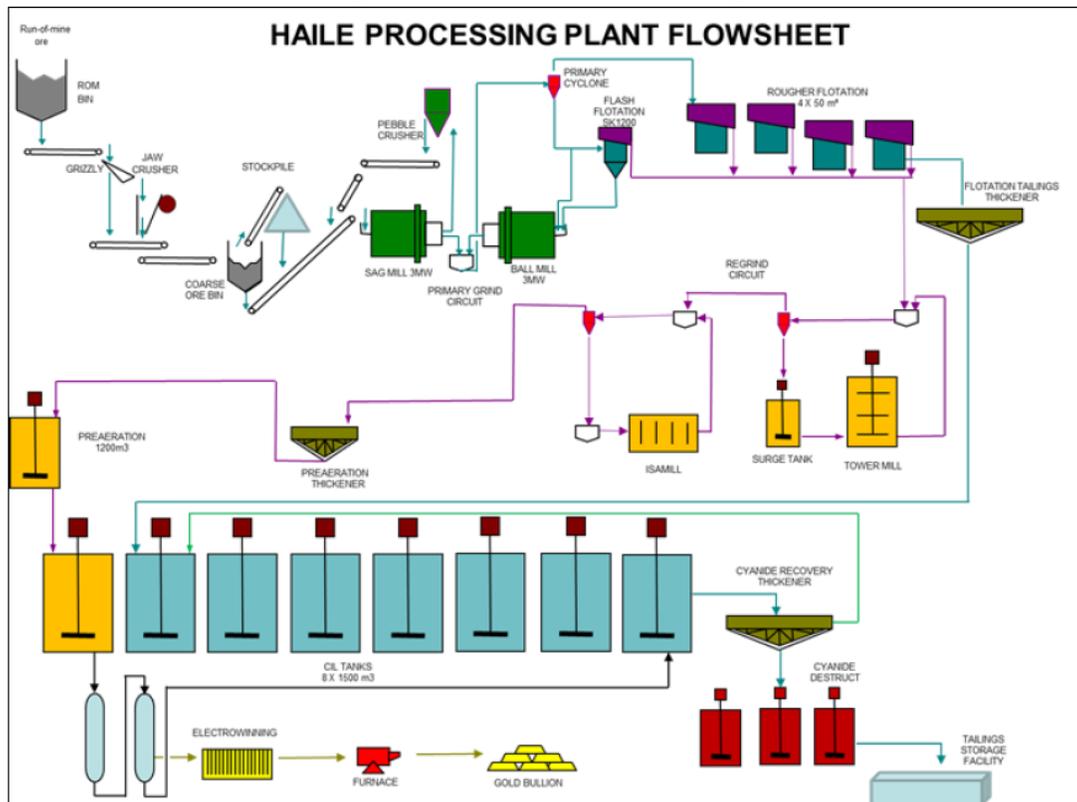
Figure 2 - Aerial Photo of Cyanide Plant (Google Earth)



Figure 3 - Aerial Photo of Tailings Facility (Google Earth)



Figure 4 - Process Flow Diagram



Source: OceanaGold, 2022

Auditor Information

Haile Gold Mine is

- in full compliance with**
 in substantial compliance with
 not in compliance with

**The
International
Cyanide
Management
Code**

The auditor has determined that the Haile Gold Mine is in **Full Compliance** over this ICMC audit cycle.

This operation has not experienced any compliance issues during the previous three-year audit cycle.

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Audit Team Leader: John R. Barber
Lead Auditor & Mining Technical Auditor

Email: john.barber@mvp-nv.com

Audit Dates

The site visit for the Initial Certification Audit was undertaken over June 16th – 19th, 2025.

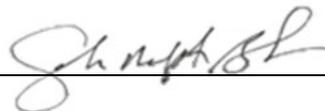
I attest that I meet the criteria for knowledge, experience, and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management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

I attest that this 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 Institute for Mining Operations Verification Protocol (2021) and using standard and accepted practices for health, safety, and environmental audits.

Date: December 19, 2025

Operation Name: Haile Gold Mine

Signature of Lead Auditor:



PRINCIPLE 1 – PRODUCTION & 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 manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

The operation is

in full compliance with

in substantial compliance with

not in compliance with

Standard of Practice 1.1

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has purchased cyanide only from one producer, Draslovka, under a continuous contract throughout the recertification period. The Draslovka plant in Memphis, Tennessee has been continuously certified since 2006 with its latest Summary Audit Report published by the ICMI in May of 2023. Haile provided bills of lading from throughout the recertification period to confirm compliance.

PRINCIPLE 2 - TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1

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

The operation is

- in full compliance with**
 in substantial compliance with
 not in compliance with

Standard of Practice 2.1

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has only received cyanide via one transporter, Empire, during the recertification period. Empire has been continuously certified since 2010 with its latest Summary Audit Report published by the ICMI in June of 2025. Haile provided bills of lading from throughout the recertification period to confirm compliance.

PRINCIPLE 3 – HANDLING & 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 full compliance with

in substantial compliance with

not in compliance with

Standard of Practice 3.1

Summarize the Basis for this Finding or Deficiencies Identified:

The offloading and mixing area, as well as the day tank, have not changed since the initial audit and last re-certification audit. The findings from those audits are still valid and repeated below for completeness.

Haile has designed and constructed the cyanide mixing area in accordance with sound and accepted engineering practices. The mixing area consists of a truck ramp for offloading isotankers and a secondary containment with a mixing tank and a distribution tank.

Haile also has a small day tank for high-strength cyanide in the CIL area. This day tank is located on the upper level of the CIL platforms to allow gravity feed to the cyanide addition points. This day tank was properly designed and constructed as part of the CIL area.

Haile has located the cyanide mixing area away from people and surface water. The nearest office is approximately 200 feet away and there are no muster points or designated smoking areas in the vicinity. Nonetheless, Haile has installed two fixed hydrogen cyanide gas (HCN) monitors in the mixing area to protect workers. The day tank in the CIL area is also located away from people and surface water; a fixed HCN monitor is nearby.

The isotanker laydown yard is located around the corner from the offloading and mixing area; therefore, the laydown yard is also located away from people and surface water.

Haile receives solid cyanide in isotankers. The isotankers are unloaded on a concrete ramp that is big enough for the entire isotanker. Therefore, cyanide is unloaded on a surface that minimizes the potential for seepage to the subsurface. The ramp drains to a sump that is operated manually to recover and return leakage to the process circuit.

The mixing, distribution, and day tank are equipped with level sensors to prevent overflows. All three tanks have interlocks to automatically shut down pumping.

The control loop, consisting of the level sensors, valves, power pumps, and interlocks, for the three high-strength tanks are maintained.

Haile has installed the cyanide mixing and distribution tanks within a single concrete secondary containment that prevents seepage to the subsurface and is a competent barrier to leakage. The cyanide day tank is located on the upper level of the CIL platform with a concrete secondary containment which prevents seepage to the subsurface and is a competent barrier to leakage.

The mixing and distribution tanks, as well as the day tank, are closed-top tanks located outside and within secondary containment, thus minimizing the potential for contact of solid cyanide with water.

The mixing and distribution tanks, as well as the day tank, are located outside, which provides adequate ventilation to prevent the build-up of HCN gas.

The mixing and distribution tanks are within a fenced and locked area where access is controlled.

The secondary containment for the mixing and distribution tanks contains no materials other than a lime silo, which is compatible with cyanide. There are no acids, strong oxidizers, explosives, foods, animal feeds, or tobacco products stored nearby such that flow paths might merge, given that the mixing area has a sump with an automatic pump. The day tank is not located near any incompatible materials.

The isotankers are stored outside (as designed), which provides adequate ventilation to prevent the build-up of HCN gas. The isotanker area is located within the secure mine area with full-time security that prevents access to the public. No other materials are stored at the isotanker laydown yard.

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 full compliance with

in substantial compliance with

not in compliance with

Standard of Practice 3.2

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has implemented procedures for managing empty cyanide containers. There is a written procedure for receiving and returning isotankers to the cyanide manufacturer to prevent them from being used for any purpose other than holding cyanide. The Isotanker Cyanide Check Sheets indicate when an isotanker arrives at site and left site, thus ensuring all isotankers were accounted for. Rinsing empty containers is inapplicable because Haile does not use drums, boxes, plastic bags, or liners. The cyanide mixing procedure calls for checking for leaks and cleaning cyanide residue, if any, from the connections after the hoses have been disconnected.

Haile has developed and implemented a written procedure and offloading checklist to prevent exposures and releases during isotanker offloading. The procedure was updated to document and align additional steps for field actions. The SOP checklist was updated to capture pre-mix and post mix inspections. This procedure details the operation of hoses, valves, and couplings for purging the isotanker as well as how to stage and chock the isotanker on the concrete offloading ramp. Haile has implemented preventive maintenance programs that include but is not limited to mixing and offload hoses, valves and couplings. The site is responsible for all maintenance on the mixing components

Limiting the height of stacked cyanide containers is inapplicable because isotankers are not stacked. However, Haile does inspect the isotanker laydown yard daily for proper storage.

The cyanide mixing procedure contains measures to clean up spills of cyanide in a timely manner.

The cyanide mixing procedure lists the personal protective equipment (PPE) required for offloading: standard site PPE; full-face respirator; chemical gloves, chemical suit, and chemical boots; and personal HCN detectors. Two personnel suited up in PPE and an observer at ground level with a radio for emergencies are required for all connections and disconnections. The auditor observed the offload connections to verify that the two operators wore the required PPE and that an observer with a radio was positioned outside the work area at ground level.

Draslovka, the cyanide manufacturer confirmed "red dye" is added to the isotanker before leaving the Memphis Plant.

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 full compliance with

in substantial compliance with

not in compliance with

Standard of Practice 4.1

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has developed written management plans and procedures for cyanide facilities. Primary among these high-level management plans are the Cyanide Management Plan and the corporate Health Safety and Environment (HSE) Manual. Other high-level systems include the INX software and the Incident Cause Analysis Management (ICAM) system.

The cyanide facilities with WAD cyanide concentrations greater than 0.5 mg/l are:

- Area 450 – CIL
- Area 500 – Stripping and Carbon Handling
- Area 600 – Detox and Tailings Systems
- Area 800 – Mixing
- TSF
- TSF Underdrain Pond
- Tailings and Reclaim Water Pipelines
- Process Events Pond

There were no modified cyanide facilities for this audit cycle. However, the following facility was under construction at the time of the field inspection:

- TSF Stage 4 raise,

Two other facilities were considered as cyanide facilities, although they do not contain cyanide solutions:

- TSF perimeter diversion channels
- Isotanker laydown yard

The following were not considered cyanide facilities:

- Crushing, conveying, grinding, and flotation circuits (Areas 100, 150/200, 300, and 420, respectively). The primary crusher, SAG mill, ball mill, and flotation circuits do not use process solutions. Cyanide is not used as a reagent in the flotation circuit (Area 420). These circuits use water from the internal reclaim water tank which is a blend of reclaim water from the TSF and fresh water. Haile presented a spreadsheet from the PI operating system that showed concentrations of WAD cyanide in the internal reclaim water tank were less than 0.5 mg/l based on weekly samples throughout the recertification period.
- Carbon fines storage area. For the 2022 recertification audit Haile provided data from four grab samples from randomly selected bags of carbon fines that showed a maximum concentration of 0.018 mg/l WAD cyanide, and therefore this area was not considered a cyanide facility.

Laboratories and refinery, as excluded by the Code.



Haile has plans and procedures that identify the facility design criteria, assumptions, and regulatory requirements as necessary to prevent or control cyanide releases and exposures. The plant designer developed a series of design criteria documents as part of feasibility planning. The TSF designers developed design criteria, design reports, issued for construction drawings, an Emergency Action Plan (EAP), and an Operation, Maintenance, and Inspection Manual (OMI). A consultant prepared a site-wide water balance in 2019 and updated it in 2020. Haile developed an overall plan for monitoring and management, as well as a cyanide management plan. DHEC issued a mine operation permit that contains regulatory requirements. These plans and procedures have been updated as appropriate for the cyanide facilities for this audit cycle.

Key plant operating criteria are:

- Minimum pH of 10.5 for mixing cyanide at a strength of approximately 27 percent
- Cyanide addition rate of 600 to 825 mg/l (free cyanide) at CIL #1 and CIL #3 at an operating pH of 10.0 to 10.5
- Cyanide addition rate of approximately 5,000 mg/l for stripping at an operating pH of 11 or greater
- Cyanide destruct target for WAD cyanide of less than 50 mg/l at the spigot and less than 30 mg/l WAD cyanide in the supernatant pool with a pH of 8.0 to 9.5

Key TSF operating criteria are:

- Storm design basis of the Probable Maximum Precipitation (PMP) of 47.96 inches with a total of 8-feet above the maximum operating pool level that includes a 4-foot PMP storm pool and a 4-foot freeboard and wave runup zone
- WAD cyanide limits of 50 mg/l at the spigots and 30 mg/l in the reclaim pool
- LCRS for the TSF Underdrain Pond limit of 50 gallons per day (gpd) rolling 12-month average or 150 gpd average accumulation rolling 3-month average
- Freeboard of 2 feet for the process Events Pond with a design event of the 100-year 24-hour storm of 8.57 inches
- Freeboard of 2 feet for the Underdrain Pond with a capacity for 24-hour drainage from the TSF plus the 100-year 24-hour storm of 8.57 inches

A key criterion for protection of groundwater and surface water is that any detection of WAD cyanide is considered a potential exceedance that would be investigated.

Haile has prepared standard operating procedures to ensure the safe and environmentally sound operation of the cyanide facilities. These procedures include measures specific to Code compliance, such as HCN gas monitoring; cyanide analysis; working on cyanide-bearing pipes and lines; cleaning screens; mixing cyanide; and conducting inspections. The procedures are organized with a common template that covers purpose, scope, responsibilities, safety, required PPE, other equipment, and step-by-step procedures. Haile has updated these procedures as appropriate during this audit cycle.

Haile has implemented a procedure to review proposed changes with respect to the potential for cyanide releases and worker exposures, and has incorporated measures into these changes to protect worker health and safety and the environment. The Haile Management of Change procedure is a structured process that includes risk assessment (including Hazard and Operability [HAZOP] review), forms, stakeholders, approval, communication of change, implementation, and post-implementation. The procedure requires a risk assessment that involves key stakeholders including safety and environmental departments to participate. If the risk assessment identifies an elevated safety or environmental risk it would trigger the requirement for the safety and/or environmental department for approval sign-off.

Haile has cyanide management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases.

There are process plant procedures for non-conforming performance of the cyanide destruction circuit and maintenance. For the TSF, the EAP contains contingency actions for embankment overtopping, and other scenarios. The TSF OMI addresses problems identified by monitoring and inspections.

Haile has developed a contingency procedure for shutdown of the process plant during a tailings line failure and power outages. The TSF OMI addresses pump failures and extended power outages that would function similarly in any short-term temporary cessation. The procedure for power outages also covers the entire mine, which would include the process plant and the TSF. For extended shutdowns the Site Cyanide Facility Decommissioning Plan would be implemented. In the event of a short duration shutdown, inspections and maintenance would continue without changes. For extended shutdowns, inspections and maintenance would be phased out as the verification procedure confirmed the lack of residual cyanide in the various circuits. Environmental monitoring would continue in any length shutdown because of permit requirements.

Haile has developed a thorough inspection program for the cyanide facilities. The inspection program is defined in two operating procedures and the corporate Gold Standard Program. This latter program requires managers at superintendent and higher to complete one task observation or area inspection per every two days at site, resulting in approximately 2,000 management inspections per year.

Haile has also reminded staff and operations personnel of how to conduct effective inspections (e.g., July 2025 crew meetings/training). The July 2025 training focused on proper completion of inspection forms, documentation of cyanide leaks/salts, locking out open-ended cyanide valves, and other items related to physical safety. The auditor observed the cyanide facilities to generally be in good condition, indicating effective inspections and follow-up. Specifically, Haile has inspected unloading, storage, mixing and process areas throughout the recertification period as follows: visually inspected all tanks and columns for structural integrity and signs of corrosion and leakage, non-destructive testing (NDT) on the cyanide mixing tank and distribution tank. Inspection of secondary containments for tanks and columns for physical integrity, the presence of fluids and available capacity, and to ensure that any drains are closed. Haile TSF staff have inspected the pipeline secondary containments between the plant and TSF for similar factors.

The only LCRS is for the TSF Underdrain Pond, which was inspected daily. Haile has inspected pipelines, pumps and valves for deterioration and leakage using workplace examinations, area inspections, and other inspections. Haile has inspected ponds and impoundments (TSF, TSF Underdrain, and Plant Events Pond) for the parameters identified in their design documents as critical to their containment of cyanide and solutions.

Haile has inspected the cyanide facilities on an established frequency throughout the recertification period that has ensured and documented that they are functioning within design parameters. Inspection frequencies are random, per event, shift, daily, monthly, quarterly, and annually depending on the type of inspection. It is the auditor opinion that the inspection frequencies are sufficient to ensure that facilities are functioning within design parameters.

Haile has documented inspections as follows: Haile's inspection forms list specific items to be observed and include the date of the inspection, the name of the inspector, and observed deficiencies. The auditor observed examples of forms with deficiencies and responses for the expected condition and additional information in the comments section. Inspection forms are reviewed by superintendents. Deficiencies have been noted and entered into the maintenance workflow where work orders are generated and closed out upon completion. Based on sampling of inspection forms, Haile has retained inspection forms for the recertification period.

Haile has implemented preventive maintenance programs and documented these activities to ensure that equipment and devices function as necessary for safe cyanide management. Haile manages maintenance using a third-party software platform with a defined workflow process for preventative and corrective maintenance. The workflow includes work requests, task scheduling, work orders, and closeout. Haile has established priority codes for maintenance, such as urgent, break-in, routine, short range, outage, and project. The frequency for preventative maintenance is run-time duration and/or set time periods.

The auditor reviewed work order history for selected pieces of equipment, inspection issue work orders, and randomly selected closed work orders to verify compliance.

Haile has developed a procedure for power outages and has an emergency generator to operate equipment that will prevent releases and exposures. Haile has installed an emergency generator with the capacity to run critical equipment, as listed in the power outage procedure.

Haile has scheduled and tracked generator maintenance using the maintenance software. Haile provided a maintenance history for the generator showing inspections every 2 weeks, annual load testing, inspections, and maintenance throughout the recertification period.

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 full compliance with** **Standard of Practice 4.2**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Consistent with the previous audit cycle Haile has continued to operate a cyanide destruct circuit as their main method to minimize cyanide concentrations in tailings. Nonetheless, Haile has continuously optimized cyanide consumption to improve safety and environmental compliance, as well as to control gold production costs. Based on the previous audit, Haile has continued to implement four methods to optimize cyanide consumption in the plant: Ore feed looking forward; Feedback using plant samples; Bench- and pilot-scale experimental studies; Control system improvements.

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

Haile developed a comprehensive and probabilistic water balance for the life-of-mine in 2019 and updated it in 2020. The water balance is comprehensive in that it includes the TSF and plant, as well as other non-cyanide facilities such as ponds, pits, underground workings, and the mine water treatment plant for contact water. The water balance is probabilistic in that it was developed in GoldSim, a Monte Carlo simulation model, using a daily time step. The 2019 model included scenarios for the wettest year, driest year, and the PMP. The 2020 update includes five scenarios for different capacities for the mine water treatment plant.

The Haile water balance considers the following factors in a reasonable manner and as appropriate for the facilities and environment: tailings production rate of approximately 12,000 tons per day, the 24-hour Probable Maximum Precipitation,

Precipitation data were obtained from the station operated by the University of South Carolina in Kershaw.

Evaporation data were obtained from the Sand Hill Research Station operated by Clemson University and located approximately 29 miles from the site.

The TSF is a ring dike configuration and therefore has no run-on from uphill watersheds, effects of potential freezing and thawing conditions were not included in the model because low temperatures do not last long enough for the supernatant pool to freeze. Solution losses other than evaporation (passive and active) include reclaim water pumping and tailing pore water reporting to the Underdrain Pond. In the event of a power outage, tailings pumping to the TSF and reclaim water from the TSF would simply stop with no effect on the potential for overtopping the TSF. There are no discharges to surface water. The Underdrain Pond was sized for 24-hours of drain down in case of a power outage interrupting pumping back to the TSF. The groundwater beneath the TSF is shallow. A groundwater collection underdrain pipe was installed beneath the lined TSF to relieve groundwater pressure on the liner.

Haile has designed and operated the TSF and Underdrain Pond with adequate freeboard to prevent overtopping. The TSF has a 4-foot PMP storm pool and a 4-foot freeboard and wave runup zone.

Haile has inspected and monitored the TSF and Underdrain Pond to prevent overtopping and unplanned discharges of cyanide solutions to the environment. Haile has completed daily and shift inspections of the TSF throughout the recertification period according to the operating procedure for the TSF, Underdrain Pond, and other ponds. The Underdrain Pond has been inspected daily. Haile has surveyed water levels in the supernatant pool approximately weekly, as compiled in the time series graph of water levels throughout the recertification period. Haile has recorded water levels in the Underdrain Pond daily throughout the recertification period as compiled in the time series graph for that facility. As required by the TSF OMI Manual, and as documented in the TSF Annual Inspection Reports, Haile has completed annual bathymetric and topographic surveys of the TSF. The annual reports also include monitoring data from vibrating wire piezometers and survey monuments in the TSF embankment. Finally, Haile has inspected the TSF diversions throughout the recertification period as required by their SWPPP.

Haile has measured precipitation with a standard 10-m weather station near the Admin Building since 2018. Haile provided a bar chart comparing the monthly site precipitation data from 2018 to 2025 to the monthly averages at the public Kershaw station with an 80-year period of record. The Kershaw station is located approximately 6 miles from the site approximately the same elevation. The Hydrology/Hydrogeology Superintendent indicated there was insufficient difference between the site data and the Kershaw data to warrant revisiting the precipitation inputs in the water balance or the site operating practices.

Standard of Practice 4.4

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

The operation is

in full compliance with

in substantial compliance with

not in compliance with

Standard of Practice 4.4

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has implemented measures to restrict access by wildlife and livestock to open waters. The open waters with the potential for cyanide are the TSF and the associated Underdrain Pond. The Events Pond at the plant is excluded as open water because its purpose is to collect process solutions in an emergency and it is cleaned up as soon as practical. Haile has reduced the potential for harm to wildlife and birds at the TSF by cyanide destruction.

Other wildlife and livestock access restrictions are the exclusionary fencing around the TSF and around the mine property. The fence around the TSF is constructed to keep out feral hogs.

Haile has maintained WAD cyanide concentrations in open waters below lethal levels during the recertification period. Haile has measured WAD cyanide concentrations post-cyanide destruct, as well as the tailings discharged at the TSF. Based on these measurements, the WAD cyanide concentration was significantly below lethal levels, with minor exceptions, over the recertification period. The open water at the TSF was sampled during the recertification period. A time series graph for these data shows the WAD cyanide concentration was significantly below lethal levels. Haile has the option to sample the Underdrain Pond when wildlife mortality occurs in the TSF if it makes sense in the overall scope of an investigation into conditions in the TSF. Given the consistently low concentrations of cyanide in the TSF supernatant pool, the auditor is satisfied that the concentration of WAD cyanide in the Underdrain Pond has also been below lethal levels during the recertification period.

Haile has prevented significant wildlife mortality in its open waters at the TSF and Underdrain Pond during the recertification period. Haile reported two mortalities in the TSF during the recertification period. Haile sent the carcasses for necropsies, which determined that the cause of death for both mortalities was not associated with cyanosis.

Haile has inspected the TSF for wildlife and birds throughout the recertification period. Haile has developed a written procedure for wildlife monitoring, reporting, and response. This procedure includes sections for avian monitoring, terrestrial mammal monitoring, carcass detection, carcass post-mortem analysis, and reporting. Haile environmental staff conduct random undocumented inspections of the TSF. Haile TSF operators conduct three types of documented TSF inspections with two types daily and the third type twice daily. These TSF inspections cover the embankment, beach, supernatant pool, and Underdrain Pond. The auditor confirmed that the TSF operators have been trained to report wildlife mortalities. Haile also contracts an avian biologist to conduct bird surveys at the TSF six times per year and issue an annual report. Data collected in each survey includes species observed, population/individuals observed, weather conditions, habitat utilized, behavior observed, and if necessary, physiological stress symptoms. Based on the auditors' observations, interviews, and documentation reviewed the auditor accepted Haile's approach to wildlife inspections and mortality reporting.

Haile does not have a heap leach pad, as such ponding and overspray are inapplicable.

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

The operation is **in full compliance with** **Standard of Practice 4.5**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile does not have a direct discharge to surface water from the cyanide facilities. Haile has a mine water treatment plant to treat acid mine water from non-cyanide facilities; there is no connection from the cyanide system to the non-cyanide system. Haile monitors for cyanide in surface water downstream of the cyanide facilities even though the mine does not have a direct discharge to surface water or a mixing zone.

However, Haile's monitoring plan only requires analysis for cyanide at SW-03, which is the permit boundary on Branch Creek, downstream of the TSF. Haile samples surface water quarterly with analysis by a third-party laboratory for WAD cyanide with a Method Detection Limit of <0.003 mg/l. The approved monitoring and management plan requires analysis of WAD cyanide rather than free cyanide.

The quarterly monitoring results, as reported in semi-annual reports submitted to DHEC, showed non-detect WAD cyanide, because WAD cyanide includes free cyanide, the free cyanide concentrations must have been less than 0.022 mg/l throughout the recertification period.

Monitoring data does not indicate indirect discharges from the cyanide facilities are present. As such, there are no exceedances during the recertification period, and therefore remediation has not been needed.

Standard of Practice 4.6 **Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.**

The operation is **in full compliance with** **Standard of Practice 4.6**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has implemented water management measures for seepage from the cyanide facilities to protect groundwater. The following measures prevent seepage to groundwater: concrete secondary containments at the process plant; high-density polyethylene (HDPE)-lined Events Pond for the process plant; HDPE-lined secondary containment ditch for the tailings and reclaim pipelines; A layer of compacted low permeability soil liner overlain by HDPE liner under the entire TSF, as well as a gravel drainage layer and underdrain piping to direct tailings pore water to the Underdrain Pond; a chimney drain overlain by a compacted low permeability soil liner and HDPE liner on the TSF embankments; a layer of compacted low-permeability soil liner overlain by a double-layer HDPE and LCRS for the TSF Underdrain Pond. The LCRS is inspected daily. The cyanide destruct circuit at the process plant is also an indirect measure to protect groundwater. The TSF raises with continued installation of HDPE liner on the TSF embankment.

Haile has monitored groundwater downgradient of the cyanide facilities. However, South Carolina does not designate beneficial uses for groundwater and there are no actual points of use within approximately 2 miles of the mine, as the few offices and buildings within that range use city water provided by Kershaw. According to the DHEC permit, WAD cyanide is the designated species for groundwater monitoring and any detection of WAD cyanide in groundwater would be considered a potential exceedance and subject to investigation.

The general groundwater gradient around the plant and TSF is from the northeast to the southwest. There are two downgradient monitoring wells for the TSF; two cross-gradient wells; and one upgradient well. Quarterly samples have been analyzed by a commercial laboratory. The WAD cyanide results were non-detect at 0.003 mg/l throughout the recertification period. There is one downgradient monitoring well near the plant; however, WAD cyanide is not a required analyte for this well.

Haile does not use tailings as backfill in an underground mine.

Groundwater monitoring data does not indicate seepage exists nor has cyanide concentrations in groundwater risen above levels protective of beneficial use, and therefore remediation is not required.

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

The operation is **in full compliance with** **Standard of Practice 4.7**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has installed cyanide-related tanks and vessels at the plant in concrete secondary containments. Haile also provided design drawings showing the rebar patterns for the tank bases, thereby proving tanks were installed with an impermeable surface below them. The auditor observed the secondary containments to be in good condition with sealed joints and cracks. The TSF booster pump station was constructed with concrete containment even though no tanks are present.

Haile has constructed secondary containments with sufficient volume (110%) for the largest tank within the containment and additional capacity for stormwater from the 100-year, 24-hour storm event.

The CIL, Cyanide Destruct, and Reclaim Water containments have flow through capability to the Events Pond via HDPE pipeline within a geomembrane-lined containment ditch, which has enough volume to contain the volume of all of the tanks and vessels that could flow to it, plus stormwater. The Lime and Cyanide and Carbon Regeneration containments do not overflow to other containments and have sufficient volume (110%) for the largest tank within them plus the 100 year, 24-hour storm event.

Haile has provided sumps with dedicated pumps for all secondary containments. While the secondary containments will contain all cyanide related spills. Plant sumps have level-triggered automatic pumps to evacuate the containment areas. Depending on the containment, the sump pumps return solutions to CIL #1, CIL #2, or the tailings junction box. The concrete secondary containment for the TSF booster station has a sump that flows by gravity through a pipe-in-pipe outlet to the nearby geomembrane-lined containment channel for the tailings and reclaim pipes. A spill at the booster station would ultimately flow to the Events Pond at the plant via the geomembrane-lined pipeline containment channel.

Haile has installed all process tanks within with secondary containment. Nonetheless, Haile has developed a procedure for remediating soil affected by cyanide solutions released from secondary containment.

Haile has provided spill containment measures for cyanide-related pipelines to collect leaks and prevent releases to the environment. Pipelines within the mixing area and the plant are located over concrete secondary containment, whereas the overhead pipelines from the mixing area to the plant have a steel tray beneath them for secondary containment. The tailings and reclaim water pipelines between the plant and the TSF are contained within a geomembrane-lined channel. The pipeline containment drains either towards the TSF or back towards the Events Pond.

The pipelines between the TSF booster pump station and the existing geomembrane-lined channel were installed with a pipe-in-pipe configuration.

The reagent grade cyanide "Day Tank" is located on the third level of the processing plant and spill containment is present as it is over the CIL concrete containment area. However, Haile has installed a containment tray under the day tank to capture drips and spills that would cascade through levels 1 and 2 where workers could be present.

Haile does not have any pipelines that present a special risk to surface water.

Haile has constructed tanks and pipelines containing cyanide solutions with materials that are compatible with cyanide and high pH. The tanks and pipelines in the plant are made of carbon steel, stainless steel, and HDPE. The pipes in the booster station are made of carbon steel.

The tailings and reclaim pipelines between the plant and TSF are made of HDPE. The auditors observed the pipes to be in good condition.

Standard of Practice 4.8

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

The operation is

in full compliance with

- in substantial compliance with
 not in compliance with

Standard of Practice 4.8

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has continued to implement quality control and quality assurance (QA/QC) programs during construction of modified cyanide facilities this audit cycle, TSF raise which was not complete at the time of this audit.

The QA/QC was, and continues to be, governed by a Quality Plan for Construction that covered: subgrade and excavation; backfill and compaction; aggregate; geomembrane; concrete; structural steel; mechanical equipment (vessels, tanks, etc.); welding; piping and pipelines; protective coatings; electrical; and instrumentation. The TSF raise this audit cycle is governed under their own QA/QC program as specified in the TSF technical specifications. The technical specifications address QA/QC testing and specifies the frequency of testing and function as the construction quality assurance plan.

QA/QC programs have addressed the proper materials and activities for the original and modified cyanide facilities. QA/QC programs for the original cyanide facilities achieved compliance at the time of the initial audit and 2022 recertification audits.

Haile established a repository on Box, an online file storing product, for construction quality assurance documents. The auditor examined Box to verify document retention.

Haile has ensured that an appropriately qualified person reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved. There were no complete cyanide related construction projects during this audit cycle.

Haile has provided quality control and quality assurance documentation or as-built certification for all cyanide facility construction.

Standard of Practice 4.9

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

The operation is

in full compliance with

- in substantial compliance with
 not in compliance with

Standard of Practice 4.9

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has developed written procedures for monitoring wildlife/birds, soil, surface water, and groundwater. The overall management plan for monitoring is supported by series of standard procedures for sampling and analysis. Haile has used qualified technical experts to develop their sampling and analysis protocols.

As described in the initial audit and 2022 recertification audit reports, the groundwater and surface water sampling protocols were developed by a registered geologist with 29 years of experience in hydrology and geology. The current Environmental Superintendent, a civil/environmental engineer with over 25 years of experience reviewed the sampling and analysis protocols. The wildlife monitoring protocols were developed by a naturalist with 18 years of experience in biology, endangered species, and natural resources management. Analytical protocols were developed by the third-party laboratory with certification by DHEC in South Carolina for cyanide analysis. Haile itself is also certified by DHEC as a laboratory for field pH measurement.

Haile's procedures specify the locations, field procedures, and analytical methods for cyanide analysis of surface water and groundwater samples. Tables in the monitoring plan summarize the purpose, rationale, and requirements for groundwater and surface water monitoring, respectively. Figures in the plan show the groundwater and surface water sampling locations, respectively. The plan contains analyte lists that show WAD cyanide as the species to be analyzed in groundwater and surface water. The procedures for sampling groundwater and surface water describe how samples should be collected, including containerization, preservation, and filtration.

The groundwater and surface water sampling procedures specify quality control requirements. A series of supporting procedures cover calibration of meters, cooler preparation, and preparation of chain-of-custody forms.

Haile has documented sampling conditions during groundwater and surface water sampling on field forms. These forms document weather, date/time, sampler's name, field parameters, sample conditions (e.g., odor, color, turbidity), other measurements, and comments on conditions that might affect sample integrity.

Haile has established and conducted monitoring at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. Groundwater and surface water have been sampled quarterly, as required by the DHEC permit and the Groundwater and Surface Water Monitoring Plan. Wildlife is observed daily by Haile TSF operators with detailed bird surveys six times per year.

PRINCIPLE 5 - DECOMMISSIONING

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

Standard of Practice 5.1

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

The operation is

- in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 5.1

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has developed a decommissioning plan for its cyanide facilities. The Plan remains relatively unchanged from the January 2019 plan. Cyanide decommissioning activities in the plan consist of cyanide stock drawdown, tank cleanout/rinsing and flushing, detoxification of residual cyanide, verification sampling and analysis, detoxification of rinse water, and disposal of rinse water in the TSF. Installation of control measures for cyanide in surface or groundwater is not anticipated as part of decommissioning. Haile has developed a decommissioning schedule for the cyanide facilities, Section 4 presents a schedule that includes: pre-closure, detoxification and deconstruction. The Haile decommissioning plan has a requirement for annual review. The last plan review was conducted in May of 2025 without making any changes to the decommissioning procedures.

Standard of Practice 5.2

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

The operation is

- in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 5.2

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has developed a cost estimate in the 2019 decommissioning plan for its cyanide facilities. The line items in the cost estimate have not changed. The cost estimate includes an estimated costs for pre-closure, detoxification, and deconstruction activities. The costs were estimated using the Standardized Reclamation Cost Estimator using third-party labor rates from the University of South Carolina and third-party equipment rates from a local heavy equipment vendor. Haile reviewed the ARO costs in May of 2025 for decommissioning. Haile has established bonding with DHEC for full mine closure that more than covers the subset of costs for decommissioning the cyanide facilities. The estimated bonding amount for full mine closure in 2025 was approximately 45 times greater than the cyanide decommissioning costs.

Haile has established and maintained eight bonds with DHEC for financial guarantee for full mine closure.

PRINCIPLE 6 – WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

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

The operation is **in full compliance with** **Standard of Practice 6.1**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has developed a set of standard operating procedures that describe how cyanide-related tasks are to be conducted to minimize worker exposure. Haile has developed procedures for cyanide mixing, confined spaces, and maintenance. The procedure for maintenance of cyanide systems includes; flushing cyanide-related equipment with fresh water for a minimum of 15 minutes prior to beginning work. The procedure for working on pipes, lines, and equipment also specifies that if any equipment must be removed to the workshop, it must be decontaminated until cyanide levels are below 0.5 mg/l. Haile's standard operating procedures have a section on required PPE, which for cyanide-related tasks typically includes standard PPE. The auditor observed operators using this PPE. Selected procedures, such as mixing and unloading, have a section called "Pre-Start Checks." Haile operators also use two types of booklets (Stop and Think, Hazard Report) for general pre-work inspections.

Haile solicits and incorporates worker input in developing the health and safety aspects of their operating procedures. Worker input is primarily obtained via Job Hazard Assessments (JHAs). Haile has installed suggestion boxes in several locations to solicit worker input.

In addition, worker input is solicited during Daily Process Morning Meetings and Daily Process Administration Meetings.

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

The operation is **in full compliance with** **Standard of Practice 6.2**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has determined the appropriate pH for limiting the evolution of HCN gas during mixing and production activities. The pH targets are: CIL #1 = 10.0 to 10.5, CIL #2 = 9.8 to 10.3, CIL #3 = 9.8 to 10.3, destruct tanks = 8.5 to 9.2, and final tailings = 8.0 to 9.5.

Selected procedures also contain targets for pH or caustic levels as follows: mixing cyanide = >10.5, barren tank prior to carbon stripping = 1.5 percent sodium hydroxide, and acid wash = 1.0 to 2.0 initially and 5.0 or 6.0 at completion.

Haile has continuously monitored pH at three key points in the plant: Mixing Tank, CIL #1 and East Destruct Tank. Time series graphs showed that Haile has maintained the target pHs at those key points throughout the recertification period.

Haile has identified areas and activities where workers may be exposed to HCN gas greater than 10 ppm instantaneous or 4.7 ppm over 8 hours. Cyanide dust is not considered an issue because solid cyanide is not handled openly. Haile has alerted workers to the need for PPE in the areas and activities where cyanide is present by a PPE section in each operating procedure and by signage in the plant. The requirement for use of portable HCN monitors, in the process area, is stated in the procedures.

Haile uses fixed and portable HCN monitors in the cyanide areas to alert workers of exposure to HCN gas. Haile has installed six fixed HCN monitors with audible and visible alarms in the following cyanide circuits: Mixing and Unloading, CIL Area, Strip Area, and Destruct Area. In addition, Haile has portable HCN monitors for use by operators.

Haile has prepared three procedures for use and operation of the portable HCN monitors. These procedures describe when and where the portable units must be used, as well as how to operate them (e.g., turning on, testing, low battery, turning off, alarm settings and actions, and troubleshooting).

The fixed and portable HCN monitors have slightly different alarm levels, but in both cases the actions are the same. The fixed HCN monitors have visible and audible alarms that are set at two levels: low alarm and high alarm. The portable HCN monitors have visible (blinking lights) and audible alarms that are set at two levels: low alarm and high alarm. At the low alarm level, the operator investigates the cause of the alarm while other operators, if present, are to leave the area. At the high alarm level, all operators must leave the area immediately.

Haile maintained, tested, and calibrated its fixed and portable HCN monitors according to the manufacturer's recommendations and the operation's written procedures.

Records for the fixed and portable HCN monitors were retained for the 3-year recertification period.

Haile has installed signs advising workers that cyanide is present, PPE is required, and that smoking, open flames, eating, and drinking are prohibited. Signs have been placed in the following locations: the mixing, CIL, strip, and destruct areas, as well as the isotanker laydown yard. Haile has provided training to inform workers of the presence of cyanide throughout the processing area.

The cyanide supplier includes red dye to the isotankers during loading at their manufacturing plant, thus providing clear identification of any leaks of high-strength solutions at the Haile plant.

Haile has installed low pressure shower and eyewash stations at multiple locations in the cyanide areas. The auditor randomly checked some of them to verify that they functioned, and that the eyewash pressure was low. Haile workers have inspected them daily as part of workplace examinations.

Haile has installed dry powder fire extinguishers at many locations in the cyanide areas. Haile workers have inspected the fire extinguishers monthly and annual maintenance and inspections are completed by a qualified third-party contractor and have been completed.

Haile has identified tanks, columns, and vessels with appropriate cyanide signage. Haile has installed signage on high-strength and process pipelines with "cyanide" and flow direction arrows. Haile has stenciled the tailings and reclaim lines with "cyanide" and flow direction arrows.

Haile has provided the cyanide Safety Data Sheet (SDS) in physical and electronic forms in the cyanide areas. Hard copies have been placed in plastic containers at the mixing and unloading, CIL, and mill maintenance areas. Electronic versions are available via a shared drive. The SDS and other informational materials are in English, the language of the workforce.

Haile has implemented a procedure to investigate incidents and determine whether the operation's programs and procedures require improvements to protect workers. The investigation process is based on ICAM and investigation reports are stored in the INX software. The investigation process consists of statements, timeline, five whys, root cause(s), corrective actions, assignment and deadlines, and closeout.

PRINCIPLE 7 – EMERGENCY RESPONSE

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

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

The operation is in full compliance with **Standard of Practice 7.1**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has developed multiple emergency response plans. Two are specific to cyanide: CN ERP and Cyanide Treatment for Suspected Poisoning (CTSP). A third plan is a general Emergency Preparedness and Response Plan (EPRP). In addition, Haile has developed a Hazardous Materials and Spill Response Plan (Hazmat SRP) with a section specific to sodium cyanide.

Haile’s plans consider the potential cyanide failure scenarios appropriate for its site-specific environmental and operating circumstances. Section 5.1 of the CN ERP lists the scenarios exactly as specified in the Code and refers to Appendix 1 for more detail, as follows: release of high concentration HCN gas during cyanide offloading, storage and initial mixing of process solution (a “catastrophic release”); spill of solid sodium cyanide pellets in a transportation accident, and rupture of an isotanker; spill of liquid sodium cyanide during mixing or unloading from an isotanker; spill of liquid sodium cyanide during fire or explosion; tank, valve or pipe rupture releasing high-concentration liquid sodium cyanide; release of water containing cyanide through overtopping of ponds and impoundments; release of water containing cyanide through partial or full power outages, pump failures, or pipeline blockages; uncontrolled release of water containing cyanide through pond liner, buried pipeline, and/or bund seepage; uncontrolled release of water containing cyanide at cyanide destruct; and uncontrolled release of water containing cyanide at the TSF.

The Duckwood EAP also contains detailed scenarios and responses for dam breach of the TSF.

Each scenario includes sections on the nature of the incident, potential causes, preventative measures, first responder protections, and immediate response actions. The immediate response actions cover general steps such as notifications and cyanide first aid, but also contain specific steps on where how and where to pump released solutions, for example.

Haile has planned responses for transportation-related emergencies specific to their mode of cyanide delivery. The CN ERP contains a transportation scenario specific to road transport of solid sodium cyanide in an isotanker. The Hazmat SRP also contains information specific to isotankers. For offsite transportation incidents, Lancaster County would provide first response with their trained hazmat team, followed by the emergency response team of the cyanide manufacturer.

Haile’s plans describe specific response actions for the anticipated scenarios of the CN ERP. These response actions include; use of cyanide antidote and first aid measures for cyanide exposure, control of releases at their source with procedures for the opening and closing of valves and stopping and starting pumps, and containment, assessment, mitigation and future prevention of releases for various hazardous materials, including cyanide are addressed in the EPRP.

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has involved its workforce and external stakeholders in the cyanide emergency response planning process. The workforce has been involved informally via training, procedure reviews, and mock drills. External emergency responders have been provided a copy of the CN ERP. Additionally, Haile participated in a SC Statewide Emergency Drill.

Haile has made the public aware of the nature of cyanide-related risks. However, the nearest community, Kershaw, is approximately 5 miles from the mine and therefore is unlikely to be directly affected by any cyanide-related emergency. Haile has communicated with the surrounding area via its external affairs program and community center, the Depot. Haile has also made community officials aware of the potential risks by sending them the CN ERP. Haile is also required by the federal Emergency Planning and Right-to-Know Act to annually report on the quantities of chemicals at the site via an electronically submitted Tier 2 Form that is then available to the public on the University of Texas at Dallas website. Finally, the established Citizen’s Advisory Committee provides another venue for making the public aware of cyanide-related risks.

Haile has identified external emergency responders and involved them in emergency response planning. The CN ERP identifies the following entities that may assist in cyanide emergencies: MUSC Hospital, Lancaster County EMS, Lancaster Fire Department, Kershaw Fire Department, and Flat Creek Volunteer Fire Department. The role of the hospital is to treat exposed workers. The role of the other entities is, if invited by Haile in a particular incident, to help onsite and/or transport injured/exposed workers to the hospital.

Haile has engaged in ongoing communication with workers and stakeholders to keep the emergency plans current. This ongoing communication is primarily via submittal of the CN ERP to external emergency responders.

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

The operation is **in full compliance with** **Standard of Practice 7.3**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile’s plans describe; EPRP designates a MERT Coordinator and Captains with the authority to commit resources during an emergency; Haile maintains a current MERT Roster; the CN ERP requires MERT training which includes medical, self-contained breathing apparatus (SCBA), confined space, ropes, hazmat, vehicle rescue, firefighting, and search and rescue. Hazmat training covers cyanide-related topics.

MERT members, like all Haile staff involved in cyanide-related activities, must also take an annual cyanide refresher; call out procedures are covered in two procedures (Call Out and Elevation; Weekend/Nights and Holiday Duty); the EPRP defines the roles and responsibilities of the coordinators and team members; the CN ERP lists emergency response equipment and first aid supplies and describes how to inspect and maintain PPE; the EPRP describes the roles of external responders and medical facilities in the emergency response procedures.

Haile has confirmed that external emergency responders are aware of their roles. The CN ERP identifies the following entities that may assist in cyanide emergencies: MUSC Hospital, Lancaster County EMS, Lancaster Fire Department, Kershaw Fire Department, and Flat Creek Volunteer Fire Department. The role of the hospital is to treat exposed workers. The role of the other entities is, if invited by Haile in a particular incident, to help onsite and/or transport injured/exposed workers to the hospital. The Flat Creek Volunteer Fire Department would be least likely to be involved because of their mobilization time and limited equipment. Haile sent the CN ERP to these entities and the entities have acknowledged receipt, thus confirming they are aware of their roles.

Haile participated in the SC Statewide Emergency Drill, thus providing opportunities for local responders input into emergency planning. This drill evaluated how the MERT and external responders worked together.

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

The operation is **in full compliance with** **Standard of Practice 7.4**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile’s plans include procedures and contact information for notifying management, regulatory agencies, external response providers, and medical facilities of a cyanide emergency. The EPRP describes the notification process, which is captured in a flowchart. Contact information for external emergency responders and medical facilities is included as a table in the EPRP. The EPRP also includes internal contact information. The emergency management plan for solid and hazardous waste includes contact information for regulatory agencies. A separate procedure for Call Out and Elevation of incidents contains additional procedural details for internal notification by incident level.

Haile’s plans include procedures and contact information for notifying potentially affected communities and for communication with the media. However, the nearest community, Kershaw, is approximately 5 miles from the mine and therefore is unlikely to be directly affected by any cyanide-related emergency. Lancaster County would use the Everbridge Notification System (Reverse 911) to dial land lines and cell phones inside an area defined at the time of an emergency. The EPRP, designates the Executive General Manager for the mine acts as the spokesperson during an emergency.

Haile has established a provision in the EPRP for notifying the ICMI of any significant cyanide incidents and includes the phone number for the ICMI incident reporting. There were no cyanide incidents this audit cycle that would fall under the ICMI reporting guidance.

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

The operation is **in full compliance with** **Standard of Practice 7.5**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile's plans describe specific remediation measures for the anticipated scenarios: recovery of solutions and solids is described in the CN ERP. Neutralization of solutions and solids is described in the procedure for use of ferrous sulfate. The Solid and Hazardous Waste Management Plan requires that recovered cyanide wastes be segregated from water or acidic wastes.

Decontamination procedures for equipment, soil, and media are described in the CN ERP. The procedure for use of ferrous sulfate provides clean up and neutralization procedures for the treatment of materials, soil and other media affected by cyanide spills, including where the ferrous sulfate is stored, equations for mixing the ferrous sulfate, and methods to apply the ferrous sulfate. The CN ERP states that remediation endpoints would be determined in conjunction with jurisdictional regulatory agencies.

Spill cleanup debris and materials are to be disposed of in the TSF.

Haile has determined that there is a very low potential for impacts to drinking water supplies of nearby communities. The nearest downstream drinking water source is, approximately 40 miles downstream of Haile. In the event of a release of liquids containing cyanide, Haile would coordinate monitoring of surface water with jurisdictional agencies.

Haile's plans have prohibited the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water or has the potential to reach surface water. The procedure for use of ferrous sulfate also states that this chemical shall not be used to neutralize cyanide spills that have entered standing surface water.

Haile's plans have addressed the potential need for environmental monitoring to identify the extent and effects of a cyanide release. The CN ERP, several regulatory agencies have joint responsibility to oversee the specific plans and procedures for cyanide remediation and detoxification. They would jointly approve remediation measures and determine of the final concentration that will be allowed in residual soil.

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

The operation is **in full compliance with** **Standard of Practice 7.6**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile reviews its three main cyanide-related emergency response plans regularly. Each plan was reviewed at least once this audit cycle. In addition, the revision history for the Call Out and Elevation procedure included updates for personnel changes this audit cycle.

The Call Out and Elevation procedure contains contact information for managers and superintendents, as well as a link to the weekend on-call schedule. This procedure was issued in December 2017;

revised in March and July 2018, June 2020, and February 2021; and most recently approved by management in February 2024. The revision history table indicates that the four of the Six revisions were to update contact information and the on-call pathway.

Haile has established a provision to periodically conduct mock drills. Section 4.7 of the CN ERP states that mock drills are to be conducted periodically to test response procedures for various cyanide exposure scenarios, and that documentation of mock drills is to be maintained in the INX software.

Haile has conducted mock drills annually during the recertification period, except for 2023. Haile was unable to confirm or produce mock drill information for 2023, this was reported to be due to a change in personnel. Haile conducted two mock drills in 2024 that included table top and field components. Haile completed a non-cyanide mock drill in early 2025, with a cyanide mock drill planned for late 2025, which was not complete at the time of this recertification audit.

Based on the auditors review of the previous recertification audit, the 2024 and 2025 mock drills and interviews with site personnel, it is the auditors opinion that the three mock drills and pending 2025 cyanide drill are sufficient to verify full compliance.

Haile has established a provision to review its emergency response procedures. THE CN ERP includes a provision for Audit and Review. The CN ERP states that:

"This procedure shall be reviewed every 2 years as a minimum and/or in any of the following circumstances:

- Following any event or investigation that impacts this procedure
- Any amendments to the site risk register
- Any amendments to legislation."

The Haile Health and Safety Superintendent stated that the two cyanide-related incidents at Haile this audit cycle did not trigger the provision to review its emergency response procedures because no exposure occurred in either incident. The mock drills conducted over this audit cycle did not trigger an update to the CN ERP.

There were no amendments to the site risk register and no amendments to legislation that would have triggered an update to the CN ERP.

PRINCIPLE 8 – TRAINING

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

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has trained personnel who may encounter cyanide in cyanide hazard recognition. All staff receive cyanide awareness training as part of the annual regulatory training. The training includes cyanide information related to: causes, symptoms, exposure routes, first aid for inhalation, skin contact, eye contact, and ingestion, (oxygen), response equipment, and first aid supplies.

New operators at the plant receive specific cyanide awareness safety training as part of their induction, while experienced operators receive this training annually. This training program covers: purpose of training, uses of cyanide, physical and chemical form, exposure routes, symptoms, first aid, antidotes, HCN detectors, HCN alarms and associated actions, locations of cyanide facilities, PPE, SDS, and requirements for maintenance (e.g., draining, flushing, purging).

Haile has refresher cyanide awareness training annually. All staff and operators receive cyanide awareness training annually. Contractors receive refresher training annually.

Haile has retained cyanide awareness training records throughout the recertification period. Haile has a document retention procedure that specifies records for cyanide safety awareness training will be stored electronically in the INX software and physically. It further requires that these records be kept for 3 years.

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has trained workers to perform their normal production tasks, including unloading, mixing, production, and maintenance. Task training consists of procedure review and on-the-job training. The task training addresses controlling risks to worker health and safety, as well as preventing unplanned releases.

Haile has identified the training elements for each cyanide-related job in their operating procedures. Haile task trains the operators to these procedures.

Haile has used qualified personnel to provide task training for cyanide management activities. Department and area supervisors with knowledge and/or experience with the task provide the training.

Haile has trained employees prior to working with cyanide. Area supervisors provide training and sign off on new employees before they are allowed to work independently.

Haile has provided refresher training on cyanide management. Refresher training on operating procedures have been provided when procedures change or when task observations indicate an issue. In addition, supervisory task observations take place regularly.

Haile has evaluated the effectiveness of task training by observations. Some of these observations are informal by the area leads and some are documented by supervisors on the Operator Training and General Checklists. Task observations take place regularly under the corporate Gold Standard Program.

Haile has retained task training records throughout an individual's employment. The training forms included the names of the operator and the trainer, the start and end dates of training, specific dates for training on each topic, and the instructor's initials on each topic.

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

The operation is **in full compliance with** **Standard of Practice 8.3**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has trained cyanide unloading, mixing, production and maintenance personnel in the procedures to be followed if cyanide is released, including decontamination and first aid procedures. Haile has assigned operators the role of initiating a "Mayday" emergency and observing the victims. However, if the victim is conscious and mobile, operators may help him/her with decontamination at a shower/eyewash station and/or give oxygen. Only the nurse is allowed to administer the Cyanokit. Operators have been allowed to administer oxygen, in addition to the nurse, security staff, and MERT. Training records and interviews with operators supported good knowledge of response procedures.

Haile has trained the MERT in the procedures included in the CN ERP, including the use of necessary response equipment. The CN ERP requires annual MERT training. The 2025 MERT training schedule includes medical, SCBA, confined space, ropes, general hazmat, plant hazmat response, vehicle rescue, firefighting, and search and rescue. Plant hazmat response training covers cyanide-related topics.

Haile has made external responders familiar with the CN ERP. The CN ERP identifies the following entities that may assist in cyanide emergencies: MUSC Lancaster Hospital, Lancaster County EMS, Lancaster Fire Department, Kershaw Fire Department, and Flat Creek Volunteer Fire Department. The role of the hospital is to treat exposed workers. The role of the other entities is, if invited by Haile in a particular incident, to help onsite and/or transport injured/exposed workers to the hospital.

Haile has refresher response training annually as part of their cyanide awareness training. All staff receive the cyanide awareness training annually during their MSHA refreshers and operators receive the more detailed plant-specific cyanide awareness training annually.

Contractors receive the MSHA refresher or the plant-specific training. Records and interviews supported full compliance.

Haile has retained response training records throughout the recertification period. For operators and contractors, the response training is embedded in the cyanide awareness training. For the MERT, plant hazmat training contains response elements, including those in the CN ERP.

As Haile's designated responders, the MERT training records also includes the names of the team member and the trainer, the date of training, the topics covered, and an assessment of the learning.

PRINCIPLE 9 – DIALOGUE & 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 full compliance with** **Standard of Practice 9.1**
 in substantial compliance with
 not in compliance with

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has promoted dialog and provided stakeholders with information on their cyanide management. Haile has a written procedure for resolving stakeholder complaints. Haile has promoted dialog by providing their contact information in various venues, such as the Haile Gold Mine website and advertisements in the local newspaper, the Kershaw News-Era. Haile has two Community Relations Coordinators that have actively engaged with stakeholders. One of them is a rover that connects with stakeholders in the local communities. The second staffs the Haile Community Center (aka the Depot) in Kershaw, which is open to the public. The business card for the Manager of External Affairs and Social Performance are available at the Depot. Evidence of external engagement from the recertification period included newspaper advertisements, log entries, and a community newsletter that started in 2022. Haile has also engaged with internal stakeholders via weekly Flash Reports that contain information on environmental and social issues.

Haile has occasionally given tours during the recertification period. Additionally, one of the Community Relations Coordinators is a regular participant with the Lancaster County Chamber of Commerce, which has led to the establishment of a Citizens Advisory Committee to provide a formal venue for dialog with community stakeholders.

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

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

Summarize the Basis for this Finding or Deficiencies Identified:

Haile has made written descriptions of cyanide management available to the public via the 2014 Final EIS and the 2022 Final SEIS. Ore Processing Methods and Facilities of the SEIS describes overall processing methods including sodium cyanide use in recovery, specifically how cyanide is used in gold recovery. In addition, the Haile website includes Frequently Asked Questions and Haile maintains a Facebook page where information on the Haile site is provided.

Most of the local population is literate, as evidenced by a high school graduation rate of 82.1 percent, thus decreasing the need for oral dissemination of information on cyanide.

Nonetheless, Haile has given information orally in meetings and tours.

Haile has procedures to make information publicly available in the event of confirmed cyanide releases or exposures.

According to the EPRP, the Haile Executive General Manager has responsibility for stakeholder management and incident briefing, while the External Affairs and Social Performance Manager is liaison for communications with external responders (police, ambulance, fire departments). The Health and Safety Manager and the Environmental Managers have designated liaison roles with government agencies. In case of a major incident, the Crisis Management Plan indicates the corporate External Affairs Coordinator would be the spokesperson on behalf of OceanaGold corporation.

Haile has not had any confirmed cyanide incidents: a) Cyanide exposures resulting in hospitalization, b) cyanide releases off the mine site requiring response or remediation, c) cyanide releases off the mine site resulting in significant adverse effects to health or the environment, d) cyanide releases on or off the mine site requiring reporting under applicable regulations, and e) releases cause application limits for cyanide to be exceeded, this recertification period. However, if such an incident occurred, Haile must legally report safety incidents to MSHA and spills with a cyanide amount greater than the federal Reporting Quantity to DHEC and the United States Environmental Protection Agency via the National Reporting Center. Information would then be available to the public via these agencies.