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Submitted to: International Cyanide Management Institute

International Cyanide Management Code Summary Audit Report

ICMC Recertification Audit
Ban Houayxai Mine (BHX)

wsp

July 2026

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International Cyanide Management Code Summary Audit Report
ICMC Recertification Audit Ban Houayxai Mine (BHX)

Submitted to: International Cyanide Management Institute

WSP
Level 17, 83 Pirie Street
Adelaide SA 5000
GPO Box 398
Adelaide SA 5001

Tel: +61 8 8405 4300
Fax: +61 8 8405 4301
wsp.com

WSP acknowledges that every project we work on takes place on First Peoples lands.
We recognise Aboriginal and Torres Strait Islander Peoples as the first scientists and engineers and pay our respects to Elders past and present.

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1 Introduction

1.1 Operation general information

Name of mine:	Ban Houayxai Gold-Silver Operations (BHX)
Name of mine owner:	PanAust
Name of mine operator:	Phu Bia Mining Ltd (PBM)
Name of responsible manager:	Daniel Jones, Principal – Sustainability, Phu Bia Mining (Laos PDR)
Address:	Capital Tower, 23 Singha Road
State/province:	Vientiane
Country:	Lao People's Democratic Republic
Telephone:	+856 20 22 881 700
Fax:	N/A
Email:	Daniel.Jones@pbm.panaust.com

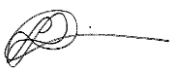
1.2 Operation location detail and description

1.2.1 PanAust

PanAust Limited is an Australian-incorporated copper and gold mining company with operations and project interests across Lao PDR, Papua New Guinea and Chile. PanAust is wholly owned by Guangdong Rising Holding Group (GDRH), a Chinese state-owned enterprise owned by the People's Government of Guangdong Province. PanAust's principal interests include a 90% interest in Phu Bia Mining Limited in Lao PDR, 100% ownership of Frieda River Limited in Papua New Guinea, and interests in the Inca de Oro and Carmen projects in Chile.

1.2.2 Phu Bia Mining Limited

Phu Bia Mining Limited (PBM) is the Lao PDR-registered operating company through which PanAust conducts its mining operations in Lao PDR. PanAust holds a 90% interest in PBM, with the Government of Lao PDR (GoL) holding the remaining 10%. PBM operates under a Mineral Exploration and Production Agreement (MEPA) with the Government of Lao PDR, which governs its exploration, development and mining activities within the 1,260 km^2 MEPA Contract Area, located in central and northern parts of Lao PDR. Its principal operations are the Phu Kham Copper-Gold Operation and the Ban Houayxai Gold-Silver Operation.

Ban Houayxai Gold-Silver Operations (BHX)		20/07/2026
Name of operation	Signature of lead auditor	Date

1.2.3 Ban Houayxai Gold Mine

The Ban Houayxai Gold-Silver Operations (BHX) is one of PBM's operations and is located at the Longcheng District in Xaysomboun province, approximately 100 km north-east of Vientiane capital. The Ban Houayxai project development area (6,416 ha) was approved by the GoL in 2010 for construction and issued with an Environmental Compliance Certificate (MTPA) in March 2011. The site is about 25 km west of the Phu-Kham Copper-Gold operation.

The Ban Houayxai mining operations have been active since the first half of 2012 and the operation was Pre-Operationally certified with the Code on 18 January 2012 and achieved full certification in March 2013 and was recertified on 27 May 2016, 12 July 2019 and 19 May 2023.

The mining operation comprises an open pit with a conventional blast-load-haul mining technique to mine the Ban Houayxai open pit in multiple stages. The process plant for the Project is approximately 1 km south-west of the deposit. The plant is a conventional Carbon in Leach (CIL) process and has a throughput of approximately 4.0 Mtpa.

Sodium cyanide is delivered to the mine in solid form within intermediate bulk containers (IBCs) transported in shipping containers by road from the port of Da Nang in Vietnam. Once onsite the containers are placed in the reagent compound that has restricted access. The IBCs are removed from the shipping containers by the trained day services team and stored in a dedicated warehouse within the fenced reagent compound. Sodium cyanide is mixed with caustic solution in batches within the reagent compound to provide a 30% solution for addition into the mill. Cyanide is stored in tanks and delivered into the CIL circuit via pipework at the rate set by the site metallurgists.

The gold in the Ban Houayxai deposit is solely present as a component of the mineral electrum (a naturally-occurring alloy of gold and silver with trace amounts of copper and other elements). Most of the silver is present as silver sulphide minerals in the oxidised and transitional ore. The primary ore contains native silver as its main silver mineral.

The process for the recovery of gold and silver comprises five major steps:

— Carbon-in-leach: Gold and silver preferentially bind onto cyanide ions while non-target minerals and waste remain behind

— Carbon adsorption: Activated carbon is used to strip gold and silver from the cyanide

— Carbon desorption: Gold and silver are stripped from the carbon and enter solution

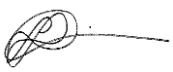
— Electrowinning: Gold and silver are removed from solution

— Smelting: The material produced by the electrowinning process is smelted at high temperature to concentrate the gold and silver.

— The end product of mineral processing is doré, a metallic combination of gold and silver.

Cyanide destruction of the thickened tailings slurry is undertaken using Air/SO_2 process. The detoxified tailings slurry is pumped via a pipeline to the tailings storage facility (TSF) when the 0.5 mg/L Weak Acid Dissociable (WAD) CN target has been achieved. The TSF is a valley impoundment and water collected on the surface of the TSF is released via a spillway to the Nam Ngum 2 hydroelectric reservoir. There is no recycling of process water from the TSF at this operation.

During the audit period the operation exclusively purchased solid sodium cyanide, which was shipped to Da Nang, Vietnam by International Cyanide Management Institute (ICMI) certified supplier Hebei Chengxin Co Ltd.

Ban Houayxai Gold-Silver Operations (BHX)		20/07/2026
Name of operation	Signature of lead auditor	Date

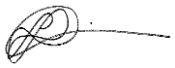
1.3 Auditor's finding

	☒ in full compliance with	
Ban Houayxai Mine is:	□ in substantial compliance with	The International Cyanide Management Code
	□ not in compliance with	

1.4 Compliance statement

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

1.5 Auditor information

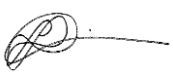
Audit company:	WSP Australia Pty Limited	
	Name (Print/Type)	**Signature**
Lead auditor:	Felicity Richards	
Lead auditor email:	Felicity.richards@wsp.com	

Names and signatures of other auditors:	**Name (Print/Type)**	**Signature**
Auditor 1:	Edward Clerk	

Date of audit:	14-17 March 2026.

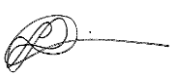
1.6 Auditor attestation

The International Cyanide Management Code (ICMC) Certification Audit fieldwork was conducted over period 14-17 March 2026.

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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 and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code 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 Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Ban Houayxai Gold-Silver Operations (BHX)		20/07/2026
Name of operation	Signature of lead auditor	Date

2 Principles and Standards of Practice

2.1 Principle 1: Production and purchase

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

2.1.1 Standard of Practice 1.1

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

	☒ in full compliance with	
The operation is	□ in substantial compliance with	Standard of Practice 1.1
	□ not in compliance with	

BHX is in FULL COMPLIANCE with Standard of Practice 1.1, requiring the operation to purchase cyanide that is manufactured at a facility or facilities certified as being in compliance with the Code.

The cyanide purchased by the mine is manufactured at a facility certified as being in compliance with the Code. Hebei Chengxin Co. Ltd. has maintained full certification throughout the audit period.

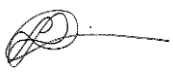
The operations contract with the cyanide manufacturer does require that the cyanide be produced at a facility that has been certified as being in compliance with the Code. Previously BHX sourced solid cyanide from Australian Gold Reagents (AGR) Kwinana production facility up until May 2022 at which time it changed to Hebei Chengxin Co., Ltd. sodium cyanide production in Shijiazhuang, Hebei Province in China.

Scope of Supply Condition 3.0 – Key Performance Indicators – of the Supply of Goods Agreement requires that the Seller must at all times comply with the International Cyanide Management Code and must provide cyanide from a production facility that has been certified as being in full compliance with the Code. The Seller must also provide a statement identifying the site of manufacture of the supplied cyanide, documentation demonstrating that the cyanide delivered was produced at the identified facility; and evidence that the cyanide production facility is fully certified under the ICMI Code. The Agreement also requires that the Seller only utilise cyanide transporters that have been certified as fully ICMI compliant.

Scope of Supply Condition 7.0 – Quality Control and Quality Assurance – requires that the Supplier's manufacturing process has been ICMI certified. The Supplier must maintain or exceed quality standards and PBM has the right to inspect the Supplier's data and records as part of its Supplier due diligence.

PBM also requires that the Supplier complies with PBM standards, policies and procedures, including the Contractor Health Safety & Environment Management Standard and Procedure.

Hebei Chengxin Co., was first certified as compliant with the Code on 1st October 2012 and subsequently certified in 2015, 2019, 2023 and 2026. Clause 4.5 of the Supply of Goods Agreement states that in the event that Hebei loses ICMI certification, PBM reserves the right to purchase sodium cyanide from other suppliers.

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2.2 Principle 2: Transportation

Protect communities and environment during cyanide transport.

2.2.1 Standard of Practice 2.1

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

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

BHX 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.

PBM has a contract with Hebei Chengxin Co., Ltd. for the supply and transport of cyanide to the Port of Da Nang in Vietnam. PBM Logistics and CEA facilitate transportation of cyanide through Vietnam and Laos to the BHX mine site. PBM Logistics is compliant with the Code.

The operations contract with the cyanide transporter(s) requires that the transporter(s) be certified under the Code. The operation has a contract with Hebei Chengxin Co. Ltd for the supply and transport of cyanide Da Nang.

The contract also notes that the Seller may only utilise cyanide transporters that have been certified as being in full compliance with the Code.

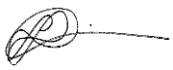
The certified supply chains that cover transport of cyanide from the production facility on Yuanzhao Road, Yuashi County, Shijiazhuang City, Hebei Province in China to site are:

- Hebei Chengxin Transport Global Co., Ltd,; certified 13 October 2013 and recertified on 18 April 2023.
- Hebei Chengxin Transport Global Ocean Supply Chain Co., Ltd,; certified 29 August 2017 and recertified on 30 October 2023
- Phu Bia Mining Logistics Asia Supply Chain,; certified on March 23, 2023.

At time of report issue, Hebei Chengxin Transport Global Ocean Supply Chain Co., Ltd and Phu Bia Mining Logistics Asia Supply Chain were fully certified as per the ICMI website. Hebei Chengxin Transport Co., Ltd., was last certified in July 2026, as indicated on the ICMI website.

2.3 Principle 3: Handling and storage

Protect workers and the environment during cyanide handling and storage.

Ban Houayxai Gold-Silver Operations (BHX)		20/07/2026
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2.3.1 Standard of Practice 3.1

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

	☒ in full compliance with	
The operation is	□ in substantial compliance with	Standard of Practice 3.1
	□ not in compliance with	

BHX is in FULL COMPLIANCE with Handling and Storage Practice 3.1, requiring that cyanide handling and storage facilities are designed and constructed consistent with sound, accepted engineering practices, quality assurance/quality control (QA/QC) procedures, spill prevention and spill containment measures.

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

No changes to the cyanide storage and mixing facility have been undertaken during the audit period. Prior to the supplier change from AGR to Hebei Chengxin Co., Ltd., a remote assessment of the condition of the storage and mixing facility was undertaken by AGR due to COVID travel restrictions and concluded that the facility remained fit for use.

Hebei has not conducted an assessment of the storage and mixing facility during the audit period.

The BHX cyanide unloading and mixing facilities were designed by AMEC Minproc in accordance with Code requirements and were constructed under PAA Projects supervision.

Unloading areas for solid cyanide are located away from people and surface waters. The operation has a dedicated storage and mixing area with a fully enclosed warehouse for storage of cyanide intermediate bulk containers (IBCs) within the plant area. The cyanide mixing and storage compound is fully fenced and located away from normal work areas/offices.

The storage and mixing area has a concrete bund that drains to a sump within the facility to contain releases should they occur. There is also a drainage containment system for the broader plant area which drains to an event pond due to the proximity of the plant to the Nam Ngum 2 Reservoir.

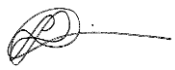
Liquid cyanide is not delivered to the site. BHX only received solid cyanide within wooden IBCs within shipping containers. The IBCs are unloaded from the shipping container on a concrete surface and stored in a dedicated area with a concrete floor that allows for collection and clean up of spills in the event that an IBC is damaged.

There is a method to prevent overfilling of cyanide storage tanks, such as a level indicator and high-level alarm.

The mixing and transfer of cyanide to storage tanks is automated by the sites digital control system (DCS) and there are low, low-low and high, high-high alarms on mixing and storage tanks that are monitored by control room operators.

The level in the cyanide mixing tank is measured and indicated by a level transmitter. The cyanide mix pH is measured and indicated by a pH meter and controlled at a setpoint by controller. The flow of sodium hydroxide to the mix tank is measured and indicated by a flow transmitter.

The mixing tank high-high level alarm state is at 85% capacity, this alarms locally and in the control room where the operator can stop water addition. A low-low level alarm indicates 30% volume in the mixing tank, as per the Cyanide Mixing Sequence Procedure and the control logic programmed into supervisory control and data acquisition (SCADA).

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The transfer of cyanide from the mix tank to the storage tank is a manual field operator function. When there is sufficient volume in the storage tank to allow the transfer, a flag is raised on the process control system (PCS) informing the control room operator on the SCADA control system that the transfer is possible.

A high high level in the storage tank (85%) or a low low level in the mixing tank (15%) stops the transfer pump.

The level in the storage tank is measured and indicated by a level transmitter. When the level in the sodium cyanide storage tank is at a point where there is sufficient volume to allow the transfer, a flag is raised on the PCS informing the control room operator that the transfer is possible. Checks on the level indicators are undertaken by and are the responsibility of the operator.

Inspections are carried out on BH29 Process Reagents instruments for the purpose of identifying any defects. Any major discrepancies are reporting immediately to the Electrical Supervisor. Inspections records were reviewed as part of this audit.

The batch process involves a selection switch used to determine pumping destination as well as which actuation valve to open. This prevents an overflow event.

Cyanide mixing and storage tanks are located on a concrete surface that can prevent seepage to the subsurface. Cyanide mixing and storage tanks are installed in a designated area on concrete plinths within a concrete bund. The bund is fitted with a sump to allow for the recovery of spillages or leaks should they occur.

Spill prevention or containment measures have been provided for cyanide unloading, storage, mixing and process solution tanks. There have been no changes to the operations spill prevention or containment measures since the previous audit which found the containment to conform to Code requirements.

The CIL tanks are installed on ring beams with leak detection system installed beneath the tanks. The tell-tales of the ring beams are checked and work orders raised to inspect/repair tanks where leaks are observed.

A site inspection confirmed that containment measures are in place and systems are implemented to maintain them.

The secondary containments for cyanide storage and mixing tanks are constructed of concrete. The site inspection confirmed the concrete bund was free of obvious defects that would allow seepage.

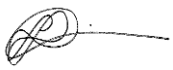
Solid cyanide, once removed from locked shipping containers, is stored in a dedicated warehouse, no other chemicals are stored within the compound and the compound is segregated from other chemical storage areas. The storage warehouse is elevated to prevent ingress of storm water or other materials. There is passive ventilation in the form of louvres in the walls and the roof design allows for air movement but prevents the ingress of water to the warehouse building.

The warehouse is located within a fully fenced and locked facility within the process plant. Access to the process plant is controlled via security gates and access control system and access to the warehouse and mixing area is further restricted. The cyanide storage tanks are installed in a dedicated open-air bund that prevents mixing with other materials.

Separation from incompatible materials is maintained and the drainage path from a cyanide release does not intersect with a common drain or culvert from other storage areas.

2.3.2 Storage facilities for reagent-strength cyanide were observed during this audit. 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.

Ban Houayxai Gold-Silver Operations (BHX)		20/07/2026
Name of operation	Signature of lead auditor	Date

☒ in full compliance with

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

BHX is in FULL COMPLIANCE with Standard of Practice 3.2 requiring that cyanide handling and storage facilities are operated using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

There are three acceptable methods of disposal of cyanide packaging, as mentioned in the Operations Environmental Social Management and Monitoring Plan (ESMMP). Incineration is the preferred long-term method but until a suitably sized incinerator is installed either burning or burying in the designated landfill area.

A log of the boxes sent for disposal is maintained by the Operations Team. Each cyanide box number is recorded on the Box Disposal form. Once completed this sheet is taken to Process Administration for recording and sending the data to environment department for recording in the master waste database monthly. If boxes are to be burnt, a Burn Permit Form must be completed.

The boxes are loaded into an articulated dump truck (ADT) using a forklift for transport to the dedicated landfill area. The truck has an escort from the Process Plant to the landfill area. At the landfill, the boxes are dumped into a prepared trench and buried during the dayshift. Environment Department representatives are present during the disposal and burial process.

Safety precautions are employed during the transportation of empty boxes from the Process Plant to the landfill area. Signs and barricades are used to ensure pedestrians are at a safe distance when loading the ADT.

Environment personnel request a suitable disposal location from Mining and advise the truck drivers where to take the empty boxes on the first trip. Red arrows direct the truck access and route.

The cyanide loading area is hosed down and the forklift is cleaned prior to departing the cyanide storage area.

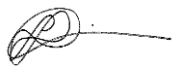
Shipping containers are inspected for residual cyanide by Warehouse personnel. The container is then checked again by Security personnel before being closed and locked. Placards and signage are removed and the container is then loaded onto the truck and transported to the Ban Thouay Transit Yard. The containers are not washed and cyanide packaging is not returned to the vendor.

When handling and transporting unrinsed containers, personnel are required to wear PPE including a hard hat, eye protection, high-vis clothing, safety footwear, hearing protection and gloves. Additional PPE requirements include carrying a radio and a Monotox cyanide meter at all times.

BHX has a procedure for mixing operations. The transfer of cyanide solution from mixing to storage tanks is automated via the site's DCS and control room operators. BHX has put in place a range of inspections to be undertaken by both maintenance and processing staff. The inspections are managed through the SAP Maintenance Management System which is used to generate work orders to correct any deficiencies identified during these inspections.

Inspection and maintenance of the cyanide mixing tank and equipment is demonstrated by a SAP work order and corresponding inspection report. The inspection covers the cyanide mixing tank foundation floor and wall, condition of the concrete footing, bolts connection, weld joints point, support frame members, stiffeners, hinged and fasteners.

IBCs of solid cyanide are moved from the storage warehouse by trained operators using a forklift. Access to the area is restricted to those that have been authorised and trained for the activities.

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Cyanide IBCs are stored in the dedicated warehouse and stored a maximum of four high. An inspection of the warehouse confirmed boxes are stored in accordance with this requirement.

BHX has procedures to undertake timely clean-up of spills that may occur during a mix. Clean-up is undertaken by mixing staff for spills within containment. Large spills to containment or any spills outside of containment are notified to ERT. The site inspection confirmed spill clean-up equipment was readily available to the crew undertaking mixing activities.

The procedures for mixing solid cyanide do provide for an observer and detail the personal protective equipment needed. Workers performing a mix wear protective disposable coveralls, gloves and a respirator with hydrogen cyanide (HCN) gas monitor.

The cyanide bag is lifted from the box using an overhead winch and a bag splitter is used to release the cyanide into the mixing tank. Once the required number of bags are added, the mixing process is automated. Once complete the resulting solution is pumped into the storage tanks.

The Cyanide Mixing Procedure requires that a second ground level operator observes the mixing procedure only from outside the bund.

Colorant dye is provided in a small bag by the producer Hebei at the point of packaging. Dye is also present in the mixing area as a back-up if needed. Audit observations confirmed that the above procedures are implemented at the point of mixing of solid cyanide and transfer of liquid cyanide.

2.4 Principle 4: Operations

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

2.4.1 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.

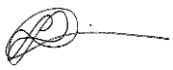
	☒ in full compliance with	
The operation is	□ in substantial compliance with	Standard of Practice 4.1
	□ not in compliance with	

BHX is in FULL COMPLIANCE with Standard of Practice 4.1, requiring that the operation implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

Written management and operating plans or procedures have been developed for cyanide facilities including unloading, mixing and storage facilities, leach plants, tailings impoundments, and cyanide treatment systems.

BHX has document controlled and approved procedures available in English and Laos on the operation's intranet system. The documents are available electronically to the workers. Since the previous audit, the operation has transitioned to a Sharepoint system.

There are plans and procedures covering cyanide related activities at BHX including:

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— Cyanide unloading and storage

— Mixing and transferring

— TSF operations

— Cyanide Destruction

— Cyanide packaging disposal.

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

BHX does have plans or procedures that identify the assumptions and parameters on which the facility design was based and any applicable regulatory requirements.

The BHX Operational Phase Environment and Social Management and Monitoring Plan (OESMMP) provides the basis for wildlife protection measures and compliance for direct and indirect discharge from the TSF.

The Process Plant Design Criteria details the engineering design criteria for the processing facility including throughput and cyanide addition rates. BHX has a cyanide destruction facility that controls cyanide in tailings to 0.5 mg/l WAD CN. CIL training and procedures identify HCN alarm limit and response actions for 4.7 ppm and 10 ppm as well as pH limits. Cyanide destruction training and procedures identify WAD cyanide limits prior to discharge.

The pH limits are described in the pH Trigger Action Response Plan (TARP).

All operational processing set points are discussed in a morning Process Operations Strategy Meeting and adjustments for the plant are discussed and documented in the Control Board document and communicated with the team.

The BHX Elution Upgrade Project necessitated revised process design criteria prepared by Lycopodium Minerals in 2024. The process design criteria for the Process Plant was developed based on a range of information and data including test work, industry standards, engineering Regulatory Standards and Codes, environmental regulation, licences and permits, the AMEC Minproc standard, recommendations and calculations and the Lycopodium standard, recommendations and calculations.

During the wet seasons in Laos from April to October, significant increased rain events occur and precautions and procedures to control excess surface water must take place. This is carried out in the form of escalation of monitoring of pond levels, pumping systems for the return of solution to the plant. An escalation for events is to be followed to minimise impact to the environment.

The Event Pond facility has been designed to collect all surface flow runoff resulting from rain and plant run-off due to the contoured topography of the plant site. In order for the Event pond system to contain all rain water runoff from around the plant area during a 1:100 year rainfall event along with maintaining sufficient volume for any spillage that may occur in the plant, the Event Pond must be maintained at a set low level with all excess solution being pumped back to the plant to maintain this level.The Cyanide Compliance Concentration - WAD criteria of <0.5 mg/L cited in the Process Design Criteria is based on the ESIA Conditions applied at the TSF. The ESIA was part of an Environmental Impact Assessment (EIA) Approval and Environmental Compliance Certificate (ECC) issued by the Lao PDR Government Ministry of Natural Resources and Environment (MONRE), now under the Ministry of Agriculture and Environment (MAE). It includes a comprehensive Operational Phase ESMMP, which acts as the operational control instrument linked to the EIA. The ESMMP was approved and PBM (including BHX) received “A-Class” certification for environmental management and monitoring practices.

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The direct legal control over the management of cyanide in Laos is under the *Environmental Protection Law* (2012) Part III (Toxic Chemical Control), the *Decision on Management and Disposal of Toxic and Hazardous Chemical Wastes* (MONRE, 3 August 2021) and the *Law on Chemicals Management* (MOIC). Mining Licence and Mining Operation Permits are regulated under the *Law on Minerals* (amended version) 2017 and the Ministry of Energy and Mines (MEM).

Recent Prime Minister's Order No. 06/PM (7 March 2025) strengthened enforcement, inspections, and environmental safeguards in the mining sector, reflecting heightened scrutiny of chemical pollution risks, including from gold mining. MAE inspected the BHX site during the audit period.

The operation does have 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.

Standard Operating Procedures (SOPs) have been developed to detail what is expected of operators when carrying out their daily duties including sampling and inspections when the plant is operating routinely.

The operation does have 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.

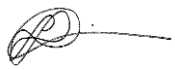
Standard Operating Procedures (SOPs) have been developed to detail what is expected of operators when carrying out their daily duties including sampling and inspections when the plant is operating routinely.

SOPs are typically structured with the following sections:

— Purpose
— Scope and Applicability
— Review Process
— Availability
— Risk Management
— Required Isolations and Permits
— PPE – Equipment – Consumables
— Control Strategy
— Minimum Team Personnel and Skill Sets
— Roles and Responsibilities
— Definitions and Acronyms/Symbols
— References/Associated Documents
— Procedure
— Decision Tree – Risk Management.

PanAust IMS 08 – Standard Operating Procedures requires that SOPs are reviewed in the event of approved changes in processes at the site, following incidents, or modified as outcomes of management system audits or recommendations.

The operation has developed a Cyanide Management Plan (CMP) which outlines a systematic approach for the responsible transport, handling, use and disposal of cyanide and cyanide contaminated equipment (including process streams containing cyanide). The CMP sets the framework for maintaining awareness and compliance with legal and

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other requirements pertaining to cyanide, assessing the risk of cyanide related activities, and links in with existing emergency response processes, consultation and communication with stakeholders regarding cyanide risks and training and monitoring requirements. The CMP has been guided by the Principles and Standards of Practice of the ICMC to enable PBM to maintain compliance with the Code requirements.

Detailed procedures have been developed for some maintenance tasks required to manage risks of cyanide exposure or release such as the cyanide pumps, dosing, repair works, hoist maintenance, level sensor inspections, cyanide inline filters and the cyanide metering system relief valve. Most maintenance tasks are documented within SAP.

Preventive maintenance programmes have been developed in SAP for the site and these will be conducted in accordance with the maintenance schedule. In addition to plant specific inspections, prestart area checks (documented checklists). Detailed Fortnightly Inspections are completed by Supervisors (documented checklists). The inspection sheets are signed and deficiencies are entered into the Computer Aided Modern Management System (CAMMS) and tracked to completion. SAP work orders are generated to address identified deficiencies as required.

The operation does have a procedure to identify when changes in processes or operating practices may increase the potential for the release of cyanide and incorporate the necessary prevention measures.

PanAust IMS 14 – Management of Change requires that all proposed changes must be documented and detailed in management of change request, which must include an assessment of the risks associated with the proposed change.

Management of change requests are initiated and the workflow is recorded on an online database system. The Management of Change (MOC) initiator allocates select stakeholders for their consultation and involvement in the risk assessment. The PBM Management of Change Procedure requires that for all cyanide-related changes, the Environment Superintendent and Process Superintendent are the SMEs required to be involved in the risk assessment process. The Process Superintendent is responsible for assessing the process safety and worker exposure-related aspects of the cyanide-related change.

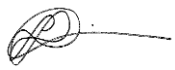
Personnel were also interviewed on the change management process and confirmed that worker exposure and environmental releases are considered as part of the process. The operation does have cyanide management contingency procedures for situations when inspections and monitoring identify a deviation from design or standard operating procedures, and/or when a temporary closure or cessation of the operation may be necessary.

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

— Tails Line Failure
— Site Power Outage
— Abnormal Excessive Rain Fall
— Detoxification High WAD Response
— Cyanide Spill response
— Detoxification Discharge

The operation also has an emergency management plan that addresses overall emergency shutdown of the facility including non-routine temporary cessation of activities. This Plan is supported by processing department procedures that provide instructions for shutdown of the leaching circuits and associated components of the plant.

This process includes the consumption of reagents in the circuit, controlled shutdown of the CIL circuit including drain down of the tanks and pipelines so that the process plant is in a fail-safe condition. The procedures do include care and

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maintenance arrangements such as inspections and maintenance should there be an extended shutdown of the operation. Once the mill has been shutdown there is no longer discharge to the TSF.

Once the controlled shutdown of the mill has been completed the presence of cyanide remaining on the site is limited to solid cyanide within the reagent storage area warehouse. Solid cyanide will remain in the access-controlled storage area or could be re-stuffed into shipping containers for removal offsite (if necessary).

In relation to the water balance, the operation no longer uses a water balance for the prevention of release. The operation has a flow through system and the revised design for the TSF and spillway prevent overtopping of the impoundment and the use of the probabilistic water balance (PWB) was ceased in 2016.

The operation must have cyanide management contingency procedures for situations when there is an upset in a facility's water balance, when inspections or monitoring identifies deviation from design or standard operating procedures, and/or when a temporary closure or cessation of operations may be necessary. It also needs to have the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted.

The BHX TSF OMS Manual includes specific details of the contingency procedures in the event of an upset in the water balance, when inspections and monitoring identify a deviation from design or standard operating procedures, or when a temporary closure or cessation of operations may be necessary.

The Cyanide Emergency Response Plan details steps to be followed in case of a cyanide emergency.

The BHX Detoxification and Discharge Protocols Procedure details the steps involved for control of WAD cyanide in tailings discharged to the TSF.

BHX inspects tanks holding cyanide solutions for structural integrity and signs of corrosion and leakage. Inspections are completed by the Fixed Plant Reliability Department every six months to addresses the visual evidence of deterioration.

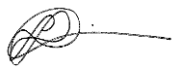
The Fixed Plant Reliability Department also conduct area inspection on a monthly basis and document results in CAMMS. Any deficiencies are actioned through the CAMMS system and SAP. Area inspections for the cyanide mixing and CIL areas include inspections of tanks and pipes for signs of leakage and corrosion. Monthly inspections check the wall thickness both in the open tank and external inspection.

A full internal inspection for the wall thickness and floor is conducted every six months. This addresses the visual evidence of deterioration and corrosion on the coating and pipes. Tank operators also complete daily visual prestart checks at the commencement of each shift.

Secondary containments are inspected informally on a shift-by-shift basis and there is a formal monthly inspection program that considers the integrity of the secondary containment. A site inspection found the bunds to be in reasonable condition with evidence of on-going repairs and maintenance indicating inspections are completed and actions are taken to rectify identified defects.

BHX do not have a leach pad and there is no process water pond. There is a containment pond installed at the process plant to collect spillage should it occur outside of the plant secondary containments.

BHX has processes in place to inspect pipelines, pumps and valves for deterioration and leakage. BHX has a preventative maintenance system that includes checks on pumps for leakage, corrosion and deterioration. In addition to the maintenance checks, operators complete daily inspections checking for leaks and monthly formalised inspections. BHX complete annual structural inspections to assess wall thickness of pipelines, pumps and valves. During each major shutdown when maintenance is conducted the pipes are opened and inspected.

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Whilst the operation no longer utilises a probabilistic water balance, daily inspections of the TSF are conducted and the freeboard on the embankment is checked. There are no other ponds or impoundments that ordinarily contain cyanide solution other than the event pond, when required.

The operation does inspect cyanide facilities at an established frequency that is sufficient to ensure and document that facilities are functioning within design parameters. BHX has a series of inspections ranging from informal shift inspections by operators to more formalised inspections and documentation of operating parameters. The facility is operated via a DCS where operating parameters are monitored continuously.

Preventive maintenance programmes are implemented and activities documented to ensure the continuous functioning of equipment and devices that are necessary for cyanide management.

BHX employs the commercially available software SAP to monitor and track preventative maintenance aspects for the process plant. The system generates a number of planned maintenance activities as well as tracking maintenance requests and work orders generated from regular inspections. The operation undertakes a range of workplace inspections, including an inspection of the cyanide storage facilities. As part of the planned maintenance program, CIL tanks are emptied and refurbished every 3 years and fixed cyanide monitors are checked on a weekly basis.

The BHX Fixed Plant Maintenance Superintendent is accountable for ensuring all planning, resourcing, scheduling, and execution of maintenance tasks on cyanide facilities are completed

The BHX Process Superintendent is accountable for ensuring all required workplace inspections are completed. Records shall be captured and maintained in CAMMS. Auditor's inspection of the operation indicated that housekeeping was of a generally good standard indicative of inspections being frequent enough to contribute to the management of risks of cyanide exposure and release.

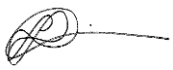
Inspections are documented including the date of the inspection, the name of the inspector, and any observed deficiencies. BHX has developed and implemented an area inspection program that prompts the inspector to check items throughout the plant and where deficiencies are observed these are noted on the forms. Where corrective actions are required, these are documented on the inspection form and either tracked through CAMMS or via SAP for maintenance requests.

The SAP maintenance system generates work orders that include details on the plant or equipment to be inspected, checked and/or repaired/replaced. These are signed off by the personnel completing the work and checked by the supervisor. Records are entered into SAP.

A review of completed inspection forms confirmed they are documented and retained. The records show that issues were raised by the inspections, that work requests are raised to address them and that these are then translated to work orders when resources are allocated.

Preventive maintenance programs have been implemented and activities are documented to ensure that equipment and devices function as necessary for safe cyanide management. BHX has implemented a preventative maintenance program that is administered through SAP. A review of completed PM forms within the SAP program and interviews with personnel confirmed that maintenance activities are undertaken and documented.

There is a comprehensive program of preventive maintenance that includes appropriate coverage of mechanical and instrumented systems particularly that must function effectively for cyanide management. The program includes tanks, vessels, pumps, fans, pipelines, valves, instruments and secondary containments that form part of BHX's cyanide facilities.

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The frequencies of activities currently scheduled are weekly, fortnightly, monthly, six-monthly and annually. Evidence supports that vessel condition inspections are being conducted on an annual cycle with attention directed towards vessels that are at higher risk.

An annual routine has been instituted to cover thickness testing of cyanide critical pipelines. Regular inspections are undertaken of steelwork and concrete that have been identified as being in a degraded yet acceptable state. Records requested in evidence showed that monthly calibrations on fixed HCN monitors and personal HCN monitors are generally carried out as planned.

Work orders are issued to action the implementation of preventive maintenance tasks and work order numbers are used to track the documents produced as records of inspection works such as condition monitoring assessments that cannot be reported effectively into the computerised maintenance management system.

BHX does have the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event of a power failure. Site power is transmitted from a Government hydroelectric power scheme supplied via two transmission lines. BHX has procedures in place to switch between external power supply and internal backup generators in the event of an interruption to the primary supply. To ensure continuous and reliable power supply for the BHX plant site, especially during both planned and unplanned power outages, two 1 MW generator sets (gensets) have been installed as part of the plant's emergency power system. These gensets are designed to manually support critical loads when the main utility power is unavailable, thereby minimizing operational disruptions and ensuring safety, and these are checked weekly. The emergency generators have enough power to supply critical functions that prevent uncontrolled discharges and process disruptions. The Workforce Accommodation Camp has a separate emergency generator. PMs are recorded for the gensets and were observed during this audit.

2.4.2 Standard of Practice 4.2

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

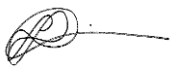
	☒ in full compliance with	
The operation is	□ in substantial compliance with	Standard of Practice 4.2
	□ not in compliance with	

BHX is in FULL COMPLIANCE with Standard of Practice 4.2, requiring that the operation limit the use of cyanide to that optimal for economic recovery of gold so that the waste tailings material has as low a cyanide concentration as practical.

The operation has implemented programs to determine the appropriate cyanide addition rates in the mill and continue to evaluate and adjust addition rates as necessary when ore types or processing practices change cyanide requirements. The operation has evaluated various control strategies for cyanide addition.

The cyanide addition strategy comprises of adjusting the cyanide flow to achieve a predetermined free cyanide concentration in the first and second CIL tanks.

Every hour process operators collect slurry samples from the CIL tanks and analyse for pH and free cyanide levels. Based on the amount of residual cyanide, bottle roll leaches and gold recovery achieved, the target free cyanide concentration is adjusted in the CIL.

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BHX has online free cyanide analysers sampling CIL Tanks 1, 4 and 6 circuit that are used to automate cyanide addition rates. Manual titrations are undertaken on CIL Tanks 1, 4 and 6 and trend analysis is conducted.

BHX have adjusted the cyanide addition point to CIL Tanks 1, 4 and 6 to better control dosage through their automated system. The last tank of the circuit is now being monitored in real-time through the Cyanoprobe system every 10 minutes to allow monitoring of cyanide levels leaving the circuit and quicker response to grades.

Quicklime addition to the semi-autogenous grinding (SAG) Mill can be adjusted to effect changes to the CIL pH levels. On-line pH monitoring is available in CIL tank 1 to provide feedback on the results of changes to quicklime addition rates. Process water is added to the SAG mill, which starts the leaching process.

Dosing of cyanide to the CIL is based on gold and silver recovery values determined from laboratory assay results. Typically, the free NaCN concentrations in CIL Tank 1 are maintained in the range 150-300ppm, however BHX prefers to keep an upper limit of 250ppm.

In addition, weekly bottle roll tests are undertaken on CIL tails to test the effects of increased cyanide concentrations and CIL residence times. Cyanide is controlled on head grade. Mine advises the grade based on bench by bench. The mine can do some blending by accessing different areas of the mine. Weekly meetings are held between the mine and plant to discuss feed. The cyanide dosage can be changed depending on grade bands.

Leaching of gravity concentrates is conducted at cyanide concentrations of 20,000ppm NaCN. Gravity leach tails are pumped to the CIL. No changes to the intensive leach for gravity concentrates have been made and there have been no significant changes to processing practices during the audit period.

The BHX Metallurgical Superintendent is accountable for ensuring this programme is completed.

BHX has installed WAD cyanide analysers in CIL tanks 1 and 4 in order to automate cyanide additions. BHX subscribes to principles of continuous improvement and will continue to assess various strategies to reduce cyanide consumption.

2.4.3 Standard of Practice 4.3

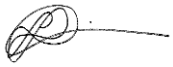
Implement a comprehensive water management program to protect against unintentional releases.

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

BHX is in FULL COMPLIANCE with Standard of Practice 4.3, requiring the operation to implement a comprehensive water management programme to protect against unintentional releases.

The operation developed a probabilistic water balance (PWB) when the operation was first commissioned. However, due to the TSF operating as a flow through system and subsequent design changes to the main embankment and spillway structure, BHX has ceased the use of a PWB as it is no longer applicable to prevent unintentional releases. BHX has a spillway commonly referred to as the Concrete Rock Faced Dam (CFRD) or flow over weir.

The updated design of the TSF includes the spillway which is designed to handle the probable maximum flood (PMF) event without overtopping the adjacent main impoundment wall. Accordingly, the PWB to prevent unintentional release, i.e. overtopping of the impoundment wall was no longer applicable to the operation of this facility and use of the PWB ceased in 2016.

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BHX monitors water levels in the TSF and commissioned a dam breach assessment for the Life of Mine (LOM) arrangement of the TSF. The dam breach assessment has been used to inform the BHX TSF emergency response plan which details actions to take in the event of significant blockage of the spill way which may lead to overtopping of the impoundment.

BHX has a cyanide destruction facility that treats cyanide prior to discharge to the TSF. Once the WAD CN concentration in the tailings stream reaches the acceptable level of 0.5 mg/L, the treated slurry is pumped to the TSF via the tailings pipeline.

The operation has in place monitoring programs to test the water downgradient from the TSF spill way at the point of discharge to surface water and the mixing zone at the entry to the Nam Ngum 2 Reservoir to verify receiving waters are below 0.5 mg/L WAD CN and 0.022 mg/L free cyanide respectively. This is discussed further in Standard of Practice 4.5.

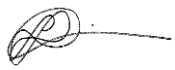
The Cyanide Management Plan details the comprehensive water management program to prevent the unintentional releases in relation to:

- The tailings slurry densities that are deposited into the TSF
- A design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of any pond or impoundment can be prevented during the operational life of the facility.
- The quality of existing precipitation and evaporation data in representing actual site conditions.
- The amounts of precipitation entering a pond or impoundment resulting from surface run-off from the up-gradient water shed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground.
- Solution losses in addition to evaporation, such as the capacity of decant, drainage, and recycling systems, allowable seepage to the subsurface, and allowable discharges to surface water.
- The effects of potential power outages or pump and other equipment failures on the drain down from tailings facilities or the emergency removal of water from a facility.

The TSF is designed to overflow to the environment and is managed to maintain WAD cyanide concentrations <0.5ppm. The Plant Water and Event Pond Management Procedure outlines the operational parameters required to ensure that the risk of discharge of contaminated storm water is minimised.

It can be shown that the design of the TSF (embankment and operational weir) has been safely designed and built to accommodate the PMF resulting from the probable maximum precipitation (PMP) (i.e. the largest theoretical rainfall that can possibly occur), without any uncontrolled discharge of either tailings or water. The structures of the TSF (embankment, operational weir, and outfall drains) have all been designed with sufficient contingency to cope with the largest rainfall events possible as well as largest deformations and seismic forces that could be experienced. As such, there is no possibility of loss of cyanide contaminated breaching containment.

The operation has procedures in place for the handling of extreme storm water events. In the event of abnormal excessive rain fall, Control Room personnel are directed to maintain event pond water balance. In the event of high–high level alarms in the event pond, corrective action will take place that may necessitate the plant to be shut down to reduce risk of overfill. The Plant Water and Event Pond Management procedure includes reference to an escalation strategy for extreme high rainfall during the wet season or power outage with extreme rain fall. Management of uncontrolled overflowing would require analysis of the overflow for cyanide levels taken at the overflow every hour. In the event that regular

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monitoring and inspection identify a deviation from the design or operating procedures, the incident must be reported immediately to the Process Manager or his designate who will take appropriate action.

Inspections are completed at the TSF and any actionable items are reported to the Process Superintendent and/or the Risk Manager. The following daily inspections are completed:

- Tailings pipeline and valves
- Diversion drain culverts
- Event Pond water level
- Tailings line choke stations
- Tailings deposition point
- TSF spillway

Monthly TSF and Spillway Inspections are conducted and records kept. Any actionable items are communicated to the Process Superintendent, Environment Superintendent, and Mining Manager.

The operation undertakes an annual review of the site weather data, inclusive of the Water Balance modelling review that is conducted by engineering and environmental services Knight Piesold or competent onsite personnel.

The operation has periodically reassesses rainfall assumptions as part of the annual TSF inspection, as well as performed long-term climate change assessments to look at impacts of climate change on extreme drought and extreme rainfall post-closure of the facilities.

2.4.4 Standard of Practice 4.4

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

	☒ in full compliance with	
The operation is	□ in substantial compliance with	Standard of Practice 4.4
	□ not in compliance with	

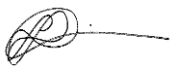
BHX is in FULL COMPLIANCE with Standard of Practice 4.4, requiring the operation implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

The operation does not have open water bodies that exceed 50 mg/L WAD CN. There is an event pond that may contain cyanide in the event of an incident but under normal operating conditions does not contain cyanide.

There is a cyanide destruction circuit that treats process discharges prior to placement in the TSF. The TSF facility is an open water body flow through system with a direct discharge via a designed spillway. The supernatant water in the TSF has WAD CN levels typically in the 0 to 0.03 mg/L range, well below the Code compliance point of 50 mg/L.

The operation can demonstrate that the cyanide concentration in open waters of the TSF does not exceed 50 mg/L WAD CN. Monitoring data shows WAD CN levels are consistently below 0.5 mg/L WAD CN in the TSF and at the point of discharge.

BHX does not have leach facilities or solution ponds.

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Maintaining a WAD CN concentration of 50 mg/L or less in open water appears effective in preventing significant wildlife mortality. Monitoring data indicates WAD CN levels are consistently below 0.5 mg/L and wildlife mortalities have not been observed associated with cyanide levels.

2.4.5 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	

BHX is in FULL COMPLIANCE with Standard of Practice 4.5 requiring measures to protect fish and wildlife from direct or indirect discharges of cyanide process solutions to surface water.

Due to the large catchment area reporting to the facility (19.7km2) and no recycling of process water, the TSF has a highly positive water balance resulting in the requirement for continual discharge from the facility all year round through a passive spillway. There is active water treatment is currently undertaken within the TSF pond before discharge to environment as the water is relatively benign, containing no excessive metals or salts and therefore, no specific treatment to discharge water is required.

The BHX TSF water management is managed under indicated in the ESMMP and under the BHX Water Quality Monitoring Program Plan (Doc No. 2-24-149), which updated year to year regarding the recommended from the third-Party review, EGi (Environment Geochemistry International).

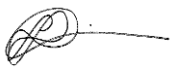
The daily water quality monitoring has been implemented by the Environment team to ensure that variations to the required standards to ensure no significant long-term adverse impacts in the receiving waters of the Nam Ngum 2 Reservoir.

The operation monitors the WAD CN levels in the TSF prior to discharge (at BHSWTSF18) and at the point of discharge downstream of the spill way (at BHSWTSF07. Daily monitoring data reviewed during this audit shows WAD CN levels are consistently below 0.5 mg/L WAD CN.

WAD CN monitoring is undertaken inhouse and via by third party National Association of Testing Authorities (NATA) accredited laboratories in Australia called MPL Laboratory. All data is recorded and maintained in the CAMMS risk management system (now known as Riskonnect).

The Water Quality Monitoring Program was updated in July 2025 to reflect the 2025 site plan and water quality review conducted by EGi.

In 2025 a fish tissue analysis was conducted at the NN2 reservoir (BHAQSVS03), NN2 reservoir (reference site) by external laboratory (ALS laboratory in Hong Kong). None of the metals detected recorded exceedances above the adopted criterion or issues of concern based on samples of fish tissue at the TSF discharge channel. This analysis did not test for levels of cyanide in fish tissue due to daily WAD CN being in compliance. PBM will continue the aquatic biological monitoring program in October 2027 by consultants Earth Systems to understand any potential impacts from the PBM operations within the catchment area.

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PBM has also invited the local village authorities, District and Provincial delegation levels to attend during aquatic biological monitoring program.

The operation conducts monitoring in surface waters downgradient of the site and can demonstrate that direct discharges to surface water do not cause the concentration of free cyanide in receiving waters to exceed the ICMC's 0.022 mg/L threshold downstream of any established mixing zone.

BHX has an ambient water quality compliance location at the point of discharge from the spillway into the Nam Ngum 2 Reservoir (at BHSWNNR07) where the ICMC's 0.022 mg/L free cyanide level applies. The Environmental Compliance Certificate (ECC) granted to BHX for operation requires a lower limit of 0.005 mg/L free cyanide. This is also lower than the national regulatory limit of 0.07 mg/L free cyanide at this location.

BHX monthly monitoring data shows that free cyanide levels are consistently below the 0.022 mg/L compliance criteria. Compliance sampling analysis is undertaken by third party NATA accredited laboratories in Australia.

The operation has an indirect discharge to surface water. There is an underdrainage system and seepage collection system for the TSF embankment that then flows via surface flow to join the direct discharge from the TSF and into the Nam Ngum 2 reservoir. Sample location BHSWNNR07 samples water quality from both direct and indirect discharges and shows free cyanide levels are consistently below 0.005 mg/L. Accordingly, the indirect discharge does not cause instream concentration to exceed the compliance criteria.

The discharges from the TSF have not caused concentrations to rise above levels protective of a designated beneficial use for aquatic life. Accordingly, BHX has not engaged in remedial activities.

External party consultants from Earth Systems undertook aquatic and water monitoring in the wet season of 2024, which confirmed no exceedances of concentrations in surface water.

2.4.6 Standard of Practice 4.6

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

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

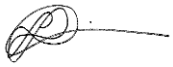
BHX is in FULL COMPLIANCE with Standard of Practice 4.6, requiring the operation implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

The operation does implement specific management measures to protect the beneficial use of groundwater beneath or immediately down gradient of the operation.

As noted previously, BHX has a cyanide destruct circuit that reduces cyanide content in the tailings to below 0.5 mg/L WAD CN prior to discharge from the destruction circuit into the tailings pipeline and subsequent deposition into the TSF.

There are currently no designated beneficial uses of groundwater beneath or immediately downgradient of the operation.

BHX has installed two water monitoring bores at the process plant (BHGWBPS06 and BHGWBPS07) and three at the TSF (BHGWTSF5B and BHGWTS65B). Previous water monitoring bores (BHGWBPS02, BHGWTSF1B, BHGWTSF2B) have now been covered. The monitoring bores at the plant are located on the south-east and south-west

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of the plant site between the process plant and the ridge down to the reservoir. The two bores at the TSF are installed downgradient of the facility.

Water monitoring data reviewed for the period 2023 to March 2026 shows that WAD CN levels are consistently below 0.5 mg/L when detected. The highest recorded levels of WAD cyanide during the audit period were recorded in July 2025 when the level at BHGWBPS07 reached 0.03 mg/L and at BHGWTSF5B where the level reached 0.02 mg/L. Data for all other months indicates a level of 0.0 mg/L.

Laboratory analysis is undertaken by NATA accredited third party laboratories.

The operation does monitor for cyanide in groundwater downgradient of the site and can demonstrate that concentrations of WAD cyanide (or total) in groundwater at compliance points downgradient of the facility are below levels that are protective of identified beneficial uses of the groundwater.

There are currently no designated beneficial uses of groundwater beneath or immediately downgradient of the operation. However, WAD CN concentrations in groundwater are below the levels for total cyanide, as specified under the National Environmental Standards 2017 (Ministry of Natural Resources and Environment (MONRE), now the Ministry of Agriculture and Environment (MAE)). All data reviewed indicates that levels of WAD CN are below threshold criteria.

PBM submits monthly monitoring data to the Laos PDR government, as well as hosting annual visits to the cyanide storage facility.

The operation does not use mill tailings as underground backfill.

No remedial activity to prevent groundwater degradation due to cyanide levels has been necessary to date.

If cyanide exceeds 0.5 mg/L in the tailings, deposition is stopped in order to detox / treat the cyanide before restarting deposition into the TSF.

2.4.7 Standard of Practice 4.7

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

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

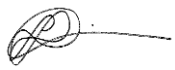
BHX is in FULL COMPLIANCE with Standard of Practice 4.7 requiring that the operation provide spill prevention or containment measures for process tanks and pipelines.

Spill prevention or containment measures have been provided for cyanide unloading, storage, mixing and process solution tanks. There have been no changes to the operations spill prevention or containment measures since the previous audit which found the containment to conform to Code requirements.

A site inspection confirmed that containment measures are in place and systems are implemented to maintain them.

BHX has undertaken the following measures with regard to spill prevention and containment:

- The CIL tanks are installed on ring beams with leak detection system installed beneath the tanks. The tell tails of the ring beams are checked and work orders raised to inspect/repair tanks where leaks are observed.

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- A range of team-based risk assessments and Hazard and Operability (HAZOP) studies for cyanide facilities.
- All process tanks and the tails thickener are provided with concrete secondary containment bunds.
- Inspections and preventative maintenance programs for all reagent bunds including the cyanide storage area. Specific procedures have been developed for process solution spills both inside and outside the secondary containment areas and for any spills during cyanide unloading.
- The pipeline to the TSF is located below ground. The pipeline has pressure sensors detecting any sudden drop in pressure and this information is relayed to the control room.

Cyanide tanks and pipelines are constructed of materials compatible with cyanide and alkaline pH conditions. The materials of construction are mild steel for tanks and thickeners as well as some pipes. The processing facilities are constructed in accordance with the relevant standards, also taking into account Australian dangerous good licencing requirements. All secondary containment areas have been constructed in concrete.

The secondary containment volumes for cyanide mixing, storage, thickener, and process tanks are sized to hold 110% of the volume of the largest tank within the containment area and consider any piping draining back to the area and allow additional capacity for the design storm event.

Procedures are in place for cyanide containment facilities to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in the secondary containment area.

The operation has a series of sumps that allow for solutions collected within the sumps to be returned to the plant. Should there be a discharge outside of the secondary containment of the plant there is a lined event pond that collects run off from the plant area and has been designed to contain overflow and rainfall from the process plant.

The cyanide mixing area is served by sump pumps, and the cyanide loading area has its own sump pump. All pumps in the area have float limit switches, allowing them to operate on and off automatically.

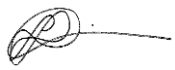
All cyanide process tanks have secondary containments. Nonetheless, in the event that a spill reaches soil, the site has procedures, as contained in the Cyanide Emergency Response Plan (CERP), for testing and remediation of contaminated soil.

Spill prevention or containment measures are provided for cyanide process solution pipelines to collect leaks and prevent releases to the environment. Cyanide solution pipelines within the plant are installed above concrete containment areas that drain back to sumps for return to the process.

The TSF pipeline located underground between the site and TSF discharge points has two pressure sensors. These sensors detect sudden drops in pressure and this information is relayed to the control room. The pressure relief stations are surrounded by concrete bunds and are inspected daily. There are flow monitors and pressure sensor transmitters that record any drops in pressure.

Areas where cyanide pipelines may present a risk to surface water have been evaluated for special protection needs. The only pipeline outside of secondary containment is the TSF pipeline which carries tailings from the cyanide destruction plant to the TSF. Accordingly, this pipeline has not been identified as needing special protection in relation to cyanide content as the tailings contains <0.5 mg/L WAD CN and the pipeline is located away from surface water.

Tailings lines outside the secondary containment areas are not classified as cyanide solution pipelines. The Detoxification Discharge Protocols Procedure provides response actions to implement following exceedances of 0.5 mg/L WAD CN in the last detox tank prior to TSF pump release.

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Cyanide tanks and pipelines are constructed of steel that is compatible with cyanide and high pH conditions. Material compatibility was assessed during the previous audit and there have been no changes to the tanks (reagent, elution or process tanks) since then.

2.4.8 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	

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

Quality assurance and quality control (QA/QC) assurance programs have been implemented during both construction of new cyanide facilities and when undertaking modifications to existing facilities.

There have been no changes to physical infrastructure of cyanide facilities at the operation with the exception of the TSF, where raises to the embankment and changes to spill way were completed. BHX has undertaken QA/QC assessments for the construction of the embankment raise and weir modification and records of the inspection have been retained. QA/QC assessments have included suitability of materials and compaction.

Verification of the QA/QC program was undertaken during the original certification audit and in subsequent recertification audits. The documents provided as evidence during the certification audit were sighted during this audit but were not reviewed.

BHX completed non-destructive test work using magnetic particle inspection (MPI) on the weld joints for tank floor repair works completed during the 2023 audit period and these were recorded in the project documentation. The QA/QC process on the TSF works did include soil compaction testing.

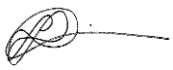
QA/QC records have been retained for cyanide facilities, including corresponding records cited in BHX's previous ICMC certification audit report and records pertaining to the construction/modification of cyanide facilities during the recertification period. QA/QC records were reviewed at the time of the certification audit and sighted during subsequent recertification audits.

Evidence of QA/QC or as-built certification documentation was available for the cyanide facility construction.

2.4.9 Standard of Practice 4.9

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

	☒ in full compliance with	
The operation is	□ in substantial compliance with	Standard of Practice 4.9

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□ not in compliance with

BHX is in FULL COMPLIANCE with Standard of Practice 4.9 requiring that operations implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

The operation has developed written standard procedures for monitoring activities. PBM has developed an overarching Operational Environment and Social Management and Monitoring plan that sets out environmental monitoring for the BHX operation including assessment of surface and groundwater quality and wildlife monitoring. The operation is situated in the greater Mekong Basin which has high diversity in freshwater fish species and freshwater fauna. The monitoring plan establishes the sampling locations for groundwater and surface water. PBM also conducts biannual aquatic surveys to examine diversity and abundance of aquatic species.

In addition to the monitoring plan, there are task level procedures for surface water and groundwater monitoring that detail preparation, collection of samples, field measurements, chain of custody and reporting. These tasks also include observations and reporting should wildlife impacts be identified.

The surface water and groundwater monitoring program are regularly reviewed and updated in order to facilitate continuous improvement and development of the program based on site risks and consistency with the annual biological monitoring locations to ensure it covers aspects of environmental monitoring, for operations, closure and compliance (it was revised as per the 2025 EGi report's recommendation).

PBM has managed and controlled the mine site discharge through the Water Quality Monitoring Trigger Action Response Plan (TARP) to ensure that the effluent and ambient surface water criteria at the defined compliance points are not exceeded. The TARP will be responsible by all operations departments involved in the controlled discharge activities.

The Level 3 TARP threshold levels for WAD CN is greater than 0.5 mg/L or Free CN levels in discharge (as measured in routine MPL monitoring) greater than 0.1 mg/L.

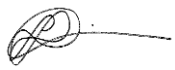
Sampling and analytical protocols have been developed and reviewed by appropriately qualified personnel. BHX has a structured document control process and the monitoring procedures have been formally reviewed and approved by a university degree qualified environmental professional (Bachelor of science, BSc).

The report provided to the government must also provide qualifications of the PBM Environment team.

Where appropriate, the operation's procedures specify how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, and cyanide species to be analysed. Quality control and assurance is managed in three aspects. Field blanks, trip blank and field duplicates are collected, and third-party laboratories are also used for quality control and assurance purposes. BHX started including trip blanks in the last three years driven by improved QAQC and more stringent monitoring.

Sampling conditions (e.g. weather, livestock/wildlife activity, anthropogenic influences, etc.), and procedures are documented in writing. A review of completed sampling forms and procedures confirmed sampling conditions are documented.

Monitoring is conducted at frequencies that are adequate to characterise the medium being monitored and to identify changes in a timely manner. Monitoring is conducted daily. Given the operating circumstances and the online monitoring within the plant, environmental monitoring is considered to be undertaken at an adequate frequency and the operation undertakes trend analysis on the data. Records of monitoring undertaken during the audit period were available for review.

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2.5 Principle 5: Decommissioning

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

2.5.1 Standard of Practice 5.1

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

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

BHX is in FULL COMPLIANCE with Standard of Practice 5.1 requiring that operations plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

The operation has developed written procedures to decommission cyanide facilities at the cessation of operations. BHX has developed a Cyanide Closure Plan that addresses cyanide facilities at the site.

The plan outlines the activities leading up to and during decommissioning of the plant and TSF pipelines including management of reagents, decontamination, residue management, detailed task planning, risk assessment and environmental protection during decommissioning and closure activities.

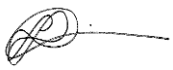
In accordance with the closure objective of no environmental impact due to cyanide, there will be no discharge of cyanide containing water from the BHX processing plant post closure which might adversely affect the groundwater or ecosystems in the vicinity of BHX. Water quality monitoring will continue at a number of significant locations for a time period in accordance with any decommissioning conditions prescribed by either the Lao PDR or the Water Resources and Environment Administration (WREA).

A Human Resources strategy for BHX closure will be developed which will include a study to investigate as far as practicable the impact the closure of the mine will have on local service providers including those that are involved in the supply and transport of cyanide to the mine.

BHX has an implementation schedule for decommissioning activities. Decommissioning of the processing plant is integrated into the overall site closure activities and described in the Cyanide Closure Plan.

Planning for the shutdown of the BHX processing plant and associated cyanide facilities will be the subject of detailed task lists and associated schedules of activities. The compilation of task lists will be the responsibility of a dedicated person who is highly familiar with the plant hardware such as a process supervisor and commence no less than 3 months prior to plant shutdown. The task lists will be tabulated under the headings of equipment number, description, required action, special requirements, resource, hours and people.

The possibility that there are soils in the plant site area that have been contaminated with cyanide during the operating life of the plant will be investigated immediately post closure by testing a number of soil samples obtained from strategic points (outside concrete bunds in the vicinity of cyanide storage, mixing and unloading areas). Soil testing will be carried out and take the form of water and caustic washing followed by speciation of washing liquors. The resultant assessment of the form and mobility of cyanide in the soil will be used to determine what remediation works, if any, will be required.

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The level of detail in the closure plan is considered reasonable for the remaining life of mine at the time of the audit. At the time of closure planning, a Laos Government-managed Closure Steering Committee will meet to discuss best way to safety rehabilitate the mine.

The Cyanide Closure Plan forms part of the whole of site BHX Closure Plan and associated documents which must be submitted to the Department of Mines (Ministry of Energy and Mines) for approval and shall be regularly updated every three years thereafter as part of the OP-ESMMP regular revision and approval process undertaken by the Ministry and Natural Resources and Environment

The plan was updated in 2018, 2022 and 2025 and approved by Process Operation control system team. Where temporary closure of the cyanide facilities is required (i.e. for periods between three months and one year) a Temporary Closure Plan must be developed which incorporates the appropriate elements of this Closure Plan plus any pertinent requirements outlined in the Environmental Compliance Certificate (ECC) issued by the Government of Lao PDR.

2.5.2 Standard of Practice 5.2

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

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

BHX is in FULL COMPLIANCE with Standard of Practice 5.2 requiring that the operation establish an 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.

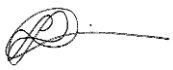
BHX does review and update the cost estimate at least every five years and when revisions to the plan are made that effect cyanide related decommissioning activities. No changes to cyanide related decommissioning activities have been made in the recent plan revie. The most recent internal closure cost estimates were provided to the Pan Aust Group Finance Manager in March 2026.

BHX has established a self-insurance as a financial assurance mechanism and has a statement by a qualified financial auditor that it has sufficient financial strength to fulfil this obligation.

In compliance with international accounting standards PBM will recognize a provision in the balance sheet for costs associated with closure of the BHX Operation. Under international accounting standards PBM is required to report its provision on each reporting date being the end of June and the end of December each calendar year.

KPMG and Kubik Rube prepared a closure provision for BHX. The closure provision was calculated based on an assumed scenario where BHX would theoretically have to close at end of calendar year and as such has been calculated in line with the most recent audited financial statements

The closure provision for 2026 considers costs associated with decommissioning of cyanide facilities. PanAust has confirmed that the provision within audited financial statements is available for, and more than sufficient, to fund the estimated cost of cyanide related decommissioning activities for the BHX operations.

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2.6 Principle 6: Worker safety

Protect workers' health and safety from exposure to cyanide.

2.6.1 Standard of Practice 6.1

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

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

BHX is in FULL COMPLIANCE with Standard of Practice 6.1 requiring an operation to identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

The operation has developed procedures describing how cyanide-related tasks such as unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure. BHX has developed management procedures for cyanide facilities including cyanide unloading and storage, Carbon in Leach (CIL) operations, and TSF operations.

There is a Cyanide Management Plan is reviewed every 2 years by the Process Operation control system team. The Plan details the measures to be implemented to manage cyanide from the transport route to deliver the shipment to the site through to destruction and placement of tailings. There is a series of standard operational procedures (SOPs) that have been implemented at the site and these are periodically reviewed.

With regard to minimizing worker exposure, there is a series of inductions for employees such as the BHX General Induction Programme, the Process Safety Induction and the Cyanide Induction.

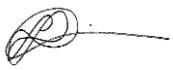
The Cyanide Management Plan also details how a BHX-supplied crane will unload each cyanide container from the truck. The container is then de-stuffed in a controlled area by BHX trained operators in accordance with the Unloading of Sodium Cyanide Procedure (1852) 2-7-196.

There is a permit system for high-risk activities onsite including the entry into confined spaces. The confined space entry system requires the area to be isolated, hazards including atmospheric hazards to be monitored by trained personnel prior to entry and during works. The operation has a confined space register that includes a risk assessment of the identified confined space, entry controls and rescue plans.

There are procedures for isolation and lock out and tagging out equipment for maintenance activities and the site inspection confirmed this system was being used. The site has calibrated monitoring equipment for monitoring HCN gas within confined spaces. There is a specific procedure for decontaminating cyanide pumps and pipelines for handover to maintenance personnel.

All relevant procedures are located on the PBM SharePoint site where all employees can access them. There is a risk register on the CAMMS Enterprise Risk Management (ERM) system that captures all safety-related risks.

Cyanide facilities are inspected at a frequency considered adequate to ensure they are operating within design parameters. There are 16 separate Inspection Checklists used for inspections in areas at risk of cyanide contamination.

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The procedures require, where necessary, the use of Personal Protective Equipment (PPE) and addresses pre-work inspections. Each of the SOPs detail a pre-task inspection of the area and detail the PPE applicable to the task.

BHX has implemented a Take 5, job safety assessment (JSA) and a field-based risk assessment process to identify and address hazards that may occur at the time of completing the work, and those additional to the standard hazards noted in the SOPs.

Pre-start meetings before every start of shift.

The operation does solicit and actively consider worker input in developing and evaluating health and safety procedures. There are multiple mechanisms available to seek and obtain feedback at the operation including planned task observations (PTOs), toolbox meetings and site safety committee meetings. Toolbox meetings are undertaken on a weekly basis and the safety committee meets on a monthly basis.

The document review process at the site is a structured process where procedures are sent out to various departments for comments and then reviewed by supervisors and superintendents. Where changes are made, the documents are sent through to document control for manager approval and signoff.

Cyanide emergency response drills are scheduled every 6 months and coordinated by the RESS-Regional Emergency Services Superintendent. Following cyanide emergency drill such as the Process Hazardous Substance Spill Suspected HCN Exposure Drill, personnel who participated are asked to provide feedback to improve the process. A Debrief report is completed by the Team Leader and reviewed by the Supervisor or Superintendent. The Debrief report that details what was done well and what requires improvement.

2.6.2 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	

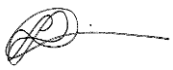
BHX is in FULL COMPLIANCE with Standard of Practice 6.2 requiring BHX to operate and monitor cyanide facilities to protect worker health and safety and periodically evaluates the effectiveness of health and safety measures.

The operation has determined the appropriate pH for limiting the evolution of HCN gas during mixing and production activities. The pH set point for mixing is 10.5 and the pH set point for the CIL circuit is 10-10.5, currently 10.2, which is sufficient to limit the evolution of HCN gas.

There are online pH probes installed on the process plant that provide a local reading and inform the SCADA system in the control room. pH set points are established and monitored.

In the mixing area there are online PH monitors, which are also reviewed and maintained regularly. The operator uses fixed and portable meters to double check readings are correct. Readings are taken by the operator every 2 hours at the CIL tank.

The operation uses monitoring to confirm that controls are adequate to limit worker exposure to HCN and sodium, calcium or potassium cyanide dust to 10 ppm on an instantaneous basis and 4.7 ppm continuously over an 8-hour period.

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BHX has identified the cyanide mixing and storage, CIL tanks, trash screen and carbon safety screen circuit as having the potential for HCN exposure and has installed fixed monitors in these locations that provide local alarms if trigger levels are exceeded. The monitors report to the SCADA system and are continuously monitored in the control room, however Superintendents have access anytime.

Personal monitors are used on site and personnel are required to leave an area where a reading is obtained in excess of 4.7 ppm – on either a personal or fixed monitor. Personal and fixed monitors are set to alarm at 4.7 ppm and 10 ppm. Personal monitors are calibrated, and a register of monitors is kept on the site.

The operation has identified areas and activities where workers may be exposed to HCN gas in excess of 10 ppm on an instantaneous basis and 4.7 ppm continuously over an 8-hour period and do require the use of PPE in these areas or when performing these activities.

The operation has identified the cyanide mixing and storage, CIL tanks, trash screen and carbon safety screen areas as those with the potential to expose workers to HCN gas. Static or "fixed" HCN detectors (Drager Polytron 7000) are located in these areas and provide continuous monitoring via digital read out on the system. BHX has developed and implemented procedures, which require a portable HCN monitor (Drager PAC 7000) to be available to all process operators and maintenance personnel entering or working within the cyanide mixing and storage area, grinding area, CIL tanks, trash screen and carbon safety screen areas. Personnel are required to leave an area when a HCN gas reading in excess of 4.7 ppm is recorded by either the personal or fixed HCN monitor alarms.

Actions to investigate and rectify the situation are set out in SOPs HCN Monitoring and Maintenance and the CERP, section 19.

At 4.7ppm alarm, the Shift Supervisor and Chief Representative Officer (CRO) are notified, the task stops (e.g. mixing is suspended), and the area is barricaded. The Shift Supervisor then investigates the source (leak, spill, pH drop, ventilation) with a portable detector while wearing a full-face respirator with an ABEK canister (gas and vapour filters use letters to indicate the chemical family A, B, E and K).

At 10ppm alarm, the area is isolated, Fire and Emergency Services (FES) responds with SCBA and chemical splash suits, and a decontamination zone is set up. Plant is isolated and tagged out as needed. FES stands down, and control passes back to the Process Superintendent, only once readings are below 10 ppm.

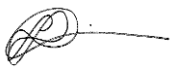
Following either the 4.7ppm or 10ppm alarms, the cause is fixed and readings are confirmed back to normal before re-entry. The event is reported and investigated under the PanAust Incident Management Procedure, and the detector's calibration is checked.

BHX has installed signage to notify personnel in which areas HCN monitors are needed and SOPs detail the additional PPE that is to be worn for specific tasks. Cyanide Mixing is an activity at the site where additional PPE in the form of coveralls and respirators are required. The site inspection and interviews with personnel confirmed that PPE was being worn as detailed in BHX SOPs.

Calibration certificates for fixed and portable monitors were reviewed during the site visit.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained for at least three years. The site utilises both fixed and personal HCN monitors and a review of Drager servicing and calibration certificates confirmed devices are serviced on a 6-monthly basis and records for the preceding three years were reviewed confirming they are retained.

The site also has the capability to calibrate devices where faults arise and the units are serviced on site. However if the monitor is extremely incorrect, then spare monitors are used as a replacement.

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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, and that suitable PPE must be worn.

Warning signs are placed at the entrances to the cyanide mixing and storage and at entry points to the process plant.

Cyanide warning signage is not provided for the TSF pipeline or TSF as the mill tailings are subject to a destruction circuit that reduces WAD CN levels to below 0.5 mg/L prior to discharge into these facilities. The pipeline is labelled so that operators understand what is in the pipeline.

High strength cyanide is dyed for clear identification. All cyanide currently stored at the site has been purchased from Hebei Chengxin Co Ltd, an ICMC certified producer. Hebei provide a small bag of red dye within the box of cyanide which is added by PBM during the production process.

PBMs mixing procedure also includes the addition of dye in the box mixing process.

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

A site inspection confirmed that showers were operational and that fire extinguishers were charged and tagged. A review of inspection records stored in the CAMMS database confirmed that routine inspections and routine maintenance are conducted.

The Emergency Response Team (ERT) team is responsible for maintenance of all fire extinguishers and showers in the processing plant. Additionally, process operators check the fire extinguishers and showers daily.

The operation has identified unloading, storage, mixing and process tanks and piping containing cyanide to alert workers of their contents.

The cyanide mixing tanks are labelled and painted for identification.

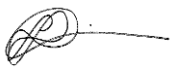
Cyanide reagent lines are coloured and labels detailing content and direction of flow are attached enabling tracing of pipelines through the plant. Process tanks and slurry pipelines are also identified with content labels and direction of flow. The site induction training material includes information on the various pipelines within the plant. The site inspection confirmed that labels were present, content could be identified, and workers were aware of the labelling system and what it means.

Safety data sheets (SDS), first aid procedures and informational materials on cyanide safety were available in the language of the workforce in areas where cyanide is stored, handled and managed. The Safety Data Sheets are located in the medical clinic reception area, both in Laos and English. Other relevant first aid information (i.e. snake species information) is provided in Lao and English. Information and pictograms are displayed around the cyanide storage and mixing area and at entry points to the processing plant.

Procedures are in place and being implemented 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.

ERT and Process team conduct drills to test the effectiveness of the Cyanide Emergency Response Plan. This the opportunity to see areas for improvement.

No incidents of worker exposure to cyanide were reported during the period. A review of CAMMS database and interviews with personnel confirmed that incidents are reported and investigated.

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2.6.3 Standard of Practice 6.3

Develop and implement emergency responses plan 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	

BHX is in FULL COMPLIANCE with Standard of Practice 6.3 requiring an operation develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The operation has the necessary equipment to respond in the event of a worker's exposure to cyanide. BHX has a site wide alarm system for the processing plant to enable evacuation and radio coverage of the site with dedicated emergency channel. Supplementary communication is provided by the site phone and mobile phone systems. Operators on the plant carry a radio with them and there are phones throughout the plant area.

In an emergency, the process operator calls to the closed-circuit television (CCTV) room, then calls the medical clinic. For general non-emergency medical treatment, the operator calls the medical clinic directly.

The BHX medical clinic is located outside the security gate entrance to the plant and has an equipped two bed triage area and three bed clinic area. The triage area is equipped with oxygen, cyanide antidote kits (hydroxocobalamin), resuscitation equipment, Electrocardiography (ECG) and Automated External Defibrillators (AED). The medical clinic is staffed 24/7 with a doctor and two paramedic per shift. In the case of an emergency, all doctors and paramedics on and off shift will respond.

Around the plant there is potable water for decontamination via emergency showers and eyewash facilities, water is available from fire hoses and medical oxygen at the permit hut adjacent to the cyanide storage and mixing facility.

The operation conducts inspections of its first aid equipment regularly to ensure that it is available when needed and materials such as cyanide antidotes are stored and/or tested as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed.

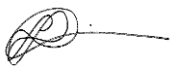
The operation has developed specific written emergency response plans or procedures to respond to cyanide exposures.

The Cyanide Emergency Response Plan is the primary reference for responding to cyanide incidents and details worker exposure response including use of oxygen, decontamination and administration of cyanide antidotes. The Plan details the necessary responses to cyanide exposure through ingestion, inhalation, and absorption through the skin and eyes. This was confirmed during interviews with the doctor, as well as signage in the medical clinic and in the cyanide first aid kit.

The operation does have its own on-site capability to provide First Aid or medical assistance to workers exposed to cyanide. The BHX medical clinic is located outside the security gate entrance to the plant and has an equipped 2 bed triage area and 3 bed clinic area. The triage area is equipped with oxygen, cyanide antidote kits (confirmed in date), resuscitation equipment, ECG and AED. The medical clinic is staffed 24/7 with a doctor and paramedics.

The operation has developed procedures to transport workers exposed to cyanide at the mine site to locally available, qualified off-site medical facilities.

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

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PBM has accounts for insurance at all the medical facilities so injured employees can be treated immediately

Given the location of the mine and the time to transport exposed personnel offsite, decontamination and initial treatment would be undertaken on site and the patient then transferred to other facilities for monitoring and recovery.

2.7 Principle 7: Emergency responses

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

2.7.1 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	

BHX is in FULL COMPLIANCE with Standard of Practice 7.1 requiring an operation prepare detailed emergency response plans for potential cyanide releases.

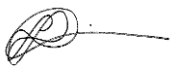
The operation has developed and implemented an overarching Cyanide Emergency Response Plan (CERP) to address potential accidental releases of and exposure to cyanide.

The CERP defines the emergency response activity for incidents and accidents involving sodium cyanide and should be read in conjunction with the BHX Cyanide Management Plan, the Significant Incident Management Team (SIMT) & Crisis Management Team (CMT) protocols.

The operation has developed a tiered emergency response system to respond to plausible site-based emergency events, including those involving cyanide. These include:

- **a** Catastrophic release of hydrogen cyanide from storage, process or regeneration facilities
- **b** Transportation accidents occurring on site or in close proximity to the operation
- **c** Cyanide releases during unloading and mixing
- **d** Cyanide releases during fires and explosions
- **e** Pipe, valve and tank ruptures
- **f** Overtopping of ponds and impoundments
- **g** Power outages and pump failures
- **h** Uncontrolled seepage
- **i** Failure of cyanide treatment, destruction or recovery systems
- **j** Failure of tailings impoundments and other cyanide facilities

Planning for response actions has considered transportation, the physical and chemical form of cyanide and the method of transport. The plan has been developed around the transport of solid cyanide within IBCs within shipping containers transported by trucks. The cyanide is delivered to a designated compound for storage and unloading.

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There is an Emergency Response Team located at the Ban Thouay logistics hub who will respond to transport-related incidents in Laos only.

The emergency response documentation does describe specific response actions (as appropriate for the anticipated emergency situations) such as clearing site personnel from the area of exposure, use of cyanide antidotes and first aid measures.

Cyanide on site is contained within the process plant area and there are no communities within proximity of the facility that would be impacted by an onsite incident. The plan addresses the foreseeable cyanide emergencies detailing the evacuation of site personnel and the actions needed to control releases at the source and treat those that may be exposed.

The plan is supported by dedicated emergency services personnel that are trained in first aid, Hazmat response, firefighting and the use of emergency response equipment such as emergency oxygen and breathing apparatus.

PBM's incident management and emergency response processes do address containment of spills, assessment of the situation, mitigation measures and review of the how the release occurred, response actions and prevention of releases. The release containment measures have been integrated into the design and position of the plant due its close proximity to the Nam Ngam 2 reservoir. The whole processing plant area is graded to drain to a lined containment sump providing an additional spill containment safeguard to the secondary containments within the plant area.

2.7.2 Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

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

BHX is in FULL COMPLIANCE with Standard of Practice 7.2, requiring an operation involve site personnel and stakeholders in the planning process.

The operation has involved its workforce and stakeholders in the cyanide emergency response planning process. The original plan was based on cyanide related components of the hazard and operability study (HAZOP) outcomes and team-based risk assessments prior to operations. No significant changes to the emergency planning provisions have been undertaken during the audit period.

There are no potentially affected communities within proximity of the operation that would be impacted by an onsite incident, the nearest village is approximately 15 km from the operation. Notwithstanding, to ensure minimal negative impact to the BHX Social License to Operate, the Community Department is responsible for ensuring the following:

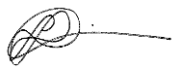
— Conducting Cyanide Awareness information in conjunction and cooperation with the Safety Section and Logistic Department and Jutsum and villages – Annually

— Regularly communicating with the villages – monthly.

— Conducting Naiban meetings – monthly.

— Conducting quarterly meetings with the district.

— Conducting annual meetings with the province.

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— Conducting Road Safety Awareness to the villages once a year.

To test the suitability of Procedures, Equipment and Training, regular mock drills are conducted. The following exercise types are be conducted at the frequencies shown:

— Evacuation of Process Area – Annually

— Process Hazardous Substance Spill Suspected HCN exposure drills (6 monthly)

The exercise is supported by a thorough debrief with participants with recommendations for any training, procedure or equipment changes documented. The documentation of each exercise, debrief notes and recommendations are kept by the Regional Emergency Services Superintendent and communicated to relevant managers. Interviews with personnel confirmed that consultation is undertaken.

Changes and updates on the emergency preparedness and response planning are circulated to the management team and the workforce through weekly safety toolbox meetings.

The operation has considered its plausible emergency scenarios and has not identified any communities that would be impacted from a cyanide related emergency on the site. The nearest community is approximately 15 km from the operation and there are strict security protocols in place that would prevent inadvertent access to the mining area. There are no specific actions identified for the community.

The operation has identified and considered the involvement of local response agencies such as outside responders and medical facilities in the cyanide emergency planning and response process. Due to the operations remote location, there are no external responders to an onsite cyanide related emergency other than Lao Skyways for post incident medical evacuation if and when required.

The operation has engaged in consultation or communication with stakeholders to keep the CERP current.

There is an annual review process and the FES team consults with representatives of the processing and environment department on updates to the plan. The plan has been reviewed and updated 14 times since initial development (September 2011), with the most recent review undertaken in November 2025.

2.7.3 Standard of Practice 7.3

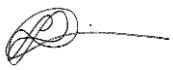
Designated appropriate personnel and commit necessary equipment and resources for emergency responses.

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

BHX is in FULL COMPLIANCE with Standard of Practice 7.3 requiring an operation designates appropriate personnel and commit necessary equipment and resources for emergency response.

The CERP does:

— Designate primary and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the plan. Section 6 of the CERP details the roles and responsibilities including authority to commit resources necessary to implement the plan. Authority is given to the Fire and Emergency Services Superintendent and Safety and Health Superintendent.

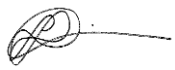
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- Identify the FES Team. The FES Team comprises three squads of 3 FES officers that work in rotation so that a fresh squad is available on each shift. Each squad has a team leader and is made up of 1 doctor and 2 paramedics. The FES Team is based in the medical clinic building in the central administrative complex. Additional resources are available from PBM's neighbouring Phu Kham operation. The emergency response plan notes in the responsibilities section that:

  "*The Senior Site Representative is responsible for the response and clean-up of all cyanide emergencies on-site. The Senior Site Representative, with advice from the Process Manager, Risk Manager, Emergency Services Superintendent, Environment/Community Superintendents, will give all clear to resume normal activities. The Senior Site Representative shall ensure that the response to any cyanide related emergency is undertaken in accordance with this procedure and PAA Significant Incident Management Team protocols.*" Duties for the personnel are outlined in the plan.

- Require appropriate training for emergency responders. The CERP states that is the responsibility of the Regional Emergency Services Superintendent to ensure all FES personnel are trained and competent to provide first response to a cyanide incident. They must schedule and coordinate cyanide emergency drills every six (6) months, and provide adequate training and equipment for FES members in accordance with the training needs analysis (matrix), now located in the Prospect system. Interviews during this audit confirmed at all doctors located at BHX are University-qualified.
- Include call-out procedures and 24-hour contact information for the coordinators and response team members. Section 10 of the CERP addresses communication. BHX has established procedures for activating emergency response and security is manned 24/7 with call out procedures for the Emergency Response Team. There is a day crew and night crew based on site adjacent to the process plant.

  Specify the duties and responsibilities of the coordinators and team members. Roles and responsibilities are detailed in Section 6 of the CERP and include the Regional Emergency Services Superintendent, Process Manager, Fire and Emergency Service (FES) Team leader, FES members, Safety Superintendent and Environment Superintendent
- List emergency response equipment, including personal protection gear, available along transportation routes and/or on site. Section 8 of the CERP details emergency response equipment for onsite cyanide related emergencies. Equipment available on site includes HCN Detector, Full-face respirator, fitted with cyanide dust / gas canister (ABEK with P3), Self-Contained Breathing Apparatus (if HCN is present above 10ppm), Cyanide Monitoring/Sampling Kit (capable of measuring free Cyanide) and Decontamination equipment & consumables. The medical clinic keeps cyanide antidote (confirmed in date), oxygen, resuscitation equipment, ECG and AED.
- Include procedures to inspect emergency response equipment to ensure its availability. Section 45 of the CERP states that all equipment and facilities described within the Plan are to be inspected and/or checked on a regular basis. All emergency equipment and facilities are to be scheduled for inspection by the relevant department. Inspection schedules may be created in Pronto for maintenance departments, or through the intranet for Site Support Departments. Emergency shower (including eyewash) stations should be inspected as scheduled for operational and mechanical operability. An inspection for emergency preparedness should consider not only equipment, but procedural and critical control elements.
- Describe the role of outside responders, medical facilities and communities in the emergency response procedures. No outside responders are designated a role within the CERP other than Lao Skyways for post-incident medical evacuation. The operation will medically evacuate personnel to Kasemrad International Hospital in Vientiane for treatment. Cyanide transporters have responsibility for cyanide incidents during transport and BHX may respond following PAA Responding to Offsite Incident Procedure.

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The operation has made outside entities aware of their involvement and has included them as necessary in mock drills or implementation exercises.

2.7.4 Standard of Practice 7.4

Develop procedures for internal and external emergency notification reporting.

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

BHX is in FULL COMPLIANCE with Standard of Practice 7.4 requiring the development of procedures for internal and external emergency notification and reporting.

BHX emergency management and response documentation includes procedures and contact information for notifying senior management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency.

If there is any form of cyanide spill outside immediate containment, it must be notified immediately to the Senior Site Representative or his designate. On the basis of the information provided, the Senior Site Representative will decide whether a Significant Incident Management Team should be activated.

If a Significant Incident Management Team is initiated, the emergency must be reported to the Executive General Manager of PanAust Asia (CMT) or his designate within 30 minutes of the Significant Incident Management Team being initiated.

In all other cyanide-related emergency situations, the Senior Site Representative or his designate shall use his judgment regarding notification of the situation to the Managing Director – Phu Bia Mining or his designate.

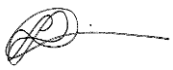
Where warranted, the Managing Director – Phu Bia Mining will notify the PanAust Crisis Management Team in Brisbane, as per the PanAust Crisis Management Team Plan.

The emergency response documentation includes procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, and for communication with the media.

Communication to communities, government representatives, and other stakeholders in the event of a cyanide emergency shall be conducted as per SIMT / CMT requirements.

No contact shall be made with external authorities or resource providers by BHX personnel unless specifically authorized by the Managing Director – Phu Bia Mining or his designate. All requests for external support or notification of government authorities at district or national level must be directed to the Senior Manager External Affairs. The External Affairs department of PanAust Asia will make all external notifications of emergency situations and requests for external support, based upon information provided by BHX personnel.

While there are no potentially affected communities identified in relation to onsite related cyanide incidents, BHX has in place protocols for contacting the regional community. The Community Department is responsible for contacting the communities with the nearest village approximately 15 km from the site. Where a cyanide incident occurs that has the potential to affect nearby communities, a communication and action plan would be developed as part of the incident response. This would be developed in accordance with SIMT / CMT requirements.

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The operation does have a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's *Definitions and Acronyms* document.

BHX has a communication and reporting procedure that details external communication protocols including reporting to external stakeholders, government and media. This procedure would apply to any communication with the ICMI regarding significant cyanide incidents.

2.7.5 Standard of Practice 7.5

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

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

BHX is in FULL COMPLIANCE with Standard of Practice 7.5, requiring an operation incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The BHX emergency documentation describes specific remediation measures as appropriate for the likely cyanide release scenarios, such as:

a) Recovery or neutralisation of solutions or solids.

Likely cyanide release scenarios outside of containment are limited at the BHX operation due to design and layout of the processing plant. Sections 16 to 26 of the CERP detail the procedures for recovery or neutralisation of solutions or solid cyanide as it applies to the plausible emergency scenarios. The treatment chemical used for spill recovery is ferrous sulphate, which is used on ground and hard surfaces and in the sea containers. It is never added to natural watercourses, as per CERP Sections 18 to 25. Contaminated wash water is raised to a pH of 11 or above with lime, soda ash or caustic soda, then diluted ferrous sulphate (less than 5%) is added and left to stand for at least 15 minutes, as per CERP Section 36. The ferrous sulphate is applied at the correct mixing ratio of less than 5% by putting 5kg in 100L of water. Ferrous sulphate is stored in the designated sea container near the reagent yard. Environmental sampling is coordinated by the Environment Superintendent based on the nature of the release.

b) Decontamination of soils or other contaminated media.

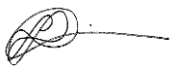
Section 38 addresses assessment and decontamination of impacted soil. Neutralisation, should it be deemed necessary would be undertaken using ferrous sulphate which is stored in a designated sea container near the reagent yard.

c) Management and/or disposal of spill clean-up debris.

Section 13 of the BHX Cyanide Spill Response In Controlled Area Procedure details disposal of clean-up debris. Cleanup of liquid spills within the cyanide bund areas can be hosed into the closest sump. Clean up of solid cyanide involves putting all recovered cyanide into the next cyanide mix for disposal. Personnel are instructed to removed contaminated PPE and dispose of accordingly.

Impacted soil will be managed through the mill discharge sump that will direct the soil via the destruction circuit prior to discharge into the TSF. This process will be coordinated with the Process Superintendent.

d) Provision of an alternate drinking water supply.

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Provision of an alternative drinking water supply is not identified as a plausible scenario related to a cyanide incident on the site. Nevertheless, BHX sets the supply rate of alternative drinking water at 5L per person for drinking plus 175L per day for cooking and washing. BHX has stored sufficient bottled water to meet this requirement.

The CERP does prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

The emergency response documentation does address the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methods, parameters and, where practical, possible sampling locations.

Section 38 of the CERP details the environmental management and monitoring protocols to follow in the event of a cyanide release outside of containment and Links and references are provided to guide the reader back to PBM Environment Department management documentation such as environmental media sampling procedures.

The Plan instructs personnel to continue monitoring down-gradient surface waters and at ambient mixing zone/or groundwater, continue conducting site inspections until any WAD cyanide concentration is consistently less than 0.5mg/L, Free CN 0.022mg/L and Total CN 0.005 mg/L.

2.7.6 Standard of Practice 7.6

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

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

BHX is in FULL COMPLIANCE with Standard of Practice 7.6 requiring an operation periodically evaluate response procedures and capabilities and revise them as needed.

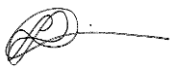
The CERP is required to be reviewed and updated annually and this was last completed in November 2025. A table of records in the CERP indicate that the Plan has been updated 14 times since it was written in September 2011.

To test the suitability of Procedures, Equipment and Training, regular training drills are conducted. The following exercise type shall be conducted at the frequencies shown:

— Evacuation of Process Area – Annually

— Process Hazardous Substance Spill Suspected HCN exposure drills (6 monthly and one drill per shift)

Interviews with response personnel confirmed that mock emergency drills are conducted periodically to test response procedures for various cyanide exposure scenarios, and lessons learned from the drills are incorporated into response planning. BHX has conducted regular mock exercises over the audit period covering spill response and worker exposure. The drills are recorded on a debrief form with recommendations for any training, procedure or equipment changes documented and loaded into CAMMS system and where actions are identified these are lodged and tracked through the CAMMS system. The documentation of each exercise, debrief notes and recommendations is kept by the Regional Emergency Services Superintendent and communicated to relevant managers.

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The FES team are the primary responders to a cyanide event, the processing team are to identify and report the incident. The process team will evacuate to a designated area and would provide technical and logistical support as requested by the FES team.

The simulated drills did address worker exposure and spill response scenarios at the site and response actions. The nature of the exercises and content of the drills is considered reasonable in the context of cyanide management and use at the operation. The mock drills undertaken during the audit period simulated the complete response process starting with the process operator notifying CCTV, FES receiving the call from CCTV, arriving at the process area/cyanide shed, donning appropriate PPE, removing the injured worker, washing and administering treatment to the worker, transporting the worker to the ambulance for transport to the BHX medical clinic, spill cleanup and returning to the station.

In addition to the ERT onsite exercises the organisation conducts desktop exercises for the site and corporate teams testing the coordination of higher-level response for the wider organisation.

Provisions are in place to evaluate the emergency response plan after a cyanide related emergency. Section 37 Post Incident Management, states that BHX will engage with stakeholders and seek feedback and Section 45 provides an Emergency Preparedness Checklist to guide the assessment of equipment, procedural and critical control elements.

2.8 Principle 8: Training

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

2.8.1 Standard of Practice 8.1

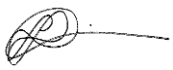
Train workers to understand the hazards associated with cyanide use.

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

BHX is in FULL COMPLIANCE with Standard of Practice 8.1 requiring that an operation trains its workers to understand the hazards associated with cyanide use.

The Cyanide Management Plan describes how BHX undertakes training of all personnel (including contractors and visitors) who may encounter cyanide in cyanide hazard recognition – including characteristics of cyanide and hazard recognition, the site emergency response plan, safe handling of cyanide, the areas on site where cyanide is used and stored and symptoms and effects of cyanide poisoning.

This is achieved through the process plant and cyanide inductions and specific process area training. Every person who works in the process plant as well as the emergency response team is given the cyanide induction at the beginning of his/her employment and a cyanide refresher is undertaken on an annual basis. The processing, laboratory and maintenance personnel are ascribed basic training matrices which identify and track the training required and completed. Further training includes hazard identification and risk assessment, isolation and permit to work, first aid, basic emergency response, confined space awareness as well as environmental inductions and courses.

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Cyanide hazard recognition and refresher training has been completed for all required personnel. The operation completes refresher training on an annual basis, and will be tracked via SuccessFactors which is also linked to a person's access control permissions to enter the plant.

Employees have the option to do the Refresher induction training online as well. If an employee does not do the refresher training in time, they must complete a Process Plant Access Permit form and have it signed by the Process Trainer.

The employee must complete the Permit form after completing the online training before re-entering the plant.

Refresher training is completed by the Process Trainer and records of course completion are entered into the SuccessFactors database; paper copies of the assessment are also retained by year.

A review of training records and files confirmed that refresher training is completed. The processing trainer also maintains a series of spreadsheet training matrices, as applicable for a given role, detailing the status of personnel training.

The operation does retain cyanide training records. These assessments are retained in the operator's files, and the completion is noted within SuccessFactors and the local training matrix (known as Prospect). Records are signed by the trainer after the details of the record are checked and correct.

2.8.2 Standard of Practice 8.2

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

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

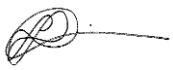
BHX is in FULL COMPLIANCE with Standard of Practice 8.2 requiring that an operation trains appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

The operation trains workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases.

The training elements necessary for each job involving cyanide management are identified in training materials. The operation has developed training packages for the operation of each part of the plant with assessment sheets. Planned task observations (PTOs) and SOPs are also used by the operations as part of the training and assessment process for workers.

Employees are trained prior to working with cyanide. To enter the processing plant workers must complete the Processing Induction and if working in cyanide areas the Cyanide Induction And awareness Training. Access to the plant is via an access control system and evidence of completion of these requirements is needed for access to be enabled.

Once the workers have completed the induction training they are not permitted to work unsupervised until the shift supervisor is satisfied that they have been trained and can demonstrate how to undertake tasks safely. Formalised competency assessment (theory, verbal and practical) is undertaken.

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BHX has also developed a Shutdown Induction which is a combined version of the Processing and Cyanide Inductions that needs to be completed for shutdowns. Shutdown workers are supervised by inducted BHX operational personnel.

Appropriately qualified personnel provide task training related to cyanide management activities. The operation has a formalised training program where initial training is provided through induction training delivered by the HSE Trainer. Once induction and theory training has been completed the worker is mentored by a senior operator who demonstrates and trains personnel in the relevant tasks, in the environment in which they occur. Once trained, a formalised assessment of competency is undertaken, and records are retained.

The Processing Trainer and Shift Supervisors have been trained and assessed as competent in plant operations. The Processing Trainer and Shift Supervisors are supervised by the Processing Superintendent who has over 20 years' experience in process plant operations and cyanide management activities.

The operation evaluates the effectiveness of cyanide training by testing, observation or other means. There is a formalised competency assessment process that includes written, verbal and work place observation and assessment of the worker. Assessments are recorded and retained on the workers training file. The outcome of the assessment is recorded in SuccessFactors.

Records are retained throughout an individual's employment documenting the training they receive. The records do 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.

2.8.3 Standard of Practice 8.3

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

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

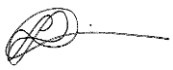
BHX is in FULL COMPLIANCE with Standard of Practice 8.3 requiring an operation train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

Cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released. Initial training on what to do in the event of an emergency is provided through the induction process and via the cyanide awareness training. The cyanide awareness training provides details on how to respond to solid and liquid releases. Refresher training is provided annually.

In addition to the induction training material, operators and maintenance personnel are trained in SOPs including Cyanide Spill Response Controlled Area, Plant Water and Event Pond Management and HCN Monitoring and Maintenance.

Emergency Response Coordinators and members of the Emergency Response Team are trained in the procedures included in the CERP regarding cyanide, including the use of necessary response equipment.

FES team members undertake regular training activities to respond to cyanide emergencies and are responsible for decontamination. The operation has established training packages covering key disciplines of emergency response include first aid and hazmat that are available in English and Lao. The participants are assessed via a combination of theory and practical assessment and then skills are maintained via regular drills and exercises.

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The primary responsibility for responding to cyanide related emergencies is with the sites full time FES team that receive emergency response training based on the Australian Certificate III Emergency Rescue including responding to hazardous material incidents and first aid. BHX has full time dedicated emergency response personnel at the site that are responsible for responding to worker exposures or cyanide releases. Operations workers are trained in the need to use safety showers and eyewash stations for decontamination.

The operation has considered off-site responders and due to the remote location of the mine and location of the villages there are no identified response actions for off-site responders or the community.

The probability of a cyanide-related off-site incident would only happen during transportation of the cyanide from Da Nang Port to BHX. The PBM Logistics Transport Cyanide Emergency Response Plan has provisions for how to treat cyanide exposure in an emergency. PBM Logistics and its contractor CEA have consulted with medical facilities on their ability to assist in cyanide transport-related emergencies.

Refresher training for response to cyanide exposures and releases is conducted regularly. The FES team cover response disciplines on a weekly basis and participate regularly in larger drills. Interviews with personnel confirmed there is a structured process for training and a review of training attendance records confirmed responders receive refresher training. Records are retained throughout an individual's employment documenting the training they receive.

2.9 Principle 9: Dialogue and disclosure

Engage in public consultation and disclosure.

2.9.1 Standard of Practice 9.1

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

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

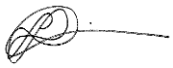
The Operation is in FULL COMPLIANCE with Standard of Practice 9.1 requiring an operation promote dialogue with stakeholders regarding cyanide management and responsible address identified concerns.

The operation does provide the opportunity for stakeholders to communicate issues of concern regarding the management of cyanide.

BHX has developed procedures and forms and has implemented processes for stakeholder communication of issues of concern which may include cyanide issues during operations.

The operation facilitates monthly minute meetings with community leaders (Naibans) where verbal concerns can be raised by community members.

There are seven villages within the area of the mine that the operation has established regular dialogue with. Of these seven villages, five are located along the transport route to the site (Phonsavang, PhonKeo, Ngiew, NaLao and Nasaysavang) and the operation provides an annual cyanide presentation and opportunity for the villages to ask questions

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and communicate issues of concern regarding cyanide management to the five villages. The presentations are attended by the BHX Paramedic and Community Team. No concerns were raised in last 3 years in relation to cyanide.

The Community team mobile phone number is advertised as the best contact method (the Naibans have the mobile phone number) as many local villages do not have internet access. Written letters can also be received by the operation.

Notice boards are provided in communities that have drop boxes where community members can put forward concerns. These are then transferred by BHX onto grievance forms. All grievances are entered into the action/event tracking system. The operation changed to the CAMMS system in Fiori in 2025. This is where the complaints are tracked and closed out.

Internally, site inductions, which includes information on cyanide, are required for all employees, contractors and visitors prior to working on the site. Questions are encouraged during the site induction.

2.9.2 Standard of Practice 9.2

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

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

BHX is in FULL COMPLIANCE with Standard of Practice 9.2 requiring an operation make appropriate operational and environmental information regarding cyanide available to stakeholders.

BHX has written descriptions of how their activities are conducted and how cyanide is managed. PanAust's BHX Operation is a signatory to the ICMI, which publishes a Summary Audit report every three years following successful recertification of the mine operations. This report is available on the ICMI website and details how BHX manages cyanide. PanAust also refers to being an ICMI signatory it its annual Business Review and Sustainability Report.

For external stakeholders, the operation has developed a Cyanide Awareness for Communities Presentation which details how cyanide is managed on the site and this is presented to stakeholders in the different villages on an annual basis. All presentation materials are written in Lao language and presented verbally where literacy is limited. Additional information on cyanide management is available via community notice boards or direct request made to the PBM Community Affairs team. This information is all written in both English and Lao language. It is recommended that a hard copy of the presentation is given to the attendees at the end of the community sessions.

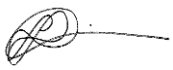
The operation has presented cyanide related information such as the Cyanide Emergency Response Plan 2-19-872 and the PBM Hazardous Materials and Dangerous Goods Management 2-8-590 to local community stakeholders.

The operation has the required mechanisms in place to make information publicly available, where applicable, following a cyanide release or exposure incident.

These plans and procedures require that communication and reporting of cyanide exposure or release events are communicated by the site personnel to the PBM Country Affairs personnel who then report to relevant community, government and other stakeholders as identified in procedures and plans.

The operation is aware of the Code's criteria for public reporting:

— Cyanide exposure resulting in hospitalisation or fatality

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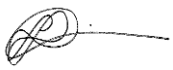
— Cyanide releases off the mine site requiring response or remediation

— Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment

— Cyanide releases on or off the mine site requiring reporting under applicable regulations

— Releases that are or that cause applicable limits for cyanide to be exceeded

The operation has not had a worker exposure or reportable cyanide release incident reported during the audit period.

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3 Important Information

QUALIFICATIONS AND ASSUMPTIONS

The services undertaken by WSP in preparing this Report were limited to those specifically detailed in the Report and are subject to the scope set out in the Report or otherwise communicated to Phu Bia Mining.

Except as otherwise stated in the Report and to the extent that statements, facts, conclusion and / or recommendations in the Report (*Conclusions*) are based in whole or in part on information provided by Phu Bia Mining and other parties identified in the report (*Information)*. The information was verified according to the scope of the ICMI Recertification Audit by WSP.

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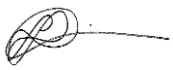
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