SUMMARY AUDIT REPORT

for the October 2025
International Cyanide Management Code Recertification Audit

Prepared for:
TÜMAD Madencilik Sanayi ve Ticaret A.Ş.

İvrindi Gold Mine

Submitted to:
International Cyanide Management Institute
1400 "I" Street NW, Suite 550
Washington, D.C. 20005

Final
20 March 2026

Lambert Environmental

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Hereford, Herefordshire, HR1 1AG, United Kingdom

SUMMARY AUDIT REPORT

Name of Mine: İvrindi Gold Mine

Name of Mine Owner: TÜMAD Madencilik Sanayi ve Ticaret A.Ş.

Name of Mine Operator: TÜMAD Madencilik Sanayi ve Ticaret A.Ş. (TÜMAD)

Name of Responsible Manager: Mr. Yahya Kemal UZUNER Operation Manager

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Location detail and description of operation:

The İvrindi Gold Mine is an open pit gold and silver mine located approximately 60 kilometres (km) from the City of Balıkesir (Türkiye), 4 km from the village of Küçükılıca and 8 km from the village of Değirmenbaşı. The mine began operation in 2019 and has an economic life 13 years. Access to the mining site is provided by a 22.5 km asphalt road branching out from Havran on the Balıkesir-Edremit highway. The site is at an elevation of between 650m and 1,200m in an area characterized by steep hills cut by deep valleys and rocky areas. The prevailing climate is Mediterranean in which temperatures can rise above 40^{o}C in the summer and fall below 0^{o}C in the winter. Precipitation is about 700 millimetres (mm) a year with the majority falling during the winter season. Vegetation is primarily natural forestland and perennial grassland/ steppe which have locally been modified for horticulture.

Ore is processed using a valley type heap-leach facility (HLF). The ore is initially passed through primary and secondary crushers, and then a tertiary crusher consisting of a fine screening plant and HPGR (high pressure grinding rolls) crusher, to achieve an optimal size. The ore is then agglomerated with cement and transferred via overland conveyors and

grasshoppers to the leach pad and placed in 10 m high lifts using a mobile stacker. Barren cyanide solution is pumped to the pad from a Barren Solution Tank and applied at the top and sides of the pad using a drip-tube irrigation system. The total leach cycle is 155 days. The pregnant solution is collected at the base of the leach pad by a network of perforated drainage pipes located above a composite engineered impermeable liner (geomembrane liner system). The pregnant solution is directed to a Pregnant Leach Solution (PLS) pond from where it is transferred to an adsorption, desorption, and regeneration (ADR) plant comprising two trains of five carbon-in-column (CIC) adsorption units, pressurized Zadra elution system, and carbon regeneration unit. The precious metal is finally separated from the stripping solution by electrowinning and refining.

The mine is managed as a zero-discharge operation and the level of solution in the PLS Pond is maintained to provide sufficient remaining capacity to retain a maximum design storm event, plus HLF drain down, plus 8 hours of operating solution without overtopping. If overtopping were to occur an emergency Excess Water Pond (EWP) provides significant additional storage capacity to prevent release to the environment. In the event that the operation needs to discharge from the EWP to the environment a peroxide treatment system is in place to neutralize any cyanide prior to discharge.

TÜMAD only uses solid cyanide briquettes packed in plywood intermediate bulk container (IBC) boxes received in marine shipping containers and stored in a dedicated cyanide warehouse. The cyanide warehouse, mix plant and reagent solution holding tank are located within secure fenced compounds accessible only to approved personnel.

The İvrindi Gold Mine became a signatory to the International Cyanide Management Code (ICMC) on 29 June 2020 and was initially certified to the Code on 17 May 2023.

Figure 1: Location of İvrindi Mine, Türkiye

SUMMARY AUDIT REPORT

Auditors' Finding

The operation is: ■ in full compliance
in substantial compliance
not in compliance

with the *International Cyanide Management Code.*

Compliance Statement

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

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Names and Signatures of Other Auditors

Technical Auditor: Ata Akcil, PhD
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Date(s) of Audit: 6 October through 10 October 2025

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

I attest that this Summary Audit Report accurately describes the findings of the recertification audit. I further attest that the recertification 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.

İvrindi Gold Mine — Name of Mine
Signature of Lead Auditor
20 March 2026 — Date

SUMMARY AUDIT REPORT

1. PRODUCTION **Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.**

Standard of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

TÜMAD has a policy to only purchase cyanide from ICMC certified suppliers. Since the 2022 certification audit TÜMAD has only purchased cyanide from two supplies: Hebei Chengxin Co., Ltd., China (Hebei), and CyPlus GmbH (CyPlus). Both companies supply the cyanide in solid briquette form packed in plywood IBC boxes.

Both plants have remained certified during the past three years. The Hebei production plant initially certified to the ICMC in 2012 and was last recertified on 18 April 2023. The CyPlus Wesseling Plant was initially certified to the ICMC in 2006 and was last recertified on 23 January 2025.

2. TRANSPORTATION **Protect communities and the environment during cyanide transport.**

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 2.1.

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide purchase agreements with Hebei and CyPlus state that the cyanide is shipped Delivered in Place (DAP) from the production plants to the mine site.

Records of cyanide shipments are maintained by TÜMAD identify that shipments originated at Hebei's Chengxin production plant in China, were transported to the Port of Qingdao, loaded onto ocean vessels from the Maersk or Sea Load shipping companies and shipped to the Port of İzmir (Aliağa). The cyanide shipments were then unloaded onto trucks operated by To-Pet A.Ş. (To-Pet) and delivered to the İvrindi Gold Mine. In the past three years TÜMAD purchased cyanide from CyPlus for two shipments in 2023. Records identify that the cyanide was purchased from the Wesseling production plant in Germany, transported to the Port of Hamburg, loaded onto Mediterranean Shipping Company S.A. (MSA) ocean vessels and shipped to the Port of Izmir (Aliağa). The cyanide shipments were then unloaded onto trucks operated by To-Pet and delivered to the İvrindi Gold Mine.

Summary reports posted on the ICMC website detail the Hebei and CyPlus supply chains from their product plants to and within Türkiye. Cyanide shipped from the Hebei plant was conveyed via three Hebei Chengxin Transport Co., Ltd certified supply chains: P.R. China Supply Chain (in China transport), Global Supply Chain (marine shipping and port handling), and Türkiye Supply Chain (within Türkiye transport). Cyanide shipped from the CyPlus plant was conveyed via two CyPlus certified supply chains designated Supply Chain No.1 and Supply Chain No.2. These supply chains have maintained certification during the past three years. The routes and transporters identified in the shipping records discussed above are included within the various certified supply chains documented in the supply chain summary reports posted on the International Cyanide Management Institute (ICMI) website.

3. HANDLING AND STORAGE Protect workers and the environment during cyanide handling and storage.

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 3.1.

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide warehouse, unloading compound, and cyanide mix-area have not been modified in the past three years. As discussed in the 2022 ICMC certification audit report, the cyanide unloading area, warehouse and cyanide mix plant were constructed using sound engineering practices within the İvrindi Gold Mine Project that was executed under the supervision of the TÜMAD Engineering, Procurement and Site Team and ProMer Consultancy Engineering Inc. (ProMer) in collaboration with Jacobs Solutions Inc. (Jacobs) for the detailed engineering design, project and contract management, construction supervision and commissioning consultancy. A quality control/quality assurance program was used throughout construction, and all engineering works were approved and signed off by the engineering management company and TÜMAD.

The warehouse is located within a fenced and locked compound and offloading and handling are undertaken within the warehouse and cyanide mixing concrete containment areas. The compound is concrete paved and has a perimeter curb to provide containment. There is a perimeter drain to collect direct precipitation or potential spillage which is pumped to the process.

All cyanide deliveries and handling of cyanide boxes during unloading and cyanide mix activities are undertaken within the warehouse and cyanide mixing concrete containment areas. The warehouse, mixing plant and holding tank are well within the security perimeter of the site, away from administrative buildings and maintenance workshops, and a considerable distance from settlements, residencies, and surface water bodies.

Systems are in place to prevent overfilling of cyanide storage tanks. The mix and holding tanks are fitted with high-level sensors that alarm in the control room. The mixing procedure requires the operators to pre-check the levels of each tank and be in constant contact with the control room via radio throughout the mix. The high-level sensors are maintained within the preventative maintenance program and routinely checked and tested on a four-week schedule.

The mix and holding tanks are seated on concrete plinths within a dedicated bermed concrete containment basin that prevents seepage to the subsurface. The basin has a metal grill covered concrete trench equipped with a sump pump that directs any spillage to the Barren Solution Tank via a waste collection pipe. The basin is coated with non-slip epoxy paint and appears to be in good condition with no cracks, flaking or other evidence of corrosion or deterioration observed.

The warehouse has a concrete floor and is fully enclosed with a roof and walls. In addition, to prevent the potential of water entering the warehouse, the exterior pavement drains away from the building. Adequate ventilation in the warehouse is provided to prevent the buildup of hydrogen cyanide (HCN) gas. There is a ventilation fan at the west end of the building and slated ventilation openings at the east end that are protected from precipitation by exterior porches. The cyanide mixing and holding tanks are located outdoors and

therefore are naturally provided with adequate ventilation to prevent the build-up of HCN gas. The warehouse and cyanide preparation area are monitored with fixed HCN sensors that are also connected to the fan that automatically starts if HCN levels reach 4.7 ppm. The cyanide storage and mixing compounds are secure and monitored with security cameras. Access is limited to authorized personnel only. The cyanide warehouse compound and cyanide preparation area are dedicated to cyanide storage and cyanide mixing operations and therefore cyanide is physically separate from areas where incompatible materials are stored. Signage posted at the entrance to the compound prohibits smoking, drinking, and eating.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 3.2.

Summarize the basis for this Finding/Deficiencies Identified:

To prevent the potential for generation of HCN gas, TÜMAD does not rinse the empty bag and liner but immediately after emptying folds them dry and places them into a dedicated waste barrel together with the used coveralls. The empty boxes are flattened and with the drummed waste is labelled "contaminated packaging" and temporarily stored in the designated area of the cyanide warehouse prior to transport by a hazardous waste transporter to a Class 1 licenced hazardous waste disposal facility in Ankara and incinerated.

TÜMAD has developed and implemented several procedures to prevent exposures and releases during cyanide unloading and mixing activities. These procedures include instruction for checking tank levels prior to a mix, addition of colourant dye to the mix if not already included in the boxed supply, operation of solution transfer valve, care to prevent puncturing boxes when handling with a forklift and limiting stacking of boxes to 2 or 3 high depending on the box load limit. The procedures provide direction on required personal protective equipment (PPE) for the particular operation to be performed, and safety measures and clean-up procedures to address solid and liquid cyanide spills. There is a requirement for two operators and an observer for the mix. The mix area is monitored remotely via security camera. Also, a pull cord switch is integrated into the automation system for potential emergencies, that when pulled a warning is displayed on the computer screens in the control rooms.

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

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.1.

Summarize the basis for this Finding/Deficiencies Identified:

TÜMAD has developed and implemented an Integrated Environmental & Social Management System (ESMS) for the planning and management of occupational health and safety, environmental and social risks. The system has been in place since the implementation of the mining operation and incorporates the requirements of International Standards Organization (ISO) 9001:2015(Quality Management System), ISO 14001:2015 (Environmental Management System), ISI 27001:2022 (Information Security Management), ISO 45001:2018 (Occupational Health and Safety Management System)), ISO 50001:2018 (Energy Management System), ISO 17025:2017 (General Requirements for the Competence of Testing and Calibration Laboratories), Social Accountability (SA) 8000:2014, and complies with the European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC) Standards. TÜMAD holds Certificates of Registration ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018 valid until January 2028; Certification to ISO 50001:2018 valid until November 2026, Certification to ISO 27001:2022 valid until March 2026, Certification to ISO 17025:2017 valid until 28 November 2025, and Certification to SA 8000:2014 until 16 May 2026. TÜMAD also has an Economic Operator Certificate, granted to companies involved in international trade that meet high standards of security and compliance. Within the ESMS, TÜMAD has implemented operating plans, instructions and procedures to identify and mitigate risk and safely manage the operation. Those applicable to cyanide management and process operation include. These documents are controlled through the Quality Document Management System (QDMS).

İvrindi Gold Mine is a heap leach operation and does not use mill based mineral extraction and tailings technology. Plans and procedures identify the assumptions and parameters on which the facility design was based and specify operating requirements to prevent cyanide releases. The facility is designed and operated as a zero-discharge operation. The level of PLS Pond is maintained to retain a minimum level of 3 m of solution to protect operation of the pregnant solution pumps, and below a maximum operating level (14.5 m) to provide sufficient remaining capacity to retain a maximum design storm event, plus HLF drain down, plus 8

hours of operating solution without overtopping. If over-topping were to occur, the overflow would go to the emergency Excess Water Pond (EWP). The EWP is maintained empty except for precipitation, to provide significant additional storage capacity to prevent a release to the environment. The PLS Pond level is monitored on the supervisory control and data acquisition (SCADA) system, and a high-level alarm would activate if the pond level approached the allowable capacity. TÜMAD has also installed a hydrogen peroxide dosing facility to neutralize potential cyanide contaminated water if an emergency discharge from the EWP was required.

As Weak Acid Dissociable (WAD) cyanide concentrations in barren solution applied to the leach pad and return pregnant solution held in the PLS Pond exceed 50 milligram/litre (mg/L) protective measures and operating procedures have been implemented to prevent the access of birds to these solutions.

The operation has developed and implemented plans and procedures that describe the practices necessary for the safe and environmentally sound operation of the facility. These are substantially the same procedures in place during the 2022 ICMC certification audit. Documented inspections are conducted each shift (three shifts a day at the ADR and one shift a day at the HLF) by operations personnel using area control forms. These forms address key aspects of process operations including inspection of pumps, tanks and lines for integrity and potential leakage; integrity and capacity of containments, operation of shower/eyewash stations, presence of salt residue, integrity of ponds and solution levels, leak detection systems for ponds and HLF, side slope stability/erosion, ponding on the leach pad, wildlife mortality, etc. There are procedures for checking HCN gas levels in the cyanide storage and work areas every 4 hours and forms for weekly monitoring piezometers and moisture sensors in the HLF. There is also a procedure for checking shower/eyewash stations weekly. The Occupational Health and Safety (OHS) Department conducts weekly documented inspections of the ADR plant, reagent areas and Gold Room, and Environment Department conducts monthly field audits.

Documented inspections and monitoring programs in place during the initial 2022 ICMC certification audit have continued through the past three years. The inspection forms used for shift, OHS, and environmental work area inspections detail areas and specific items to check and include a check column to confirm the item has been checked and a comments column to record any deficiencies observed. The checklists provide sufficient detail to direct the inspector to potential issues of concern. One exception was the form for ADR area shift inspections which does not provide direction on specific items and potential issues to check. Nevertheless, this form is supported by an *ADR Area Control Instruction*, that provides detail on items to be checked during the area inspection and completion of the ADR Area Control Form. The inspection checklists include the date of the inspection, the shift, the name of the inspector, and signatures of the inspector and supervisor approval. If the deficiency cannot be corrected immediately by the operator a work order request is generated and the request

number is recorded on the form and tracked to completion. All completed inspection forms are maintained in binders or electronically.

The inspection forms used for shift, OHS, and environmental work area inspections detail areas and specific items to check and include a check column to confirm the item has been checked and a comments column to record any deficiencies observed. The checklists provide sufficient detail to direct the inspector to potential issues of concern. One exception was the form for ADR area shift inspections which does not provide direction on specific items and potential issues to check. Nevertheless, this form is supported by an *ADR Area Control Instruction*, that provides detail on items to be checked during the area inspection and completion of the ADR Area Control Form.

TÜMAD continues to use the (System Applications and Products in Data Processing) SAP software-based management system for planning and tracking preventative maintenance (PM) of critical equipment, including major machinery, tanks, pumps, sensors, fans, generators, and other equipment involved in the management of cyanide. The SAP system generates PM actions based on a predetermined maintenance schedule, or upon corrective action work orders in response to specific inspection observations or observed operational needs. The PM schedule is based on manufacturers recommendations and/or site experience. Maintenance is planned weekly and daily meetings are held attended by maintenance and process to review and update the plan as needed. The history of maintenance for each piece of equipment is tracked on SAP.

Inspections and PM are conducted at established frequencies to ensure and document that cyanide facilities are functioning within design parameters and to identify potential issues before they become severe. The adequacy of the frequency of these inspection and maintenance programs was evident during the site audit through the observed good housekeeping, absence of leaks or salt buildup on piping, flanges and valves, well maintained containment basins, and absence of pipe leakage and significant ponding on the HLF. It is therefore the auditors' opinion that the inspection and monitoring programs currently in place are sufficient to ensure that the equipment is in good order, and the facility is operated within design parameters.

TÜMAD has implemented a Management of Change (MOC) Procedure under its ESMS that applies to the evaluation of the environmental and safety impacts of new or modified processes, equipment, or materials. In the last three years the procedure has been revised twice; in 2023 to incorporate requirements of ISO 50001 - Energy Management System, and in 2024 to align with the corporate Security Management System. In 2025 the change management process has been programmed as a module in QDMS to allow computer data entry of change requests and tracking of stakeholder reviews and the approvals process, replacing the previous manual entry and tracking process. Internal stakeholders automatically include the OHS Manager and Environment and Sustainability Manager for review and

approval prior to the implementation of a change. The management of change procedure was used 104 times since the 2022 ICMC certification audit; 35 of these changes were cyanide related.

Contingency procedures have been prepared to minimize the potential for cyanide exposures and releases during non-standard operating situations. Process operation training manuals address the operational parameters established for each process, and the actions to take when parameters stray outside of set points or when upsets from normal operating conditions occur. Pond levels are maintained to manage upsets in the operational water balance. A hydrogen peroxide dosing system is also in place to neutralize cyanide contaminated solution if a release to the environment is required. The heap-leach design report details actions to be taken if piezometer pore water pressure readings within the pad rise above trigger levels. The Spill Clean-up Plan addresses response actions to be taken in the event of a spill, including a cyanide spill. An unexpected (temporary) shutdown procedure would be implemented in the event of unplanned or temporary shutdowns. The procedure aims to ensure the mine is placed in a safe, environmentally compatible and controlled manner, and to minimize environmental risks occupational health and safety hazards and equipment/facility damage during the maintenance and protection phase.

The power for the İvrindi operation is supplied by a 7.5 km long, 154 kilovolt (kV) line to the TÜMAD Burhaniye transformer station where it is stepped down to 6.3 kV to supply the mine. Backup power capability is unchanged from the 2022 ICMC certification audit. Backup power is provided by two Cummings 2,500-MW diesel generators, which kick in automatically in cases of power failure. These generators provide sufficient power for continued full operation of the ADR and Leach Pad. The generators are on a weekly (routine maintenance and no-load test), 3 monthly (load test) and annual or 250-hour (hr) PM schedule.

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

The operation is: ■ in full compliance
in substantial compliance
not in compliance…with Standard of Practice 4.2.

Summarize the basis for this Finding/Deficiencies Identified:

This requirement is not applicable as there is no mill operating at the İvrindi Gold Mine.

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

The operation is: ■ in full compliance

in substantial compliance
not in compliance…with Standard of Practice 4.3.

Summarize the basis for this Finding/Deficiencies Identified:

An operational water balance was developed for the İvrindi HLF that covers Phases 1A, 1B, 2 and 3 for a total of 69.4 million tonnes (Mt) of ore to be stacked over the planned operation. The water balance was a stochastic model using and design criteria developed by TÜMAD for the HLF. The model is considered comprehensive as it includes solution application rates, stacking rates, seasonal and extreme variations in precipitation and evaporation, run-on, freezing and thawing, and potential power outages. In addition, a site wide water balance is maintained to provide a quantitative water balance for the mine that tracks the inputs and outputs for the whole mine operation. Although not probabilistic, this water balance model demonstrates insufficient water input during the dry summer months and a requirement to store precipitation during the winter months to provide sufficient water for the operation's annual consumption needs. This water balance model is updated daily on an Excel spreadsheet with precipitation, evaporation, input and output flowrates, changes in total and active heap leach areas, and ore stacking rates. The spread sheet is used to monitor and balance conservation of water against maintaining available pond capacities to ensure adequate volume is available to retain the design storm event.

The water balance considers the rate that barren solution is applied to the HLF and a 100-year 24 hr storm event in the design and operation of the PLS Pond and EWP to maintain a minimum 1 m freeboard, 8 hrs of normal operating solution flow, and 24 hrs of HLF drain-down flow in the event of a power outage, and a closed system with no discharge to surface water. A stochastic precipitation model used precipitation data from Bergama weather station located about 30 km south of the mine and on experience from a similar project in the region to calculate the 100-year 24 hr storm to be 145 mm for the İvrindi site.

Daily precipitation data collected daily from the onsite weather station is entered into the water balance spreadsheet weekly and a total volume calculated based on the combined areas of the PLS Pond, EWS and HLF. Run-off from the up-gradient water shed is diverted away from the ponds therefore is not an applicable input to the water balance. As snow does not stay more than a few days, the in-use water balance model does not consider the effects of freezing and thawing to be significant. When snowfall is recorded, it is converted to an equivalent precipitation and added as precipitation into the spreadsheet. Evaporation rates are entered weekly into the water balance spreadsheet and are calculated from weather data collected from the onsite weather station. The rates are factored to adjust for the evaporation surface of the ponds, active heap pad and inactive pad. A power outage of 24 hrs in conjunction with a 100-year design storm event is used in the available design capacity of the ponds. No other aspects are included in the water balance.

The PLS Pond capacity is designed to have a 1 m freeboard and retain a minimum level 3 m above the pump intake (2,500 m^3), 8 hrs of normal operating solution flow (21,808 m^3), and 24 hrs of drain down flow in the event of a power outage (65,424 m^3), requiring a total available capacity of 89,732 m^3. The EWP was sized to accommodate flows reporting to the pond such that there is a 95% probability of non-exceedance as calculated from the probabilistic water balance modelling. The volume of the EWP with 1 m freeboard is 570,443 m^3. The volume of the PLS Pond with 1 m freeboard is 193,715 m^3.

The PLS Pond is operated to maintain a design storm event without overflowing to the EWP. The EWP is maintained empty except for precipitation water. Pond levels are monitored on SCADA in the control room. Pond inspection and monitoring activities are unchanged from the 2022 ICMC certification audit. Pond level alarms will trigger if the solution level in the PLS Pond nears (high-level alarm) and reaches (high-high level alarm) the maximum operating level needed to provide sufficient capacity to retain the design storm event. In addition, documented visual inspections of the ponds are completed every shift.

Precipitation is measured at the İvrindi weather station located to the south of the PLS Pond. The station records precipitation, snowfall, evaporation, temperature, solar radiation, and wind speed and direction. The station was installed in 2018 and is maintained on a 6-month schedule by ECONORM Environment Technologies, Ankara. Data from the station is forwarded daily to the process department and entered weekly into the water balance to forecast water needs to ensure sufficient water is available to meet annual consumption requirements. Frequent comparison of meteorological data to design assumptions is of limited practical value as the management of pond levels at İvrindi maintains considerable available pond volume that an uncontrolled release of solution to the environment is unlikely.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.4.

Summarize the basis for this Finding/Deficiencies Identified:

There is no tailings storage facility at İvrindi, as only heap leach processes are used. The barren solution applied to the HLF has an estimated cyanide concentration of about 230 ppm. The pregnant solution is returned from the HLF along buried solution pipelines to the PLS Pond. This pregnant solution has a cyanide concentration of between 160 to 200 ppm, so the PLS Pond and EWP are fenced and provided with bird balls to restrict access of wildlife to the solution. The EWP is generally kept empty during normal operating conditions but may contain water after a rain event. Nevertheless, the pond contains bird balls to deter

bird access in the event of temporary storage of cyanide solution. There are also ten bird scarers located across active areas of the HLF and pond flume area that are synchronized with each other. The adequacy of bird balls and integrity of fencing is checked weekly.

Because the İvrindi Gold Mine operation does not have open ponds that contain cyanide, wildlife mortality from cyanide in open waters is not considered an issue. Wildlife sightings or mortalities found on the mine property are required to be reported to the Environmental Department. In addition, there is an active monthly monitoring program that the Environmental Department conducts to record wildlife and fauna at and around the mine. Records covering the past three years indicate there have been no cyanide related mortalities at the mine site. All OHS and Environmental monitoring records are subject to independent verification. Sustainability reports are also prepared and published only after completion of an independent external assurance process.

The operation uses drip lines to the top and side slopes of the HLF as an effective leach solution application system and has implemented procedures to minimize the potential for solution ponding on the HLF pad. On the top of the HLF the ore is ripped to maximize porosity of the pad, and the drip lines are buried to a depth of 200 to 300 mm to reduce the potential for evaporation and minimize surface ponding of solution. The agglomeration process also minimizes the potential for surface ponding by reducing the breakdown of the ore and maintaining the porosity in the pad. Flexible 100 mm diameter distribution lines fitted with specially designed valves are used to connect to the barren feed and allow easy shutoff of flow to the drip lines. The flexibility of these lines and ease with which the drip lines are connected/disconnected to the distribution lines significantly reduces the potential for leaks and allows operators to quickly address leaks if they occur. On the side slopes the drip lines are not buried; however, the lines are fitted with flow restrictors at regular intervals along each line that reduce head build up within the line provide even irrigation and reduce the potential for pressure releases and ponding or overspray of solution.

Daily operator inspections of the pad by specifically include checking for ponding and leaks of solution lines. If ponding is identified, the irrigation in that area is temporarily shut down or the rate of irrigation is reduced. No sign of significant ponding was evident during the audit site visit on the areas under active irrigation.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.5.

Summarize the basis for this Finding/Deficiencies Identified:

The İvrindi Gold Mine operation does not discharge directly to surface water. The operation is designed and operated as a closed circuit with zero discharge to surface and groundwater. Nevertheless, the operation monitors cyanide in surface water samples collected quarterly at eight locations in various creeks around the mine property. Four of these sample locations are in ephemeral streams and creeks downgradient of the HLF and results covering the past three years show total, WAD and free cyanide concentrations consistently below the detection limit of 0.005 mg/L for the method of analysis.

There have been no indirect discharges to surface water. The HLF pad is underlain with an impermeable 2.0 mm single sided textured high-density polyethylene (HDPE) geomembrane liner installed over a 0.5 m thick low permeable soil layer having maximum hydraulic conductivity of $1x10^{-9}$ m/s, or on slopes, a geosynthetic clay liner over 0.15 m of bedding soil. The HDPE liner is overlain by a minimum 0.6 m-thick drain cover fill with solution collection pipes, to minimize hydraulic head on the liner and drain leach solution by gravity toward the PLS Pond. An underdrain is constructed within the natural drainage channels within the valley beneath the HLF to collect water from seeps and springs beneath the HLF. This underdrain would capture any leakage through the liner. The underdrain discharges to a collection sump located down gradient of the PLS Pond and EWP which is sampled weekly for total and WAD cyanide, and quarterly by a third-party accredited laboratory for total, WAD and free cyanide. Results covering the past three years show all three cyanide parameters to be less than 0.005 mg/L.

The PLS Pond and EWP are designed as a double liner system with a leak collection and recovery system (LCRS) provided between the two 1.5 mm geomembrane liners. The HDPE geomembranes are underlain by 0.5 m thick low permeability soil layer with maximum hydraulic conductivity of 10^{-9}m/s. The LCRS consists of a HDPE geonet that drains to a gravel filled collection sump at the low point of each pond. Riser pipes installed in each sump are fitted with submersible pumps to remove any solution reporting to each LCRS sump. The Barren Tank is a concrete structure that is HPDE lined. A leak detection system is in place to check the integrity of the liner. The LCRSs for the ponds and Barren Tank are monitored daily and any flow detected is sampled and analysed for potential cyanide. No cyanide has been detected to date

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.6.

Summarize the basis for this Finding/Deficiencies Identified:

İvrindi Gold Mine — Name of Mine

Signature of Lead Auditor

20 March 2026 — Date

TÜMAD has implemented solution management and seepage control systems at İvrindi to protect groundwater beneath and downgradient of the operation. The cyanide storage warehouse, cyanide mixing and holding tanks, CIC columns, ADR plant, Barren Solution Tank, HLF, PLS Pond, EWP, and related piping are all are provided containment to prevent seepage, and systems are in place to monitor the integrity of these containments.

As detailed in the 2022 ICMC audit report, design reports and as-build drawings show that the cyanide warehouse, cyanide preparation compound, CIC and ADR plants are constructed with reinforced concrete floors with containment berms which provide containment against seepage in the areas of the operation where cyanide is stored and used. All cyanide solution lines are located within the containment areas and there are no buried solution pipelines without containment. Collection drains and sumps are used to capture precipitation (where plant is located outside) and any spillage and direct it to the process. The cyanide solution tanks are founded on reinforced concrete pedestals that provide an impermeable barrier. The facilities are inspected and maintained to ensure the integrity of these containment systems and prevent potential seepage. Based on the site inspection and discussions conducted during the October 2025 site audit there have been no significant changes to the operation, and the above description is still considered valid.

As discussed in 4.5, the HLF, PLS Pond and EWP are all constructed over impermeable liners to prevent seepage and protect the beneficial use of ground water. The barren pipeline between the ADR plant and HLF is contained over concrete or HDPE liner. The pregnant solution collection lines are buried within the drain cover solution collection fill at the base of the pad until they daylight as three flumes within the PLS Pond containment. The pregnant solution line between the PLS Pond and CIC Plant follows the perimeter of the ponds and is contained within the HDPE liner for the ponds. Operational inspection and leak detection monitoring procedures are in place to check the integrity of the liners. The Barren Tank is a concrete structure that is HPDE lined with a LCRS. Operational inspection and leak detection monitoring procedures are in place to check the integrity of the liners.

In addition to the above inspection, maintenance and monitoring programs, a groundwater monitoring program is in place to confirm that beneficial use(s) of ground water are not impacted. The program follows TÜMAD's Water Resources Management Plan (WRMP) and was designed to meet Turkish and IFC standards for protection of beneficial use of ground water. TÜMAD monitors twelve groundwater wells located upgradient and down gradient of the pits and operational facilities. In 2025 an additional four wells were installed west of the HLF as part of a proposed expansion of the HLF south and west of the existing pad. The wells are sampled and groundwater analysed on a quarterly schedule. Results of the groundwater monitoring show total and WAD cyanide to be less than 0.005 mg/L in all wells, i.e., levels protective of beneficial use.

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

The operation is: ■ in full compliance
in substantial compliance
not in compliance…with Standard of Practice 4.7.

Summarize the basis for this Finding/Deficiencies Identified:

As discussed in Standard of Practice 4.6, there have been no significant changes to the operation since the 2022 ICMC certification audit. The cyanide warehouse, cyanide preparation compound, CIC and ADR plants are constructed with reinforced concrete floors with containment berms, which provide containment in the areas of the operation where cyanide is stored and used. Except for the CIC tanks which are set on a steel framework clear of the concrete containment, all cyanide reagent and process tanks are installed on solid concrete plinths. The cyanide warehouse compound and plant containment areas are equipped with sumps allowing spills or precipitation to be directed to the process. The containments were observed to be clear of solution, sludge or debris that could compromise containment capacity, and the walls and floors appear to be in good condition with no evidence of cracking.

All cyanide tanks are located within containment. As detailed in the 2022 ICMC certification audit the mixing and holding tanks have volumes of 132.3 m^3 and 25 m^3, respectively, and are located within the cyanide preparation concrete containment area. This containment has a capacity of 257.4 m^3: more than sufficient to retain 110% of the larger tank volume and a maximum design storm event. The Barren Solution Tank is equipped with an overflow pipe that reports to the PLS Pond to prevent it overtopping. In the unlikely event that the HDPE liner fails and the concrete ruptures, solution leakage would flow to the PLS Pond over a competent HDPE liner that extends from the PLS Pond to the Barren Solution Tank. The CIC and ADR buildings are constructed with reinforced concrete floors with containment berms which provide more than adequate capacity to hold the volume of the largest tank within the containment and any piping draining back to the tank.

Water collected in secondary containments back to the process irrespective of whether it is contaminated or not. Water or spillage collected in the cyanide preparation area is returned to the Cyanide Mixing Tank or pumped to Barren Solution Tank. Water collected in the CIC Building sump is pumped to the Carbon Absorption Head Tank and trash screen. Water from sumps in the ADR area are pumped to the Barren Solution Tank, except for the sump located in the acid containment area, which is pumped to the Acid Wash Recovery Tank or Acid Storage Tank. A peroxide treatment system has been installed adjacent to the EWP to allow neutralization of any cyanide in this pond prior to discharge, in the rare event that an emergency discharge is necessary.

İvrindi Gold Mine — Signature of Lead Auditor — 20 March 2026
Name of Mine — Date

All cyanide solution pipelines are provided with containment. Cyanide pipelines in the cyanide preparation compound, CIC Building, and ADR are all located within concrete containment. The barren pipeline to the HLF is provided with concrete containment in the vicinity of the ADR plant that either drains into the ADR plant containment area or to the PLS Pond. Beyond this concrete containment the barren pipeline in underlain by HDPE liner that drains to the PLS Pond or EWP or is aligned within the HLF containment. The pregnant solution pipelines are fully contained by the HLF liner until they daylight as flumes within the PLS Pond liner. The pregnant solution line between PLS Pond and ADR is provided with HDPE liner and concrete containment. No surface water bodies are located near cyanide facilities that require special protection from cyanide pipelines.

All cyanide mixing, holding, and solution tanks are constructed from carbon steel. Cyanide solution pipelines and piping system components are constructed of HDPE or carbon steel or stainless steel: materials compatible with cyanide and high pH conditions. The Barren Solution Tank is a HDPE lined concrete tank.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.8.

Summarize the basis for this Finding/Deficiencies Identified:

As presented in the 2022 Detailed Audit Findings Report the İvrindi Gold Mine facilities design and construction of the ADR plant, cyanide warehouse and cyanide preparation areas was executed under the supervision of the TÜMAD Engineering, Procurement and Site Team, and ProMer Consultancy Engineering Inc. (ProMer) in collaboration with Jacob Solutions Inc. (Jacobs) as the Owner's Engineer. Kappes, Cassidy and Associates (KCA), together with DAMA Mühendislik Proje ve Madencilik San Tic A.Ş (DAMA), were retained as the engineering, procurement, and construction (EPC) contractor for the detailed design and project and construction management. Detailed design and project and construction management for the HLF and ponds was undertaken by Golder (became WSP in 2021). Specialty contractors were retained to conduct quality control for earthworks and geomembrane liner placement for the HLF and ponds. A third-party inspector company HES Su Yapıları Denetim Hizmetleri Limited (HES) provided full-time monitoring of the construction activities on behalf of the Ministry of Urbanization and Climate Change (MEUCC).

Construction work conducted in the last three years included expansion of Phase 1B, Phase 2 and Phase 3 of the HLF and construction of a 420 m section of barren pipeline. WSP (acquired Golder in 2021) continued to undertake the detailed design, construction management and quality control services for the HLF, and HES continued to provide full-time monitoring of the construction activities. A 420 m section Barren Pipeline was constructed in 2023. TÜMAD Engineering, Procurement and Site Team supervised the construction, assigning Jacobs/Promer to undertake the detailed engineering design, project and contract management, construction supervision and commissioning consultancy. FRC Construction was the engineering contractor. Technical specifications for the pipeline were prepared by TÜMAD and contained quality assurance/quality control (QA/QC) requirements, that were used throughout procurement and construction phases.

QA/QC verification was undertaken during the original construction as detailed in the 2022 Detailed Audit Findings Report. QA/QC programs were also applied to procurement and construction work undertaken in the past three years. WSP Construction Completion Reports include QA/QC records for the HLP expansion works. The records include laboratory soil testing results for sieve analysis, Atterberg limit, moisture content, proctor-density, permeability, and fracture resistance tests; field nuclear density tests; specifications, certifications, inventory control logs and roll test data for clay-liner fabric, HDPE liner and drainage pipe; WSP inspection checklists and WSP weekly reports; non-conformity and correction reports; and photographs of construction and testing programs. The Project Commissioning Form prepared by TÜMAD for the Barren Pipeline extension has attached QA/QC records provided by FRC Construction that include manufacturer material certificates for pipe, valves, fittings and compensator, welder test reports and welder certificates, non-destructive testing (NDT) reports, hydrostatic test report, and photographs of construction.

As presented in the 2022 Detailed Audit Findings Report, all original engineering design and construction works conducted to the date of that audit were completed and approved by experienced engineering companies. This practice has continued through the last three years. TÜMAD Engineering, Procurement and Site Team supervised the construction, assigning Jacobs/Promer to undertake the detailed engineering design, project and contract management, construction supervision and commissioning consultancy. FRC Construction was the engineering contractor. WSP has been retained for design and on-going construction management of the HLF and ponds. HES continues to conduct full-time monitoring of the HLF construction activities.

The construction and QA/QC records and engineering drawings for the 2023 barren pipeline construction is compiled in signed report. The signatures include TÜMAD's Construction Chief, Project Engineer, and Process Superintendent, and states that the works, executed by FRC Construction, have been completed in full compliance with the project documents and technical specifications. The construction and QA/QC records and engineering drawings for

HLF construction in the past three years are compiled in Construction Completion reports. These reports are all signed by WSP's Project Manager and Project Director.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 4.9.

Summarize the basis for this Finding/Deficiencies Identified:

Since the 2022 ICMC certification audit, the Water Resources Management Plan continues to be the primary document that sets out TÜMAD's commitments of the program for environmental monitoring of surface and groundwater resources and specifying the operational requirements. The Plan sets out the parameters and water quality standards for various water uses and details sampling frequency and parameters to be analysed for each monitoring station and provides a map showing the location of each station. The Plan is supported by instructions of environmental sampling, including sampling of surface water and groundwater wells. TÜMAD also continues to monitor wildlife through application of the Biodiversity Management Plan to monitor wildlife activity and report on wildlife encounters and mortalities.

The WRMP was originally prepared by TÜMAD senior environmental managers and this and associated environmental procedures and instructions are reviewed at least annually to ensure they remain valid and meet the needs of TÜMAD, local communities, other stakeholders, and National requirements and EU directives. The reviews and updates are approved by experienced environmental engineers in the Environmental Department. TÜMAD also seeks advice from WSP and retains a professor in hydrogeology from the Middle East Technical University (METU), Ankara on an advisory basis for proposed changes to the monitoring program. All environmental sample collection and analyses are undertaken by TS EN ISO/IEC 17025:2017 certified and Turkish accredited laboratories using field personnel who have received "Water and Wastewater Sampling Training" from the MEUCC and hold a Sampling Authorization Certificate. Also, TÜMAD's Environmental Technicians in Environmental Department have the Water and Wastewater Sampling Training and certificates. The sampling protocols follow TS ISO 5667 standards.

The sampling and analysis protocols detail how samples are to be taken, including the field sampling equipment needed, sampling method, sample containers and labelling, preservation requirements, shipping instructions, and completion of sampling form and shipping documents, and chain-of-custody protocol. The sampling label specifies the sample code,

sampling date, time, sampling purpose and if necessary, parameters to be analysed and the type of protection.

A Sampling Report Form is completed to record sample information, sampler's name, facility representative's name and signature, time and date of sampling, sample location/number, field conditions (temperature, weather, etc.), method of sampling, and preservation details, and comments for any conditions that may affect the sampling. For groundwater sampling the form includes entry for well purging record (pH, conductivity, and dissolved oxygen). The form also records time of delivery to the laboratory and name and signature of the receiver.

The Mine is designed as a zero-discharge facility and operates to minimize the potential for a cyanide release to the environment through provision of secondary containments in all areas where cyanide is stored, handled, and used in the ore leaching, pregnant solution collection and the gold/silver recovery process. Records show that total, WAD, and free cyanide have not been detected in surface water or groundwater (i.e., concentrations are below detection limits of 0.005 mg/L) and therefore it is the opinion of the auditors that the quarterly groundwater and surface water monitoring program appears reasonable considering the current operational management and analytical record.

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

Standards of Practice

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of 5.1.

Summarize the basis for this Finding/Deficiencies Identified:

TÜMAD developed a Mine Closure Implementation Plan in October 2021 that provides the approach for overall mine closure and land rehabilitation. In June 2022 TÜMAD contracted ProMer to supplement this plan with a report that specifically addresses the approach and estimated decommissioning costs for cyanide facilities. ProMer updated this report and cost estimate in May 2025. The reports outline the planned approach to decommissioning cyanide facilities that includes, cleaning the cyanide mix and holding tanks and sending the rinse to the heap leach pad; rinsing the heap leach pad to reduce WAD cyanide levels to 10 mg/L or less, then covering the pad with an impermeable layer topped with a drainage layer and topsoil;

washing, neutralizing, or disposal of hazardous waste to a hazardous waste facility; evaporation or discharge of neutralized rinsate from ponds and infill of ponds; and reusing dismantled plant at other facilities or disposing as scrap.

During decommissioning all cyanide operating plans, procedures and emergency response capability will remain in place. Washing and neutralization of will be determined by a method suitable for each unit being decommissioned and may include application of hydrogen peroxide. The schedule of proposed decommissioning activities is described in text with the cyanide tanks and piping in the plant being cleaned and decommissioned and the rinsate going to the heap leach, followed by the heap leach pad being washed to reduce cyanide, followed by decommissioning of piping to/from the heap leach, followed by neutralization and evaporation or discharge of residual drain-down water in the ponds, followed by infilling of the ponds. Under the Turkish Mine Waste Regulation (2015) mine closure should be completed within 2 years of the cessation of mine site activities.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 5.2.

Summarize the basis for this Finding/Deficiencies Identified:

The 2025 ProMer report provides an updated cost estimate to fully fund third party implementation of the cyanide-related decommissioning measures. The estimate is based on unit prices taken from contractor current pricing or from ProMer's database. The estimate includes an overall capital expenditure contingency of 23% to allow for potential unit price changes and additional works during demolition. The report states that the closure plan will be reviewed when changes are made to the plan that effect cyanide-related decommissioning activities and costs or at a minimum every 5 years. The information provided shows that the cost estimate has been reviewed in the past three years

There is no established financial assurance mechanism in Türkiye to cover estimated costs of cyanide related decommissioning activities. TÜMAD has therefore established an insurance policy to cover estimated costs for the cyanide-related decommissioning activities. TÜMAD has a Public, Product and Pollution Liability Insurance Policy with Anadolu Insurance Company (Anadolu Anonim Türk Sigorta Şirketi), Istanbul (the insurer) through Nurol Sigorta Aracilik Hiz A.Ş (the agent) that includes coverage for decommissioning of cyanide facilities under the requirement of the "*safe closure of cyanide facilities in unexpected situations if TÜMAD will not be able to fulfil its obligations for closure*". The insurance policy is reviewed annually, and

coverage was increased for the period 30 June 2025 to 29 June 2026 to reflect the increased cost estimate provided in the 2025 Promer report.

6. WORKER SAFETY Protect workers' health and safety from exposure to cyanide.

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 6.1.

Summarize the basis for this Finding/Deficiencies Identified:

TÜMAD has developed procedures describing how cyanide-related tasks should be conducted to minimise worker exposure. Cyanide Management Plan describes the steps and procedures implemented at the İvrindi Gold Mine for safe management of cyanide. The Plan references Safe Working Procedures and Standard Operating Procedures as well as the OHS Handbook for Cyanide Management (OHCM) that provide step by step requirements for undertaking specific cyanide related tasks. Procedures are in place that address unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance. The operating procedures describe the risks associated with specific work tasks and the precautions and safety equipment required to safely complete the tasks. Other general operating procedures include requirement for completing a Job Safety Analysis (JSA) prior to undertaking non-routine operations or maintenance tasks.

TÜMAD has mandatory workplace requirements for all employees and contractors. Operating procedures specify the PPE to be worn as well as other equipment required to safely undertake the task. There are also requirements to use of portable HCN gas meters when undertaking specific tasks or working in specific areas where there is a risk of exposure to cyanide. PPE requirements are posted in areas of the plant where specific PPE is required. The JSA process also identifies the mandatory PPE required, work permit requirements, and pre-work inspections for the task to be undertaken.

The operation solicits and actively considers worker input in developing and evaluating health and safety procedures. Employees are encouraged to seek ways to continually improve workplace safety; this ethic was observed during the audit with respect to workforce attitudes and general housekeeping practices. In addition to these casual discussions with their supervisors, there are several formal approaches for workers to communicate and provide input into the development and evaluation of health and safety procedures.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 6.2.

Summarize the basis for this Finding/Deficiencies Identified:

The importance of maintaining appropriate pH within the leach circuit is described in the Cyanide Management Plan. The pH level in the preparation solution is measured and adjusted during the cyanide mix procedure. To prevent the generation of HCN gas and optimize the efficiency of cyanide in the leach process, TÜMAD maintains pH in the heap leach circuit at between 9.5 and 11 and has set an operating goal of pH 10.5 for the barren solution. TÜMAD also controls pH in the stripping and neutralization processes through checking and adjusting with caustic as needed to ensure pH is maintained between 11 and 12 for these operations.

TÜMAD has installed stationary HCN detectors in strategic areas of the plant where there is a potential for HCN gas generation and use portable HCN detectors when conducting tasks where there is a potential for HCN gas generation. The HCN portable and fixed detectors alarm at 4.7 ppm and 10 ppm. The fixed detectors are equipped with both audible and visual alarms. If HCN concentrations exceed 4.7 ppm, workers must exit the work area and proceed to a designated muster area outside the laboratory. A worker with full face respirator and appropriate filter cartridge and portable HCN meter then investigates the reason for the upset. If HCN concentrations exceed 10 ppm, plant operators trained in the use of self-contained breathing apparatus (SCBA) would investigate, except in an emergency where there is a man-down, in which case the investigation would be undertaken by three emergency responders wearing SCBA and chemical suits.

HCN gas is monitored each shift at the ADR plant and HLF using a portable HCN device to check for potential concerns. All process operators are fit tested and trained in the use and maintenance of full-face respirators. Respirator refresher training provided annually. Filters are required to be replaced monthly or as required. Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained. TÜMAD calibrates the fixed and portable detectors as directed by the manufacturers. The portable HCN detectors are also calibrated semi-annually by a subcontractor. Calibration of the detectors is tracked on an Excel™ spreadsheet maintained by the OHS Department. A visual check is carried out at each shift by operators. Missing/unfound devices are noted on the tracking sheet. Any observations deemed as non-conformities are recorded in the QDMS system with corrective actions tracked to completion.

İvrindi Gold Mine — Name of Mine
Signature of Lead Auditor
20 March 2026 — Date

Cyanide warning signage appeared to be well maintained. Signage is clearly posted at entrances to the ADR, CIC, mixing area, ponds, cyanide storage warehouses and includes cyanide hazard warning signs; prohibitions on open flames, smoking, eating and drinking; restricted entrance to authorized persons only; and PPE requirements. Cyanide piping is colour-coded to identify contents, and a colour-coding key and cyanide warning signage is posted on the access gates at the ADR and leach area. Reagent cyanide piping is colour-coded purple and flow direction is clearly marked. Solution pipelines at the ADR including CIC, ponds and leach units were clearly labeled with name and flow direction, and colour-coded yellow and cream to identify their contents. Cyanide hazard warning signs are posted on fencing around the cyanide facilities and ponds. Signs are also posted for all ponds to identify the name, use and capacity of the pond. Each tank is labelled clearly to identify the size, content, and hazard. In addition, all workers and contractors are required to complete induction and workplace hazard training that includes cyanide hazard awareness, and safety training. Instructions for actions to be undertaken in the event of HCN releases and alarm triggers are prominently posted at locations around the ADR plant, cyanide warehouse and CIC tanks.

Since the 2022 certification audit TÜMAD has received solid cyanide from CyPlus and Hebei. Both suppliers provide carmoisine dye in each cyanide box as per their contract with TÜMAD. As a precaution, the mix procedure includes instruction to add dye during a mix in case a future purchase from a different supplier does not include dye in the cyanide boxes.

Shower and eye-wash units are located in strategic areas of the process plant where there is a potential for exposure to cyanide. These stations are plumbed into the fresh water supply system. In addition, there are several self-contained eyewash stations. Showers and eye wash stations are checked weekly for flow, condition, mechanical and visual control and access. TÜMAD installed regulators and pressure gauges on each eye-wash unit connected directly to the water supply line to ensure a safe operating pressure is maintained.

Fire extinguishers located strategically about the mine site. Fire extinguishers in the cyanide use areas are all non-acidic dry chemical extinguishers. Each department is responsible for weekly inspections of fire extinguishers in their area. In addition, extinguishers are inspected monthly by the OHS Department and serviced and inspected together with the fire detection systems by a contractor every three months.

Safety Data Sheets (SDS), first aid procedures and other informational materials on cyanide safety are in the language of the workforce and available in binders or posted areas where cyanide and other chemicals are managed. SDS binders containing hard copies of SDS are strategically located at the warehouse, ADR, Emergency Response Team (ERT) Station, ambulance and laboratory. The SDS are filed in binders and segregated by mine area for ease of reference. There is also signage that provide procedures for first aid response to cyanide emergencies in the event of a cyanide exposure. Additionally, SDS are located in the ADR

plant office, the HLF Mobile Field Office, the Clinic, and the Administration Building. All departments maintain their own SDS.

TÜMAD has not experienced any cyanide exposure incidents since operations began in 2022. TÜMAD has a procedure in place to investigate accidents and incidents. The procedure provides instruction and guidance to ensure that investigations (including those that involve cyanide) are completed and applies to all employees and contractors. In the event of an accident or near miss workers are required to complete an Incident Reporting and Investigation that documents information on the level of injury; description of the event; actions taken; and equipment, people and witnesses involved. The information is saved into the QDMS system which automatically notifies all relevant department managers, the operation manager, the OHS Department and the Environmental Department.

The incident reporting procedure is actively managed on an Excel™-based tracking table that identifies: the location and other particulars of the incident, type, cause, individual or parties responsible for any corrective actions, severity category, and corrective action or control methods applied. The OHS Department or Environmental Department provides guidance and extends support to the individual departments during the investigation. In addition, the root causes and the actions are discussed by the department heads and the worker representatives during an Accident Assessment Meeting.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 6.3.

Summarize the basis for this Finding/Deficiencies Identified:

Shower/eyewash facilities and eyewash solution are located at strategic areas of the plant site to provide immediate access to workers in the event of contact to cyanide. Medical oxygen resuscitator kits are located in the clinic, the ambulance, the ERT Station, the heap leach office container and the ADR building. The units are inspected monthly by clinic personnel and recorded on control forms which also note the expiry date of cylinders. In addition to clinic staff, all ERT members are trained to administer medical oxygen. At the time of the audit the ERT comprised 36 members trained in the use of medical oxygen, application of first aid, fire emergencies, confined space entry, vehicle rescue, and chemical emergency responses.

TÜMAD has 10 packs of hydroxocobalamin (Cyanokit) available in the event of a cyanide first aid emergency. As hydroxocobalamin is applied intravenously and can therefore only be

administered by a qualified nurse, Occupational Physician, or paramedic /emergency medical technician, the kits are maintained at the medical clinic.

First Aid Kits are present at strategic locations within buildings and emergency response vehicles. The kits are inspected by clinic personnel with observations noted on a control form. The OHS Department also conducts monthly documented inspections of first aid kits and response equipment.

Communication is through radio, cell phone, or fixed phone. All workers including security personnel are equipped with radios for use in the field and plant. However, most workers prefer and use cell phones in place of radio. Light vehicles are equipped with hands-free systems for cell phones. The radios are tuned to Channel 1 to allow for emergency communication. The emergency response plan includes radio protocol and call channel and emergency phone numbers in the event of an emergency. The stickers are located on all workers' helmets which display the emergency phone numbers and emergency radio channel.

TÜMAD has developed plans for responding to cyanide leaks and spills. Emergency response procedures in the event of a cyanide release are set out in the Emergency Plan (EP), Cyanide Management Plan and OHCM. Specific emergency response procedures to cyanide, cyanide solution or HCN gas releases are detailed in the OHCM. Cyanide emergency scenarios are also described in OHCM including cyanide spills within and outside of the mine boundary, medical emergencies from cyanide contact or HCN gas, HCN emissions on or outside the mine, fires involving cyanide, heap leach slides, overflows from ponds containing cyanide solution, cyanide solution leaks from the heap leach pad or ponds, and temporary shutdowns or process and equipment failures. The OHCM details the roles and responsibilities and response actions for potential cyanide release situations. Specific emergency procedures to respond to cyanide or HCN gas exposures are clearly presented and include SDS that are also posted at the cyanide mix plant and cyanide warehouses.

TÜMAD has an on-site clinic with capability to provide first aid and medical assistance to workers exposed to cyanide and transport cases to a hospital. The clinic is staffed with an Occupational Physician, a head nurse, four paramedics and four emergency medical technicians who provide 24-hour medical support. The medical staff members receive cyanide awareness training and instruction from the Occupational Physician on the application of medical oxygen and intravenous use of Cyanokits. The Occupational Physician, nurse, paramedics and medical technicians have participated with the emergency brigade in mock drill exercises since 2022. All workers are trained to recognize the symptoms of cyanide poisoning and first response actions in the event of cyanide exposure; however, their responsibility is limited to immediately report the emergency directly to security, ensure his/her own safety and make other personnel in the area aware of the situation. Security is responsible to ensure the clinic is notified and to initiate the emergency call-out procedures. The ERT members, many of which are plant operators, are trained to provide cyanide first aid

including use of medical oxygen pending arrival for the paramedic or Occupational Physician. At the time of the audit there were 188 first aid responders including the ERT from TÜMAD and 57 trained first aiders from subcontractors.

TÜMAD has emergency response vehicles including an ambulance, fire truck and rescue vehicle stationed 5 to 10 minutes journey from the ADR Plant. The clinic is subject to annual inspections by the Health Ministry. TÜMAD has informed local medical facilities of the potential need to treat patients for cyanide exposure, although the clinic is confident that the medical facility has adequate, qualified staff, equipment, and expertise to respond to cyanide exposures. Technical communications were made to the nearest hospitals by the Company Occupational Physician, to gather information on the İvrindi mining operation, the use of cyanide in the gold recovery process, the potential risks associated with the operation, the emergency response plan and in house response capability, and the potential additional medical services that may be requested in the event of an accident.

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

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.1.

Summarize the basis for this Finding/Deficiencies Identified:

TÜMAD has developed the EP, Crisis Management and Communication Plan (CMCP) and OHCM as per the Cyanide Management Plan to address potential accidental releases of cyanide and cyanide exposure incidents. They identify the emergency management organization, reporting structure, response protocols, roles and responsibilities, evacuation procedures and emergency communication details, and provide contact information of external support, ERT equipment and drill scenarios, cyanide exposures and symptoms, cyanide first aid, and cyanide spill response. Potential emergencies other than cyanide related emergencies are separately addressed in the EP. The specific procedures that describe the standard actions to follow in the event of cyanide releases or other cyanide related emergency scenarios are presented in the OHCM. The protocols for each scenario identify the specific actions and the steps, and roles and responsibilities of various personnel during an emergency. The protocols address all probable emergencies including releases from low potential catastrophic events.

The TÜMAD cyanide supply contracts with CyPlus and Hebei state that the supplier is responsible for cyanide transport including route planning and emergency response.

The Hebei and CyPlus supply chains include assessments of the routes, the shipping lines and emergency response capability. To-Pet contracts with Hidra a company that provides emergency response and escort expertise, for emergency response services. A Specific Emergency Response Plan has been developed by Hidra for responding to potential transportation emergencies between İzmir Port and İvrindi Gold Mine Site. Hidra has overall responsibility to ensure that all parties (including subcontractor personnel) are familiar with the plan. Hidra has an emergency response vehicle that accompanies each transport convoy to respond to the emergencies. The emergency response vehicle is equipped with spill response kits, SCBA units, impermeable chemical overalls, and other response equipment to respond to cyanide related emergencies enroute.

TÜMAD has developed safe work procedures for on-site transportation and off-loading of shipping containers that includes a pre-defined route that is closed to other vehicles and controlled by flagmen during a cyanide delivery.

The TÜMAD EP classifies emergencies as per the level of response required:

> Level One emergencies are no injury, insignificant financial loss (less than 1,000 USD) and low or none-environmental impacts. All level one events need to be reported to the relevant departments within 24 hours.
>
> Level Two emergencies are first aid injuries (discomfort, minor injuries), low financial loss (1,000 USD – 10,000 USD) and low environmental impacts. All level two events need to be reported to the Operation Manager within 24 hours.
>
> Level Three emergencies are injuries requiring medical treatment (injuries that require care and treatment after first aid), moderate financial loss (10,000 USD–100,000 USD) and medium environmental impacts. All level three events need to be reported to the Operation Manager with 24 hours.
>
> Level Four emergencies are restricted work injuries which are injuries resulting in some restrictions of duty, high level of financial loss (100,000 USD–1,000,000 USD) and high environmental impacts. The event should be controlled, and the process should be checked and stopped. All level four events need to be reported to the General Manager by the Operation Manager within 6 hours.
>
> Level Five emergencies are injuries resulting in loss of workforce (lost time injuries), very high level of financial loss (1,000,000 USD–10,000,000 USD) and serious -

irreversible environmental impacts. All level five events need to be reported to the General Manager by the Operation Manager as soon as possible.

A person discovering an emergency is required to report the emergency to the Security Supervisor to initiate action. The relevant department head and OHS Chief are also notified. The responsible staff assess the situation and notify the Operation Manager. The Operation Manager immediately notifies the General Manager if the emergency is a Level Four or Level Five. The ERT contact numbers and tasks are pre-defined in the EP and OHCM.

The OHCM includes protocols that present specific response actions to be followed for various types of cyanide emergency. The EP and OHCM define the actions to be followed in case of cyanide releases which may affect communities. These include notification of potentially affected communities and downstream villagers/village leaders to minimize potential exposure to cyanide. In the event of a cyanide related and other emergency onsite, personnel are required to evacuate to one of eight designated emergency rallying points. Security officers are assigned to account for personnel and verify that no personnel go missing during an emergency.

There are 36 ERT members distributed over several shifts. The ERT is activated by the Event Controller (ERT Team Leader) under order of Emergency Controller (Operation Manager) to respond to all cyanide related emergencies Level two and above. Emergency shower and eyewash stations, first aid stations, assembly points, fire and rescue stations are shown on site layout maps which are posted at locations around the site.

The ADR, warehouse and leaching areas have secondary containments or hardstanding areas to prevent release of cyanide to soil and groundwater. Secondary containments are sized to retain a minimum of 110% of the largest tank within a containment as well as precipitation from a design storm event where containments are outside. Spill kits, absorbent pads, portable containment ponds, drums and heavy-duty mobile equipment for receiving waste materials are sited at strategic locations and are also readily available in the hazardous material (HAZMAT) vehicle. Ferrous sulphate and sodium hypochlorite are available as neutralizing agents for addressing small cyanide spills. Conditions for use of these neutralizers are defined in the OHCM, which states that they should never be used to treat cyanide released into natural surface water sources.

7.2 Involve site personnel and stakeholders in the planning process.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.2.

Summarize the basis for this Finding/Deficiencies Identified:

İvrindi Gold Mine — Name of Mine
Signature of Lead Auditor
20 March 2026 — Date

TÜMAD provides several avenues where the workforce can provide input into emergency response planning, including monthly worker OHS committee meetings, quarterly Health and Safety meetings, toolbox talks, employee engagement program meetings, desktop simulations, departmental risk assessment updates, and preparation of JSAs.

TÜMAD has a policy to actively involve local communities, and public and private stakeholders to address questions and concerns on the use of cyanide in mining, and response to transportation accidents or other types of emergencies involving cyanide. Current versions of emergency response plans include procedures for communicating with the various stakeholders during an emergency. The EP, OHCM, and CMCP include requirements for notification of external stakeholders in case of emergencies. Annual meetings are conducted with the attendance of Private Administration Office, disaster and emergency management presidency, police and gendarme chiefs, sub-governors, village leaders, mayors and local fire and hospital representatives to provide information about cyanide and discuss response to possible cyanide emergencies.

Mutual Medical operates the onsite clinic and developed the first-aid procedure for cyanide exposure. The medical staff provides input into emergency response planning. This is provided with each emergency response kit. The Occupational Physician, nurse, paramedics, and health staffs also provide cyanide first aid training and participate in emergency response and mock drill exercises and follow up debriefings.

The operation continues to make potentially affected communities aware of the nature of their risks associated with accidental cyanide releases and consulted with them directly or through community representatives regarding appropriate communications and response actions. Annual meetings are held with community and civil service representatives with the nearest hospitals, during which cyanide awareness and potential emergencies are discussed, including the possible services and support that may be required or requested in the event of an emergency. Comments and discussion generated during such meetings are recorded.

TÜMAD reviews the CMCP, EP, OHCM periodically and following emergency drills, with input from site personnel, workers and internal stakeholders. TÜMAD's Public and Community Relations (P&CR) Department engages with governmental offices and local people, affected by the mine's activities to seek feedback on the EP in order to keep the Plan current. External stakeholders (Transporters, HAZMAT companies, Ministry of Interior Disaster and Emergency Management Presidency (AFAD), etc.) are also directly consulted to provide input when updating the EP. To-Pet periodically reviews its Dangerous Goods Transportation Emergency Plan (DGTEP) and when changes are made, provides an updated copy to the mine.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.3.

Summarize the basis for this Finding/Deficiencies Identified:

Roles and responsibilities of employees and emergency response personnel are defined in the EP and OHCM. The local incident and emergency teams are designated in the EP and OHCM, with roles and responsibilities for initial response in a cyanide-related emergency. Alternates are also defined. For Level one, two and three incidents, the Emergency Control Group (ECG) members, primarily composed of TÜMAD managers, are delegated with roles and responsibilities as ECG chair, ECG Coordinator, Site Coordinator, Communication Coordinator, Security Coordinator and Administration Assistant, to fulfil these roles during an emergency. Their alternates are also defined in the EP. The ECG reports to the General Manager and the TÜMAD Corporate Office in Ankara.

The ERT participates in regular training managed by the Emergency Response Coordinator (ERC). The ERC has a safety expertise certification issued by the government and coordinates all the training needs of the ERT. The distribution of the ERT among the shifts is communicated via a monthly e-mail to all departments. ERT members are trained according to an annual training plan. Training sessions are conducted every month with the attendance of ERT members in four groups to accommodate members from different areas and shifts. Most of the training is provided in-house by the ERC. Training records are retained and were reviewed during the audit. The ERT members have completed chemical response, firefighting training given by TÜMAD OHS Department.

TÜMAD's 24-hour security service manage the call out procedures for relevant coordinators and ERT members. An up-to-date list of emergency contacts and telephone numbers is maintained at the main security office. TÜMAD has extensive emergency response equipment and personal gear on site to respond to cyanide related emergencies. The fire and rescue station, fire truck, and rescue vehicle contents are listed in EP and OHCM.

The P&CR Department engages with governmental offices and local people with regard to their involvement in a response to an emergency that extends beyond the boundaries of the mine. Annual community meetings held with stakeholders including hospitals, fire departments, government and civil service representatives, gendarme and army representatives and communities provide awareness to outside entities about potential emergency situations where outside emergency response assistance may be requested. In the past three years, TÜMAD has conducted several joint mock drills with external stakeholders such as To-Pet and

Hidra. These drills have included HCN gas poisoning, cyanide spillage, cyanide leakage, fire and earthquake scenarios.

In accordance with Turkish regulations, TÜMAD undertook a site assessment aligned with the European Union Seveso Directive for control of major accident hazards. An outcome of this assessment was the development of an EP which was shared with the AFAD and may include requirements for joint responses in the event of a major accident potentially including cyanide release.

7.4 Develop procedures for internal and external emergency notification and reporting.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.4.

Summarize the basis for this Finding/Deficiencies Identified:

The EP and OHCM provide lists of contact information for regulatory agencies, outside responders (i.e., fire and ambulance), hospitals, as well as call out procedures and other emergency response protocols and detail the communication chain. Depending on the level of emergency there are procedures for notifying TÜMAD corporate and for communicating with media and regulators. The EP and OHCM place responsibility on the P&CR Manager to coordinate and communicate with the local and provincial government including the Balıkesir Governor who in turn would contact the relevant regulators including the Environment and Urban Directorate, General Directorate of Mining and Petroleum (MAPEG) Affairs and General Directorate of Labour and Social Security.

The CMCP defines which communities the Crisis Management Group will notify in the event of a cyanide emergency. Communities will be notified through communications with village and public leaders that will be contacted by TÜMAD P&CR staff. Community and media relations guidelines in the EP and OHCM provide detailed information on media statement preparation, next of kin notification, and spokesperson/news briefing procedures.

TÜMAD has procedures for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. The obligation to notify has been identified in the OHCM. No such significant cyanide incidents have occurred or been reported to ICMI since 2022.

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

The operation is: ■ in full compliance
in substantial compliance
† not in compliance…with Standard of Practice 7.5.

Summarize the basis for this Finding/Deficiencies Identified:

The OHCM and Cyanide Management Plan, and its protocols address recovery and neutralization of cyanide solution and solid cyanide spills. Ferrous sulphate crystals are used to neutralize a sodium cyanide solution up to 30% by weight. Sodium hypochlorite may also be used but is recommended only for residual trace cyanide concentrations and for washing equipment and personal protective equipment. These agents are stored in drums in the 'Emergency Response Kit Cabinet' in the Cyanide Warehouse compound. As specified in the Plan, dry cyanide material spills onto soils are recovered along with any contaminated soils and placed in sealed containers or bags. Residual contamination is neutralized with sodium hypochlorite.

The Spill Cleanup Plan prohibits chemicals such as sodium hypochlorite from potentially contaminating surface water. Additionally, the OHCM and the Process Department's, Cleaning Instructions for Cyanide Spills state that sodium hypochlorite, ferric sulphate, and hydrogen peroxide are prohibited from use in spills that may potentially reach surface water. Plans and procedures limit the use of sodium hypochlorite for decontamination of the equipment to concrete containments and facility areas. The use of chemicals such as sodium hypochlorite, iron sulphate and hydrogen peroxide for the treatment of cyanide solution in case of any mixing or possibility of reaching surface water is strictly prohibited.

The Cyanide Management Plan and OHCM define spill clean-up procedures in detail and refer to sampling after the residue has been cleaned up to confirm that remediation has been completed. These plans also define a monitoring program for water quality to be applied in cases where cyanide solution enters surface water. The program defines the sampling locations, sampling frequency, sampling quantity and reference values according to Turkish regulations. The surface water quality monitoring would be performed to ensure conformance with the Cyanide Code's standard of 0.022 mg/L free cyanide for the protection of aquatic life and the results recorded and reported to the MEUCC as required in the WRMP. A contingency plan and monitoring program will be developed and implemented based on the level of impact and risk. TÜMAD has an accredited laboratory capable of analysing the water samples. TÜMAD also has arrangements with university laboratories in Türkiye, if required, and an ongoing contract with a private and TURKAK (Turkish accreditation agency) and MEUCC accredited laboratory.

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 7.6.

Summarize the basis for this Finding/Deficiencies Identified:

As required in TÜMAD's integrated ESMS all procedures are reviewed on an annual basis to ensure they are up to date and reflect changes in operations, legislation and procedural improvements. The date of review and any revision is documented in each procedure, together with sign-off by the author of the change and the approving manager, which in the case of the emergency response plans is the Operation Manager. Review of the Cyanide Management Plan, CMCP and OHCM show they were last reviewed and/or revised in October 2025. They are considered living documents and are modified as required to incorporate any improvements identified during an incident or mock drill.

The EP and OHCM require that simulation exercises are undertaken annually to test the understanding of the ECG roles and responsibilities and adequacy of the Plan. The Cyanide Management Plan key performance indicators (KPIs) also require that simulation exercises are undertaken annually to test the ERT understanding of the roles and responsibilities, the competency of the team, and the adequacy of the response plans. The simulation exercise scenarios are identified in the OHCM. Mock drills are undertaken that include both worker exposures and environmental releases. In the past three years TÜMAD has undertaken 22 mock drills involving cyanide or related emergency situations. Some drills were undertaken with external participation of the AFAD or Hidra.

The ERT conducts monthly drills to test various emergency scenarios. Each drill is evaluated to assess the effectiveness of the EP and CMCP, and follow-up actions are taken to address any identified deficiencies. Procedures require that drill results be evaluated, and action plans developed to address deficiencies. Mock drill records include action plans detailing each deficiency, proposed solutions, and deadlines with responsible persons to complete recommended actions.

Corrective actions recommended as a result of TÜMAD's formal incident reporting and investigation program of an incident or near miss may include modifications to the EP and CMCP or operating procedures. They may also lead to new or additional training requirements, or modification of current operating procedures. The Emergency Response Coordinator is responsible for conducting this review which is completed as part of the debriefing and critique undertaken by the ECG. Evaluation and investigation results and corrective actions are communicated to workers through daily meetings or other means. None

of the incidents that occurred over the past three years warranted revision of the EP or CMCP or OHCM, but modifications were made to several JSA instructions to reduce the potential of such an incident in the future.

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

Standards of Practice

8.1 Train workers to understand the hazards associated with cyanide use.

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 8.1.

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide awareness training is mandatory for all new employees and contractors who will work in cyanide facilities. This training includes forms of cyanide, recognition, hazards, signage, safe handling guidelines, exposure routes, control of HCN gas generation, symptoms of cyanide poisoning, and first aid treatment in the event of exposure. A tracking system is in the process of being introduced where trainings can be viewed/checked in the field on a Company's cell phone by scanning Quick Response (QR) Codes (FIORI) posted on workers safety helmets. Additionally, contractors and workers are required to attend induction training which includes site policies, procedures, workplace health and safety, workplace and chemical hazards, PPE, signs, colour coding meanings, alarms, emergency response plans and actions, incident reporting and safety meetings.

Visitors to the operation receive a basic induction in the form of a video which includes cyanide awareness and information on cyanide hazards. The video is in Turkish with English subtitles. A short exam is applied after the video. This program includes instruction on cyanide awareness and cyanide management including the Cyanide Management Plan, OHCM, EP, ICMC, and cyanide properties, exposure symptoms, hazards, usage, and safety systems. The visitor induction video can also be watched remotely using the M-Files Field Acceptance Module.

Prior to undertaking cyanide related tasks, all workers receive further training on management systems and JSA Work procedures, including those specific to cyanide tasks. Each new worker receives pre-work training for a minimum of two hours specific to the department or area of work. New employees to the ADR plant receive on the job training from experienced operators under supervision of the day shift supervisor for at least one month. Thereafter the

employee receives a further four weeks of training to the satisfaction of their supervisor and general foreman before being allowed to work under less supervision. New employees to the heap leach receive training by the shift supervisor for two months and are evaluated at the end of that period. A minimum evaluation score of 70% is required for working alone.

Cyanide refresher and awareness training is a part of a 4-hour session on Chemical awareness that forms part of a 16-hour health and safety refresher training program (Long - Period OHS training) that is required annually by all workers including contractors. This training includes OHS Training, Physical and Chemical Risk Factors, Major Industrial Accidents, SDSs, Emergency Procedures, PPE Training, Health Training, Fire Training). The cyanide awareness/refresher trainings portion of the program is about 1 hour in length and is given by Process Department/Safety Department trainers, and includes cyanide awareness, risks of cyanide, cyanide handling procedures and emergency response, and includes an examination (threshold 70 points). Employees specifically working or engaged on cyanide related tasks are required to complete additional refresher training on specific cyanide related operating procedures. These include emergency procedures, cyanide offloading and mixing procedure, cyanide storage, oxygen resuscitation kit operation, CyanoKit and CarboSorb awareness, expiry dates for HCN gas canisters, cyanide facility inspections, working on cyanide pumps/valves/pipelines/tanks, and wet and dry sodium cyanide decontamination.

All induction and training records are retained by the Process Department and include attendance sheets. These records are tracked on SAP software by the Human Resources (HR) Department and hard copies are retained by the Process Department office. Review of training records covering the past three years for selected operators and managers confirmed that their records were available and complete. Cyanide training is tracked by the HR Department on the SAP System. Paper copies of the training attendance sheets are filed in the Process Department Office.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 8.2.

Summarize the basis for this Finding/Deficiencies Identified:

TÜMAD has a detailed program for training workers to perform their normal production tasks. TÜMAD continues to maintain this detailed training program for cyanide related tasks and related health and safety procedures. All workers that undertake cyanide related tasks are required to complete cyanide awareness training as well as task specific training. As per a legal requirement, plant operators must also receive "Occupational Certification" before being

permitted to work. Certification is gained through a 5 to 15 day program provided by government trainers. The program provides a general understanding of process operations. Prior to undertaking tasks without direct supervision, workers must undertake training in standard operating procedures.

TÜMAD has 18 policies, 31 plans, 10 handbooks, 125 procedures and 584 work instructions for mine operations. A training matrix is used to track those cyanide related requirements which include: a management plan, two routine operation procedures, and 165 instructions. All procedures contain instructions to be followed for each task, the hazards identified, PPE to be used, and precautions to be followed for safe working. The training matrix is retained on the QDMS system.

There are 125 general operating procedures for non-cyanide specific mine site operating tasks that all workers are required to be trained. In addition, workers that have job tasks involving cyanide are required to complete training in specific procedures for each of the applicable cyanide related tasks conducted as part of their job role. This task training includes training in cyanide unloading, storage and mixing operations, cleaning screens, preparation of stripping solutions, and operations with other hazardous materials. The heap leach pipe irrigation crew receive trainings in pipe installation and maintenance specific tasks that are based on an annual schedule. The training requirements program identifies the safety and monitoring equipment in-place, warning signage, PPE requirements, and procedures to be followed to minimize risks associated with task related hazards.

Operating procedures and instructions form the basis of the written materials for training. They also provide the information on the primary hazards of the task, required PPE, step by step instruction on performing the task, and reference to related safety and operating procedures. Training requirements associated with the operational procedures and instructions applicable to each area/process in the plant must be completed to the satisfaction of the training supervisor before a worker can work unsupervised in that area or process. All staff also receive cyanide awareness and Long - Period OHS training (OHS Training, Physical and Chemical Risk Factors, Major Industrial Accidents, SDSs, Emergency Procedures, PPE Training, Health Training, Fire Training) which is updated annually.

Employee task training is undertaken by supervisors or managers who are experienced in cyanide process operations. This training is supplemented by monitors assigned in each area who have been trained to provide cyanide training. In general, the supervisor of an area is assigned the role of monitor. Monitors have received detailed training on the management of cyanide in the workplace. During a 2-month probationary period, employees are monitored and work with an experienced employee. After passing the 2-month probationary period, the worker is allowed to undertake assigned tasks without being monitored by an experienced employee and shift supervisor.

Health and safety training undertaken by the OHS Department is provided by professionals who are government certified with each trainer is required to sit an exam to be qualified. Trainers are certified by experience into classes A, B and C. The ERT is trained by a certified health and safety expert from within the OHS Department with 14 years of experience in health and safety.

In addition to classroom training and exams to check an employee's understanding, new employees are subject to a 6-month probationary period during which the employee is observed by the shift supervisor and process engineers. When deemed proficient by the supervisor the employee is evaluated by the Process Superintendent over one shift and if satisfied the Superintendent approves a completion of training form which is filed by the HR Department. Each department is required to conduct 3 task observations per annum to evaluate operator safety: including performance of operator activities, operator behaviour, and management of task related risks. The employee's name and employee number, task observed, date of observation, comments and any corrective actions are recorded into form and entered into QDMS System.

Records for cyanide training are retained throughout an individual's employment. Records are in the form of signoff sheets; that include the training topic(s), trainers name and signature, date of training, and sign-off by each attendee. The course materials are either videos and power point presentations, as in the case of induction training and cyanide awareness refresher training, or the actual standard operating procedures in the case of task training. Hard copies of training records are kept by the Process Department.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 8.3.

Summarize the basis for this Finding/Deficiencies Identified:

All employees that work with cyanide including unloading, mixing, process and maintenance personnel are trained in the requirements of operational procedures as well as procedures to follow in the event of a cyanide exposure or release. The induction training materials address solid and gaseous cyanide, safe handling guidelines, exposure routes, symptoms of cyanide poisoning, incident management, emergency call out procedures and first aid treatment including administering oxygen and decontamination steps. Refresher training materials address Cyanide Management Plan and ICMC requirements, including emergency response, hazard awareness, risk minimization, spill response, cyanide first aid and emergency scenarios.

Operators are issued with radios and are trained to contact security and their supervisors via the emergency call channel in an emergency (Radio Channel1). Operating procedures include pre-work inspections that require checking access to emergency response equipment and testing showers prior to mixing cyanide. Operators are also provided with and trained in the use of personal HCN monitors, which in addition to the fixed HCN monitors strategically located in the ADR plant, leach area, gold room, cyanide warehouse and cyanide preparation area, alert operators of HCN gas releases and when to evacuate a work area. The ERT members are trained in responding to chemical releases including cyanide. The team members receive the same training as above and conduct at least 2 cyanide spillage and man down drill per year.

ERC and members of the ERT are trained in the response procedures in the Cyanide Management Plan and OHCM regarding cyanide, including the use of necessary response equipment. All employees that work with cyanide complete cyanide hazard training and refresher training. This training includes recognition of cyanide exposure symptoms, decontamination and first aid. Depending on the shift at least two or three members of the ERT are always present at the ADR Plant during the shift. The pipe irrigation team on the heap leach pad has at least one ERT member present per shift. The ERT members have been trained to apply first aid including the use of medical oxygen and advanced medical first aid. An Occupational Physician, nurse or paramedic are on duty at the clinic, located a 5 to 10 minutes' drive from the ADR and Leach area. These medically trained personnel would provide further assistance such as administering Hydroxocobalamin (Cyanokit).

The ERT, like all employees, also receive annual cyanide first aid training from the clinic doctor. The ERT conduct monthly emergency response training exercises. Since 2022, exercise scenarios included: a cyanide solution spill and HCN release in the ADR; a vehicle rollover and solid cyanide spill with release of HCN; a man-down cyanide exposure scenario; and a pond overflow. The operation has made external responders, such as local fire brigades and emergency medical services familiar with those elements of the CMCP related to cyanide. The İvrindi Gold Mine has the resources to handle all probable emergency situations through an onsite team of well-trained emergency brigade personnel, emergency response vehicles and equipment, and medical capability available from on-site clinic paramedics, nurse and doctor. The mine meets annually with local community stakeholders and has also communicated with local government agencies, including the Ministry of Health Department in Balıkesir to provide information on the İvrindi mining operation, the use of cyanide in the gold recovery process, the potential risks associated with the operation, the emergency response plan and in house response capability, and the potential additional services and support that may be requested in the event of an accident. There is one well-equipped ambulance onsite and the nearest hospitals are in Edremit and Balıkesir.

İvrindi Gold Mine — Name of Mine

Signature of Lead Auditor

20 March 2026 — Date

Annual meetings are held with the District Governor, Mayor, District Agriculture Director, Fire Chief, Police Chief, village leaders, Non-Government Organizations (NGOs), District Health Director and representatives of surrounding local hospitals. These representatives are invited to attend a meeting at the mine; however, if this not possible the related department will attempt to arrange a meeting offsite at the representative's location. These meeting include discussion of the emergency response plan as appropriate.

ERT members receive additional refresher training as first responders and emergency response coordinators and serve as an internal training resource for EP training. In event of an actual emergency, EP assigns primary Emergency Coordinator responsibilities to either General Manager or Operational Manager or designate appointed by them. Emergency drills are periodically conducted to test the adequacy of emergency response equipment and use, Drill reports with observations and corrective actions are filed using a form. Also, the observations and actions are entered into the QDMS System and actions are tracked to closure.

9. DIALOGUE AND DISCLOSURE Engage in public consultation and disclosure.

Standards of Practice

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

The operation is:
- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 9.1.

Summarize the basis for this Finding/Deficiencies Identified:

TÜMAD maintains a transparent community outreach program similar to that noted in the 2022 ICMC certification audit. TÜMAD also continues to uphold its general policy as "Open door policy and open visitor access", to be as responsive and open as possible with respect to questions or requests for information on the management of cyanide. TÜMAD has implemented plans and procedure to engage with local government, non-government organizations (NGOs), media and the press. TÜMAD public relations staff undertake periodic outreach campaigns in local villages including four small villages (Değirmenbaşı, Küçükılıca, Karadere, Çakırdere) located within 15 km of the mine. These meetings provide an opportunity for external stakeholders (governmental and private) and members of the public to verbally communicate and ask questions or relay any concerns related to the use of cyanide and its management at the mine site. The P&CR Department is responsible for engaging with governmental offices and local people, affected by mine's activities. In the

past three years many local and national-level stakeholder meetings have also been conducted with governmental-municipal officials, security and health organizations, police, gendarme, hospitals, and specific communities. The Department also meets regularly with interested local stakeholders (e.g., once a year community consultancy meetings) and meetings have continued since 2022.

TÜMAD has various types of informative audio-visual tools and brochures including a General Visitor Brochure (includes cyanide awareness). An interactive Cyanide awareness Training Video is in the process of being prepared to be rolled out next year for white collar personnel. PowerPoint presentations are also used; tailored for specific audiences, website/press releases (TÜMAD Sustainability Report), company magazine (Nurol Dünyası ENG and TUR) and televised presentations.

TÜMAD, on an annual basis, continues to organize and conduct site tours for hundreds of external stakeholders including NGOs and members of the public. All visitors receive basic information on the use of cyanide in the mining process as well as basic practices employed for the safe management of cyanide in transportation and use.

If proposals/complaints are received from outside parties, they are documented on a Grievance and Feedback List, as stated in the Stakeholder Engagement Plan and Grievance and Feedback Procedure. All such complaints, requests or proposals received from the communities of interest or local people are examined by the P&CR Department, and where necessary, discussions are held with other concerned departments and responses are communicated back to the relevant party in person or by telephone/on-line.

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

The operation is:

- ■ in full compliance
- in substantial compliance
- not in compliance…with Standard of Practice 9.2.

Summarize the basis for this Finding/Deficiencies Identified:

TÜMAD has developed several written and electronic materials (flyers, leaflets, brochures) for stakeholder groups, local communities, and meeting purposes in Turkish, that describe the use of cyanide in mining, the Cyanide Code and the management of cyanide during production, transportation and operations. A general, OHS Handbook of Cyanide Management explaining cyanide processes at the mine, has also been developed that is suitable for internal distribution. This handbook on cyanide safety and emergency response is widely available at the mine site. TÜMAD has continued to maintain a strong community outreach program and engages with community stakeholders on a weekly basis; and

community leaders, majors, public officials, police and gendarmes, AFAD, local fire and hospital representatives on annual basis during which information about cyanide management and mine operations is provided.

All site visitors are provided a double-sided, brochure presenting basic site safety information and the use of cyanide in mining. Video presentations (Turkish with English subtitles) are also made available that provide a basic overview of the use of cyanide in gold mining and the precautions taken in the production, transportation, storage, and use of cyanide. Newsletters and a company journal are also published periodically that provide another means of communicating information on ICMC certification and other aspects of cyanide management at the site.

TÜMAD maintains a corporate website that contains technical information on the İvrindi Gold Mine. TÜMAD is also a signatory to the United Nations Global Compact and annually prepares a Sustainability Report that contains general information on cyanide management, company commitments to ICMC compliance, and environmental and health and safety performance. All activities are carried out in accordance its ESMS (as described in section 4.1).

Literacy around the local population is extremely high so illiteracy is not considered a significant issue (average rate: over 95% as per four villages). The site has developed a descriptive video of site operations; however, and all visitors to the site are provided verbal briefings in a visual presentation format. Public meetings are supported by verbal presentations as well as audio-visual materials (PowerPoint presentations and televised tool).

Reviews of incident records from 2022 through to 2025 indicate that there have been no reportable "major" cyanide releases on or off the mine site that have resulted in hospitalization, fatality or adverse effects to health or impact to the environment. Cyanide has never been released off site, and no cyanide releases have occurred, on or off site, that have had a significant adverse effect in any discharge limit exceedances.

If a cyanide exposure incident were to occur, communications will be controlled via the EP, Cyanide Management Plan or OHCM to ensure that 1) responsible regulatory agencies and officials are immediately notified; 2) ICMI is notified; and 3) the causes of the incident and associated corrective/preventive action are discussed in subsequent meetings with communities and regulatory authorities. Other TÜMAD management staff may be involved in the coordination of such discussions, as appropriate for the nature and scale of the incident. The responsibilities of the Communication Controller/Spokesperson require that an up-to-date list of local and regional public institutions, organizations and stakeholders is available and that draft press releases for various likely scenarios have been prepared in readiness should a crisis occur.

TÜMAD management indicate that regulatory agencies are not obliged to share information of this type to the general public. However, it should be noted that TÜMAD prepares an annual Sustainability Report in accordance with Global Reporting Initiative guidelines, and information on such incidents would be separately identified for İvrindi in this report and posted on the company website in the next issue of the TÜMAD Sustainability Report in conformance with their "open, effective, honest and transparent communication" approach declared in the TÜMAD Community Relations Policy and hence would be available to the general public, beyond those individuals engaged as part of the community meetings. The regulators and authorities will in turn inform communities of the incident, through direct communication to the local elders, stakeholders, and media. TÜMAD's OHS Handbook for Cyanide Management, also requires the publication of incidents of cyanide exposures causing hospitalization or fatality, releases on or offsite requiring response or remediation, and releases exceeding applicable limits or reporting requirements, or causing significant adverse effects to health or impacts to the environment. Both the ICMI and AFAD would also be notified of such incidents on a timely manner. Reportable spill data is also required to be recorded as an annual key performance indicator in the Environmental Performance Report submitted to EBRD and the other lenders.

İvrindi Gold Mine — Name of Mine

Signature of Lead Auditor

20 March 2026 — Date