REPORT

ICMC Recertification Audit - Summary Report

Ahafo South Gold Mine, Ghana

Submitted to:

International Cyanide Management Institute (ICMI)
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Distribution List

Newmont Ahafo - 1 PDF

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Table of Contents

1.0 SUMMARY AUDIT REPORT FOR GOLD AND SILVER MINING OPERATIONS 1

2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION 2

2.1 Mine Location and Background 2

2.2 Cyanide Facilities 4

3.0 SUMMARY AUDIT REPORT 5

Auditors Findings 5

Name of Other Auditors 5

Dates of Audit 5

PRINCIPLE 1 – PRODUCTION 6

PRINCIPLE 2 – TRANSPORTATION 7

PRINCIPLE 3 – HANDLING AND STORAGE 8

PRINCIPLE 4 – OPERATIONS 10

PRINCIPLE 5 – DECOMMISSIONING 20

PRINCIPLE 6 – WORKER SAFETY 22

PRINCIPLE 7 – EMERGENCY RESPONSE 26

PRINCIPLE 8 – TRAINING 32

PRINCIPLE 9 – DIALOGUE 35

FIGURES

Figure 1: General Location 3

Figure 2: Simplified Process Plant Flowchart 3

1.0 SUMMARY AUDIT REPORT FOR GOLD AND SILVER MINING OPERATIONS

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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

2.1 Mine Location and Background

Ahafo South Gold Mine (referred to as Ahafo South) is located in the Ahafo region, approximately 307 km northwest from the national capital city of Accra (Figure 1). Ahafo South is primarily a surface mine with one underground portal. Commercial production at Ahafo began in 2006.

Run-of-mine (ROM) ore from Ahafo South mine workings is transported to the processing facility, which comprises two parallel comminution circuits. Each circuit is equipped with a primary gyratory crusher, a crushed ore stockpile, a Semi-Autogenous Grinding (SAG) mill, and a cyclone cluster. Additionally, Line 1 is equipped with a Ball Mill, and each circuit is supported by a pebble crushing unit. Slurry from the comminution circuit is transported to the Leaching and Carbon in Leach (CIL) circuit where gold is extracted through cyanidation. Dissolved gold is adsorbed onto activated carbon, which is recovered for downstream elution, electrowinning, and smelting to produce doré bars. Tailings material is conveyed by pipeline to a counter-current decantation (CCD) recovery plant where tailings are rinsed with recycled decant return water from the tailings storage facility (TSF) to reduce Weak Acid Dissociable (WAD) cyanide concentrations to less than 50 milligrams per liter (mg/L). The tailings are pumped from the CCD circuit via two dedicated pipelines, contained within a lined tailings trench, to the engineered TSF for final disposal. Tailings water is recovered from the TSF supernatant water pond and recycled back to the process plant for re-use in the CCD circuit. Overflow water from the CCD and Leach Thickener is re-used in the milling circuit. A simplified process plant flowchart is presented in Figure 2.

Ahafo South currently purchases sodium cyanide from Samsung C&T Deutschland (Samsung C&T), which is manufactured by TongSuh Petrochemical Corporation (TongSuh) in Korea. Due to the need for additional supply, Samsung C&T has also temporarily provided Ahafo South with sodium cyanide from the Asahi Kasei production facility in Japan. The cyanide, in solid briquette form, is packaged in one-ton flexible intermediate bulk containers (FIBC) comprising poly-woven bags inside plywood boxes. The FIBCs are transported by sea in shipping containers to the port of Tema in Ghana from where the cyanide contained in the FIBC is removed and transferred to isotainers at the Vehrad Transportation and Haulage Limited (Vehrad) repackaging facility in Tema. The isotainers are transported by road to Ahafo South by Vehrad. The cyanide is delivered to the Ahafo South process plant in dry briquette form, in truck-mounted isotainers, for solid to liquid sparging.

During sparging, pH adjusted water from the cyanide sparge tank is continuously passed through the isotainer in a closed circuit until the cyanide has been dissolved and the required concentration of liquid cyanide is achieved. On completion of the sparging process, the liquid cyanide is transferred from the cyanide sparge tank to a cyanide storage tank ready for delivery by pipeline to the CIL and elution circuits.

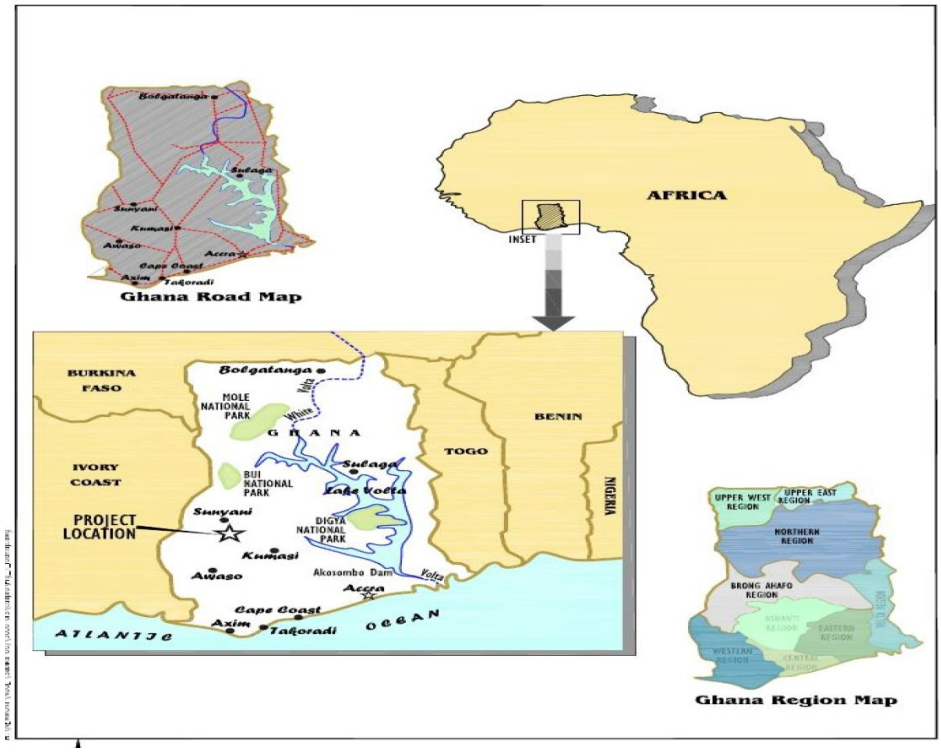

Figure 1: General Location

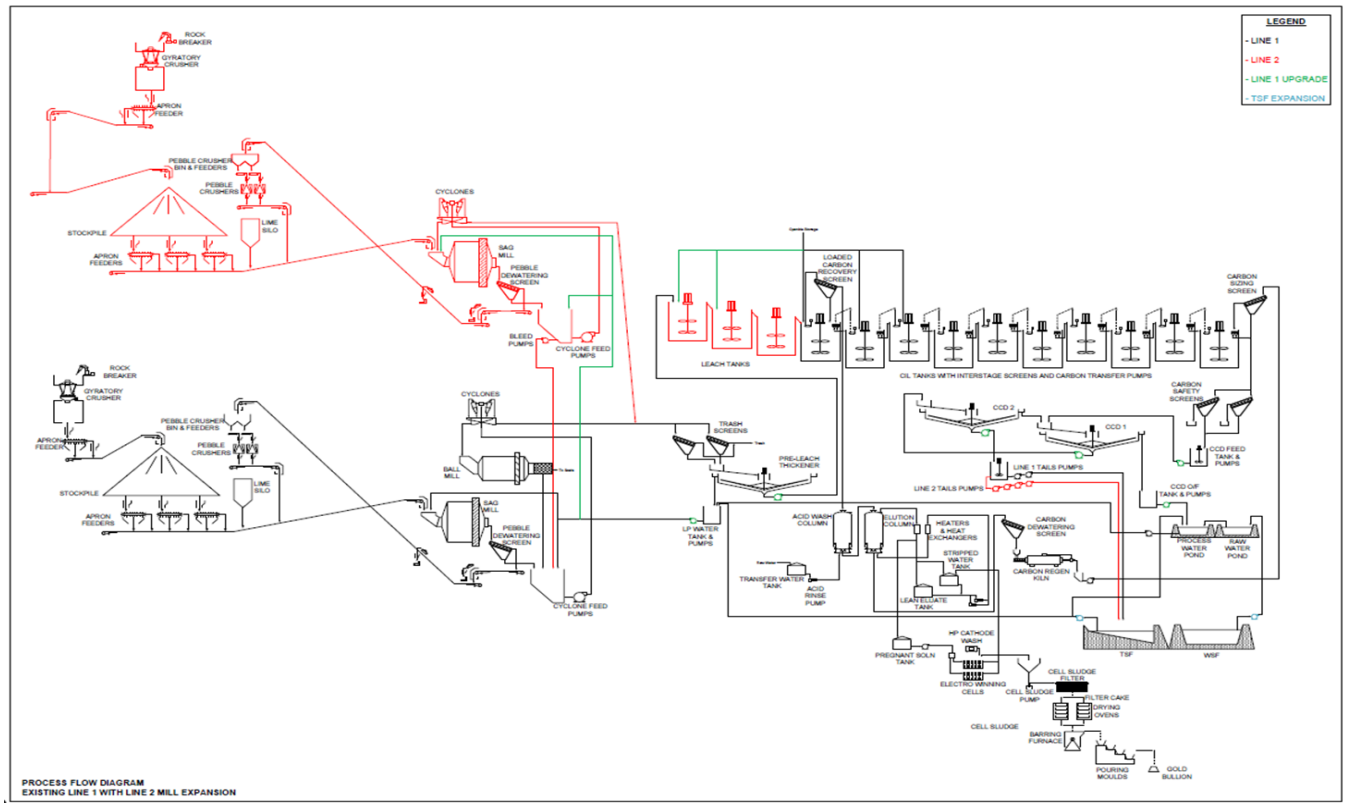

Figure 2: Simplified Process Plant Flowchart

2.2 Cyanide Facilities

The cyanide facilities (as per the Code's definition as any facility containing solution with a WAD cyanide concentration of 0.5 mg/L or greater) consist of the following:

- Cyanide offloading/storage area
- Process areas
  - Grinding circuit
  - CIL circuit
  - Stripping/Elution circuit
  - CCD recovery plant
- TSF
- Associated Ponds
  - Process water pond
  - Event pond
  - Raw water pond
- Associated pumps, piping, secondary containment and leak detection, collection, and recovery systems.

The only process change associated with the cyanide facilities that has occurred over the recertification period is the pumping of TSF reclaimed water to the raw water pond since March 2024. Physical changes to the cyanide facilities during the recertification period include the raise of the Cell 1 TSF embankments to the 150 million tons (Mt) design (which was completed in 2023) and the ongoing raise to the 170 Mt design that started in July 2024.

Laboratories and refineries are two uses of cyanide at gold mines not required to be evaluated under the Code, and therefore they have been excluded from this audit.

Ahafo South was last recertified with the Code on February 24, 2022. This recertification cycle covers the period from February 2022 to the present.

Ahafo South had a "significant cyanide incident", subject to the notification requirements of the ICMI (as per Section VI.A of the Code's Signatory and Certification Process document) in January 2022. This event occurred a month prior to the announcement of the 2022 recertification by ICMI and was not included in the 2022 audit reports and therefore it is being discussed in this report for completeness. This cyanide incident involved a bird mortality of twenty ducks in the process water pond as described in more detail in Standards of Practice 4.4 and 7.4 and was reported to the ICMI. No other "significant cyanide incident" has occurred at Ahafo South during the recertification period. Ahafo South has also had five minor or insignificant cyanide releases (classified based on Newmont Incidents Classification Criteria), not considered significant as per the Code's definition, that were reported to the regulators and are discussed in Standards of Practice 6.2 and 9.2.

3.0 SUMMARY AUDIT REPORT

Auditors Findings

	☒ **in full compliance with**	
Ahafo South is:	☐ in substantial compliance with	**The International Cyanide Management Code**
	☐ not in compliance with	

The operation has not experienced compliance problems during the three-year audit cycle.

Audit Company: WSP USA Inc.

Audit Team Leader: Ivon Aguinaga, Lead Auditor and Mining Technical Specialist

Email: ivon.aguinaga@wsp.com

Name of Other Auditors

Name, Position	Signature
Benjamin Asiedu - WSP Ghana Limited, Trainee Auditor	

Dates of Audit

The recertification audit was undertaken over four days, from February 3 to 6, 2025.

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

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

Ahafo South Gold Mine
Name of Facility

Signature of Lead Auditor

July 28, 2025
Date

PRINCIPLE 1 – PRODUCTION

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.**

☒ **in full compliance with**

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

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with 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.

Over this audit cycle, Ahafo South has purchased sodium cyanide from Samsung C&T, that is the cyanide supplier. The purchased cyanide was manufactured by Tongsuh at their production facilities in South Korea. Due to the need for additional supply, Samsung C&T also temporarily provided Ahafo South with sodium cyanide from the Asahi Kasei production facility in Japan; however, Samsung C&T's primary producer was, and remains, Tongsuh. Tongsuh is a subsidiary of Asahi Kasei.

The cyanide, in solid briquette form packaged FIBC, is transferred to isotainers prior to delivery to the site at the Vehrad repackaging facilities (Plant #1 and #2) in Tema, Ghana.

The Tongsuh production facility was most recently recertified with the Code on April 19, 2023, with prior certification on March 9, 2020. The Asahi Kasei production facility was most recently recertified with the Code on December 15, 2021, with prior certification on October 26, 2018. The Vehrad repackaging plants #1 and #2 were most recently recertified with the Code on September 5, 2024. In addition, the Samsung C&T Africa Supply Chain was most recently on August 9, 2024. Therefore, Ahafo South has only purchased sodium cyanide manufactured at facilities certified with the Code.

The auditors verified compliance through the review of the Samsung C&T, Asahi Kasei, Tongsuh and Vehrad summary audit reports posted on the ICMI website as well as Newmont's agreement with Samsung C&T.

During the preparation of this report, and as of March 25, 2025, Asahi Kasei has voluntarily withdrawn from the Code. Following this event, Samsung C&T informed Ahafo South that Asahi Kasei no longer produces sodium cyanide and is therefore no longer compliant with the Code. Consequently, Samsung C&T will exclusively supply Ahafo South with cyanide produced by TongSuh going forward. This was confirmed by the review of the ICMI's notification on Asahi Kasei's withdrawal, and two emails from Samsung C&T dated March 28, 2025, and April 25, 2025.

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 **Standard of Practice 2.1**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with 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.

Ahafo South has chain of custody records identifying all the elements of the supply chain responsible for transporting cyanide from the producers to the site.

Chain of custody records identify the supply chains as follows:

- Samsung C&T purchased cyanide from Tongsuh in South Korea (and temporarily from Asahi Kasei in Japan). The Samsung C&T Africa Supply Chain includes the transport of the cyanide manufactured by Tongsuh using certified carriers, Bukwang Logistics and Hae Dong Logistics, to the Pusan New Port in South Korea, followed by ocean transport by shipping companies, MSC, Maersk Hapag Lloyd, and CMA-CGM, to the port of Tema, in Ghana.
- At the Port of Tema, the cyanide is accepted by Vehrad, taken to its repacking facilities, and then transferred to isotainers. The isotainers travel to the mine via road by Vehrad.

All identified transporters are individually certified in compliance under the Code or included in a certified supply chain. Samsung C&T Africa Supply Chain was most recently recertified on 9 August 2024. Vehrad, including the repackaging plants, were most recently recertified with the Code on September 5, 2024.

As discussed under Standard of Practice 1.1, due to the need for additional supply, Samsung C&T temporarily provided Ahafo South with sodium cyanide from the Asahi Kasei production facility in Japan. Samsung C&T indicated in an email to Ahafo South that, given the temporary nature of this supply, and considering that Tongsuh is a subsidiary of Asahi Kasei and its primary cyanide producer, the details of Asahi Kasei's supply chain were not incorporated into Samsung C&T's Africa Supply Chain certification. Based on Samsung C&T's statement and the fact that Asahi Kasei no longer produces cyanide, the auditors consider Ahafo South to be in full compliance with Standard of Practice 2.1.

The auditors verified compliance through the review of the chain of custody records describing the supply chains as well as the Samsung C&T, Asahi Kasei, Tongsuh and Vehrad summary audit reports posted on the ICMI website. The auditors also reviewed two emails from Samsung C&T, dated March 28, 2025, and April 25, 2025.

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.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 3.1**

☐ not in compliance with

Summarize the basis for this finding:

The operation 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.

As indicated in the 2022 recertification audit report, the facilities for cyanide offloading and storing cyanide have been designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules and/or other sound and accepted engineering practices for these facilities. The cyanide reagent facility consists of a sparge offloading area, a cyanide sparge tank and a cyanide storage tank. No physical changes have occurred to these facilities over this audit cycle. The design of these facilities was evaluated and found fully compliant during the previous audits and most recently during the 2022 recertification audit; and remain compliant this audit cycle. Findings from the previous audits are not repeated for brevity. The auditors observed the cyanide offloading and storage facilities to be in good condition at the time of the site visit.

Liquid cyanide is offloaded during the sparging process on a concrete surface that can minimise seepage to the subsurface. The cyanide sparge and storage tanks are also located on a concrete surface that can prevent seepage to the subsurface. The cyanide offloading area is constructed to contain, recover and allow remediation of any leakage from the isotainer. The area is constructed on concrete pads with containment bunding to prevent any discharges to the subsurface. The entire area slopes towards the secondary containment of the cyanide sparge and storage tanks which will contain leakage from the isotainer. The cyanide sparge tank and storage tank are positioned on concrete ring beams with a high-density polyethylene (HDPE) liner between the tank bottom and the top of the ring beam. The concrete secondary containment floor continues beneath the base of both ring beams and can prevent seepage to the subsurface. No physical changes have occurred to the cyanide offloading and storage facilities over this audit cycle. The auditors observed the cyanide offloading concrete pads and the secondary containment of the cyanide tanks to be in good condition.

There is a method to prevent the overfilling of the cyanide sparge and storage tanks. The cyanide sparge and storage tanks are equipped with ultrasonic level detection with high-level alarms which are interlocked with their associated transfer pumps. Tank level sensors and alarms are checked and maintained every month as part of the site maintenance program. Ahafo South has also defined the maximum level that the cyanide sparge tank should have to accept a cyanide offload. Tank levels are also checked before and after a cyanide offload and documented on the cyanide offloading checklist.

The cyanide offloading and storage facilities are located away from people and surface waters in a locked and fenced area adjacent to the high security process plant area. There is no public access near the process plant area and only cyanide trained and authorized personnel can enter the cyanide offloading and storing area.

Cyanide is stored with adequate ventilation to prevent the build-up of hydrogen cyanide (HCN) gas. Solid cyanide is delivered to site using truck-mounted isotainers, which are sparged. Solid cyanide is not stored on site. The delivery of the solid cyanide in isotainers minimize any potential contact of the sodium cyanide briquettes with precipitation. Liquid cyanide is stored within the cyanide sparge and storage tanks. These tanks are fitted with ventilation pipes at the top to prevent the build-up of HCN gas. Also, the cyanide offloading and storing facilities are located outside.

The cyanide sparge and storage tanks are separate from incompatible materials such as acids, oxidizers, and explosives, as well as separate from foods, animal feeds, and tobacco products.

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

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 3.2**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 3.2; operate unloading storage and mixing facilities using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

Ahafo South has implemented procedures to manage empty isotainers, prevent or contain releases, and control and respond to worker exposures during cyanide offloading.

Ahafo South receives solid cyanide in isotainers (which is dissolved via an enclosed sparging process). Isotainers are not unloaded from the truck during sparging. Once sparging is complete, the isotainers are returned to the cyanide manufacturer immediately. Therefore, no empty cyanide isotainers require disposal. Following the sparging process, the isotainer is also subject to a rinsing sequence. The rinse water is sent to the sparge tank. The isotainer, coupling joints and hoses are also rinsed following the sparging process.

Procedures have been developed and implemented that detail the operation of all valves and couplings for cyanide offloading. Ahafo South also conducts the inspection and maintenance of the hoses, valves and couplings used for cyanide offloading.

If leaks or spilled solution are observed during the cyanide offloading, the procedure entails rinsing with water, which is drained into the secondary containment of the cyanide sparge and storage tanks for its return to the process circuit.

Procedures are in place, which state the required personal protective equipment (PPE) and that a second individual is required during cyanide offloading. In addition, procedures require that the site emergency response team (ERT) with an emergency response vehicle are present during the sparging process.

Colorant is added to the isotainers by Vehrad at the transfer facility in Tema prior to arriving on site.

The auditors verified compliance through observation of an offload event; review of the Cyanide Sparge procedure and examples of completed cyanide offloading checklists; and interview with process personnel and cyanide reagent operators. The auditors also reviewed an email from the Samsung C&T confirming the addition of the colorant dye.

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 preventative maintenance procedures.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 4.1**

☐ not in compliance with

Summarize the basis for this finding:

The operation 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 preventative maintenance procedures.

Ahafo South has developed and implemented written management and operating plans and procedures for all their cyanide facilities. The cyanide facilities (i.e., facilities with concentrations of WAD cyanide greater than or equal to 0.5 mg/L) evaluated during this audit cycle include the following.

- Cyanide offloading/storage area
- Process areas
  - Grinding circuit
  - CIL circuit
  - Stripping/Elution circuit
  - CCD recovery plant
- TSF
- Associated Ponds
  - Process water pond
  - Event pond
  - Raw water pond
- Associated pumps, piping, secondary containment and leak detection, collection, and recovery systems

WAD cyanide concentrations in the raw water pond have been maintained below 0.45 mg/L as required per operating procedures and based on analytical data, but it is listed as a cyanide facility because there is the possibility that this pond may have concentrations of WAD cyanide greater than 0.5 mg/L if an upset condition occurs.

Operating procedures cover procedures for the safe operation of the entire cyanide management at Ahafo South. The procedures include process descriptions, operating tasks, inspections, maintenance and contingency procedures. Each procedure also details task-specific measures and PPE requirements. The

procedures have been reviewed during this audit cycle but were only updated when changes to the cyanide facilities or the operational process have occurred.

Ahafo South has plans and procedures that identify the assumptions and parameters on which the facility design was based as well as applicable regulatory requirements to prevent or control cyanide releases and exposures consistent with applicable requirements. Critical design parameters described in the procedures and plans include the required freeboard for the TSF and ponds, the concentration of WAD cyanide discharge at the spigot that should be maintained, the design storm events for plant ponds and impoundments, and the pH in the sparge tank and the pre-leach thickener (prior to the cyanide addition). The design criteria are reviewed, and the associated documents are updated as and when required by changes to facilities, processes, and/or as part of incident reviews. The auditors reviewed the operating plans and procedures to verify compliance.

Ahafo South has procedures to identify when changes in a site's processes or operating practices may increase the potential for the release of cyanide and to incorporate the necessary release prevention measures. These procedures ensure that changes are identified, reviewed by appropriate stakeholders and managed effectively prior to being implemented. Ahafo South has only one process change associated with the cyanide facilities over this recertification cycle. This change was related to the pumping of the TSF reclaimed water to the raw water pond which also receives pit dewatering water. The evaluation of this change identified controls to maintain the WAD cyanide below 0.45 mg/L in the pond, actions for daily monitoring of the WAD CN concentrations, inspection of the pond and its liner, and the development of mitigation actions if the WAD cyanide concentrations are greater than 0.45 mg/L. This change was evaluated with the participation of the process, environmental, permitting and corporate sustainability team as stakeholders. The auditors reviewed the completed evaluation for this change to verify compliance (Note: The raise of the Cell 1 TSF to the 150 Mt and 170 Mt designs, that is a physical change of the cyanide facilities, was evaluated and approved under Newmont processes for major engineering projects per interview with process personnel, and not under the management of change procedures).

Ahafo South has cyanide management contingency procedures for situations where there is an upset in a facility's water balance, when inspections and monitoring identify a deviation from design or standard operating procedures, and/or when a temporary closure or cessation of the operation may be necessary. The Event Pond procedure includes actions for an upset of the operational water balance. Operational procedures and plans also include procedures to respond to problems identified by monitoring and inspection. For example, the TSF Operations, Maintenance and Surveillance Manual includes procedures for inspections after extreme events including a severe 24-hour rainfall event, an earthquake, and sabotage by community members. In addition, contingency actions to respond to potential emergencies due to damage to the TSF embankments, significant erosion of the embankments, significant increase in seepage through an embankment, cracking settlements, movement of the embankments are considered in the Emergency Preparedness Plan for Tailings and Water Storage Facilities document. The Emergency Environmental procedure describes actions in the case of an emergency environmental monitoring during and after a spill event. The Process Plant Shutdown Protocol makes provision for unplanned process plant outage and temporary cession of operations including inspection and maintenance of all plant areas. In addition, the site-wide Reclamation and Closure Plan describes additional procedures and contingency arrangements necessary in the event of a temporary closure of the operations.

Ahafo South inspected the cyanide facilities on an established frequency sufficient to assure and document that they are functioning within design parameters. The inspection frequencies are daily, weekly, monthly or annually depending on the facility. The inspections cover all cyanide facilities and activities including cyanide offloading and storage area, the process plant, process ponds, TSF area and surface water diversions. Ahafo South conducts inspections of process tanks, pipelines, pumps, valves and secondary containments for physical integrity, corrosion, the presence of leaks, available capacity for the secondary containments, and others. Ahafo

South also inspects the process ponds and TSF for water levels and wildlife presence and mortality. The Leak Detection and Collection Recovery System (LDCRS) of the ponds and the TSF are also inspected and monitored.

Ahafo South has implemented a maintenance program to ensure that equipment and devices function as necessary for safe cyanide management. The operation utilizes SAP to manage all maintenance tasks included those identified during inspections. The preventive maintenance program includes the following elements: 1) fixed and portable HCN monitors (calibrated monthly), 2) pH meters (calibrated weekly); 3) pond and tank level sensors (checked and calibrated monthly); 4) pumps (cyanide tank pumps checked every 2 weeks, other process pumps checked monthly or quarterly), 5) Thermographic and ultrasonic thickness testing on cyanide and process tanks (performed annually internally and every two years externally), and 6) backup generators (checked daily and weekly). The auditors reviewed examples of completed maintenance records for the recertification period to verify that the preventive and corrective maintenance programs were implemented.

Ahafo South has the necessary emergency power resources to operate critical items (such as the event pond, sump pumps and tailings line pumps) in order to maintain the water balance at their process facilities and prevent unintentional releases and exposures in the event its primary source of power (that is the Volta River Authority grid) is interrupted. Power resources include 7 diesel powered gensets with a total emergency/backup power capacity of 27,300 kilowatts. The emergency gensets are inspected and tested daily and weekly as part of the plant preventative maintenance program (as previous indicated). The auditors observed the emergency power generators to be in good condition at the time of the site visit. The auditors also reviewed maintenance records.

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

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 4.2**

☐ not in compliance with

Summarize the basis for this finding:

The operation 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.

Ahafo South implements a program to evaluate cyanide use in the process circuits and adjust the cyanide addition rate to minimize its use in terms of gold recovery but also to maintain the WAD cyanide levels at the TSF spigot discharge below 50 mg/L. The cyanide addition rate is also adjusted as necessary when ore types or processing practices change cyanide requirements.

The Ahafo Mine to Mill (2022-2024) Metallurgical Report includes a recovery evaluation and results from leach characterization tests based on the ore types being mined. The results from this report are being used to manage the cyanide addition rate. Bottle roll tests and diagnostic tests are conducted to confirm cyanide addition and plant recovery weekly (composite sample of daily samples) and quarterly, respectively. Based on these results, a set point of 230 ppm has been established.

An automatic cyanide analyser is used to test cyanide levels in the first leach tank and adjust the cyanide addition rate according to available free cyanide. Manual titration is also conducted every two hours in the leach tanks to determine the cyanide concentration in the various tanks.

The auditors reviewed the Ahafo Mine to Mill (2022-2024) Metallurgical Report, and examples of completed bottle roll tests, completed diagnostic tests, and manual titration results. The auditors also interviewed metallurgical personnel.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.3**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 4.3; implement a comprehensive water management program to protect against unintentional releases.

Ahafo South has developed a comprehensive, probabilistic water balance using the GoldSim software for the operation. The model is updated annually since 2014 (or more often if significant changes occur within the operation or large imbalances are observed). The most recently update and calibration of the water balance was conducted in August 2024 by Piteau. This update included the pumping of the TSF reclaimed water to the raw water pond (that is the only process change occurred during this audit cycle) as well as the most updated TSF design and raise constructed over the recertification period.

The water balance model is probabilistic in that it includes extreme events and climate dry and wet cycles. The water balance model is comprehensive. The model considers the production rates and tailings densities. The model also automatically generates a storm event to the maximum of a 1-in-100-year return period, 24-hour storm event based on historic rainfall data. On-site daily rainfall and evaporation data has been used for the annual update of the model. The water balance model also takes into consideration solution losses from the TSF and the run on of the TSF. In addition, the water balance model considers the effect of total power failures by simulating the operation of the event pond under normal conditions as well as during shutdown conditions (even though the operation has the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted). The site does not have any treatment, destruction or regeneration systems and therefore this is not considered in the model.

Ahafo South uses this GoldSim water balance model in conjunction with an Excel spreadsheet as an operational tool for water balance management and pond storage capacity control. Input process data, rainfall, TSF and pond data are updated into this spreadsheet monthly and the spreadsheet is used to run the water balance update annually.

The operating procedures incorporate inspection and monitoring activities to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment. In addition, the ponds and impoundments are designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations.

Ahafo South operates the TSF with a minimum freeboard of 3 meters. The water level of the TSF is checked daily to ensure that the TSF impoundment is operated at a safe level. Also, a bathymetric survey is done monthly to confirm the TSF storage capacity and the freeboard level.

The water levels of the process pond, raw water pond and event pond are also checked daily to ensure that the ponds are operated at a safe level with adequate freeboard. A minimum freeboard of 0.3 meters is required to be maintained in these ponds to prevent overtopping. This freeboard is engineered into the embankments of the ponds. Level sensors are installed at these ponds. Any overflow from the raw water pond will flow into to process water pond, and any overflow for the process water pond will flow into the event pond. The event pond has been designed with sufficient capacity for the maximum operating water balance plus runoff from a 100-year 24-hour storm event. The event pond is designed to contain any excess spillage from the process in case of an upset condition and not as a storage facility, and therefore its standard operating procedure is to pump out the material in this pond as quickly as possible to have room for any eventuality. This pond is equipped with automated pumps to remove the material in this pond and maintain maximum storage capacity in this pond.

Daily checks of this pond are conducted to also confirm that the event pond is operated meeting the intent of its design.

Ahafo South measures precipitation on site daily and compares results to design assumptions and revises operating practices as necessary. Onsite rainfall records are used in the monthly updates of the water balance done using the Excel spreadsheet, which provides continual comparison of results to design and operating parameters. Onsite available rainfall records were also used in the 2024 annual update of the water balance. As part of this annual update, the storm events considered in the model were checked.

The auditors reviewed pond level and capacity data, examples of daily TSF and pond inspection sheets, monthly reports on the TSF bathymetric survey results, monthly reports on the TSF supernatant pond capacity for use, and annual TSF performance reviews for the audit cycle to verify that the TSF and ponds are being inspected and have been operated with the required adequate freeboard. The auditors also reviewed a technical memorandum describing the GoldSim water balance model development, a report on the 2024 water balance update and the operational Excel spreadsheet using for water balance management.

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 **Standard of Practice 4.4**

☐ not in compliance with

Summarize the basis for this finding:

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

Ahafo South has implemented measures to restrict access by wildlife and livestock to all open waters including the TSF and the process ponds.

Fencing is in place to restrict wildlife and livestock from gaining access to the TSF area. Also, the process ponds are inside the fenced mine and plant area. Ahafo South maintains these fences and inspects them as part of the TSF and pond daily inspections. In addition, Ahafo South maintains the WAD cyanide concentrations in open waters below 50 mg/L as required under the operational procedures related to the TSF and the process ponds.

Ahafo South has demonstrated that the WAD cyanide concentrations have been less than 50 mg/L in open waters (i.e., in the process water pond, raw water pond, TSF supernatant pond and TSF spigot) without physical

restrictions over the recertification period with a few isolated exceptions. The auditors reviewed WAD cyanide data for the ponds over the recertification period to verify compliance. The auditors also reviewed the reports on the investigation of the few WAD cyanide exceedance occurred over the recertification period to verify compliance.

Ahafo has prevented significant wildlife mortality by maintaining WAD cyanide concentrations less than 50 mg/L in open waters. No wildlife mortality has occurred from February 2022 to the present. Ahafo South had one bird mortality event in January 2022 that involved the death of 20 ducks in the process water pond on January 3, 2022. This event occurred a month prior to the announcement of the 2022 recertification by the ICMI and was not included in the 2022 audit reports and therefore it is being discussed in this report for completeness. The average cyanide concentration measured in the process water pond at the time of this event was 55.1 mg/L WAD cyanide; however, a sample taken after the incident and analysed by an external laboratory had a cyanide concentration of 104 mg/L WAD cyanide. Results from the necropsy revealed blood clots in the lungs of the birds sampled, which could be indicative of cyanide poisoning. The site has implemented actions to prevent a similar recurrence in the future including the following:

- An ultrasonic bird laser unit was installed to prevent birds from accessing the process water pond.
- WAD cyanide laboratory analysis is conducted daily by the metallurgy team to verify that the WAD cyanide concentrations are maintained below 50 mg/L in the ponds and tailings spigot.
- The security team has increased surveillance in and around the process plant and ponds.
- The Enablon event reporting has been modified following this bird mortality event to include additional questions for cyanide related incidents and Newmont receives automated notifications when a cyanide related incident is entered in Enablon. Also, procedures have been updated to include roles and responsibilities for ICMI significant cyanide incident notifications.

No other bird mortalities related to cyanide have occurred at the site since the January 2022 event.

The TSF and process ponds are inspected on a daily basis for the presence of wildlife and wildlife mortalities.

The auditors the reviewed the investigation report on the January 2022 mortality event as well as completed TSF and pond check sheets to verify compliance. The auditors also reviewed Newmont's notification of this mortality event to the ICMI as well as Newmont's 2022 Sustainability Report and the 2022 Ahafo South's Environmental and Social Responsibility Report issued to EPA Ghana through which Newmont made this mortality event public.

There is no heap leach facility at Ahafo South.

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**

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

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 4.5; implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

Ahafo South operates four Environmental Control Dams (ECDs). The ECDs collect run-off water from the operational areas and sediment before released to the environment. The water is tested monthly (at stations ECD-2D, ECD-3D, ECD-4D and SCS-8D). WAD cyanide data for these stations showed all results were below the laboratory detection limit of 0.005 mg/L over the recertification period.

Ahafo South conducts surface water monitoring at various points upstream and downstream of the cyanide facilities monthly to quarterly. In addition, Ahafo South monitors boreholes downgradient the TSF as well as groundwater stations downgradient the process plant monthly. All results showed that free cyanide at these surface water and groundwater stations were below the laboratory detection limit of 0.005 mg/L over the recertification period, not exceeding 0.022 mg/L of free cyanide.

Based on the data reviewed by the auditors, there is no evidence that if any indirect discharge to surface water has occurred, it has caused cyanide concentrations in surface water to rise above levels protective of a designated beneficial use for aquatic life.

Standard of Practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

☒ **in full compliance with**

The operation is

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

☐ not in compliance with

Summarize the basis for this finding:

The operation 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 groundwater.

Ahafo South implements specific water management or other measures to manage seepage to protect the beneficial use of groundwater beneath and/or immediately downgradient of the operation. Communities around the operations use groundwater for domestic use.

All cyanide tanks and process solution tanks have concrete secondary containment. Pipelines are in pipe in pipe systems, over concrete or HDPE lined trenches/channels, or placed in pipe racks over concrete containment areas. The TSF has been designed with underdrains. The water from the underdrains as well as from the finger drains, installed to dewater the TSF walls, are collected and returned to the TSF. The TSF is lined with a clay liner and partially lined with HDPE in the area of the supernatant pool. Secondary underdrains have been installed under the HDPE liner. Any lifts to the TSF will continue to employ the clay and HDPE line as applicable.

The process water and event ponds are double HDPE lined and equipped with LDCRs to prevent seepage. The pond liners and LDCRs are inspected as part of the operational inspections. The raw water pond is single HDPE lined. WAD cyanide concentrations at the raw water pond are maintained below 0.45 mg/L as discussed in Standard of Practice 4.1.

Ahafo South monitors for cyanide in groundwater downgradient of the cyanide facilities and can demonstrate that concentrations of cyanide in groundwater at compliance points below or downgradient of the facility are below levels that are protective of identified beneficial use of groundwater, namely the use of groundwater for domestic use.

The numerical standard for free cyanide in groundwater for drinking water is 0.07 mg/L as detailed in Ghana Standards Authority, Ghana Standard GS175:2017 - Water Quality Specification for Drinking Water.

The auditors reviewed analytical data, which showed that free cyanide at the groundwater sampling points downgradient of the cyanide facilities were below the numerical standard of 0.07 mg/L of free cyanide in groundwater for drinking water.

Ahafo South has not caused cyanide concentrations of groundwater to rise above levels protective of beneficial use and therefore is not engaged in groundwater remediation.

The operation does not use mill tailings as underground backfill.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.7**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 4.7; provide spill prevention or containment measures for process tanks and pipelines.

Ahafo South provides spill prevention or containment measures for all cyanide-related tanks.

All cyanide and process solution tanks (i.e., the cyanide sparge tank, cyanide storage tank, CIL tanks, elution tank, treated water tank, pregnant solution tank, CCD feed tank, CCD tails tank, CCD overflow tank and thickener overflow tank) are contained on impervious tank foundations (concrete ring beams with an impervious HDPE liner beneath the tanks) and within concrete containments. The grinding circuit is also located within a concrete bund. The auditors observed the secondary containment areas of the tanks to be in good condition during the site visit.

Secondary containments for the cyanide sparge, storage, and process tanks are sized to be 110% of the largest tank within the containment area. Also, if a bund overflows, it will report to the event pond which provides additional storage. An exception to this is the CIL bund and elution bund. These bunds are smaller than the capacity of their largest tank plus 10%, however a concrete trench will direct any overflow from these bunds to the event pond (that has a storage capacity of 7,500 m^3). The bund at the grinding circuit is sized to be sufficient to contain more than 110% of the two mills combined.

There are procedures in place that are being implemented to prevent discharge to the environment of any cyanide solution or cyanide contaminated water that is collected in the secondary containment area. All secondary containments are equipped with pumps and pumping systems returning the contents to the process. The sumps are largely automated with fixed piping systems to contain process areas (tanks). Emergency power is available on all pumps including the event pond pumps.

Spill prevention or containment measures are provided for all cyanide process solution pipelines to collect leaks and prevent releases to the environment. TSF pipelines are placed inside an HDPE lined trench, draining to the event pond or back into the TSF. Cyanide pipelines are pipe in pipe systems and equipped with leak detection systems. These pipelines are routed over concrete trenches draining into the event pond, which is the additional secondary containment. Process pipelines are placed in pipe racks over concrete containment areas. Spill prevention measures include flanges equipped with flange covers to prevent spraying of the cyanide solution.

A planned maintenance program is in place, supported by daily inspections of tanks and pipelines as discussed in Standard of Practice 4.1.

There are no areas where cyanide pipelines present a risk to surface water that might require special protection needs.

The materials of construction of the cyanide and process tanks and pipelines include HDPE, mild or stainless steel that are compatible with cyanide and high pH conditions.

Standard of Practice 4.8: **Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Standard of Practice 4.8**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with 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.

Construction quality assurance and quality control (QA/QC) programs have been implemented for all the cyanide facilities.

Construction QA/QC documentation for the cyanide facilities in operation at the time of the 2022 recertification audit, including their content, were evaluated and found compliant during the initial certification audit, and subsequent recertification audits.

The raise of the Cell 1 TSF to the 150 Mt and 170 Mt designs is the only construction activities, associated with the cyanide facilities, that have been conducted over the recertification period. The 150 Mt raise was completed in December 2023 and the 170 Mt raise started in July 2024 and is ongoing. The construction QA reports for the Cell 1 TSF 150 Mt and 170 Mt raises addressed the suitability of the materials and adequacy of soil compaction as applicable to compacted clay liner and other soil materials for earthworks, concrete, HDPE geomembrane, geotextile for the embankments, and piping, electrical and diversion wall. The auditors reviewed the Construction Completion Report for the Cell 1 TSF 150 Mt raise and the monthly Construction QA Reports for the Cell 1 TSF 170Mt raise to verify compliance. These reports were prepared by an external consulting engineering firm (Jones and Wagener) and signed by appropriately qualified engineers from this firm. The reports were also approved and signed by the Responsible Tailings Facility Engineer at Ahafo South.

Ahafo South has retained the QA/QC records identified in the initial audit report and subsequent recertification audit reports as well as the QA/QC records for this audit cycle. Ahafo South has electronic copies of design and QA/QC documentation. The auditors checked the electronic files to verify that electronic versions of the documents were retained.

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

☒ **in full compliance with**

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

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 4.9; implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

Ahafo South has developed written standard procedures for monitoring activities including monitoring of surface and groundwater, and wildlife presence and mortality.

Sampling and analytical protocols have been developed by appropriately qualified personnel. Procedures and protocols were originally developed by AMEC Consultants and have been updated by the environmental personnel with several years of experience in water quality assessment.

Ahafo South has sampling and analytical procedures and plans that specify how and where the samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, and cyanide species to be analyzed, and quality assurance and quality control requirements for cyanide analysis. These plans and procedures include the Site Wide Water Resources Monitoring Plan, the Emergency Environmental Monitoring procedure (for emergency monitoring related to spillage or releases), and the Surface Water Sampling (Grab) and Groundwater Sampling procedures.

Sampling conditions and procedures are documented in writing on the field sheet including sample ID, sampling date, sampling time, water level, temperature, pH, conductivity, dissolved oxygen, total suspended solids, total dissolved solids, turbidity, sampling method, weather conditions, any wildlife mortality, evidence of livestock/wildlife activity/anthropogenic influences, and other field observations. The auditors reviewed completed field sheets to verify compliance.

Ahafo South has conducted monitoring at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. LDCRS are inspected daily at the TSF and at the event and process water ponds. WAD cyanide monitoring in the process water and raw water ponds as well as the tailings spigot is conducted daily. TSF impoundment water is monitored monthly. Groundwater and surface water have been monitored monthly to quarterly. Wildlife has been monitored daily. The auditors reviewed monitoring data to verify compliance.

The auditors reviewed the sampling and analytical procedures and plans, completed field sheets and monitoring data to verify compliance.

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, and livestock.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 5.1**

☐ not in compliance with

Summarize the basis for this finding:

The operation 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.

Ahafo South has developed written procedures to decommission its cyanide facilities at the cessation of operations. These procedures, included in the site-wide Reclamation and Closure Plan, cover the decommission of the TSF, ponds, process areas, cyanide offload and storage facilities including tanks, piping, pumps, concrete foundations, structures and other equipment. The plan describes measures to decontaminate cyanide-related process components and structures prior to implementing any decommissioning activities that would include resale or disposal. Decontamination would be done by rinsing the process components until WAD cyanide concentrations are less than 0.5 mg/L as indicated in the Cyanide Equipment Decontamination procedure. The plan also describes measures for TSF decommissioning including water management and treatment.

The closure costs spreadsheet includes an implementation schedule for decommissioning activities. Currently the end of operations is planned for 2033. Based on the implementation schedule, decommissioning activities will start in 2035. TSF water management and treatment are expected to happen from 2035 to 2040. Process facilities decommissioning including detoxification is expected to happen in 2036 and in 2041.

The cyanide decommissioning procedures are reviewed and updated every three years along with the update of the site-wide Reclamation and Closure Plan. The most recent update of this plan was conducted by SRK Consulting in December 2023.

The auditors reviewed the 2022, 2023 and 2024 closure cost spreadsheets, the site-wide Reclamation and Closure Plan and the Cyanide Equipment Decontamination" procedure. The auditors also interviewed environmental personnel to verify compliance.

Standard of Practice 5.2: Establish an assurance mechanism capable of fully funding cyanide-related decommissioning activities.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 5.2**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 5.2; establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

Ahafo South has developed detailed closure costs for fully funding third party implementation of the cyanide-related decommissioning as identified in the Reclamation and Closure Plan. The Basis of Estimate for the closure costs specifies the third-party unit rates considered for the closure activities. The auditors reviewed the Basis of Estimate document and interviewed environmental personnel to verify compliance.

Ahafo South has reviewed and updated its closure cost estimate annually as part of its annual Asset Retirement Obligation (ARO) and Life of Mine process. The auditors reviewed the 2022, 2023 and 2024 cost estimate spreadsheets to verify that the cost estimate updates have been done annually.

Ahafo South has established a financial mechanism through reclamation bonds (that include bond bank and cash components), approved by the applicable jurisdiction to cover the estimated costs for cyanide-related decommissioning. Ahafo South provided a letter from Ecobank as well as a copy of the letters sent to EPA Ghana on the bond bank and cash guarantee confirming Newmont's current financial guarantees for the Akyem and Ahafo South and North mine sites. The auditors also reviewed an Excel file with the calculation of Ahafo South's bond bank and cash obligation, and the 2024 closure cost estimate including the cost for decommissioning of the cyanide facilities. The auditors reviewed this documentation to verify that the financial guarantees cover the bond obligation for Ahafo South as well as the estimated cost for decommissioning of its cyanide related facilities.

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.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 6.1**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 6.1; identify potential cyanide exposure scenarios and take measure as necessary to eliminate, reduce, and control them.

Ahafo South has developed and implemented procedures describing how cyanide-related tasks such as cyanide offloading and sparging, operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure. There are a series of procedures for cyanide offloading and sparging, and the operations of the cyanide facilities. There is also a procedure for equipment decontamination prior to releasing the equipment to maintenance. A permit for entry into confined spaces and requirements for atmospheric testing at the work areas prior to entering a confined space are also established and implemented.

The operational procedures include the scope, licensing and permit requirements, training pre-requisites, references, health and safety (H&S) and sustainability and external relations hazards, risk management identifier, mandatory PPE, and pre-task checklist requirements. The procedures also describe the specific procedures to conduct each task and adequately describe safe work practices. In addition, the procedures detail inspection requirements. The auditors reviewed the procedures and interviewed the process and safety personnel to verify the implementation of these procedures. The auditors also observed signage requiring PPE and workers wearing the appropriate PPE during the site visit.

Ahafo South has conducted pre-work inspections prior to cyanide offloading and sparging. These pre-inspections are documented in the cyanide offloading checklist. In addition, Ahafo South has conducted regular inspections of all its cyanide facilities including the cyanide offloading and storage facilities, the process plant areas, the ponds and the TSF as indicated in Standard of Practice 4.1. The auditors reviewed the operating procedures and examples of completed inspection forms and cyanide offload checklists to verify compliance.

Ahafo South solicits and actively considers worker input in developing and evaluating health and safety procedures. The mine has adopted various platforms to communicate with employees and contractors on safety procedures and to provide them with the opportunity to give their input in developing and evaluating these procedures. The platforms include face to face engagements, safety meetings, safety leadership team and fatality risk management meetings, employee well-being programme, field level risk assessments, and daily pre-start meetings. In addition, worker input is solicited via the review of operating procedures. The auditors reviewed examples of records of safety meetings, leadership inspection reports, fatality risk management steering committee meetings, and others to verify compliance.

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**

☐ in substantial compliance with **Standard of Practice 6.2**

☐ not in compliance with

Summarize the basis for this finding:

The operation 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.

Ahafo South has determined the appropriate pH for limiting the evolution of HCN gas during cyanide offloading and sparging, and production activities. Ahafo South has established an optimal pH control of 10.5 to prevent the evolution of HCN gas during cyanide offloading and sparging and production activities. To help control pH, caustic solution is mixed with the sodium cyanide and lime is added. pH probes in the CIL circuit are used to monitor the pH of the solution. Portable pH probes are used to verify pH levels, and in-line probes are routinely calibrated. The auditors reviewed pH data for cyanide production activities showing that the pH was maintained as required.

Where the potential exists for significant cyanide exposure, the operation uses ambient and personal monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide gas to 10 ppm on an instantaneous basis and exposure to cyanide at 4.7 ppm continuously over an 8-hour period.

The site has a “Process Plant Gas Badge Management Register” to keep track of the personal monitors, whether it is fit for use, due date for calibration and who it is issued to. The spreadsheet indicates when it is due for calibration.

In the event of HCN levels triggering the 4.7 ppm and 10 ppm alarm levels, the area will be evacuated. The cause of the event will be investigated by the designated employees wearing the required PPE and personal HCN monitors once the alarm has stopped.

HCN monitoring equipment is maintained, tested, and calibrated as directed by the manufacturer, and records are retained for at least 3 years.

Warning signs are strategically posted at various locations where cyanide is present, including the cyanide offloading and storage areas, grinding, CIL, CCD, elution, TSF, pipelines and ponds (process water, raw water and event ponds). These signs alert workers to the presence of cyanide and provide critical safety information, including prohibitions on smoking, open flames, eating, and drinking, as well as requirements for PPE.

Cyanide sparge and storage tanks, process tanks and piping containing cyanide are identified to alert workers of their contents, and the direction of cyanide flow in pipes is designated. The cyanide sparge and storage tanks and distribution pipes are colour-coded in accordance with Ghana Mining Regulations requirements.

Carmoisine dye is added to the isotainers by Vehrad at their transfer facility in Tema prior to arriving on site. This was confirmed from an email between Samsung C&T and Newmont. Photographic evidence of the dyed cyanide taken from the sparge tank was presented to the auditors as well.

Showers, low pressure eyewash stations and dry powder fire extinguishers are located at strategic locations throughout the operation and are they maintained, inspected, and tested on a regular basis. This includes the

cyanide sparging and storage tank area, grinding, CIL, elution, CCD and tails tank area. A portable eyewash station is also available at the TSF.

The Sodium Cyanide Safety Data Sheet, first aid procedures or other informational materials on cyanide safety in the language of the workforce are available in areas where cyanide is managed.

The operational language for the mine and plant is English in written and verbal communications. This was confirmed through interviews with the process personnel.

Procedures are in place and being 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 of revising. These procedures are included in the Event Reporting and Investigation Management System Procedure. These procedures ensure a consistent approach to classifying, reporting and investigating incidents, determining underlying causes, and communicating lessons learned to prevent recurrences across the organisation. The auditors reviewed the investigation reports of the five cyanide related events (classified as insignificant or minor based on Newmont Incidents Classification Criteria) that occurred over the recertification period to verify the implementation of these procedures.

The auditors also observed the signs on the process areas and the TSF to verify compliance. In addition, the auditors reviewed inspection records of the eye wash stations and showers and fire extinguishers, as well as interviewed process personnel.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 6.3**

☐ not in compliance with

Summarize the basis for this finding:

The operation 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.

Ahafo South has water, oxygen, a resuscitator, antidote kits and a radio, telephone, alarm system or other means of communications or emergency notification readily available for use at cyanide offloading and storage locations and elsewhere in the plant. Emergency showers are also available throughout the plant. Oxygen and self-contained breathing apparatus (SCBAs) are available at key areas around the process plant.

Resuscitator and antidote kits (Cyanokit) are kept by the clinic, and radios are used for communication throughout the operation. The cyanide antidote will be administered by the on-site medical doctor in the event of a cyanide exposure.

The operation inspects its first aid equipment regularly to ensure that it is available when needed, and 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 ERT inspects their first aid equipment daily and during sparging activities.

Monthly inspections of the SCBAs and oxygen cylinders are undertaken in-house by the ERT. Calibrations however are undertaken by a third-party vendor, Nezo company Limited, monthly.

According to the Chief Medical Officer, the site has eight Cyanokits, kept in the clinic. New stock is ordered when the current antidotes are close to expiry.

The paramedic on duty inspects the first aid equipment on a quarterly basis and the ambulances are inspected daily.

Ahafo South has developed specific written emergency response plans and procedures to respond to cyanide exposures. The procedures and response plans detail the necessary response to cyanide exposure through ingestion, inhalation and absorption through the skin and eyes. In addition, the process induction and cyanide training cover the response requirements for emergency cyanide first aid.

The operation has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide. The operation employs a full-time and fully trained ERT and MediSite medical team to effectively respond to cyanide and other incidents at the site.

Given the remote location and capabilities of local hospitals, Ahafo South and MediSite have determined that personnel would be best treated at the on-site clinic with the trained staff and equipment that they have.

MediSite staff conduct internal drills to ensure their staff are capable of dealing with emergencies. Auditors were presented with a training register listing attendance of MediSite staff.

For any reason, if secondary complications occur after initial treatment, the patient will be transferred to a local hospital, the Komfo Anokye Teaching Hospital, for further advanced medical care. This external medical facility has acknowledged it can accept, manage and treat patients.

The operation has made formalised agreements with the onsite clinic, MediSite, and the Komfo Anokye Teaching Hospital so that these providers are aware of the potential to treat patients for cyanide exposure. The operation is confident that the medical facilities have adequate, qualified staff, equipment and expertise to respond to cyanide exposures.

The auditors reviewed completed inspection forms of first aid equipment including the oxygen and the Cyanokits as well as interviewed medical and ERT staff to verify compliance. The auditors also visually observed the Cyanokits and oxygen. The auditors reviewed the emergency response procedures, trainings records of the clinic and ERT personnel, and a letter from the Komfo Anokye Teaching Hospital (confirming their acceptance, management and treatment of patients presented with cyanide poisoning).

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**

☐ in substantial compliance with **Standard of Practice 7.1**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 7.1; prepare detailed emergency response plans for potential cyanide releases.

Ahafo South has prepared a site-wide emergency management plan (Ahafo South Emergency Management Plan) and a process plant specific plan (Ahafo Process Plant Emergency Management Plan). These documents outline the various credible event scenarios for the operation and the responsibilities, actions, and notifications required to ensure an effective and efficient response. In addition to these overarching plans, the site has other emergency response procedures and plans including the TSF Operations, Maintenance and Surveillance Manual, the Emergency Preparedness Plan for Tailings and Water Storage Facilities, and the Emergency Cyanide Spill Response procedure. These plans and procedures cover scenarios applicable to the site including HCN gas release; transportation accidents; releases during offloading and sparging; releases during fires and explosions; leaks from rupture of tanks, valves, and pipes; overtopping of ponds and impoundments; power outages and pump failures; uncontrolled seepage from cyanide facilities; failure of the TSF impoundments, and failure of cyanide recovery systems (as applicable to the CCD circuit to recycle process solution and reduce WAD CN concentration in tailing slurry to less than 50 ppm).

Vehrad is responsible for transport related emergencies outside the mine. The transporter has considered the transportation route, physical and chemical form of the cyanide, method of transport (via truck), the condition of the road, and the design of the transport vehicle under its emergency response planning. This was evaluated under the certification of Vehrad with the Code. The auditors reviewed Vehrad's most recent certification summary audit report and its Hazmat Handling Guide & Transport Management Plan to verify compliance.

The emergency response procedures also include procedures for evacuation of site personnel and potentially affected communities, the use of antidotes for cyanide poisoning and cyanide first aid procedures. Procedures for spills include control of the spills at their source, spill containment, neutralization, cleanup, and monitoring. The auditors reviewed the emergency response management plans and other emergency procedures as well as interviewed the Health and Safety Manager to verify compliance.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 7.2**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 7.2; involve site personnel and stakeholders in the planning process.

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

The emergency response procedures have been developed using cross-functional teams from the process plant, H&S, environmental and community relations departments, security command centre, ERT and the clinic. This is to ensure that adequate consideration is given to the various impacted departments and ensure that personnel understand and are aware of their roles in an emergency. Documentation of these reviews is included on the document control forms submitted for each document as per the Integrated Management System standards.

Also, the operation involves its workforce in the emergency planning process through monthly safety meetings where procedures and updates, including emergency response, are presented and through mock emergency drills that are conducted periodically to test response procedures for various cyanide exposure scenarios.

External stakeholders do not have a direct involvement in emergency preparedness and response planning; however, the operation 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. Newmont External Affairs personnel maintain a list of critical external contacts including chiefs, clergy, and other notable community persons to effectively disseminate information about possible emergency situations and responses. Through the use of community information centres and community liaison officers, Ahafo South is able to ensure communication flow with relevant stakeholders prior to and/or in the event of an emergency situation.

The main response agencies are the mine's ERT and MediSite, the on-site clinic. These have all been involved in the emergency planning and response process as confirmed through interviews. Due to the location and response capacities of local agencies, Ahafo South would maintain responsibility for emergency response activities within the communities. However, emergency preparedness and management plans are made available to and shared with the Inspectorate Division of the Ghana Minerals Commission and Ghana EPA as part of their routine site reviews. Local agencies (e.g., local fire and police) have a statutory responsibility to assist with notification and mobilization of people under direction from Ahafo South. In case of a cyanide emergency, the patients will receive initial medical treatment and stabilisation at the on-site clinic. If secondary complications occur the patient will be transferred to the Komfo Anokye Teaching Hospital, the local hospital in Kumasi. A letter from this hospital has acknowledged it can accept, manage and treat patients.

The on-site ERT and the clinic takes part in mock drills to test their response to emergency situations.

The auditors reviewed mock drill documentation, a letter from the Komfo Anokye Teaching Hospital (confirming their acceptance, management and treatment of patients presented with cyanide poisoning), the Ahafo South Emergency Management Plan as well as interviewed the Chief Medical Officer to verify compliance. The

auditors also reviewed records of community engagement related to emergency response and records of safety meetings.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 7.3**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 7.3; designate appropriate personnel and commit necessary equipment and resources for emergency response.

The Ahafo South Emergency Management Plan and other emergency response procedures state the detailed roles and responsibilities for plant emergencies including the responsibilities of management and ERT. There are three ERT crews (Crew A, Crew B and Crew C), which are headed by the Emergency Response Lead. In addition, the site has emergency response volunteers who work either straight day shifts or day-and-night shifts.

The ERT training matrix was observed. The matrix included various emergency related training modules such as cyanide awareness and first aid, chemical awareness, cyanide safety, safe work at height, hot work, event reporting, exclusion, restriction zones & barricades, fatigue management, fire prevention and extinguisher safety, medical cardiopulmonary resuscitation, and oxygen administration.

The Ahafo South Emergency Management Plan describes the call out procedures and contact information for the ERT members and management.

The emergency response equipment is presented in the Cyanide Management Plan. The Cyanide Sparging PPE and Equipment checklist details the equipment available to the ERT during an incident. Emergency response equipment is inspected to ensure availability; the fire truck, rescue truck, hazmat truck and first aid box checklist (fire truck) are checked daily. The Cyanide Sparging PPE and Equipment checklist is checked weekly, and fire hydrants and self-contained breathing apparatus (SCBAs) are checked monthly. There are three medical ambulances and supporting medical response toolkit as part of the emergency response equipment and these are checked daily.

The onsite clinic takes part in emergency response. The outside responders are the local fire department, who are present if the incident requires additional firefighting resources and the Ghana police service who are responsible for ensuring public safety and protection. The Ahafo South Emergency Management Plan includes contact details for the local fire and police services and responsibilities for the internal clinic. The external medical facility identified for secondary treatment of cyanide exposure patients is the Komfo Anokye Teaching Hospital in Kumasi, which has acknowledged it can accept, manage and treat patients.

The auditors reviewed the emergency response management plans and procedures. The auditors also reviewed ERT training records and record of the inspections of the emergency response equipment as well as interviewed safety personnel and the Chief Medical Officer. In addition, the auditors interviewed, a letter from the Komfo Anokye Teaching Hospital (confirming their acceptance, management and treatment of patients presented with cyanide poisoning) mock drill reports to verify compliance.

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

☒ **in full compliance with**

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

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 7.4; develop procedures for internal and external emergency notification and reporting.

The Ahafo South Emergency Management Plan includes procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency. Appendix 18 (Newmont Ghana Operations Emergency Contacts) of the plan provides the relevant emergency contact numbers.

The Ahafo South Emergency Management Plan also includes procedures and contact information for notifying potentially affected communities of cyanide-related incidents and any necessary response measures as well as for communications with the media.

Ahafo External Affairs personnel maintain a list of critical external contacts including chiefs, clergy, and other notable community persons to effectively disseminate information about possible emergency situations and responses.

Ahafo South utilizes community information centres and liaison officers to facilitate effective communication with stakeholders, both before and during emergency situations, ensuring timely information dissemination and response.

The Ahafo South Emergency Management Plan was updated to include the requirement and procedures for notification to the ICMI of any significant cyanide incident (as defined in ICMI's Definitions and Acronyms document). This notification will be done within 24 hours of the incident occurrence by a nominated team member of the Site Response Team and in accordance with the Event Reporting and Investigation procedure.

Details of the notifications to the ICMI should include date and nature of the event, and the name and contact information of the nominated member to respond to requests for additional information from the ICMI. Procedures requires that further detailed reports including root causes, health, safety and environmental impacts, and any mitigation or remediation should be supplied to the ICMI within seven days of the event.

Ahafo South recorded a multiple bird mortality event in January 2022 which was made public through Newmont's 2022 sustainability report (posted on Newmont's website) and the 2022 Environmental and Social Responsibility Report issued to EPA Ghana. This bird mortality event was also reported to the ICMI in March 2025 as a corrective action since it was not reported at the time of the event as required by the ICMI. Also, as corrective actions to prevent a similar recurrence, the Enablon event reporting has been modified following this bird mortality event to include additional questions for cyanide related incidents and Newmont receives automated notifications when a cyanide related incident is entered in Enablon. In addition, procedures have been updated as previously discussed to include roles and responsibilities for ICMI significant cyanide incident notifications. No other significant events, reportable to the ICMI, have occurred over the recertification period.

The auditors the reviewed the investigation report on the January 2022 mortality event, notification email to the ICMI, the Ahafo South Emergency Management Plan as well as interviewed safety and environmental personnel.

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

☒ **in full compliance with**

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

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with 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 plans and procedures describe specific remediation measures as appropriate for the likely cyanide scenarios. Ferrous sulphate will be used to neutralise cyanide spills as per the Neutralize CN Spills with Ferrous Sulphate procedure. The procedure provides a table that should be used to determine the required amount of ferrous sulphate solution required for neutralisation in relation to the spill volume and measured cyanide concentration in the spill. This procedure also states that the ferrous sulphate is stored at the Reagent Shed. The Emergency Cyanide Spill Response procedure provides a ferrous sulphate mixing guide for both slurry and solution spills. Samples are taken of the residual material after clean-up of the area to determine the WAD cyanide level. Neutralisation is continued until the WAD cyanide can no longer be detected.

Contaminated tools and other equipment used in incident response are required to be washed in an area where water will enter the process plant circuit. Contaminated soil must be added back into the SAG mill. Cleaned up spillage can be reintroduced into the process plant via the SAG Mill or deposited onto the TSF.

The Neutralize CN Spills with Ferrous Sulphate procedure prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. The auditors reviewed this procedure to verify compliance.

Alternative drinking water will be supplied by Ahafo South, if required. This will be provided via water trucks. This is covered in the Emergency Management Plan.

The Emergency Environmental Monitoring procedure addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methodologies, parameters and, where practical, possible sampling locations. Field sampling requirements are also covered in the Emergency Environmental Monitoring procedure, and the sampling points are indicated on Emergency Environmental Monitoring Locations Map.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 7.6**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 7.6; periodically evaluate response procedures and capabilities and revise them as needed.

The operation reviews and evaluates the cyanide-related elements of its emergency response procedures for adequacy on a regular basis. The Ahafo South Emergency Management Plan is reviewed annually, or in the event of a major change, such as the results of a drill or incident. The plan also describes required actions to responsible managers to keep certain elements of the emergency management plan up to date. The plan includes the date the original plan was prepared and when it has been updated. It was confirmed that the plan had been reviewed as per the stipulated frequency. The Emergency Management Plan was originally issued in June 2006. The current version is No. 4.5, issued in September 2024 and due for review by September 2025.

Cyanide-related mock drills are conducted periodically as part of the Emergency Management Plan. Cyanide related mock drills are conducted twice a year and involve process personnel as well as the plant first responders, ERT and clinic personnel. Mock emergency drills are conducted to test response procedures for various cyanide exposure scenarios and as part of the Emergency Management Plan evaluation process. The response to cyanide spills were evaluated through actual spills that occurred over the recertification period and are discussed in Standard of Practice 6.2.

The cyanide-related mock drills conducted over the recertification period tested the entire cyanide emergency response process, from the initial emergency callout notification through to the close-out of the response process.

There is a de-briefing session after each mock emergency drill. The de-briefing session gives rise to action, which may include the revision of the Ahafo South Emergency Management Plan. The process training coordinator confirmed that training material will be updated, as and when required, following the mock drill debriefing sessions.

No cyanide related incidents occurred during the current recertification period that required the update of the Emergency Management Plan or other emergency response procedures as a result thereof. No mock drill related corrective actions required the update of this plan either.

The auditors reviewed the Ahafo South Emergency Management Plan, the mock drill reports and interviewed emergency response personnel to verify compliance. The auditors also reviewed the cyanide incident reports discussed in Standard of Practice 6.2.

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.

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Standard of Practice 8.1**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 8.1; train workers to understand the hazards associated with cyanide use.

Ahafo South trains all plant employees, contractors and visitors, who may encounter cyanide, in cyanide hazard recognition. All contractors and employees working in the plant receive process plant induction training including cyanide awareness and cyanide hazard recognition and emergency response as well as a separate module on cyanide awareness training. The cyanide safety awareness training module is presented to all new plant and TSF personnel prior to working at the plant and the TSF.

The auditors observed the Ahafo South General Site training materials and Cyanide Awareness Training presentation. These trainings include the following aspects related to cyanide: potential hazards at the process plant, chemical hazards, general information on cyanide, forms of cyanide, response alarm levels, areas where cyanide is found on the plant, characteristics of cyanide gas, early warning signs / symptoms of cyanide poisoning, cyanide exposure, cyanide releases, management of cyanide risks, emergency procedure, cyanide decontamination and spill response, emergency and first aid procedures and other cyanide awareness topics.

A refresher training on Cyanide Safety Awareness is conducted annually. It is presented to employees when returning from annual leave and contractors annually. The site's access control card system prevents personnel from entering the site if the refresher training has expired.

Training records are retained electronically for the duration of employment plus an additional 8 years.

The auditors reviewed training materials and records, and the Africa Region training matrix to verify compliance.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Standard of Practice 8.2**

☐ not in compliance with

Summarize the basis for this finding:

The operation 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.

The operation trains workers to perform their normal production tasks, including cyanide offloading and sparging, production and maintenance, with minimum risk to worker health and safety in a manner that prevents

unplanned cyanide releases. The auditors observed the Africa Region Training Matrix. The matrix stipulates training needs as identified per occupation and per section of the plant such as operation section, maintenance section, and others as applicable. Training modules include both in the class and on the job training prior to prior to working with cyanide.

The training session plans requires a 90% pass rate for the theory component and a 100% pass rate for the in-field competency assessment (also known as On the Job Technical Training Assessment). The standard operating procedures and standard task procedures for the cyanide tasks form part of the training modules.

The training department will conduct a Planned Task Observation (PTO) assessment on an employee once the mandatory and required theoretical and practical training has been completed for a specific task. Sampled training records were observed to verify and confirm that employees receive task specific training prior to working with cyanide.

Trainings related to cyanide management activities are provided by appropriately qualified personnel with several years of experience in the process tasks.

Refresher training on cyanide management and cyanide related procedures is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. Trainings in Cyanide Awareness, Chemical Awareness, Confined Space Entry Safety, and Safety Induction are refreshed annually. Machine Guarding and Inspection, Work Permit, Elution Area Safety & work trainings are refreshed every 2 years. Trainings in Crushing Operations, Grinding Operations, CIL Operations, Elution Operations, Reagent Operations, CCD Operations, Event Pond Operations and Tailings Operations are refreshed every 3 years. However, these training can also be conducted earlier based on the supervisor's discretion and following a PTO assessment. PTO assessments are conducted on employees to ensure a continual understanding of a specific task.

Training records are retained throughout the duration of an individual's employment plus an additional 8 years. This applies to both Newmont employees and contractors. The records include the names of the employees and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training material. PTO assessments are also retained for at least 3 years and it provides details on the name of the employee assessed, the observer's name, the date of the assessment, the task observed, and the result of the assessment.

The auditors reviewed training files of selected employees and the African Region training matrix as well as interviewed trainers and process personnel to verify compliance.

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

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 8.3**

☐ not in compliance with

Summarize the basis for this finding:

The operation 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.

All cyanide offloading and sparging, production and maintenance personnel are trained in the procedures to be followed if cyanide is released, including decontamination and first aid procedures. The types of training are included in the following:

- General Site Induction which is presented to all employees and contractors.
- Ahafo Process Safety and Security Induction Training which is presented to workers at the process plant.
- Cyanide Awareness Training which is presented to all employees including long term contractors, ERT members, on-site clinic staff employees and community relations employees.

A module on Cyanide First Aid Response has been included in the emergency first responders training presentation presented to all on-plant first responders. The module covers identification of cyanide and cyanide emergency response and first aid.

Emergency Response Coordinators and members of the ERT are trained in the procedures included in the Ahafo South Emergency Management Plan regarding cyanide, including the use of necessary response equipment. They team also undergo annual refresher trainings. In addition, ERT members undergo annual additional training on Cyanide Emergency Management, facilitated by the ERT Coordinator,

External stakeholders do not have a direct involvement in Emergency Response Planning, however the Community Relations team maintains contact with external responders to share relevant information regarding emergency response planning.

The Senior Operations Trainer provides annual cyanide-specific training to Medisite, the on-site clinic staff to ensure they are familiar with those elements of the emergency management plan. In addition, the clinic staff provide regular trainings to its employees, both annually and as part of new staff onboarding.

In the event of a worker exposure, response efforts are led by the ERT with support from the clinic paramedic. The rest of the plant employees evacuate to a designated muster point, where they can safely observe the response activities.

After the drill, a debriefing session is conducted to gather feedback and discuss observations, highlighting both successes and areas for improvement.

Refresher trainings for response to cyanide exposures and releases are conducted periodically.

Training records are retained for the duration of an individual’s employment plus an additional 8 years, after which it will be archived. It was observed that the records included the names of the employee and the trainer, the date of training, topics covered, and how the employee demonstrated an understanding of the training.

The auditors reviewed mock drill documentation, the Africa Training Matrix, cyanide presentations, and attendance registers for cyanide awareness trainings to verify compliance.

PRINCIPLE 9 – DIALOGUE

Engage in Public Consultation and Disclosure

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

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 9.1**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 9.1; promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

Ahafo South provides stakeholders with information on its cyanide management practices as well as the opportunity for stakeholders to communicate issues of concern regarding the management of cyanide.

Five community information centres are situated in the various communities. There are further fence line communities dotted around the site but all fall under these 5 main communities. The information centres are managed by the site community relations officers and have cyanide fact sheets available.

Cyanide fact sheets are available for distribution to community members, who can also approach officers with concerns. The information officers talk around the sheets to provide more information on cyanide management and answer questions and concerns.

There are subject matter experts from the process plant, who accompany the community relations department and lead the discussion in engaging the communities on cyanide and its risks and uses.

Stakeholder groups in the vicinity of Ahafo South consist of community leaders, youth associations, disabled, local contractors, religious leaders, woman groups, local authorities, non-governmental organizations, community-based organisations and government agencies.

Quarterly stakeholder engagement meetings are held during which operational issues and cyanide management measures are discussed with the attendees. The meetings typically end with opportunities for the attendees to ask questions. The meetings are conducted in the local language.

An Annual Stakeholder Engagement Plan is compiled that stipulates the quarterly meetings planned with the stakeholder groups. The Stakeholder Engagement Schedule provides detail on the number of invitees, topics for discussion, engagement frequency, venue and proposed month of engagement.

Ahafo South has also implemented a Complaints and Grievance Management System. Stakeholders can lodge complaints or request information at the community centres. They can obtain information about Newmont and the mining process. All complaints are put into an electronic database (Enablon).

The auditors observed a copy of the Cyanide Fact Sheet, which includes text and pictures. The auditors also reviewed the Annual Stakeholder Engagement Plan and observed samples of external stakeholder engagement meetings. No cyanide-related complaints were received within the audit period, as confirmed by the Social Responsibility Specialist.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 9.2**

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 9.2; make appropriate operational and environmental information regarding cyanide available to stakeholders.

Ahafo South has developed written descriptions of how their activities are conducted and how cyanide is managed, and these descriptions have been made available to communities and other stakeholders.

Ahafo South has developed a written Cyanide Fact Sheet in English, Ghana's official language. This sheet is distributed at the external stakeholder meetings and is available at the community information centres. During the stakeholder meetings, the information contained in the Cyanide Fact Sheet is also communicated in Twi, the local language. The auditors reviewed the Cyanide Fact Sheet to verify compliance.

The operation has also disseminated information on cyanide in verbal form where a significant percentage of the local population is illiterate. Ahafo South has developed a presentation on cyanide management that is presented in Twi during the stakeholder engagement meetings and contains various pictures of cyanide management facilities and related infrastructure.

The operation makes information publicly available on confirmed cyanide release or exposure incidents. Ahafo external affairs personnel maintain a list of critical external contacts including chiefs, clergy, and other notable community persons to effectively disseminate information about possible emergency situations and responses.

Newmont reports on cyanide management, at all operations, publicly in the Newmont Sustainability Report available on the company website.

Any incidents involving cyanide exposure or release will be subject to detailed reporting, both internally and externally, to affected communities and relevant regulatory authorities.

There have been no incidents of cyanide release or exposure over the audit cycle that fall under the requirements of Standard of Practice 9.2. Only five cyanide related leaks or spills (classified as insignificant or minor per Newmont Incidents Classification) have occurred. These were not reportable but were included in the annual environmental reports submitted to the EPA Ghana. These annual environmental reports are available to the public through the EPA Ghana's library system.

The auditors reviewed the annual environmental reports submitted to EPA Ghana, the investigation reports for the insignificant or minor cyanide events, and the Newmont sustainability reports. The auditors also interviewed environmental personnel to verify compliance.

Signature Page

WSP USA Inc.

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