

Newmont Corporation

Lihir Gold Mine

International Cyanide Management Code

Mining Operations Recertification Audit

Summary Audit Report



30 April 2026



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1. AUDIT DETAILS

1.1 Operation

Lihir Gold Mine (Lihir)

1.2 Owner

Newmont Corporation

1.3 Operator

Newmont Corporation

1.4 Responsible Person

Pearson Leki – Metallurgy Superintendent

1.5 Address

Lihir Island, New Ireland Province
P.O Box 789, Port Moresby 121
Papua New Guinea

1.6 Contact Information

Tel: +61(0)437 529 536
Email: Joseph.Silih@newmont.com

1.7 Audit Dates

The site audit was conducted from 28 to 31 October, 2025.

1.8 Description of Operations

Located on Aniolum Island in Papua New Guinea's New Ireland Province, the Lihir mine is one of the world's largest producing gold operations and is wholly owned by Newmont Corporation following its acquisition of Newcrest Mining Limited in 2023.

The gold deposit at Lihir is within the Luise Caldera, an extinct volcanic crater that is geothermally active, and is one of the largest known gold deposits in the world. Most of the ore is refractory and is treated using pressure oxidation before the gold is recovered by a conventional leach process. Lihir produces gold doré.

Lihir is an open-pit mine comprising of two overlapping pits. The operation has designated facilities for unloading, storing and mixing of cyanide. The facilities were designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules and other sound and accepted engineering practices for these facilities. Two cyanide reagent facilities are present on site and the newer facility is the primary reagent facility. Both the reagent facilities and container storage area are located away from people and surface water.

Only solid cyanide in briquette form is unloaded from bulka bags at the reagent facilities which are located within concrete secondary containment areas. Locked cyanide shipping containers are stored on an aggregated hardstand near the primary reagent facility. The containers are enclosed with security fences with access through security gates. The locked cyanide shipping containers are also stored on an interim basis on a concrete hardstand adjacent to the secondary reagent facility that is also enclosed within a security fence. Cyanide mixing and storage tanks at both facilities are secondarily contained and located on concrete surfaces that can prevent seepage to the subsurface.

Ore fed to the Lihir process plant is predominantly refractory (sulphide bearing) and requires oxidation to burn sulphur and expose the gold for recovery via cyanidation. The process flow consists of three milling circuits - Flotation Grade Operation (FGO), High Grade Operation 1 (HGO1) and High Grade Operation 2 (HGO2). Generally high grade ore is fed to one mill and then directed straight to the autoclaves where sulphides are oxidised to sulphuric acid. The other two mills receive lower grade ore which is subsequently upgraded via flotation before reporting to the autoclaves.

Acid entrained in the oxidised slurry exiting the autoclaves is washed from the slurry in a series of Counter-Current Decantation (CCD) thickeners. Washed slurry reports to the Neutralisation, Cyanidation and Adsorption (NCA) circuit where lime is added to increase slurry pH and cyanide is added to leach gold into solution. Gold in solution is adsorbed onto carbon and then recovered via elution, electrowinning and smelting processes to produce gold doré. Tails from the NCA circuit are combined with the acidic overflow from the CCD thickeners. Residual cyanide reacts with the acid to form hydrogen cyanide. Flotation tails and NCA tails are then combined and directed to the Deep Sea Tailings Placement (DSTP) system. Tails and/or process water is not recirculated to the milling circuit, therefore Weak Acid Dissociable (WAD) cyanide is not present in the milling circuit. The cyanide facilities at Lihir have not changed since the previous audit. The following cyanide facilities were included in the scope of this audit:

- Neutralising Cyanidation Adsorption (NCA)1 and NCA2 circuits
- Cyanide Mixing Area (CN)1 and CN2 mixing and storage facilities
- Counter Current and Decantation (CCD) Overflow tank (TK2054A)
- Tailings storage tank (TK2054B)
- Neutralisation Cyanide Adsorption (NCA) Tailings Pipeline
- Tailings mix tank (Tank TK2055)
- CN Deaeration Tank (TK2050) and deep-sea tailings placement (DSTP)
- Cyanide box incineration area.

2. AUDITOR INFORMATION

2.1 Audit Company

Cyanide Audit Services

ABN: 34845262702

6 Cowper Road Sorrento

WA 6020 Australia

2.2 Auditor

Lead Auditor and Technical Specialist – Rudi Seebach

2.3 Contact Details

Email: rudi@cyanideaudit.com.au

Mobile: +61(0)48 775 1801

2.4 Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute (ICMI) and meet the applicable criteria established by the ICMI for Code Auditors.

I attest that this Audit Report accurately describes the findings of the recertification audit. I further attest that the audit was conducted in a professional manner in accordance with the International Cyanide Management Code's *Mining Operations Verification Protocol* (June 2021) and using standard and accepted practices for health, safety and environmental audits.

Newmont Corporation —
Lihir Gold Mine

Operation



Signature of Lead Auditor

30 January 2026

Date

3. AUDIT FINDING

The operation is:

- IN FULL COMPLIANCE
- IN SUBSTANTIAL COMPLIANCE
- NOT IN COMPLIANCE

With the International Cyanide Management Code.

The operation has not experienced any compliance issues or significant cyanide incidents during the previous two-year audit cycle.

4. PRINCIPLES AND STANDARDS OF PRACTICE

Principle 1 – Production and Purchase

Standard of Practice 1.1

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

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 1.1

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 1.1; to purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

The cyanide purchased by the mine is manufactured at a facility or facilities certified as being in compliance with the Code. The operation's contract with its cyanide producer requires that the cyanide be produced at a facility that has been certified as complying with the Code.

Lihir has a Major Goods Contract (Contract) with Tongsuh Petrochemical Corporation Limited (Tongsuh). The Contract requires that the cyanide being produced at a facility that has been certified as being in compliance with the Code. Tongsuh was recertified as being in full compliance with the Code on 19 April 2023.

Principle 2 – Transportation

Standard of Practice 2.1

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 2.1

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 2.1; requiring that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

The operation has chain of custody records or other documentation identifying all transporters and supply chains responsible transporting cyanide from the producer to the operation. Lihir maintains a contract with Tongsuh that requires all cyanide produced at a Cyanide Code–certified facility to be transported by a company that is also certified under the Cyanide Code.

Tongsuh has provided Lihir with written confirmation that Bukwang Logistics is exclusively used for transporting sodium cyanide from the Ulsan Plant to the Port of Busan. Bukwang Logistics was recertified as being in full compliance with the Code on 24 April 2025.

From the Port of Busan to Put Put Wharf at Luise Harbour, Lihir Island, cyanide is transported under the Lihir Gold Limited Papua New Guinea Supply Chain. This supply chain was certified in full compliance with the Cyanide Code on 27 September 2023.

Principle 3 – Handling and Storage

Standard of Practice 3.1

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

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 3.1

Summarise the basis for this Finding/ Deficiencies Identified:

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.

Facilities for unloading, storing and mixing cyanide has been designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules and/or other sound and accepted engineering practices for these facilities.

Two cyanide reagent facilities are present on site. CN1 is an older facility located adjacent to the Gold Room. CN2 is a newer facility that is located adjacent to the Lime Plant. CN2 is the primary reagent facility. Design and as built documents are approved, signed, or stamped by professional engineers or project managers from Lihir.

The site, including CN1 and CN2 is licensed by the Papua New Guinea (PNG) government. Locked cyanide shipping containers are stored on an aggregate hardstand near the Lime Plant at CN2. The containers are enclosed within a security fence. In addition, the entire processing facility is located within a security fence (2m cyclone mesh, topped with three strands of barbed wire) with access through manned security gates.

Locked cyanide shipping containers are also stored on an interim basis on a concrete hardstand adjacent to CN1 that is enclosed within a security fence (as per above), which is in turn, located within the secure processing area. The CN1, CN2, and container storage area are located away from people and surface waters.

Both CN1 and CN2 are located away from offices and areas where workers may congregate. The closest building to CN2 that is used and occupied is the Fixed Plant Maintenance building, this facility is over 100 m away. The closest building to CN1 that is used and occupied is the Site Access Operations Centre (SAOC)/Operations Office building, the distance to this facility is approximately 140 m.

Nearby surface water bodies are the Luise Harbour at over 200 m from CN2. There is no direct pathway to these surface water bodies in the event of an anticipated incident. The cyanide offloading and storage areas are located within the fenced security perimeter of the processing facility.

Only solid cyanide in briquette form are unloaded from bulka bags at the CN1 (when operational) and CN2. These facilities are located within concrete secondary containments areas.

There are methods in place to prevent the overfilling of cyanide mixing and storage tanks at CN1 and CN2. For both facilities, mixing water is pumped into the mixing tank (TK091 and TK2091). An interlock on the water addition inflow automatically stops the water entering the tank at a set point value of 65%, which allows enough room to mix cyanide. The interlock prevents further addition of water to the tank. Following addition of the cyanide, more water is added until the interlock stops it at 85%. Mixing then occurs, when the mix is complete, the contents of mix tanks are automatically transferred to the storage tank (TK092 and TK2092).

Pressure sensors record levels within the mixing and storage tanks TK091 and TK092 (CN1) and TK2091 and TK2092 (CN2), the information is transmitted to the distributed control system (DCS) and level alarms have been set. In addition to the alarms, an overflow pipe allows for cyanide to overflow into the sump which pumps back

into the mix tank if it is overfilled. The level sensors within tanks were inspected as part of a 6 monthly preventative maintenance programme, and calibrated in an annual basis.

Cyanide mixing and storage tanks are located on a concrete surface that can prevent seepage to the subsurface. At both facilities the mixing and storage tanks are located within concrete, secondary containment.

At CN1, the cyanide mixing and storage tanks are situated on concrete ring beams. The perimeters of the tank bases are supported by the concrete ring beam while the inner sections of the tank base are positioned on 100 mm of oil sand, which overlies a 1.5 mm medium density polyethylene (MDPE) layer. Compacted fill is located beneath the MDPE layer. The MDPE layer forms a continuous impermeable layer beneath the tank, and it extends onto the top of the concrete ring beam. Concrete foundations underlie the facility. At CN2, the mixing and storage tanks are located on concrete plinths. The auditor observed that the mixing area, mixing tank, and storage tank were in good condition.

Secondary containments for the cyanide storage and mixing tanks are constructed of concrete, providing an effective barrier to potential leakage. This was confirmed during the site visit. The site maintains a structured inspection and maintenance program for all concrete containment facilities. Repairs were observed at the Acid Wash and Presoak Solution bunds, where a polyurea application was used to completely reseal the bunds.

Cyanide briquette bulk bags are stored in boxes within locked shipping containers, preventing any contact with water. These containers are located in a designated, secure cyanide storage area on an external concrete hardstand with adequate drainage to minimise the potential for solid cyanide exposure to water. The facility is supported by secondary containment, including bunding, perimeter drains and a sump. The cyanide mixing facilities are fully roofed, and mixing activities are not conducted during wet conditions.

The cyanide mixing facilities are equipped with ceiling fans and are open-sided to promote ventilation. Storage tanks at CN1 and CN2, as well as the CN2 mixing tank, are vented to the atmosphere. A formal unloading procedure requires containers to be moved to CN2 before opening, ventilated for five minutes, and then tested for the presence of HCN prior to removing boxed cyanide. Personnel wear HCN monitors at all times.

Locked cyanide shipping containers are stored on an aggregate hardstand near the Lime Plant at NCA2. The containers are enclosed within a security fence. In addition, the entire processing facility is located within a security fence (two metre cyclone mesh, topped with three strands of barbed wire) with access through manned security gates. Locked cyanide shipping containers are also stored on a concrete hardstand adjacent to NCA1 that is enclosed within a security fence (as per above), which is in turn, located within the secure processing area.

The cyanide mixing and storage areas consist of a concrete apron used for forklift access and box destuffing. Secondary containment facilities adjoin the destuffing areas, and contain bag hoists, a cyanide hopper with bag splitter, mixing tanks and storage tanks. The facilities are enclosed with wire mesh and locked gates.

Cyanide was observed to be stored separately from incompatible materials. The cyanide mixing and storage facilities are dedicated facilities. Boxed cyanide is stored in locked containers within dedicated laydown areas. An inspection of these areas did not identify the presence of incompatible materials.

Standard of Practice 3.2

Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.2

Summarise the basis for this Finding/ Deficiencies Identified:

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

Cyanide boxes are not re-used for any other purpose. Following destuffing, empty bags are placed into a wooden box. All empty boxes are then stacked in a designated location within the secure CN2 storage facility. Empty cyanide bags and boxes are removed from the facility via a routine collection process and taken to the waste disposal (box burning) facility where boxes are burned.

Lihir determined that the rinse of plastic bags present an unacceptable exposure risk to the operators. The boxes and bags are sent directly to the waste disposal facility where they are burned under controlled conditions. Triple rinsing is not required as the bags are not reused or manually handled.

Following destuffing, empty bags are placed into a wooden box. The Cyanide Mixing Procedure provides safe work instructions for placing the empty bags into wooden boxes, loading the boxes onto a flatbed truck, and transporting them to the designated waste area for incineration. The procedure requires operators to wear full PPE during this process, including an HCN monitor, Miniscape, dust mask, and gloves.

Standard Operating Procedures (SOPs) require the outside of shipping containers to be rinsed prior to transporting back to the wharf. SOPs have been developed and outline the process for the operation of valves and couplings during tasks such as completing a mix, system start up and shut down and collecting samples of cyanide solution.

The mixing procedure describes the process of delivery of containers, destuffing containers and stacking of empty boxes to prevent rupturing. SOPs state that empty, cleaned and marked cyanide boxes are to be stored no more than two high in preparation for removal. Shipping containers are stacked no more than 4 high.

A complete procedure that accurately reflects the process to be followed in the event of a spill occurring during transportation or mixing is contained in the Cyanide Emergency Response Plan (CERP) and the Cyanide Spill Assessment and Response Plan (CSARP). The Auditor inspected the cyanide mixing area and did not note spillage, such as dyed cyanide solution outside of the mix tank, or cyanide flakes or briquettes on top of the mix tank or in gratings of adjacent platforms or walkways.

SOPs have been developed and outline the safety requirements requiring appropriate personal protective equipment (PPE) and the process to be followed when conducting a mix, including an observer/spotter with radio communication being physically located outside the mixing area compound. SOPs clearly states to add dye to tank TK2091 and TK91 during the mixing process. It is specified that this is a safety requirement for the easy detection of spills or leaks.

Principle 4 – Operations

Standard of Practice 4.1

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

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 4.1

not in compliance with

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation does have plans and procedures that identify the assumptions and parameters on which the facility design was based and any applicable regulatory requirements as necessary to prevent or control cyanide releases and exposures consistent with applicable requirements.

The key assumptions and design parameters are provided in the Cyanide Management Plan (CMP). The assumptions have also been incorporated into the site's operating plans and procedures, where applicable.

The operation has plans and procedures that describe the standard practices necessary for the safe and environmentally sound operation of the facility including the specific measures needed for compliance with the Code, such as inspections and preventative maintenance activities.

Preventive maintenance programmes have been developed for the site and activities documented to ensure that equipment and devices function as necessary for safe cyanide management. The site uses the SAP system to manage maintenance activities in the process plant and this includes preventative maintenance.

Cyanide alarms, detectors, pumps and tanks have been included within SAP. The process plant has a routine set of tasks on planned maintenance, including daily, weekly, quarterly and annual inspections of the dedicated cyanide facilities. Work orders generated from these inspections are entered and tracked to completion within this system.

Cyanide critical equipment has been identified in SAP and is provided as Appendix 2 within the Cyanide Management Plan. The list includes approximately 300 items deemed critical for the safe and environmentally sound operation of the cyanide facility. Appendix 2 details the SAP task list number, maintenance plan number, maintenance item number, description and the frequency of the task.

The operation does implement procedures to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures, and incorporate any measures necessary to protect worker health and safety and the environment.

The operation has implemented a management of change (MOC) procedure. The objective of the procedure is to ensure that health, safety, environmental, community and production issues resulting from a change are identified and assessed, and control measures are implemented.

The MOC procedure requires that all relevant stakeholders be included for any cyanide-related changes. This includes the Site Cyanide Champion, the Site Health and Safety Representative, and the Site Environment Representative. The procedure further requires the MOC Owner to ensure that the appropriate stakeholders have been engaged and that their recommendations are incorporated into the Implementation Plan prior to MOC approval.

The change management process is conducted In CHESS (internal electronic record-keeping and action-tracking system). Completed change management examples were observed in CHESS.

The operation has cyanide management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases. In relation to the water balance, the operation does not use a water balance for the prevention of release. The Lihir cyanide facilities are a flow through system ultimately discharging to a DSTP system.

The operation has a DCS that is used to monitor the operation of the facility together with in field monitoring carried out by process operators. There are a series of contingency procedures covering:

- Overtopping of the Containment Pond
- Leaking NCA tanks
- Tails pipeline failure
- High WAD cyanide
- Upsets surrounding DSTP
- Cyanide spills or tank failure
- Site power outage
- Safe shutdown of the process plant

In the event of temporary closure, cessation of the operation or emergency shutdown several procedures and the Mine Closure Plan are utilised to ensure the safe shutdown of the process plant. A post closure/temporary closure monitoring and maintenance program will also be implemented.

The Mine Closure Plan states that a reduced workforce will remain on site, with services such as power and water maintained. Environmental monitoring activities will continue in line with regulatory requirements. The operation also has a CERP that identifies emergency scenarios involving cyanide and the specific response procedure.

The operation conducts inspections of unloading, storage, and process areas, as applicable to each site. Tanks are registered within the SAP maintenance management system. Specific maintenance tasks and associated frequencies have been assigned for each tank which are subject to American Petroleum Institute (API) Inspections.

Secondary containments are inspected routinely through multiple layers of operational and statutory checks. Daily shift inspections use the High-Risk Task (HRT) checklist, which includes verification of cyanide-related equipment and prompts operators to check containment areas for integrity, the presence of fluids, available capacity, and that all drains are closed or locked to prevent environmental releases.

Weekly 274 Area Inspections, required under PNG Mining Legislation, provide a more detailed assessment using a formalised template. These inspections include checks for leaks or spill evidence, bund integrity, functional safety equipment, and correct signage and labelling.

Inspections require documentation of inspection dates, inspector names, deficiencies, and corrective actions, with all records retained in CHESS. Findings are actioned where required, and work orders are raised and tracked to completion.

Secondary containments are therefore verified daily and weekly, and any deficiencies identified through these inspections result in a work order in SAP or an action in CHESS. The site does not have any leach pads and the HDPE lined containment pond does not have leak detection but the liner is inspected weekly for tears as part of the 274 inspection process. Cyanide reagent pipe in pipe lines are tested for leaks at the tell tales during daily shift inspection.

Pumps and valves are registered in SAP. Specific maintenance tasks and associated frequencies have been assigned for each item. In addition, pipelines, pumps and valves are inspected during daily shift and weekly 274 inspections.

The Containment Pond is used for contingency storage and does not normally contain cyanide. Freeboard levels are monitored through CCTV and during weekly 274 inspections, with increased monitoring when freeboard capacity decreases, and physical markers provide a visual indication of pond levels for monitoring purposes. A 2 m freeboard requirement is specified in the Lihir Process Plant – Containment Pond Management TARP.

The operation inspects cyanide facilities on an established frequency sufficient to assure and document that they are functioning within design parameters.

Inspections conducted are documented, including the date of the inspection, the name of the inspector, and any observed deficiencies. The nature and date of corrective actions are also documented, and records are maintained.

Any identified deficiency noted on the checklist is transferred to the Action List section of the Inspection form, and a work order is created in SAP. The Action List notes:

- Location of the equipment and its asset number
- Corrective action required
- Assigned risk value
- Responsible person
- Work order number
- Completion date

The inspection forms are signed by the Inspector, Supervisor, Coordinator and Superintendent. Preventive maintenance programmes are mostly implemented, and activities documented to ensure that equipment and devices function as necessary for safe cyanide management.

System generated preventative maintenance activities are conducted on-site. The Maintenance Plant Superintendent advised that the Maintenance Department has developed maintenance strategies for all equipment on-site based on operator experience and the original equipment manufacturer specifications. Once developed, maintenance strategies are entered into SAP the sites preventative maintenance (PM) database.

Maintenance Planners on-site coordinate the scheduling of maintenance activities across short-, medium-, and long-term planning horizons, including weekly plans, multi-week forecasts, annual planning, and major event schedules. Each weekly plan is confirmed between planners and maintenance teams before being reviewed with the Process Plant Coordinator.

Maintenance works orders are allocated at the daily pre-start meeting. A work order, and depending on the complexity of the job may have a work pack attached (check sheets and technical instructions). In addition to specific plant work orders, maintenance general area inspections are included as a system general work order. These inspections include pipes, pumps, valves, and tanks within the inspection area. The operation does have emergency power to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted.

The site is supplied by multiple independent power sources that provide redundancy and backup capability in the event of a power failure. These generation systems are continuously maintained and remain in active service, ensuring they are available to support plant operations when required.

In the event of a supply interruption, an automated load shedding system is in place to stabilise the network and prioritise critical loads, enabling continued energy supply to essential plant areas. This resilience is supported by established maintenance programs that ensure all generation and backup assets are maintained in operational condition through ongoing servicing and upkeep, rather than reliance on periodic testing.

Original Equipment Manufacturer (OEM)-supplied equipment is maintained under a formal Computerised Maintenance Management System (Maximo), with a significant volume of completed work orders demonstrating sustained and active maintenance activity. Site-managed equipment is maintained through SAP, with additional verification checks undertaken to confirm maintenance compliance and ensure ongoing asset reliability.

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.2; to introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

The operation has implemented a program to evaluate cyanide use in the mill and adjust the addition rate to minimize its use. Cyanide addition rates were originally determined during the feasibility study and have been refined as the project has evolved. Continual test work is conducted on new ore sources for the plant.

The cyanide added to the NCA and elution circuits is approximately 25% strength and is fed from either CN1 or CN2 mixing and storage areas. Free cyanide and WAD cyanide concentration is measured on six of the tanks in each NCA circuit. There are cyanide addition points on three of the eight NCA tanks. The cyanide flowrate is measured and controlled by modulating valves. There are four cyanide analysers (Process IQ Cynoprobe v3) installed, two for each NCA train. Each analyser will automatically sample and analyse three different tanks with manual operator checks as backup.

The Metallurgical Superintendent is accountable for setting the parameters for cyanide dosing and preparation of standard solution for calibration whilst the Superintendent – Processing (Back End) is accountable for adherence to this parameter and maintenance of levels. The target cyanide concentration is normally set between 280-320 ppm depending on the gold feed grade and ore leaching characteristics.

The operation has evaluated a number of control strategies for cyanide addition. Depending on deviation between the analysers and operator titrations the control system will be switched between different modes to ensure the set point is maintained in the three tanks at different levels.

In addition to the control modes, there are override/interlock controls installed to override the control modes to minimise excessive cyanide usage, minimise HCN gas emission and manage WAD cyanide. There are guiding documents for analyser operation and maintenance to ensure the analysers are reliable and produce accurate results. The operation has implemented its strategy to control its cyanide addition, including:

- Metallurgical test work
- Leach test work
- Online analysers
- Manual testing
- Set points

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
 not in compliance with

Standard of Practice 4.3

Summarise the basis for this Finding/ Deficiencies Identified:

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

The Lihir cyanide facilities are a flow through system ultimately discharging to a DSTP system at a depth of 115 m. As no cyanide solutions are stored outside of process tanks, there is no chance of unintentional releases and a probabilistic water balance is not required to protect against this.

Lihir commissioned an investigation into the need for a probabilistic water balance (PWB) to prevent unintentional releases from the operation. The study assessed short duration intense storms or daily rainfalls occurring over the longer seasonal and annual durations and the ability for site containments to retain the events without release to the environment.

The study concluded that a PWB is not necessary to prevent unintentional discharges to the environment as the site has sufficient capacity to retain the storm events. The conclusion was provisional on the ability to pump between the containment pond, which is used as contingency storage, and the DSTP.

The Auditor confirmed during discussions with the Metallurgist and through visual inspection that there is the ability to pump between the Containment Pond and the DSTP. Inspection and maintenance routines were also observed for the area and pump.

The site has developed a contingency procedure to manage the Containment Pond and pumping transfers. The contingency procedure includes the use of a secondary pump if required to manage the Containment Pond level and prevent overtopping, as well as monitoring of pond freeboard and environmental sampling.

There are also levels alarms on the DSTP tank and periodic inspections on the pipeline from TK2054B (tailing storage tank) to TK2055 (tailings mix tank).

As Golder was involved in the assessment of the need for a probabilistic water balance an Independent Review was completed of the ICMC Assessment of Probabilistic Water Balance Requirements report during the previous audit report. There is no change to these findings.

The independent report concurred with Golder's assessment and provided that:

"...detailed probabilistic water balance is not warranted for the Lihir Gold Mine. It is noted that the current system is essentially a "flow through" discharge to the marine environment and, on the basis of calculations by a Golder specialist, the single containment pond provides sufficient containment for contingency and run off, with the freeboard of 2 m not being exceeded under a realistic worst-case event."

Standard of Practice 4.4

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

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 4.4

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation does not have any open waters where WAD cyanide exceeds 50 mg/L WAD cyanide. The Containment Pond is the only open water that could potentially contain a cyanide solution.

This pond is used as additional containment for the processing tanks and would not normally contain cyanide solutions in excess of 50 mg/L WAD cyanide. The pond is monitored, and the operation confirmed that under normal operations the WAD cyanide levels within the Containment Pond are consistently less than 0.50 mg/L WAD CN.

The operation has a DSTP rather than a conventional Tailings Storage Facility (TSF). The DSTP system discharges tailings at a depth of 115 m. The operation does not have heap leach facilities or solution ponds.

Standard of Practice 4.5

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation has a direct discharge to surface water via the DSTP. The operation has been issued with a Discharge Permit by the Department of Environment and Conservation (DEC) (now Conservation and Environment Protection Authority, CEPA) (WD-L3 (191)) authorising 446, 760, 000 m³/year across nine discharging points. Of these, only Discharge Point 3 (Tank TK2050) contains cyanide. Discharge Point 3 is the De-aeration tank associated with the DSTP and the authorised discharge occurs at a sufficient depth of water to avoid mixing with the shallow water marine zone.

The Discharge Permit has defined a mixing zone for Discharge Point Three that extends 1.8 km to the north and 2.3 km to the south of the outfall alignment. Historical correspondence from the ICMI advised that the 0.5 mg/L WAD cyanide limit applied to the end of pipe discharge is not applicable where a mixing zone has been authorised by the government, however this evidence was not sighted by the auditor.

The operation does monitor for cyanide in surface water downgradient of the site and the operation can demonstrate that direct discharges to surface water do not cause the concentration of free cyanide in the receiving water to exceed 0.022 mg/l downstream of any established mixing zone. The Discharge Permit has defined a mixing zone for Discharge Point Three that extends 1.8 km to the north and 2.3 km to the south of the outfall alignment.

Samples for WAD CN are collected both within the mixing zone and at its boundary as part of the Lihir Environmental Management and Monitoring Program. The marine water quality results reviewed by the Auditor showed that free cyanide concentrations at the established mixing zone sampling locations consistently remained below 0.022 mg/L.

The operation does not appear to have an indirect discharge to surface water. The Containment Pond is located adjacent to the Small Boat Harbour in the greater Luise Harbour and is the only likely source for any potential indirect discharge into the Small Boat Harbour and Luise Harbour. The Containment Pond is used for contingency storage and does not normally contain cyanide.

Standard of Practice 4.6

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.6; to implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

Lihir does not implement specific water management or other measures to manage seepage to protect groundwater beneath and/or immediately downgradient of the operation due to the limited potential sources of groundwater seepage and groundwater users.

Groundwater extraction for domestic use occurs only at the Londolovit Borefield, which supplies Londolovit Town. This borefield is located upstream of the cyanide facility. Although the town of Put Put is adjacent to the process plant, the Environment Lead confirmed that groundwater is not used there. Instead, Lihir provides water to designated distribution points throughout the Put Put community.

As no beneficial use exists or is designated beneath or immediately downgradient of the facility, and it was advised that there is no applicable numerical standard for protection of that use, this question is not applicable. The operation does not use mill tailings as underground backfill as there is no underground mining activity.

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 not in compliance with Standard of Practice 4.7

Summarise the basis for this Finding/ Deficiencies Identified:

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

Spill prevention or containment measures are provided for all processing facility cyanide unloading, storage, mixing and process solution tanks.

The cyanide mixing and storage facilities (CN1 and CN2), the NCA circuits and the tailings neutralisation circuit are located within impervious concrete bunds, which are equipped with sump pumps, covered concrete spoon drains and the lined process containment pond.

All NCA (neutralisation, cyanidation, and absorption) tanks are constructed on ring beams. Tank foundations consist of a thick oiled sand pad, sitting on a 1.0mm MDPE impermeable membrane liner, which sits on compacted coronous material. The MDPE liner is fixed to the internal concrete wall beneath the tank.

The MDPE liner forms the secondary containment beneath the tank floor. Secondary containments for cyanide unloading, storage, mixing and process tanks are sized to hold a volume greater than 110% of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event.

The Process Containment Pond is included within the containment calculations. Procedures and inspection processes are in place to confirm and maintain sufficient freeboard within the Containment Pond to satisfy the secondary containment requirements.

Measures are in place and being implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. Secondary containment systems are installed for all tanks associated with cyanide storage, mixing, leaching, detoxification, carbon stripping, and acid washing.

Each containment area includes a sump designed to capture any spilled cyanide solution or contaminated water. Sumps are fitted with automated pumps that return collected liquids directly to the detox tank. Sumps and pumps are inspected on a regular basis. Because these engineered controls effectively manage any potential discharge, no standalone procedure has been developed specifically for secondary containment outflows.

All cyanide process tanks are fully located within secondary containment; therefore, no additional procedures are required. Spill prevention or containment measures are provided for all cyanide solution pipelines to collect leaks and prevent releases to the environment.

Cyanide, process solution and tails lines are secondarily contained within secondary containments, pipe-in-pipe and lined trenches. A site inspection did not identify any cyanide pipelines that present a risk to surface water.

Cyanide tanks (including process solution tanks) and pipelines are constructed of materials compatible with cyanide and high pH conditions (uPVC, HDPE, carbon steel, mild steel and stainless steel are used for all pipelines containing cyanide within the site). The leach/ adsorptions tanks are made from carbon steel. The presoak tanks and elution column are made from 304 stainless steel. The cyanide mix tanks are made from carbon steel.

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

Summarise the basis for this Finding/ Deficiencies Identified:

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.

In 2018, Lihir engaged Worley Parsons to conduct a visual inspection of the cyanide facilities (excluding the Gold Room), as comprehensive QA/QC records had not been retained. A registered professional engineer undertook these inspections to determine whether any cyanide-related structures presented an unacceptable risk in terms of structural or containment integrity.

The inspection found all cyanide-containing plant to be in good condition, with the exception of cyanide mixing tank TK091, which was identified as the sole high-risk item. The review recommended that TK091 be replaced as a priority, as corrosion of the welded seams had reduced the tensile strength of the welds and created a risk of sudden catastrophic failure. TK091 was subsequently replaced.

Since the 2018 engineering review until the last recertification audit in 2023, several cyanide facilities have been modified or newly constructed. Modifications have been managed through the site's Management of Change process, while larger new projects have been delivered by the Engineering Projects Team. QA/QC documentation is now incorporated into the completion packages for Engineering Projects Team works, and these packages include the required QA/QC records.

QA/QC records have been retained for all cyanide facilities. Where QA/QC records were not preserved, declarations of conformity issued by independent engineers have been retained.

Standard of Practice 4.9

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

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 4.9

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation has developed written standard procedures for monitoring activities. The operation's Discharge Permit requires the site to have in place an Environmental Management and Monitoring Program (EMMP) which:

"...outlines specific monitoring elements designed to ensure the impacts arising from Lihir's activities are within the range and extent of the environmental parameters approved by the State of PNG and in accordance with the approved Environmental Plan."

The EMMP describes the site environmental management and monitoring programmes, including Amenity (meteorology, dust, sulphur emissions and noise); Surface water; Ground water; Marine; and Biodiversity. A number of procedures have been developed to support the EMMP through the provision of specific instructions for the monitoring programmes.

All documents form part of the site's Environmental Management System (EMS). The documents are also contained within the Document Management Control System. Sampling and analytical protocols have been developed by appropriately qualified personnel.

Internal laboratory procedures were established by the plant's quality engineer, who holds a degree in mining engineering. The monitoring plan and associated procedures were prepared by the plant ecologist (a qualified chemical engineer) and the environmental lead (a degreed environmental scientist).

Field sampling and laboratory analysis protocols for external testing were independently developed by Australian Laboratory Services (ALS). This laboratory maintains NATA (National Association of Testing Authorities, Australia) accreditation under ISO/IEC 17025 17025 for laboratory competence in chemical testing. The procedures specify how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, and cyanide species to be analysed.

The EMMP describes how and where samples should be taken, the species of cyanide as well as the frequency of sampling. Sampling techniques are specified within individual SOPs along with preservation techniques, chain of custody documentation and cyanide species to be analysed.

QA/QC measures, including laboratory duplicate sampling and field blanks, have been incorporated into the relevant SOPs. Shipping instructions are provided through EQUIS, the environmental monitoring, data, and reporting system. Sampling conditions and procedures are documented in writing.

All environmental procedures are documented in writing. All field sampling activities are recorded on forms that allow the person undertaking the sampling to comment on conditions that may influence analysis of the parameters formally included within the existing programme. It is considered that the monitoring frequencies are adequate to characterise the medium being monitored and to identify changes in a timely manner.

Principle 5 – Decommissioning

Standard of Practice 5.1

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 5.1

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 5.1; to plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

The operation has developed written procedures to decommission cyanide facilities at the cessation of operations. A Cyanide Facilities Decommissioning Plan has been prepared to ensure compliance with the Code. The plan details activities such as:

- Decontamination of equipment
- Sequential shutdown of the circuit and removal of residual cyanide
- Monitoring of contaminated rinse waters
- Dismantling of the process plant

The plan also provides:

- A Decommissioning Schedule
- Contingency Plan/Trigger Levels
- Decommissioning Costs

The Cyanide Facilities Decommissioning Plan does include an implementation schedule for the decommissioning activities. The implementation schedule was reviewed, and the level of details considered suitable for the stage in the mine life.

The Cyanide Facilities Decommissioning Plan have been reviewed and updated. The Cyanide Management Plan notes that the plan will be reviewed and updated with the Mine Closure Plan (MCP) and mine closure cost estimates every five years. The Cyanide Facilities Decommissioning Plan was updated in 2025.

Standard of Practice 5.2

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 5.2

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation has developed an estimate of the cost to fully fund third party implementation of the cyanide related decommissioning measures as identified in the operations closure plan. The Cyanide Facilities Decommissioning Plan incorporates an updated cost estimate that reflects the full scope of work required for decommissioning.

The estimate covers all third-party contractor activities, including mobilisation to site, execution of the planned decommissioning tasks, and subsequent demobilisation. This ensures that the financial provisions accurately represent the resources needed to safely and effectively complete decommissioning in accordance with Code expectations.

The operation has established a process to review and update the cost estimate at least every five years and when revisions to the plan are made that effect cyanide related decommissioning activities. The Cyanide Management Plan states that the plan, including its cost estimate, will be reviewed and updated in alignment with the Mine Closure Plan (MCP) and associated closure cost estimates on a five-year cycle. In accordance with this requirement, the Cyanide Facilities Decommissioning Plan and its cost estimate were updated in 2025.

Lihir is not required to establish a financial mechanism approved by the applicable jurisdiction to cover the estimated costs for cyanide related decommissioning activities as identified in its decommissioning and closure strategy. It is understood that at the time of the audit, the Government had not formally requested a security bond.

The operation has established self-insurance or self-guarantee as a financial assurance mechanism, and has provided a statement by a qualified financial auditor that it has sufficient financial strength to fulfil this obligation as demonstrated by an accepted financial evaluation methodology.

Newmont engages Ernst & Young (EY) to conduct an annual financial audit, including providing an opinion on whether the Company's consolidated financial statements present a true and fair view of its financial position, financial performance, and cash flows.

As part of this audit, EY also reviews the estimated Asset Retirement Obligation (ARO), which incorporates cyanide related decommissioning costs. EY must assess the Company's ability to continue as a "going concern", or to continue operating indefinitely while meeting its ARO even after the cessation of its operations.

This term also refers to a company's ability to make enough money to stay afloat or to avoid bankruptcy. If there was substantial doubt about the Company's ability to continue as a "going concern", a disclosure would be required in the Company's annual financial statement. The 2025 audited financial statements established Lihir operation's ability to continue as a "going concern".

These processes demonstrate that the Company has sufficient financial strength and is capable of fully funding cyanide related decommissioning activities in accordance with the Cyanide Code.

Principle 6 – Worker Safety

Standard of Practice 6.1

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation has developed procedures describing how cyanide related tasks such as unloading, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure.

Lihir has established comprehensive procedures for all cyanide-related tasks—including unloading, mixing, plant operations, confined-space entry, and equipment decontamination prior to maintenance—to minimise worker exposure. The standard operating procedures (SOPs) provide detailed guidance on cyanide-specific first aid requirements and the appropriate personal protective equipment (PPE). All documents are reviewed and updated as required to ensure they remain aligned with current practices and regulatory expectations.

Each procedure outlines task-specific hazards and prescribes safe work practices. Supporting materials clearly define PPE requirements, personnel responsibilities, and step-by-step instructions for safe execution. Verification was confirmed through auditor review of the written procedures and associated plans.

The procedures require, where necessary, the use of PPE and address pre-work inspections. Procedures include risk assessment references, pre-task checklists, PPE requirements, references to linked procedures, training prerequisites, and licence and permit requirements. The standard PPE for the site is hi-vis long sleeve shirts, hi-vis long pants, steel capped boots, safety glasses and hard hat.

Individual procedures list the additional PPE required for the task and there is signage in places advising of PPE that needs to be worn. When undertaking cyanide mixing, and in accordance with the procedure, personnel wear:

- PVC hand gloves
- Tyvek disposable coveralls
- A full-face respirator
- Safety helmets
- Portable HCN monitors
- PVC rubber boots.

Pre-work inspections are addressed through the JSA process where operators consider hazards in the work area prior to commencing a task. The operation also has a procedure for pre-work inspection of the cyanide mixing area. The operation solicits and actively considers worker input in developing and evaluating health and safety procedures.

The site conducts monthly safety meetings that all staff are required to attend. These meetings provide updates on new procedures and Plant changes, and they offer workers a structured opportunity to contribute to health and safety processes. Procedural documents are developed collaboratively across departments. Draft SOPs are circulated to departmental supervisors for review prior to implementation, and supervisors formally sign off on all SOPs and subsequent revisions.

Workers can raise concerns during pre-shift safety meetings, through the JSA process before starting a task, and during toolbox talks. Morning prestart meetings and weekly safety meetings also serve as key forums for discussing safety and operational matters, including procedural changes. Employees may raise issues with their supervisor at any time and are encouraged to request changes or suggest improvements to existing procedures.

Standard of Practice 6.2

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.2; to operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

The operation has determined the appropriate pH for limiting the evolution of HCN gas during mixing and production activities. The operation has established that a pH of 9.5 or above limits the evolution of HCN gas during production activities. The CMP details that the setpoint target is 9.8. Low (9.0) and high level (11) alarms are also present. The set point is controlled through the DCS and operators are not permitted to make changes to the set points without authorisation.

The pH alarm set points are managed using DCS Software Change Form, which is prepared by the Metallurgists and signed off by the manager for the area. The process includes changes to pH. The pH is also rated to tonnes and flow rate to maintain levels with dual online pH probes on the neutralisation tanks prior to cyanide addition.

DCS alerts Control Room Operator if the pH is too low. There is then a process to follow checking the dosing systems, manual check and calibrations. Cyanide mixing pH is controlled through the addition of caustic soda to the solution prior to the addition of sodium cyanide briquettes to maintain pH at 10.5.

The operation has identified activities and areas where the exposure to harmful concentrations of cyanide is possible. For such activities, the operation has operating procedures in place that state the PPE requirements. These identified activities include:

- Sodium cyanide reagent mixing.
- Work in the reagent area.
- Work in the NCA 1 and 2 areas.

In addition, personal HCN monitors must be worn when entering the NCA circuit areas, CN 1 and CN 2 mixing areas and all areas of the process plant. Stationary gas detectors are mounted at fixed locations within NCA 1 and NCA 2 of the process plant.

The operation has procedures that dictate what personnel must do when HCN monitor alarms sound. The HCN monitors, both static and personal, are set to alarm at 4.5 and 10 ppm. The operation has dictated the actions to be taken in the event of an alarm including actions to determine when it is safe to re-enter the area. Where the potential exists for significant cyanide exposure, the operation uses fixed and personal monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide gas and sodium, calcium or potassium cyanide dust to 10 ppm on an instantaneous basis and 4.5 ppm continuously over an 8-hour period, as cyanide.

Fixed monitors are located within the process plant area. All personnel entering either of the NCA circuits must wear a HCN monitor or be escorted at all times by an inducted person who is wearing a HCN personal monitor. If a fixed or portable alarm sounds at or above 4.5 ppm HCN, yet below 10 ppm, personnel are required to stop

work, make the area safe and report to their supervisor. Area checks will be conducted to confirm the HCN detection.

If operators had left the work area, they may return to the work area to carry out confirmation testing. If HCN levels fall below the limit, work may resume. If concentrations remain at or above 4.5 ppm, operators must maintain restricted access to the area and notify the control room for escalation. Because work is only permitted below 4.5 ppm, the 8-hour TWA of 4.7 ppm specified in the Code cannot be exceeded.

If a fixed or portable alarm sounds at or above 10 ppm HCN, personnel are required to stop work immediately, making sure that any tools, tasks at hand etc. are left in a safe manner, and evacuate to the nearest muster area (across and up wind wherever possible) of the high HCN concentration. Personnel should then secure access to the area and advise the shift supervisor or Control Room Operator by two-way that a high HCN gas reading has started an evacuation. Personnel are to remain at the muster point until given clearance by the supervisor to return to work.

Hydrogen cyanide monitoring equipment are maintained, tested and calibrated as directed by the manufacturer, and records are retained for at least three years. HCN monitors are calibrated onsite by the instrumentation technicians. Calibration is required quarterly for personal HCN monitors. Following calibration of personal HCN monitors, coloured tags are attached to monitor to indicate the current quarter. In addition, a daily bump test is conducted on all personal HCN monitors to further validate the quarterly calibration.

Fixed HCN monitors also undergo full calibration on a quarterly basis, including an alarm-sounding test and verification of alarm set points. These activities are scheduled and tracked through Lihir's SAP maintenance system. The instrumentation team also performs weekly inspections of fixed HCN monitors installed across the site to check for damage, obstruction, or material buildup.

Personal and fixed HCN monitor calibration records for the audit period were sighted by the auditor. Each record included the monitor's serial number, the calibration status (pass or fail), and the date the calibration took place.

Warning signs have been placed where cyanide is used advising workers that cyanide is present and that smoking, open flames and eating and drinking are not allowed. The signage also stipulates the PPE that must be worn when working in the area. Signage was observed to be located at entrances to the plant areas, CN1 and CN2 mixing and storage areas and at entrance points to the leaching circuits. Signage was clear and legible.

Designated smoking areas and amenities are provided for personnel to use, located away from cyanide facilities. In relation to eating and drinking, induction material states that eating and drinking on the processing plant is prohibited.

High strength cyanide is dyed for clear identification. The cyanide makeup SOP clearly states to add carmosine dye to tanks TK2091 and TK091 during the mixing process. It is specified that this is a safety requirement for the easy detection of spills or leaks.

Showers, low-pressure eye wash stations and dry powder or non-acidic sodium bi-carbonate fire extinguishers are located at strategic locations throughout the operation and are maintained, inspected and tested on a regular basis.

Emergency Showers, low pressure eyewash stations and dry powder or non-acidic sodium bicarbonate fire extinguishers are located at strategic locations throughout the operation and are tested on a regular basis. The auditor observed showers, eye wash stations and fire extinguishers in all cyanide areas.

Pre-operational inspection requirements are contained in the various task specific SOP's. The pre-operational check for cyanide mixing requires personnel to check emergency eye wash and shower stations are in working order prior to commencing a mix.

Routine inspections are completed via the Weekly 274 inspection process. The inspection check sheet contains prompts for visually checking and assessing the condition of fire extinguishers, safety showers and eye wash stations. The inspection sheet contains an action list which allows for the assigning responsible personnel and

work order numbers (if required) for tracking to completion. Fire extinguishers are located strategically throughout the plant and were observed to be serviced (tagged) and pressurised for use.

Unloading, storage, mixing and process tanks and piping containing cyanide are identified to alert workers of their contents, and the direction of cyanide flow in pipes is designated. There is signage on pipelines and tanks. Where labelling was in place directional indicators were observed. Signage is further supported through the induction and site-specific training processes.

Safety Data Sheets, first aid procedures or other informational materials on cyanide safety are written in the language of the workforce and available in areas where cyanide is managed. Information is generally provided in English and in Pidgin (the language of the country and workforce). Signage around the plant is provided in English and in Pidgin. SDS information is provided in English. The SDS information is provided in hard copy at the locations where cyanide is used.

Procedures are in place, to investigate and evaluate cyanide exposure incidents to determine if the operations programmes and procedures to protect worker health and safety, and to respond to cyanide exposures, are adequate or need revising.

Incident details are recorded in the CHES Database. This database also provides an action tracking and escalation function for the operation. Incident classification is determined via a risk assessment, conducted as part of the incident reporting and investigation process. The department responsible for the incident facilitates the process and is required to enter the incident into CHES. A 'sequence of events' and 'basic cause' are established, and actions developed to prevent re-occurrence.

A review of the CHES database shows that the system has been implemented and incidents are being recorded and investigated. Incident reports and investigation outcomes are shared with the workforce through safety alerts and communicated during toolbox and safety meetings.

Standard of Practice 6.3

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

in full compliance with
The operation is in substantial compliance with Standard of Practice 6.3
 not in compliance with

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.3; to develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The operation does have oxygen, a resuscitator, antidote kits and a radio, telephone, alarm system or other means of communication or emergency notification readily available for use at cyanide unloading and storage locations and elsewhere in the plant. The operation has oxygen and antidote kits located at the Medical Clinic and in the site 4WD ambulance. The Medical Clinic is located between the processing plant and the wharf and is within the processing plant operational area. The Clinic is permanently staffed with two medical personnel, and it has a single bed.

The operators were observed to be wearing radios and this is the primary means of notifying an emergency, there is also a dedicated telephone number, radio trunk number and an open emergency radio channel for alerting workers. The operation has emergency oxygen, resuscitator and rescue equipment in the form of Oxy-Viva kits stored at the cyanide storage and mixing area (in the Cyanide Spill Container) and with the Emergency Response Team (ERT).

The operation does inspect 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 schedule to ensure that they will be effective when needed. There are routine checklists for emergency response equipment, and these are completed on a regular basis. Oxygen cylinders are inspected to ensure that they are full and the oxygen washers kept free of cracks, dirt, grease and oil.

Cyanide antidote kits are stored as directed by the manufacturer at the Medical Clinic with labelled expiry dates. Cyanide antidote kits were observed by the Auditor within their respective expiry dates and stored at the correct temperature. The ERT undertake weekly checks of the site ambulance that is based at the Medical Clinic including emergency oxygen equipment and trauma kits.

The operation has developed specific written emergency response plans and procedures to respond to cyanide exposures. The operation has developed written emergency plans and procedures that outline the required response to cyanide exposure through ingestion, inhalation, and absorption via the skin or eyes. These documents collectively support the site's emergency response framework.

The Cyanide Emergency Response Plan (CERP) forms the foundation of this framework and is further supported by a suite of plans, procedures, and guideline documents. Each document specifies the appropriate response actions relevant to its purpose within the overall emergency management system.

The operation does have its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide. The site maintains a fully equipped ERT and an on-site clinic staffed by a Medical Doctor and a qualified Paramedic. The ERT is the primary responder to worker exposure incidents and is responsible for recovering and decontaminating any worker who is unable to self-rescue following cyanide exposure.

The team is trained in emergency first aid and HAZMAT response. Exposed personnel are treated either at the scene or at the on-site clinic by the site medic, using cyanide antidote kits and emergency oxygen (if required). Medical support is available on site during all working shifts.

The Emergency Response Coordinator advised that the workers once decontaminated and treated by the site medic would be transferred to the island's hospital and then to Port Moresby International Hospital by aircraft if required. Further medical referral out of Port Moresby will be decided on a case-by-case basis.

Aspen Medical would make the arrangements for medical evacuation of the patient which has been documented in the Lihir Medical Evacuation Response Plan. The operation has an on-site 4WD ambulance that can be used to transport the patient to the island's hospital or to the operations-controlled airstrip for evacuation.

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

The local hospital has experienced expatriate and local medical personnel and capabilities to respond to cyanide related emergencies. The operation has also contacted Port Moresby Hospital who advised that they are willing to accept cyanide patients.

Principle 7 – Emergency Response

Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

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

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation has developed the plans which all have a role in emergency response and address potential accidental releases of cyanide. The operation has established written emergency plans and procedures that define the required responses to plausible cyanide release scenarios at Lihir and outline the respective roles of the ERT and the Process Department.

The CERP provides the foundation for this framework and is supported by a suite of complementary plans, procedures, and guideline documents. Each document sets out the specific response actions appropriate to its purpose within the overall emergency management system.

The operation's emergency documentation does consider the potential cyanide failure scenarios appropriate for its site-specific environmental and operating circumstances. The plans have been based on following the stages of an incident, incident and notification; initial response and assessment; respond; recover; and closure. A Failure Modes and Effects Analysis identified the below 13 key plausible cyanide-related emergency scenarios:

- Fire during transport.
- Spillage of solid CN briquettes during transport and handling.
- CN1 or CN2 Reagent strength CN solution tank or pipe leak.
- CN1 or CN2 Reagent strength CN solution mixing or storage tank catastrophic failure.
- NCA1 or NCA2 Process strength tank or pipe leak on CIL circuit.
- NCA1 or NCA2 Process strength CIL tank catastrophic failure.
- Spillage of process solution onto unsealed surface due to CIL circuit overflow.
- Elevated HCN levels on top of NCA tanks (up to 30 ppm).
- Containment Pond spillage/overtop event.
- Tails line pipe leak.
- Tails discharge circuit, catastrophic tank, or pipe failure.
- Power failure to sea water pumps.
- High HCN build up in confined spaces.

These scenarios above resulted a plausible incidence scenario assessment which included transport accidents, pond overtopping, power outages and mechanical failures (i.e., pump failures, engineering, natural disasters, circuit blockages).

Planning for response to transportation-related emergencies considered transportation route, physical and chemical form of the cyanide, method of transport, the condition of the road or railway, and the design of the

transport vehicle. The site receives cyanide in solid form in bulk bags within boxes that are shipped in sea containers.

Off-site Transport emergencies are managed under the Code certified transporters emergency management plan. However, the emergency document addresses release scenarios resulting from transport accidents onsite, based on the following plausible scenarios for the site:

- Dropped shipping container (boxes) leading to the spillage of cyanide during wet or dry conditions.
- Cyanide transport truck and vehicle/other equipment interaction on the access roads.
- Container handler vehicle interaction or accident while moving CN containers.

The Cyanide Emergency Management Plan (CERP) establishes requirements for the evacuation of both the workforce and potentially affected communities during a cyanide emergency. Workforce evacuation is initiated by First Responders and the On-Scene Controller, who are responsible for cordoning the area, directing personnel to muster points, and ensuring movement upwind or crosswind to avoid exposure. Broader community considerations are incorporated through Social Performance and External Relations, which engages local authorities, provides public information, and participates in selected mock drills to ensure communities understand protective actions.

The Cyanide Response Emergency Procedure address the use of cyanide first aid measures, as outlined in the procedure for rendering first aid in the event of an accident when carrying out activities with sodium cyanide, including decontamination and administration of antidotes and medical oxygen. The following procedures provide guidance for controlling liquid and solid cyanide releases at their point of origin during transportation, mixing, processing activities:

- Hazardous Material Spill Emergency Response Procedure
- Cyanide Spill Assessment and Response Plan
- Cyanide Emergency – Liquid and Solid Spillage Procedure

Procedures referenced above outline containment measures assessment and mitigation. Future prevention is managed through the CHES database and associated incident-investigation procedures.

The department responsible for the incident initiates and facilitates the investigation, ensuring the event is entered into CHES. As part of this process, a clear sequence of events and underlying basic causes are identified, and corrective actions are developed to prevent recurrence.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

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

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation has involved its workforce in the cyanide emergency response planning process. This was undertaken during the initial development of the plan which has not had material changes since its inception. As noted in 6.1.3, the operation has in place mechanisms to consult with its workforce who are the main stakeholders for cyanide related emergencies.

The external community has not been involved in the emergency response planning however as discussed in 7.1.4 the communication of a cyanide emergency which would affect the local community would involve the Environment, Community Relations, External Affairs and Government Relations teams. The operation made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions.

As noted in 7.2.1, the operation has ongoing dialogue with the local community and landowners. There are no cyanide emergency scenarios that require operation to present information to the communities. However, the operation does communicate with the communities generally on cyanide management and spill response. Lihir is located on an island to the northeast of the Papua New Guinea mainland and all emergency response is facilitated by the operation and on-site ERT.

The Emergency Response Coordinator advised that the workers once decontaminated and treated by the site medic would be transferred to the island's hospital and then to Port Moresby International Hospital by aircraft if required. Further medical referral out of Port Moresby will be decided on a case-by-case basis.

Aspen Medical would make the arrangements for medical evacuation of the patient which has been documented in the Lihir Medical Evacuation Response Plan. The operation has also contacted Port Moresby Hospital who advised that they are willing to accept cyanide patients. The operation does engage in consultation or communication with stakeholders to keep the Emergency Response Plan current.

The operation does engage in consultation or communication with stakeholders to keep the Emergency Response planning current. The main stakeholder for the operation is its workforce and the operation engages through mock exercises and through safety meetings where revisions to procedures and plans are discussed and implemented. The emergency response and cyanide management documentation has recently been reviewed.

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 not in compliance with Standard of Practice 7.3

Summarise the basis for this Finding/ Deficiencies Identified:

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

Emergency roles and responsibilities are set out in the cyanide emergency response-specific duty cards, which identify the authorised emergency response coordinators, including the On-Scene Commander (OSC), ERT Supervisor, and the Incident Management Team/Emergency Management Team (IMT/EMT).

The Surveillance Control Communication Officer (SCCO) supports these coordinators by receiving emergency requests, dispatching the ERT as directed, maintaining communication with the ERT Supervisor, escalating matters to the IMT/EMT when instructed, and recording all radio communications during the incident. These functions enable the designated coordinators to carry out their decision-making and resource-commitment responsibilities.

The CERP and the Cyanide Spill Assessment and Response Plan outlines the equipment, responsible personnel (ERT) and other resources allocated to the emergency response. The operation has an on-site ERT comprised of full-time personnel. The ERT training needs analysis outlines the training requirements for the Emergency Response Team.

There is a 24-hour emergency control room, and contact information is provided in the Emergency Response Control and Command Procedure. The SCCO activates the IMT, determines the most appropriate IMT to respond, and notifies all personnel listed, advising them of the activation.

The duties and responsibilities of ERT Coordinators and Team Members are addressed in the CERP and supporting cyanide emergency response duty cards. The Cyanide Response Emergency SOP lists PPE and containment equipment. The operation has procedures to inspect the emergency response equipment to ensure its availability which is scheduled in the ERT Yearly Plan.

The role of Chief Medical Officer and Mine Site Clinic Medical Officer is defined in the CERP as well as supporting cyanide emergency response duty cards. The operation confirmed that outside entities included in the Emergency Response Plan are aware of their involvement and on a periodic basis and are included as necessary in mock drills or implementation exercises

Lihir is a remote site and there are no external responders that would be involved in the on-site response. The operation does have links with external medical facilities. As noted in 7.2.3, the operation uses Aspen Medical who would make the arrangements for medical evacuation of the patient which has been documented in the Lihir Medical Evacuation Response Plan.

The operation has also contacted Port Moresby Hospital who advised that they are willing to accept cyanide patients. The CERP states that external parties, are to be considered in mock drills.

Standard of Practice 7.4

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

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

The emergency documentation does include procedures and contact information for notifying management, ERT, medical officers and cyanide suppliers. Regulatory agencies would be addressed through the CERP.

The Emergency Response Control and Command Procedure outlines the process and the roles and responsibilities for activating the Site Response Team (SRT) which includes site management. It also specifies when to notify regulatory agencies, and Aspen Medical, who can support medical evacuation to a mainland hospital if required. The procedure is supported by an up-to-date contact directory for the Lihir SRT.

Emergency management documentation contains procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, including communication with the media. The CERP describes the process for notifying potentially affected communities of a cyanide-related incident and any required protective actions. Communication during a cyanide emergency involves the Environment, Community Relations, External Affairs, and Government Relations teams. Where external notification is required, the EMT identifies the stakeholders affected and is responsible for arranging and approving all communication with them.

The CERP also defines procedures for media communication, including preparing approved media releases, responding to inquiries, coordinating briefings and monitoring media coverage. Communication pathways are managed through the Social Performance & External Relations function, with the External Relations Representative participating in the SRT whenever external communication is required.

The operation has a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. The Cyanide Management Plan specifies the requirement and process for reporting any significant cyanide incident, consistent with the definitions provided in ICMI's *Definitions and Acronyms* document. Lihir confirmed that no significant cyanide incidents occurred during the current audit cycle that required notification.

Standard of Practice 7.5

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 7.5; to incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The Emergency Plans do describe specific remediation measures as appropriate for the cyanide release scenarios. The CERP and CSARP outline the processes for recovering liquid and solid cyanide, decontaminating soils or other affected media. While the use of neutralising chemicals is generally not recommended at Lihir, the Environment Department may refer to the Environmental Spill Assessment and Monitoring One Page Instruction if neutralisation is required. This guidance specifies that any neutralisation method must be confirmed with the manufacturer, as indicated in the SDS, to ensure best-practice remediation.

Material management requirements, sampling parameters, and disposal methods are also defined and must be undertaken in consultation with the Environment Department. The department reviews these activities in accordance with the Cyanide Affected Soil Sampling Plan and, where necessary, liaises with the supplier for clean-up and disposal advice. Disposal options, such as DSTP or landfill are considered alongside sampling requirements to confirm suitability for these pathways.

The CMP notes that providing an alternate water supply is not applicable, as the cyanide release scenarios identified for the site do not pose a risk to water sources used by the workforce or the community. There are no credible release scenarios that could impact community water supplies.

The emergency documents do prohibit the use of chemicals to treat cyanide that has been released into surface water. This has been addressed in the Environmental Spill Assessment and Monitoring Work Instruction.

The emergency documentation addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release. The both the CERP and CSARP defers to the environment department in the response to determine sampling requirements.

Monitoring is performed by members of the Environmental Department who have been suitably trained in the sampling and monitoring procedures involved. Such monitoring includes:

- WAD cyanide concentrations in soil.
- WAD cyanide concentrations in liquid discharges.
- Free cyanide concentrations in water bodies below the mixing zone of a spill.

Sampling locations are not stipulated, as they are incident dependent. The environmental monitoring procedures provide methodologies and sample preparation, preservation and shipment information.

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
 not in compliance with

Standard of Practice 7.6

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation does review and evaluate the cyanide related elements of its Emergency Response Plan for adequacy on a regular basis. The CERP states that emergency documents must be reviewed every two years, or sooner if an event or incident triggers the need for reassessment. This review process incorporates findings from mock drills and considers any changes to cyanide facilities or operational activities at Lihir that may influence incident scenarios.

Document control information is recorded in the footer, including the Date Published, Review Period, and Next Review, in line with Newmont's document control standards. Emergency documents reviewed during the audit were confirmed to have been updated within the past two years.

The operation does conduct mock cyanide emergency drills periodically as part of the emergency management evaluation process. Lihir's ERT conducts mock emergency drills involving operational, logistics, and environment personnel where relevant. These exercises are designed to assess the site's readiness to respond to cyanide-related incidents and to confirm that existing programs and procedures adequately protect worker health and safety. ERT Operations is required to conduct two mock emergency drills each calendar year, and these must be field-based exercises that test the full cyanide emergency response process, from the initial call-out through to the close-out of the response.

Across each three-year audit cycle, drills must address a range of potential release scenarios, including hydrogen cyanide gas, liquid cyanide, and solid cyanide, as well as various worker exposure pathways such as inhalation, ingestion, and dermal contact. One drill reviewed during the audit simulated a cyanide solution leak during routine mixing operations, caused by a pressurised pipe failure that resulted in liquid cyanide splash and brief vapour inhalation by the operator. The objectives of this exercise were to test emergency response readiness for chemical exposure incidents and to validate communication, first aid, and decontamination procedures.

After reviewing mock drill records the Auditor can confirm that that mock drills are conducted at least annually; address release and exposure scenarios appropriate to the operation; involve on-site and external personnel (where applicable); are evaluated to determine the adequacy of planned actions and responder training; and lead to improvements in the operation's response plans and training programs, as necessary.

Provisions are in place to evaluate and revise the Emergency Response Plan, as necessary, following mock drills and following an actual cyanide-related emergency requiring its implementation. As detailed in 7.6.1 the emergency documentation includes requirements to review every two years or when there has been an even or incident that requires a review to occurs. This includes findings from mock drills and changes to cyanide facilities or operations at Lihir that change the incident scenarios.

Principle 8 – Training

Standard of Practice 8.1

Train workers to understand the hazards associated with cyanide use.

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

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation does train all personnel who may encounter cyanide in cyanide hazard recognition. Lihir provides comprehensive cyanide training beginning with the Process Plant General Safety and Cyanide Awareness Induction, which all personnel must complete during onboarding.

Additional, more detailed training is required before workers can access high-risk areas such as Stockpiles, Autoclaves, the Reagents Area, and Laboratories. Progression to high-risk cyanide tasks requires completion of up to eleven general competencies to ensure personnel have the necessary baseline knowledge and skills.

The operation maintains written training programs and training materials that ensure all personnel who may encounter cyanide are trained to recognise the cyanide materials present onsite, understand the health effects and symptoms of cyanide exposure, and follow the correct procedures in the event of an exposure. A structured suite of procedural training methods supports safe cyanide handling across the operation. These include inductions, training manuals, standard operating procedures, Zero 3 Tasol hazard assessments, and Management of Change processes.

Inductions outline area-specific hazards, PPE requirements, and controls, and often include a familiarisation walk-around. SOPs have been developed for all key cyanide-related tasks, including container unloading, reagent delivery, cyanide mixing, plant operations, confined space entry, and equipment work. These documents clearly identify hazards and required controls, ensuring tasks are performed safely and consistently.

All processing plant personnel, along with relevant support teams, must complete Cyanide Awareness Training, which includes both theory and practical components. The program covers cyanide forms, exposure symptoms, safe handling, first-response actions, and the importance of ICMC compliance. Short-term visitors do not receive this training but must be escorted at all times and are not permitted to enter cyanide areas unaccompanied.

Cyanide training is delivered by in-house trainers, with refresher training conducted on a twelve-month cycle. All training records are maintained in the site's Learning Management System (LMS) namely SuccessFactors, with hard-copy backups retained onsite.

Cyanide hazard recognition refresher training is periodically conducted. The operation has established a twelve-month refresher cycle for the Cyanide Awareness Training Program. The operation has an electronic database for managing training and a review of training records for processing and maintenance personnel indicates training is to be completed in accordance with the schedule. Training records have been retained.

The operation has an electronic database that provides training profiles for individuals and their specific roles, the system holds training records against an individual. Additionally hard copy files of completed training competencies are also maintained on site. A review of training records for personnel across processing and maintenance revealed that records are maintained.

Standard of Practice 8.2

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

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 8.2

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 8.2; to train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

The operation does train workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. The training is provided by a team of trainers that have qualifications in training and experience and qualifications in operating a processing plant. The mill employees are assessed by the trainer prior to undertaking tasks without direct supervision.

A new starter undertakes site inductions, Process Plant General Safety and Cyanide Awareness. Further detailed training is required to be completed prior to being allowed to work in high-risk areas. Additional training and induction material exist for the following areas:

- Stockpiles
- Autoclaves
- Reagent areas
- Laboratories.

There are up to 11 general competencies that must be met prior to a person attempting more task/role specific ones. The operation has a structured training programme and training for cyanide related tasks is included in induction materials, procedures and training manuals. The material is supported by procedures that describe how the task is to be performed and the controls needed for the task.

Following general onboarding inductions and safety training, personnel are required to complete more task/role specific training competencies. Along with step-by-step task information, each procedure details required competencies that a worker must hold in order to complete the task.

Shift Supervisors use this list to assess individual's capabilities before signing off that the worker can complete the task unaccompanied. Short term visitors do not receive any Cyanide Awareness Training; however, they must be always escorted and cannot enter cyanide areas without the escort.

Task training related to cyanide management activities is delivered by an appropriately qualified training team. The Process Training function has transitioned through several organisational structures and has expanded from a small group of trainers to a larger team of dedicated personnel.

Trainers are selected for their technical backgrounds and work closely with subject matter experts to ensure the accuracy and relevance of cyanide-related content. They deliver compliance training across the operation and support departments whose work may bring them into contact with cyanide. All trainers hold, or are supported to obtain, competency-based trainer and assessor certifications. In addition to these formal qualifications, trainers possess operational experience in process plant environments, enabling them to provide practical, risk-focused instruction.

Cyanide-related training is also supported by a structured train-the-trainer process within the Technical Training Management Procedure, ensuring consistency and ongoing capability development. Based on this structure,

qualifications, and governance framework, cyanide management task training is provided by personnel who are appropriately qualified to deliver it. Employees are trained prior to working with cyanide.

As noted in 8.2.1 and 8.2.2 the operation has processes in place to train employees prior to working with cyanide. There is a skills matrix that details what competencies an individual must hold. All personnel receive cyanide awareness training as part of general safety training and prior to being permitted to work in high-risk areas, personnel are required to complete further training modules. This process has been documented in the Lihir Technical Training Management Procedure.

Refresher training on cyanide management is provided to ensure employees continue to perform their jobs in a safe and environmentally protective manner. The operation has established a twelve-month refresher cycle for the Cyanide Awareness Training Program. The operation has an electronic database – LMS, for managing training. Supervisors receive notifications when refresher training is required for their personnel. The operation does evaluate the effectiveness of cyanide training by testing and observation.

The operation uses written knowledge assessments, completed by the participant at the completion of the training session. Handle, Store and Use Cyanide and Process Chemical Inductions are tested via written questionnaires. Task specific training is assessed by way of a buddy system, in field assessments, written assessment and demonstration. Records are retained throughout an individual's employment documenting the training they receive. The records include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials.

Training records are maintained in the LMS as electronic files, with hard-copy backups stored in the Process Training office. The process trainers keep the training needs analysis up to date to ensure competency requirements remain current. Each record documents the employee's name, the trainer, the date of training, the topics covered, and evidence that the employee demonstrated understanding of the material. The auditor confirmed that these records are complete and properly retained.

Standard of Practice 8.3

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Standard of Practice 8.3; to train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

Cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released. The operation has developed SOPs for response to cyanide spills and as well as emergency documentation. All personnel working in the processing area complete the cyanide awareness training, followed by further area specific training, which includes information on actions to take if cyanide is released in their work area. Mock drills are undertaken specifically for process personnel involved in a cyanide spill.

All personnel receive instruction and training on emergency response and raising the alarm. The primary response actions for processing and maintenance personnel are to raise the alarm and evacuate the area. The ERT are responsible for emergency response, along with the support of experienced personnel in the area of the emergency. The ERT members have completed cyanide emergency training as per the ERT Training Needs Analysis.

The ERT receive more advanced training in decontamination and first aid and generally facilitate the drills to test and improve skills. The ERT train daily and this training includes response to chemical incidents. The ERT are the primary responders and undertake regular skills training which includes:

- Extraction equipment
- Self-contained breathing apparatus
- Oxy-Viva
- Fire fighting
- Chemical hazard suit.

The operation has the in-house capacity to provide first aid training to workers. Decontamination and first aid response is covered in training materials and SOPs Emergency Response Coordinators and members of the ERT are trained in the procedures included in the emergency documentation regarding cyanide, including the use of necessary response equipment.

The ERT have regular training in both the theory and practical aspects of emergency response. General response to chemical incidents is covered through hazardous materials (HAZMAT) and Industrial Emergency Response training, which are nationally recognised programs; site specific training and equipment use is undertaken through practical training and mock exercises.

Principle 9 – Dialogue and Disclosure

Standard of Practice 9.1

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 9.1

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation does provide an opportunity for stakeholders to communicate issues of concern regarding the management of cyanide. The operation undertakes community consultation and activities that provide its external stakeholders opportunities to communicate issues of concern via the following:

- A dedicated phone line for community contact, with phone number to call in public areas.
- Open door policy and manned reception desk at the Londolovit town offices.
- Lihir Grievance Handling and Resolution Process.
- Community and stakeholder meetings.

The community relations office is open from 9.00 am to 4.00 pm daily with the exception of Friday where it is open from 1:00 pm to 4:00 pm. The Lihir Social Performance Grievance Procedure applies to all stakeholders of the operation. The primary objective of the process is to resolve stakeholder grievances in a way that is timely, fair, culturally appropriate, transparent, confidential and to the reasonable satisfaction of the complainant(s).

The process is designed to comply with the Newmont Communities Policy, Newmont Community Standards and the Lihir Operation's Environment and Community Policy. It provides additional direct avenues for community engagement around grievances, including the ability to:

- Meet directly with Lihir Community Relations staff, or Grievance Officers at Belisi Haus in Londolovit town centre.
- Communicate by telephone, email, fax, or letter to Lihir.
- Communicate via community forums or other means.

The operation meets with community leaders on a monthly basis and concerns regarding operations can also be raised at these meetings.

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 not in compliance with Standard of Practice 9.2

Summarise the basis for this Finding/ Deficiencies Identified:

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

The operation has mechanisms implemented to make information publicly available on cyanide release or exposure incidents, where applicable. The Cyanide Emergency Response Plan outlines the process for external reporting of Significant Cyanide Incidents, as defined in the International Cyanide Management Code's Definitions and Acronyms Document, to ensure disclosure is transparent and timely, in addition to statutory reporting obligations.

All Significant Cyanide Incidents are disclosed in Newmont's annual sustainability report and associated performance data, which are publicly available on the Newmont website. Disclosures separately identify each significant cyanide incident, including the nature and location of the event. During the reporting period, the Lihir operation did not record any confirmed cyanide release or exposure incidents that met the criteria for a Significant Cyanide Incident.

5. LIMITATIONS

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The scope of this Report is limited to the areas, processes, and practices reviewed at the time of assessment. Findings are based on information provided by the audited operation and relevant third parties, including (but not limited to) documentation, monitoring records, due diligence assessments, and site inspections, all of which were reviewed on a sample basis. Cyanide Audit Services has relied on this information in good faith and has not independently verified its accuracy or completeness. All conclusions reflect the information available at the time of preparation. No assurance is given that conditions remain unchanged after the assessment date, and this Report does not constitute a certification of ongoing compliance.

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