

SUMMARY AUDIT REPORT

1

Cyanide Production Operation

Summary Audit Report

for

The International Cyanide Management Institute

and NowataBurkina Faso S.A (NaCN importer/

distributor/producer)/ 2023.

Prepared by NCABrasil Expert Auditors Ltd.

www.globalsheq.com

This report contains 16 (sixteen) pages



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

SUMMARY AUDIT REPORT FOR CYANIDE PRODUCTION OPERATIONS

Instructions

- 2
1. The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
 2. The name of the mine operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report. The lead auditor's signature at the bottom of the attestation on page 3 must be certified by notarization or equivalent.
 3. An operation that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
 4. The Summary Audit Report and Corrective Action Plan, if appropriate, with all required signatures must be submitted in hard copy to:

ICMI
1400 I Street, NW, Suite 550.
Washington, DC, 20005, USA.
Tel: +1-202-495-4020.

5. The submittal must be accompanied with 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report on the Code Website, and 2) a completed Auditor Credentials Form. The letter and lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable gold mining company.
7. The description of the operations should include sufficient information to describe the scope and complexity of the gold mining operation and gold recovery process.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT


Name of Producer: Nowata Burkina Faso S.A.
Name of Producer Owner: Nowata Burkina Faso S.A.
Name of Producer Operator: Nowata Burkina Faso S.A.
Name of Responsible Manager: Souleymane Zanga
Address: 11 BP 1329 Ouagadougou 11.
Country: Republic of Burkina Faso
Telephone: +226 64 04 22 67
Fax: not applicable
E-Mail: Souleymane Zanga <sz@nowataba.com>

3

Location detail and description of operation:

Nowata S.A is a company existing under the laws of the Republic of Burkina Faso, with its administration headquarter at the city of Ouagadougou and, its operational facilities for cyanide storage, distribution and transportation at Zagtoui industrial zone (Ouagadougou). Nowata imports solid NaCN from Draslovka Mining Solutions, a Czech NaCN producer that is certified by the International Cyanide Management Institute since March 2011. Draslovka is responsible to transport the solid cyanide from its production plants and deliver it at Tema port in Ghana. S&P International Logistics (a sister company of Nowata) is responsible to transport the solid sodium cyanide (UN No. 1689) by truck to Nowata's warehouse in Ouagadougou or straight to Nowata's final clients, the gold mines. Nowata may import solid NaCN from other cyanide producers, with the condition they are certified by ICMI. The NaCN boxes are transported inside 20' containers, that belong to the ocean freighter or to the cyanide producer. Each container transports 20 (twenty) boxes of solid NaCN. After the arrival of the trucks at Nowata warehouse, where the solid NaCN boxes are unloaded from the containers and stored inside the assigned NaCN warehouse (# 5), specifically designed and constructed for this purpose. The warehouse is able to store up to 200 solid NaCN boxes, with three layers stacking configuration. The warehouse is located inside two layers of protection (external wall with barbed wire and internal fence with barbed wire, both locked, with a mechanical ventilation/exhaustion system, under roof, on concreted floor and fire extinguisher system (dry chemical powder). This facility is under security surveillance 24 hours per day, with armed security and CCTV (closed-circuit television) system. There are lightning installations outside and inside (explosion proof ones) the warehouses. The warehouse is exclusively used to store solid NaCN boxes. There are no other materials stored in this warehouse. The stored solid NaCN boxes are sold to mining operations in Burkina Faso and transported by S&P International Logistics specifically designed trucks and trailers.

Nowata also incinerates (three incineration furnaces) "potentially" cyanide contaminated solid waste, produced by gold mines established in Burkina Faso. The operation has a specific environmental permit, issued by Burkenabe Environmental Authority, to incinerate such kind of solid waste.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

Auditor's Finding

This operation is:

- in full compliance
 in substantial compliance *(see below)
 not in compliance

with the International Cyanide Management Code.

* The Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit (not applicable).

Audit Company: NCABrasil Expert Auditors Ltd. (www.globalsheq.com)

Acting Audit Team Leader: Celso Sandt Pessoa

E-mail: celsopessoa@ncabrasil.com.br (ICMI qualified lead auditor and TEA since 2006).

Names and Signatures of Other Auditors: not applicable.

Date(s) of Audit: 06 ~ 09/11/2023 (on-site) and 04~05/03/2024 (off-site)

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

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



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

Principle 1 | OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1: Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

5

The operation is: in full compliance with
 in substantial compliance with Production Practice 1.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The NaCN warehouse was designed, constructed and commissioned in accordance with burkenabe and international technical standards. Quality assurance (QA) plans were defined and implemented for the design, construction and commissioning of such warehouses. Records of such activities are kept by the operation. Reviewed QA documentation related to the construction of the warehouse floor (structural concrete), warehouse walls and roof, ventilation/ exhaust system and the ones related to the three incineration furnaces, designed and constructed by a South African company and assembled and commissioned at the operation. The commissioning records of the operation facilities are retained by the operation and the initial and new installation were reviewed approved by qualified engineers. The entire operation facilities were reviewed and approved by the local environmental authorities in accordance with the environmental permits 2021/354/MEEVCC/CAB (environmental permit/ warehouse) and 2023/278/MEEA/SG/DGPE (environmental permit/ incineration and waste management). The operation facilities were commissioned by qualified engineers as evidenced in the sampled commissioning records and at the granted environmental permits. Although the solid NaCN is not produced at the operation, all the materials used to construct the warehouses are compatible to store NaCN wooden boxes. The solid NaCN is not produced by the operation so the NaCN warehouse has no interlock systems. On the other hand, all three incineration furnaces are provided with temperature sensors that trigger the shutdown the furnaces when the set temperature is reached. The warehouse was constructed with structural concrete floor, which are included in the preventive maintenance plan and in the operational inspection plan. During the field audit, it was evidenced that the warehouse floor is maintained in order and the warehouses are kept clean. All potentially cyanide contaminated solid waste is stored inside locked sea containers (as received by the mining operation), clearly identified that cyanide is present. When preparing to incinerate, this waste is disposed over a plastic carpet inside the furnaces area, which has a concreted floor. All the furnace area perimeter is fenced, and the entrance door is locked. The incineration area is constructed under roof.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT


Although the solid NaCN is not produced by the operation, all monitoring and alarm instruments, such as HCN detectors and fire alarms are included in the preventive maintenance system and inspected and calibrated on a regular basis. Reviewed maintenance, inspection and calibration records for fire extinguishers, fix and portable HCN detectors issued between 2022 and 2023, were reviewed. There are no process tanks in the operation. The solid NaCN is not produced at the operation. There are no solution pipelines at the operation. The solid NaCN is not produced at the operation. All solid cyanide wooden boxes are stored inside the warehouse, where no other product is allowed to be stored. The operation only stores solid NaCN in this installation as evidenced during the field audit. The NaCN warehouse is provided with mechanical and natural ventilation/ exhaustion system, as evidenced during the field audit. Before stating any operation related to NaCN boxes handling, the warehouse's doors are open and the ventilation /exhaustion system is turned-on 15 minutes before any person be allowed to enter the warehouse, using appropriate personal protective equipment (PPE). All operation perimeter is fenced (external wall with barbed wire and internal fence with barbed wire), and the access is controlled and only allowed personnel have access to the process plant, as evidenced during the field audit. Armed security and a CCTV system are available 24 hours per day. The warehouse is kept locked as well as the incinerators area and the solid waste containers. The warehouse is used only to store solid NaCN wooden boxes. No other materials are stored in the warehouse.

Production Practice 1.2: Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The operation is: in full compliance with
 in substantial compliance with Production Practice 1.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation developed, documented, implemented and maintains a documented management system, composed by work instructions, maintenance and inspection plans, emergency response plans, among other documentation. Reviewed safe work procedures for the unloading activities (from the truck to the warehouse and from the waste containers to the incineration area), NaCN boxes loading procedure to the trailer, NaCN boxes handling, storage, stacking and maintenance of solid NaCN wooden boxes, maintenance and inspection plan and emergency response plan. Safe work procedures (work instructions) and emergency response plan (ERP) address non-standard operating situations and how to manage them.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT


The operation developed, documented, implemented and maintains a documented change management procedure (where all proposed changes must be reviewed and approved (or not) by a multidisciplinary team which includes representatives of the environmental, occupational health and safety processes). No cases of change management process were evidenced. The operation developed, documented, implemented and maintains a preventive maintenance program. Reviewed preventive maintenance plans and associated records for the following equipment: forklifts (1,5 and 3 ton), ventilation/ exhaust system, fire extinguishers and alarm system, HCN detectors, incineration furnaces, emergency showers and eye-washer and the warehouse general maintenance. The preventive maintenance frequency for all equipment and installations is annual. Inspections of such equipment and installations are performed on a monthly basis. HCN detectors and alarm system are maintained and calibrated, as previously mentioned. There is no cyanide solution in the operation. The warehouses are not washed, and no effluent potentially contaminated with cyanide is generated. The warehouse has a sump, not connected with the external sump located outside the warehouse (used to collect effluent from the emergency showers and eye-washer. This main sump is closed and covered, constructed of structural concrete and wall covered with ceramic plates, and has no connection with external environment. During the field audit it was evidenced that all sumps were empty and dry. All cyanide contaminated material (real or potential) are packed, identified and incinerated in the operation incineration furnaces. All transportation containers have mandatory UN (United Nations), Ghana and Burkina Faso safety and environmental signage. All cyanide boxes have the same signage (pictograms) and safety, health and environmental instructions in English and French.

Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

The operation is: in full compliance with
 in substantial compliance with Production Practice 1.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

There are no cyanide solution tanks in the operation. There are no secondary containments in the operation. Related to the operation sumps, they were constructed in a closed-circuit system, where no discharge to the external environment is possible. The sumps are made of concrete and recovered with ceramic. One is connected to the emergency shower and eye washer and the second one is inside the warehouse. Both sumps are inspected as a routine activity. During the field audit both sumps were evidenced to be dry. The laundry process sump is also included in this routine inspection. There are no cyanide solution pipelines, pumps and valves in the operation. All containers (used to transport solid cyanide boxes), are maintained by the cyanide producer and are inspected and cleaned by the operation before returning to the cyanide producer.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

According to my professional experience, as a mechanical engineer, the defined inspection frequencies are adequate to ensure that that facilities and equipment are working within the design and operational parameters. During the field audit, it was evidenced that the operation facilities (e.g: NaCN warehouse, fire extinguishers, ventilation/ exhaust system, incineration furnaces) and equipment (e.g: fork lifters, showers and eye-washers) are well maintained. Inspections of such equipment and installations are performed on a monthly basis.

As previously mentioned, there are specific inspection protocols, addressing the quality aspects to be inspected, by the operational team and by the maintenance team. Inspection records address the date of inspection, the scope of inspection, the acceptance criteria, the inspectors name, the results obtained and, if necessary, any correction or corrective action that shall be implemented. All corrective maintenance orders, resulting as an output from the inspections, indicates the corrections and corrective actions to be implemented. All corrective maintenance orders address the date when the corrections and/ or corrective actions were implemented. All corrective maintenance orders records are retained by the operation.

Principle 2 | WORKER SAFETY


Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1: Develop and implement procedures to protect facility personnel from exposure to cyanide.

The operation is: in full compliance with
 in substantial compliance with Production Practice 2.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation developed, documented, implemented and maintains operational safe work procedures, as previously mentioned. The operational documentation addresses non-standard operating situations and how to manage them. It was also evidenced that the operation developed, documented, implemented and maintains an Emergency Response Plan (ERP). Please refer to Principle 5. The operation developed, documented, implemented and maintains a preventive maintenance program. There are specific documented protocols to be followed by the operational team to prepare a facility to be maintained, including the liberation of the facilities to the maintenance team to work. The operation documentation was developed by a multi-disciplinary team, led by the operational team, but involving other processes such as environmental management and occupational health and safety teams.



SUMMARY AUDIT REPORT

The operation identified areas (the warehouse and the incineration area) where HCN or NaCN dust may (potentially) exist in instantaneous or continuously basis. Such places are monitored and calibrated HCN detectors installed. Before entering the warehouse, the doors are open, the ventilation/ exhaust system is turned on and works for fifteen minutes before operators are allowed to go inside the warehouses, always using appropriate PPEs (tyvec overall, full face masks with ABEK1HgP3 filters, PVC gloves and boots, portable HCN detectors).

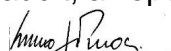
The operation installed HCN detectors in such places where alarm 1 is set for 2.5 ppm (operators must report the situation to the supervisor or leave the area) and alarm 2 is set for 4.5 ppm (operators must leave the area). Reviewed calibration records for the HCN detectors, as previously mentioned. Reviewed maintenance and calibration records for HCN detectors, as previously mentioned. All warehouse operators are not allowed to work alone. At least, two operators must be working together. CCTV (closed circuit television) system is also available, and monitoring of the areas is made from security room. Both systems were evidenced during the field audit. According to the Burkina Faso legislation, all employees must pass an annual occupational health evaluation and obtain a permit to be allowed to work. Reviewed occupational health permits from operational (warehouse and incineration furnaces) and maintenance team. The annual occupational health monitoring scope includes clinical exams (e.g: blood, urine), visual capacity, hearing capacity, pulmonary studies (e.g: spirometry), cardiologic studies and general examination. There is a clothing policy in the operation where people leaving such areas must change their clothes or disposable overall into identified plastic bags and disposed for washing or incineration. The number of operators transiting in the process plant is very low. The operation has a laundry area where the washing effluents are collected in a closed sump, constructed with structural concrete and the wall covered by ceramic plates. This effluent is neutralized using a 12% sodium hypochlorite solution and left for evaporation. Reviewed monitoring results of such neutralized effluent and total cyanide was not detectable. The operation facilities are richly identified related to the presence of cyanide and the mandatory personal protective equipment that must be used, as evidenced during the field audit. Such kind of signage is available in several places at the operation installations, as evidenced during the field audit.

Production Practice 2.2: Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The operation is: in full compliance with
 in substantial compliance with Production Practice 2.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation developed a specific written emergency response plan and procedures to respond to cyanide exposures and related emergencies. It was evidenced during the field audit that the operation installed and maintains, emergency showers and eye-washers in the vicinity of the NaCN warehouse and inside the emergency response facility located outside the warehouse, that are inspected and maintained in a routine basis and were tested during the field audit, all operational.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

All eye-washers are low pressure ones in order to avoid any injury in the eyes caused by the water jet. It was also evidenced that the operation installed ABC type (dry chemical powder) fire extinguishers in different places outside the warehouse, that are preventively maintained on a yearly basis. These fire extinguishers are maintained in accordance with the Burkina Faso legislation by a qualified maintenance supplier. Records of such maintenance are retained by the operation and were reviewed during this opportunity.

10

It was evidenced the operation dispose oxygen bottles in the security office, that is located not far than 20 (twenty) meter from the NaCN warehouse. Beyond that, the operation has an operational emergency response room equipped with oximeter, AED (Automatic External Defibrillator),ambu (Artificial Manual Breathing Unit), antidotes (cyanokit), telephone and a shower + eye washer. The operation has an agreement with the Zagtouli Public Hospital that is located in the vicinity the operation. Beyond ambulance service, the hospital is able to provide full assistance to cyanide intoxicated persons. The first aid will be always performed at the operation. The operation developed, documented, implemented and maintains an inspection program related to first aid hardware and resources, including drugs (antidotes´ expire date). All antidotes are adequately stored in their original package, inside a foam box, specifically designed by the antidote producer for this purpose. Depending on the resource, the inspection frequency may be daily, weekly or monthly. Records of such inspections are retained by the operation and were reviewed during this audit. Inspections are performed by safety team. Safety data sheets and first aid procedures (intoxication) are available in different places at the operation, in English and French, as evidenced during the field audit. There are no tanks and pipelines containing cyanide in the operation. Warehouses are clearly identified about the presence of cyanide inside them. Cyanide boxes are also clearly identified about its content, as evidenced during the field audit. Solid waste containers are clearly identified and remains locked until being sent to incineration. The operation installed a changing room outside the warehouse, where employees shall change their PPEs, clean them all and dispose the ones (overall) that shall be disposed. Beyond that, workers must perform their personal hygiene washing their hands and taking a shower.

During the field audit, it was evidenced that the warehouse is kept clean, in order, with solid NaCN boxes without damage (puncturing). So, the potential for skin exposure to cyanide is very low. The operation has a full equipped emergency response room, as previously mentioned. The operation has an agreement with the Zagtouli Public Hospital that is located in the vicinity of the operation. Beyond ambulance service, the hospital is able to provide full assistance to cyanide intoxicated persons (first aid (oxygen therapy) will be provided at the operation). Cyanokit application will be used only with a doctor decision. As previously mentioned, the operation has formal agreements with the Zagtouli Public Hospital. The operation documented and maintains a procedure to report and investigate incidents (real and potential ones). There were no cases of incidents (real or potential) involving cyanide. There were no cases of lost time injuries (LTI), restricted workday injuries (RWDI), first aid injuries (FAI) or high potential incidents (HPI), in 2022 and 2023.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1: Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

11

The operation is: in full compliance with
 in substantial compliance with Production Practice 3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation does not discharge effluents to surface waters and in surface and ground water up and downgradient of the site. The operation uses ground water (one water well). Monitoring results shows that the underground water is adequate for industrial purposes. Total cyanide was not detectable (< 0,007 mg/l) in all reviewed monitoring results. The operation has three fixed sources of emissions (from the incineration furnaces). All reviewed monitoring reports showed that air emissions values are in accordance with the defined acceptance criteria, established by local legislation. According to the operation operational/ environmental permits, issued by the local environmental protection agency, the operation is demanded to monitor underground waters (water well) and air emissions, due to the nature of its activities. The monitoring frequency is defined by the environmental authority and in my professional experience is adequate to characterize the medium being monitored.

Principle 4 | TRAINING

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

Production Practice 4.1: Train employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.

The operation is: in full compliance with
 in substantial compliance with Production Practice 4.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation developed and implemented an induction program, addressing cyanide related risks (e.g: cyanide impacts on health, safety and environment, intoxication symptoms and first aid procedures to be followed in the event of cyanide exposure), that is mandatory to all employees and contractors entering the operation. There is a second training program for those that will work in the operation involving cyanide. This second training program is focused on the safe work procedures (work instructions). In both cases, the training effectiveness is verified through a written examination and field observations.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

Both training programs are refreshed every three years, or when operational procedures are updated or during safety meetings promoted by the operation. During this audit, records of such trainings performed between 2022 and 2023 were reviewed. For those employees and contractors that will work in the operation (warehouses), there is a training session focused on the PPEs that must be used in the operation and during emergency situations, where specific PPEs must be used. In all cases, the training effectiveness is verified through a written examination and observations. During this audit, records of such trainings performed between 2022 and 2023 were reviewed. All PPE related trainings are in conformance with Burkina Faso and international legislation. Such trainings are refreshed every three years or when a new PPE is implemented by the operation. During this audit, a refresh training focused on the use of PPEs was performed. All workers that will work with cyanide must pass through a training program (theoretical and practical), which includes the training in the operational procedures and safe work procedures (e.g: unloading boxes from the containers at the warehouse and loading boxes into trailers for transport to the mining operations (clients)). The trainee receives practical training under the supervision of qualified workers (operators and supervisors) and, if approved, they will work under supervision, before being allowed to work alone. All activities involving cyanide are performed, at least, by two operators. Such operational training program is refreshed every three years. Records of such trainings were reviewed during this audit. All workers that will work with cyanide must pass through an “on the job” training program (theoretical and practical), which includes the training in the operational procedures and safe work procedures. The trainee receives practical training under the supervision of qualified workers (operators and supervisors) and, if approved, they will work under supervision, before being allowed to work alone. Such operational training program is refreshed every three years. Records of such trainings were reviewed during this audit. The training program (theoretical and practical), includes the training in the operational procedures and safe work procedures. The training program (theoretical and practical), includes the training in the operational procedures and safe work procedures. The trainee receives practical training under the supervision of qualified workers (operators and supervisors). The effectiveness of all mentioned training programs is verified through written examinations and observations, as previously mentioned.

SUMMARY AUDIT REPORT

Production Practice 4.2: Train employees to respond to cyanide exposures and releases.

The operation is: in full compliance with
 in substantial compliance with Production Practice 4.2
 not in compliance with

13

Summarize the basis for this Finding/Deficiencies Identified:

All operational team is trained on cyanide related emergency situations, including releases to the environment and exposures to cyanide. All provided training is recorded and records are retained by the operation. The training records identify the trainee, the instructor, the training date, the training scope and the trainee performance. Reviewed training records for trainings performed in 2022 and 2023. Also evidenced refresh training records performed in 2023.

Principle 5 | EMERGENCY RESPONSE

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

Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.


The operation is: in full compliance with
 in substantial compliance with Production Practice 5.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation developed, documented and maintains an emergency response plan/ERP, dated 08/09/2023. The ERP consider the following emergency scenarios: catastrophic release of hydrogen cyanide, releases of solid or liquid cyanide during packaging, storage, loading and unloading operations, releases during fires and explosions, power outages and equipment failures. After a risk evaluation, all potential emergency scenarios were identified and specific responses for each scenario were defined.

Evacuation plan for internal and external stakeholders is clearly defined by the operation. There are specific first aid protocols related to cyanide intoxication, that includes the use of antidotes and oxygen therapy. The emergency response team is composed of warehouse operators and maintenance employees. All responses related to cyanide releases involves the emergency response team (internal and external) and maintenance process team. The emergency response plan addresses specific actions, according to the emergency scenario, that shall be implemented to contain, assess, mitigate and prevent future release of cyanide.

Nowata S.A
Name of Producer


Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

Production Practice 5.2: Involve site personnel and stakeholders in the planning process.

The operation is: in full compliance with
 in substantial compliance with Production Practice 5.2
 not in compliance with

14

Summarize the basis for this Finding/Deficiencies Identified:


The operation ERP was developed by different and multi-disciplinary team including the operational and maintenance team and supervisors, occupational safety and health technicians, environmental technicians and brigade members. External stakeholders are involved also (e.g: local firefighters, police and public hospital/ ambulance service). External stakeholders are aware about the operation emergency response plan (ERP). Such stakeholders are informed directly by the operation through planned meetings and participation on emergency response drills. The operation is located in a mixed industrial (cement factory)/residential zone (small farms/ properties), where a few constructions were evidenced to be outside a radius of 300 meters from the operation. According to the performed risk evaluation, the potential of these stakeholders be impacted by an operation's emergency is low.

Production Practice 5.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

The operation is: in full compliance with
 in substantial compliance with Production Practice 5.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation designated two emergency response coordinators (Environmental, Occupational Health and Safety Coordinator and the Operational Warehouse Coordinator) with corporate authority to provide the necessary resources to implement the emergency response plan. The Incineration Process Coordinator will be a third option to coordinate the implementation of the ERP. The operation Top Management will act, in the back office, as support Coordinators. The operation has a specific and qualified internal emergency response team. The operation emergency response team is trained and qualified in accordance with Burkina Faso legislation and technical specifications developed by the local Firefighters Department. Annually, the emergency response team receives a planned refresh training, in accordance with the Burkina Faso legislation. Records of both trainings' sessions are retained by the operation and were reviewed during this opportunity. There is an annex in the ERP addressing all contact information related to the emergency response team and with the external stakeholders that may be necessary to participate in the emergency response.



SUMMARY AUDIT REPORT

The responsibilities and authorities of the emergency response coordinators and the emergency response team are clearly defined. In another ERP annex there is a master list of all resources available to the emergency response team. Monthly all the available resources to the emergency response team are inspected.

Records of such inspections are retained by the operation and were reviewed during this audit. During the field audit, it was evidenced that such resources are kept in order and in good condition and are promptly available to be used. As previously mentioned, all external stakeholders (local firefighters, local hospital/ ambulance service, local police) duties are clearly defined in the ERP. As previously mentioned, all external stakeholders' duties are communicated in planned meetings and during the participation of emergency drills.

15

Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.

The operation is: in full compliance with
 in substantial compliance with Production Practice 5.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

As previously mentioned, there is an annex in the ERP addressing all contact information of internal and external stakeholders that are involved with emergency response activities. The emergency communication loop is clearly defined at the ERP. ICMI contacts are informed in the ERP. There were no cyanide related emergencies in the last twelve months (November 2022 to October 2023).

Production Practice 5.5: 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
 in substantial compliance with Production Practice 5.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The neutralization of solid NaCN shall be made with the aid of CaO powder that is available in bags at the operation. Recovery of the neutralized solid NaCN/ soil will be made with the aid of plastic shovels. The recovered briquettes/ neutralized soil will be disposed into identified plastic bags and sent to be incinerated at the operation own incinerators. All contaminated materials are neutralized and disposed into plastic bags and send to be incinerated at the operation incineration furnaces. The operation activity has no potential to impact sources of potable water (the water well is located outside the warehouse fenced area). But in the event of any necessity, the operation is able to provide water to communities located in the vicinity of the operation and mineral water for drinking. The operation activity has no potential to impact surface and underground waters.



Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date

SUMMARY AUDIT REPORT

Environmental monitoring to identify the impact of cyanide in such waters are not required. Anyway, and in accordance with the operation environmental permit, the quality of the water obtained at the water well is monitored on a regular basis. All reviewed results show that the water quality is in conformance with the defined acceptance criteria for the different water quality aspects. Total cyanide was not detectable in all sampled cases, as previously mentioned.

16

Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is: in full compliance with
 in substantial compliance with Production Practice 5.6
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The emergency response plan is reviewed and evaluated after real or potential emergency and after planned emergency drills (if necessary). The operation annually establishes a mock emergency drill program. In 2023 the operation performed two emergency drills. The scope of the emergency drills included a fire in the NaCN warehouse and a cyanide intoxication of an operator. Records of such emergency drill were reviewed in this opportunity and found in conformity. The emergency response plan is kept updated and is reviewed after real or potential emergencies and after emergency drills. The emergency response plan was updated in 08/09/2023.

Audit team conclusions:

Evidenced that Nowata Burkina Faso SA maintains a documented SHEQ (Safety, Health, Environmental and Quality) management system. This system ensures an adequate cyanide management in accordance with the Cyanide Code principles. Being usual in all audit process, through sampling, opportunities of improvement (corrective and preventive) may exist and were not identified in this opportunity. Based on the sampled evidences, reviewed documented procedures, records, drawings, data sheet, the physical conditions of the site (installations), in the interviewed personnel, the audit team concludes that the cyanide management system **is FULLY** implemented and maintained in accordance with the Cyanide Producers Verification Protocol for the International Cyanide Management Institute – ICMI dated June 2021.



Celso Sandt Pessoa
Rio de Janeiro, RJ, Brasil.
09/08/2024..

Nowata S.A
Name of Producer

Signature of Lead Auditor

09/08/2024
Date