SUMMARY AUDIT REPORT

for the June 2024
International Cyanide Management Code Recertification Audit

Prepared for:

TÜMAD Madencilik Sanayi ve Ticaret A.Ş.

Lapseki Gold Mine

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

FINAL REPORT
21 November 2024

Lambert Environmental

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Hereford, Herefordshire, HR1 1AG, United Kingdom

SUMMARY AUDIT REPORT

Name of Mine: Lapseki 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. Çağrı ÖKTEN, Operation Manager

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Location detail and description of operation:

The Lapseki Gold Mine, Türkiye is operated by TÜMAD Madencilik Sanayi ve Ticaret A.Ş. (TÜMAD), one of over 40 companies operating within Nurol Holding a large organization of companies with varied industrial and commercial interests. The mine is located 35 kilometres (km) northeast of the city of Çanakkale and 7 km southeast of the town of Lapseki. The site is situated in hilly topography at an elevation of approximately 280 m above sea level. The climate is generally Mediterranean with hot dry summers and cool rainy winters and an average annual rainfall of about 600 mm per year. The surrounding region is rural, characterized primarily by forest and grazing agricultural land and orchards in the valleys. The access road to the mine site branches from the Bursa-Çanakkale Highway E.90. Electricity is provided from the national grid via a 9.7 km power line from the 154 kilovolt 1272 MCM Koru WPP Transformer Station. Water for the operation is pumped from wells of the Lapseki Municipality through a 10.1 km pipeline.

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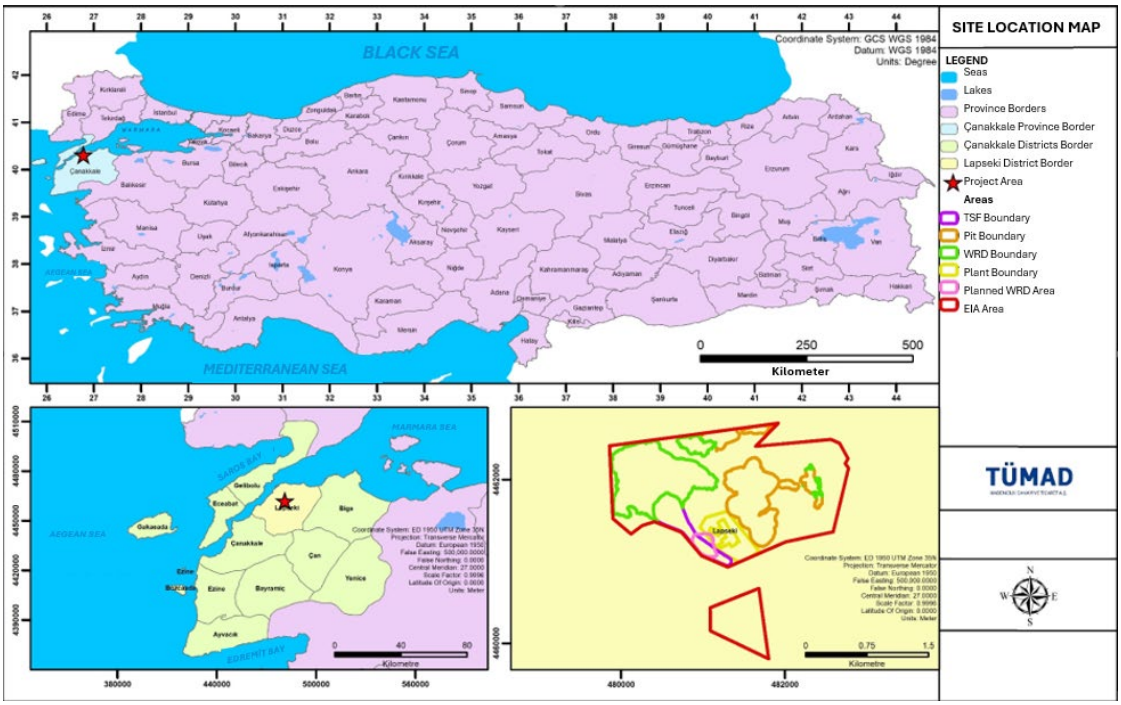
The mine currently employs approximately 800 staff, including contractors, and began operation in December 2017. As of February 2024, the economic life of the mine is 13 years.

Figure 1: Location of Lapseki Gold Mine, Türkiye



The high-grade ore extracted from underground and open-pit mining operations is processed using a conventional tank leach operation. Cyanide is supplied by certified producers as solid briquettes that are delivered to the site by International Cyanide Management Code (ICMC) certified cyanide transporters in 1.0 tonne or 1.1 tonne capacity wooden boxes loaded in sealed ocean shipping containers. On arrival to the mine site the boxes are unloaded from the containers and stored in a dedicated cyanide warehouse. The ore is initially crushed and milled to optimal size and then passes through a leach circuit and carbon-in-pulp (CIP) absoption circuit to extract the precious metal. Tailings are detoxified using the INCO SO_2/Air process with sodium metabisulphite and copper sulphate and then filterpressed prior to being transferred to a dry stack tailing storage facility (DTSF). Gold and silver is recovered from the loaded carbon through stripping, electrowinning and smelting to produce the final dore.

Between 2021 and 2024 additions and modifications were made to Process Plant to increase ore throughput capacity from 750,000 tonnes per year to 1.2 Mtpa (million tonnes per annum), with a peak capacity of 1.38 Mtpa. This Expansion Project was part of the initial operating permit approval and included the following:

- Addition of another water process tank
- Addition of two leach tanks
- Addition of two CIP tanks
- Addition of a third cyanide detoxification tank
- New elution column and heating system
- New barren solution tank
- New carbon regeneration kiln
- Addition of new filter press building and two new filter presses
- Relocation and increase of capacity of the Drainage Pond
- Construction of a new 6 million tonne capacity dry tailings facility
- Relocation of the cyanide preparation facility and capacity increase of the cyanide mixing and holding tanks
- Relocation of the cyanide warehouse and compound, and
- Associated changes to supporting plant, piping, and increase in containment capacities.

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: 24 through 29 June 2024

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.

Lapseki Gold Mine — Name of Mine
Signature of Lead Auditor
21 November 2024 — 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. Over the past three years TÜMAD has primarily purchased boxed solid cyanide through a supply contract with Hebei Chengxin Co. Ltd (Hebei) production plant in China. In 2022, TÜMAD also purchased cyanide from Samsung C & T Corporation (Samsung) who ship cyanide produced at the TaeKwang Industrial Co. Ltd., Ulsan Plant in Korea (TaeKwang). Both the Hebei and TaeKwang production plants have been ICMC certified throughout the past three years.

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:

TÜMAD retains hard and soft copies of all cyanide supply and transportation documentation related to each purchase and shipment. A written supply agreement between Hebei and TÜMAD states that the cyanide will be shipped Delivery at Place (DAP) to the Lapseki Mine

site. Hebei therefore has designated responsibility for the cyanide transport until delivered at the mine site. The Purchase Order with Samsung states the cyanide is shipped Delivered Duty Paid (DDP) whereby the seller assumes total responsibility for the shipment to the mine site. In fulfilling their supply agreements, Hebei and Samsung use TO-PET A.Ş. (TO-PET), an ICMC certified transport company, for road transportation within Turkey and Hidra Teknik Paz. San. Tic. Ltd. Şti. (Hidra) is retained by TO-PET for providing emergency response services including equipment during cyanide transport.

The transporters, ports, and interim storage facilities identified in the supply and shipping records are all included within the following certified supply chains and documented in the following reports posted on the International Cyanide Management Institute (ICMI) website:

- Samsung C&T Corporation Turkey Supply Chain, 3Points Co. Ltd, Summary Audit Report, dated 4 February 2021.
- Hebel Chengxin Transport Co., Ltd. Globel Ocean Supply Chain, MSS Code Certification Service, 11 October 2023.
- Hebel Chengxin Transport Co., Ltd. Turkey Supply Chain, 4 August 2022, Golder Associates Consulting Ltd.

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:

Between 2021 and 2024 TÜMAD made several modifications to the Process Plant as part of the Expansion Project. These modifications included relocation of the cyanide warehouse and preparation facility and capacity changes to the mix and holding tanks. The changes were executed under the project and contract management, construction supervision and commissioning consultancy supervision of the TÜMAD Engineering, Procurement and Site Team. ProMer Consultancy Engineering Inc. (Promer) in collaboration with BBA Engineering (BBA) completed the detailed engineering design. A quality control/quality assurance program was used throughout construction and all engineering works were approved and signed off by the TÜMAD project management team.

The new cyanide warehouse yard and floor where container unloading operations occur and cyanide boxes are stored, are constructed of reinforced concrete pavement. The yard has a perimeter concrete containment berm and trench drain to capture potential spills or contaminated rainwater from being released to the environment. The mixing and holding tanks are located within a dedicated cyanide preparation containment basin within the warehouse compound. This containment has a capacity to retain over 129% of the largest tank (cyanide holding tank) plus the 500-year 24-hour design storm.

The cyanide warehouse and preparation facility compound is located a considerable distance from settlements, residencies and away from any surface water features. It is also located well within the security perimeter of the site and over 110 m from the administrative buildings and maintenance workshops. The compound is enclosed within a gated security fence and entrance is permitted only by approved personnel. Cyanide is only delivered in solid briquette form. All cyanide delivery, offloading and handling of cyanide boxes during unloading and cyanide mix activities is undertaken on the concrete pavement and any spillage would be captured by the trench drain and pumped to the preparation facility containment. The preparation area sump is equipped with an automatic pump that directs water or solution back to the mix tank.

The mixing and holding tanks are fitted with high-level sensers that alarm in the control room. Procedure requires that operators check the levels of the mixing and holding tanks prior to a mix. The operators are also in constant contact via radio with the control room throughout the mix. The high-level alarms are maintained within the preventative maintenance program and are routinely checked and tested on a three-month schedule.

The cyanide mixing and storage tanks are located within a dedicated concrete containment basin. Joints in the concrete are sealed with an elastic sealing compound. The containment is epoxy coated and appeared to be in excellent condition with no cracks, flaking or other evidence of corrosion or deterioration observed. Each tank sits on a thick reinforced concrete ring beam plinth founded on a reinforced concrete base. The interior of the ring beam is infilled with lean concrete, and this is capped with asphalt to form a flexible surface to prevent point stresses on the steel tank base and provide an impermeable foundation to prevent possible seepage to the subsurface.

The warehouse is fully enclosed with a roof and walls and fitted with ventilation fans to prevent the build-up of hydrogen cyanide (HCN) gas. The exterior openings for the ventilation fans have grills protected with porches to prevent water entering the building. The cyanide mixing and holding tanks are located outdoors and therefore have adequate ventilation to prevent the build-up of HCN gas. The warehouse and cyanide preparation facility are monitored with fixed HCN sensors that report to the control room and are equipped with exterior audible visual alarms. The warehouse and compound are securely locked and monitored with security cameras. Access is restricted to approved personnel or those accompanied by an authorized person. The compound is dedicated for 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 within the compound.

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:

Procedures to prevent empty cyanide containers from being used have not changed since the initial certification audit. After completion of a mix the empty boxes are flattened and the empty bags, plastic liners and used coveralls are placed in a plastic waste drum. The boxes and drummed waste are labelled per regulatory requirements and temporarily stored in a designated area of the cyanide warehouse pending transfer to the hazardous waste storage warehouse. TÜMAD has a contract with a licenced transport and incineration company in Ankara where the cyanide waste is taken and incinerated. As observed in the 2021 certification audit, TÜMAD continues to fold and roll the empty dry bag without rinsing and placing it into a dedicated waste plastic drum on the upper deck of the plant immediately after adding the briquettes in the mixing tank. TÜMAD prefers not to rinse the bags to prevent the potential generating HCN gas.

TÜMAD has several operating procedures in place that provide instructions to prevent exposures and releases during cyanide unloading and mixing activities. These procedures have changed little since the 2021 ICMC certification audit. The cyanide preparation instructions include visual inspection of the cyanide preparation area for damaged or leaking equipment, checking tank levels prior to a mix and during transfer of cyanide from the mix tank to holding tank, and manual operation of valves for the suction and discharge lines for cyanide transfer. In addition, the cyanide preparation plant is included within a formal preventative inspection and maintenance program. Cyanide delivery instructions address the safe lifting of the shipping container from the delivery truck onto the concrete pavement, use of the forklift, and maximum stacking of warehoused boxes. The cyanide preparation instructions address a requirement for two operators, checking tank levels, operation of valves, addition of coloured dye, and washdown and clean-up after a mix. All procedures specify the required personal protective equipment (PPE). There are also procedures that provide instruction the safety measures for clean-up of solid and liquid cyanide spills.

***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 a fully functioning integrated environmental social management system (ESMS) for the planning and management of occupational health and safety, environmental and social risks associated with the operation. The system has been in place since the implementation of the mining operation and incorporates the requirements of International Standards Organization, Social Accountability International, European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC) Standards. TÜMAD holds Certificates of Registration for International Standards Organization (ISO) 9001:2015, ISO 14001:2015, and ISO 45001:2018 valid until 28 January 2025, Certification to ISO 50001:2018 until 24 November 2026, Certification to ISO 27001:2022 until 2 March 2025, and Certification to Social Accountability Management System (SA) 8000 until 16 May 2026. TÜMAD is also in the final process of implementing and certifying to ISO 39001:2012, Road Traffic Safety Management System.

Within the ESMS, TÜMAD has implemented operating plans, procedures and instructions to guide implementation and efficient operation, and to identify and mitigate risk to safely manage the operation. Except for updates to incorporate plant changes resulting from the Expansion Project this documentation has not significantly changed since the 2021 ICMC certification audit.

The 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 as a zero-discharge operation and operates within European Union (EU) regulatory requirements that limit discharge to the tailings storage facility to 10 mg/L Weak Acid Dissociable (WAD) cyanide (CN). Tailings are filter pressed and stored in a dry stack tailings storage facility (DTSF). The existing (DTSF-1) and recently constructed (DTSF-2) are lined to prevent downward seepage of potentially cyanide containing water to the environment. Diversion channels divert non-contact precipitation and seepage away from the DTSF. Precipitation falling within the DTSF footprint is collected by a perforated pipeline drainage and tank collection systems constructed above the impermeable liner at the base of the DTSF and pumped, via a pump station, either directly to the process water tank for use in the plant or to a lined Drainage Pond, recently reconstructed on the east area of DTSF-1. The drainage pond

is designed to retain a 500-year 24-hour storm event. A minimum freeboard of 1.6 m is maintained in the Drainage Pond to provide capacity to accommodate precipitation from a design storm and prevent overtopping and potential discharge to the environment.

Operations personnel conduct documented inspections each shift (3 times a day) using detailed checklist forms that address key aspects of process operations including inspection of pumps, tanks and lines for leakage; cracks in containments, presence of salt residue, presence/condition of fire extinguishers, proper functioning of equipment, and operation of fans, presence/condition of PPE and emergency supplies, deformation of cyanide boxes in the warehouse, presence/legibility of signage, condition of pond and DTSF membranes, and condition of water diversion channels. HCN gas levels in the Adsorption, Desorption and Recovery (ADR) and Process Plant are checked every 4-hours, and shower and eyewash stations are checked weekly. The inspection frequency is considered sufficient to ensure and document that the facilities are functioning within design parameters.

TÜMAD has implemented an Excel based water balance for managing the water resources at the mine. The model considers all water sources, tailings discharge moisture and application rates, precipitation, evaporation, seepage rates, and process water return rates. The operation has a net negative water balance and therefore needs to minimize water use and extraction from nearby aquifers by maximizing the recycling and re-use of water.

TÜMAD has a robust (System Applications and Products in Data Processing) SAP software-based preventive maintenance (PM) system in place that encompasses critical machinery, tanks, pumps, valves, sensors, and other equipment involved in the management of cyanide.

TÜMAD has a documented Management of Change Procedure to evaluate the health, safety, environmental, and operational risks created by permanent, temporary or emergency changes in the facility, process, human resources, or management systems and specifies the methods and responsibilities for recording and tracking the changes in order to mitigate these risks. In the last three years the procedure has been revised twice; in 2022 to incorporate a human resource change, and in 2023 to incorporate requirements of ISO 50001 - Energy Management System. Since the 2021 ICMC certification audit, the procedure has been used 13 times on cyanide related changes to operations/facilities or management practices.

The 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 upsets in normal operating conditions occur. A spill clean-up plan provides response actions to be taken in the event of a cyanide spill.

With addition of DTSF-2 and imminent closure of DTSF-1, the DTSF operation is basically unchanged from the initial ICMC audit with dry tailings being trucked, placed, and compacted in the DTSF, and except for periodic local seasonal ponding of precipitation the facility remains dry. The DTSF is managed to ensure sufficient ponding capacity remains in place within the facility to prevent overtopping during a design storm event. In the event of ponding,

procedures are in place to pump any accumulated water directly to the Process Plant or Drainage Pond. A conceptual closure plan is in place that includes measures to be taken if an unexpected closure of the mine occurs including temporary closure/shutdown and unexpected permanent closure prior to planned end of mine life.

Facility inspections are conducted at an established frequency to identify potential issues before they become severe. Operators conduct documented inspections each shift. These include inspection of tanks, pipelines, pumps and valves for leakage or deterioration, lock-out of drain valves, presence of salt deposits, and integrity, presence of fluids, and available capacity of containments. These inspections are supplemented by weekly shower and eyewash station inspections, Occupational Health and Safety (OHS) Department area inspections and monthly Environmental and Sustainability (E&S) Department area inspections, as well as preventative maintenance inspection programs that include quarterly maintenance of pumps and annual inspections of tanks and containments, and non-destructive testing to monitor tank wall thicknesses. There are no ponds that contain cyanide solution so leak detection systems were not required as part of the pond design. However, a leak detection system is in place for the high-density polyethylene (HDPE) pipe-in-pipe cyanide reagent lines.

Operators use checklist forms to document area shift inspections. For each item on the checklist the operator marks if it is satisfactory or unsatisfactory, and if unsatisfactory, describes the deficiency in the "comments" column. If the deficiency cannot be corrected immediately by the operator a Work Order (WO) request is generated, and the request number is recorded on the form and tracked to completion. The date and shift on which inspection was undertaken and the name of the inspector and shift supervisor are recorded on the form. Hard copy records of the inspection forms are maintained in binders and electronic copies are also retained.

The OHS and E&S Department weekly inspections are similarly documented and maintained in inspection reports. Inspection reports include area/items inspected, date of the inspection, and inspectors and supervisors name and signature. Deficiencies are detailed with photographs and corrective actions are assigned and tracked to completion using an "action management" data entry system which allows ongoing tracking of actions to completion.

TÜMAD continues to plan and track maintenance using SAP software for preventative maintenance (PM) and corrective maintenance of critical cyanide equipment including major machinery, tanks, pumps, valves, sensors, and other equipment involved in the management of cyanide. The system generates PM actions based on a predetermined maintenance schedule, or upon generation of work orders in daily response to specific inspection observations or observed operational needs. The maintenance department currently has 17 electricians and 38 mechanics on staff. Contractors may be retained for non-routine or specialist work. Maintenance is planned every 14 days by electrical and mechanical planners. Maintenance requiring plant shutdown is scheduled approximately every 6 months based on replacement needs for the mill liners.

The Lapseki operation is powered by the national grid via a local substation but also has 16 diesel generator sets dedicated to the backup operation of major equipment or key infrastructure associated with the operation. Two of these generators were purchased since the 2021 ICMC certification audit, one to service the mine and the other for the CIP expansion. These generators are included in a 15-day schedule for routine inspection and maintenance and a 250-hour or annual schedule for general maintenance. Although standby power is critical for continued operation of the plant, temporary loss of power is not critical for operating pumps to prevent unintentional release of cyanide.

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:

Bottle roll tests are undertaken periodically as ore characteristics change to determine if the target cyanide concentration needs to be modified to maintain optimum gold/silver recovery. Cyanide concentrations in the leach circuit are closely monitored using a manual silver nitrate titration analysis on samples collected every 2-hours by process operators. The results are entered onto the process log sheet. The cyanide addition rate to the leach circuit is adjusted manually to maintain the cyanide concentration within an average optimal target of 120 mg/L, resulting in a residual concentration of about 100 mg/L in the last tank. Minimizing the concentration of cyanide in the final tanks reduces the quantity of reagents required to detoxify the tailings to meet tailings discharge requirements.

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:

TÜMAD continues to use a site wide Excel based water balance for managing the water resources for the mine and prevent unintentional releases. The model is comprehensive as it considers all water sources, tailings discharge moisture and application rates, precipitation, evaporation, seepage rates, and process water return rates. The model is probabilistic as it allows consideration of the 500-year (yr) 24-hour (hr) design storm event. The operation has a net negative water balance and needs to pump water from nearby wells to make up the shortfall. The destruction of cyanide prior to tailings being transferred to the DTSF is carefully

monitored. The results of weekly analysis of filtration plant discharge (representative of the moisture remaining in the tailings) show WAD CN concentrations less than 0.5 mg/l indicating that under the established cyanide destruction plant operation, the DTSF and Drainage Pond do not classify as a cyanide facility.

The water balance considers the rate of solids being deposited in the DTSF to calculate the volume of water being delivered to the DTSF. A 500 yr 24-hr period (185.6mm) design storm event was used in the design of the new Drainage Pond to provide a sufficient degree of probability that overtopping of the Drainage Pond can be prevented. Meteorological data (precipitation, evaporation and temperature) is updated monthly in the water balance using data collected daily by the E&S Department from the on-site meteorological station.

Precipitation entering the DTSF is limited to the area of the facility. Diversion channels take surface run-off from the surrounding catchment area away from the DTSF and discharge into the Kovanlik Stream downgradient of the facility. Infiltration of precipitation in the surrounding catchment area is collected as groundwater seepage beneath the DTSF and pumped to the Drainage Pond.

Freezing/thawing effects are not considered in the water balance since snowfall does not extend more than 30 days in the vicinity of the mine. Solution loss other than evaporation is limited to transfer of water collected via underdrain and over drain systems to the Process Plant, either directly or via the Drainage Pond for later use. There is no loss of water through seepage as the DTSF is constructed with an impermeable membrane placed over compacted clay to prevent seepage losses from the facility.

In the event of a design storm there will be sufficient capacity in DTSF-1 and DTSF-2 to retain the volume of precipitation generated. The Drainage Pond is operated with a minimum freeboard on 1.6 m to ensure sufficient capacity is available to accommodate the precipitation in DTSF-1 as well as ongoing seepage from the DTSF over a 24-hr period during a power loss. DTSF-2 is also operated to maintain sufficient drainage collection capacity to retain the design storm event. The requirement for backup power during a design storm is therefore not critical.

Process operators conduct daily inspections of the tailings facility to monitor the status of the water lines and pumps, record the volumes of flow in the lines, check that the diversion channels are open and free of debris, and record the water volume in the Drainage Pond.

Meteorological data collected from a meteorological station located near to the Process Plant is used to review and update the water balance each month if needed. The 500-yr 24-hr design storm was based on return period predictions calculated by the General Directorate of Meteorology with data collected at the Çanakkale meteorology station. The General Directorate re-evaluates this information annually and the updated predictions are provided to TÜMAD.

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:

The operation does not have any open waters that contain cyanide in excess of 50 mg/L WAD CN. The results of daily monitoring show that WAD CN concentrations in the Drainage Pond are less than 0.06 mg/l WAD CN. Nevertheless, as a condition of the operating permit the pond is fenced to prevent access to wildlife and has suspended wires with bunting flags that stretch across the pond, and a bird sound scarer, to discourage birds contacting the water.

TÜMAD has various sampling programs in place that demonstrate that cyanide concentrations in open water in the DTSF are maintained below the Cyanide Code criteria for defining a cyanide facility. These include daily sampling and analysis of the tailings discharge from the detoxification plant, drainage water in the DTSF, and surface water in the Drainage Pond. Review of records covering the last three years show that the average WAD CN in the tailing discharge was 0.31 mg/l. Analysis records for water samples collected from the upper drainage of the DTSF and from the Drainage Pond show that WAD CN is maintained below 0.06 mg/L.

Because of these low WAD CN concentrations, the potential impact to wildlife from cyanide was not considered an issue and therefore a cyanide specific documented wildlife mortality inspection program was not implemented. Nevertheless, TÜMAD has a wildlife monitoring program in which wildlife sightings or mortalities found on the mine property are reported, with photographs, if possible, to the Environmental Department. Records covering the past three years show that a variety of mammals, birds and reptiles live/visit the area. No mortalities have been reported.

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:

There are no direct discharges to surface water. The Lapseki Gold Mine operation is designed and operated as a closed circuit with zero discharge to surface water. Nevertheless, the

operation monitors cyanide in the Kovanlik Stream that flows northward from the mine site. Surface water samples are collected quarterly at the location of a weir structure just downgradient of the DTSF, and seasonally at two other locations approximately 400 m and 800 m, respectively, further downstream where the Kovanlik Stream is ephemeral. The results of samples analysis covering the past 3 yrs show Total CN, WAD CN and free CN have been consistently below the detection limit of 0.005 mg/l for the method of analysis.

The DTSF-1 and DTSF-2 and the Drainage Pond are underlain with an impermeable HDPE liner installed over a low permeable engineered clay layer that provides a barrier to downward seepage. Seepage water in the tailings has Total CN and WAD CN concentrations less than 0.06 mg/L. This seepage is captured by the over-drain system for the DTSF and pumped either directly to the Process Plant or to the Drainage Pond from where it is pumped as needed to the Process Plant for use as process water. The cyanide offloading area, warehouse, and process facilities are all located within concrete containment, and operating procedures and preventative maintenance programs are in place to minimize the potential for releases and indirect discharge to the environment.

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:

As presented in 4.5, the operation is designed as a zero-discharge facility and was constructed with containment structures to prevent contact water seeping into the ground and impacting groundwater beneath and/or immediately down gradient of the operation.

Inland water resources in Turkey are regulated through the 2004 *Water Pollution Control Regulation* and *2005 Regulation on Water for Human Consumption.* Water immediately beneath and downgradient of the cyanide facilities has beneficial use for irrigation and livestock watering and is sourced by nearby communities from springs and ephemeral streams. Groundwater quality in the area is not suitable for drinking water due to naturally occurring elevated arsenic levels and the potable water is supplied to the mine and communities from Lapseki Municipality groundwater wells located approximately 10 km from the mine site and conveyed via pipelines to the mine site and villages.

TÜMAD continues to follow a Water Resources Management Plan (WRMP) established at project startup to manage and monitor water resource quality and protect the environment. The water quality standards established for the project are 0.01 mg/l for Total CN, WAD CN and free CN. These are stricter than the strictest (Class I) Turkish regulatory standard of 0.05

mg/L for Total CN, as well as the EBRD project IFC standards of 1 mg/L for Total CN, 0.5 mg/L for WAD CN and 0.1 mg/L for free CN.

The WRMP includes monthly groundwater elevation and quarterly sampling of eighteen groundwater wells located within the licensed area. Seven of these wells located down gradient of the DTSF had to be moved in the last three years due to the Expansion Project. These wells were relocated further down groundwater gradient within 1 km of the Process Plant and expended footprint of the DTSF. Review of quarterly groundwater monitoring data covering the three years show that Total CN, WAD CN and Free CN in all eighteen groundwater wells are less than the detection limit of 0.005 mg/L for the method of analysis.

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:

All cyanide mixing, storage, and process tanks are located within concrete containment basins. The basins for the process tanks in the leach, CIP, and detox areas are interconnected. The cyanide mix and holding tanks were located within a dedicated containment within the warehouse and unloading compound that was concrete paved and surrounded by a concrete containment berm. Since 2021, as part of the expansion project, the warehouse/mix facility compound was relocated, and the leach tank containment was expanded to accommodate two new leach tanks.

Two additional CIP tanks and a third detoxification tank were constructed within the existing CIP and detox containment basins. The detox, CIP and leach tank containment basins remain interconnected and the expanded area of leach tank containment has been connected to the original leach tank containment. The integrated containment now provides a total available capacity over 117% the volume of the largest tank plus precipitation from a design storm event.

As with the previous cyanide warehouse, the new facility's warehouse yard and floor where container unloading operations occur and cyanide boxes are stored, are constructed of reinforced concrete pavement. The yard has a perimeter berm and collection trench to prevent potential spills from being released to the environment. The mix and holding tanks are located within a dedicated cyanide preparation containment basin within the warehouse compound. The containment of the new mix plant has a capacity to retain over 129% of the largest tank plus precipitation from a design storm event.

The ADR building thick reinforced concrete slab floor with perimeter berm slopes to one of two floor sumps fitted with automatic pumps. The total containment capacity of the ADR excluding the dedicated bermed acid area has a capacity of 540% of the largest tank within the ADR.

The tank containment basins have sumps fitted with automatic pumps to return spillage back to the process. The containments were observed to be clear of solution, sludge or debris that would compromise containment capacity, and the walls and floors appeared in good condition with no evidence of cracking. Review of engineering drawings confirm that all cyanide preparation and leach tanks are constructed on reinforced concrete ring beams founded on a reinforced concrete slab foundation that provides competent secondary containment. The reinforced concrete ring beam for each tank is infilled with lean concrete and capped asphalt to provide an impermeable flexible base over the concrete to prevent point stresses on the steel base of the tank.

At the time of the recertification audit site visit the interconnection between the original leach tank containment and new extension of the leach tank containment was observed to be limited to an approximately 200 mm diameter hole through the adjoining containment wall. In the event of a large tank failure this may restrict flow between the two containments as intended in the containment design and result in overflow from the containment. Subsequent to the site visit TÜMAD enlarged the interconnecting drain to permit unobstructed flow between the two containments to reduce the probability of overtopping and spillage outside the containment in the event of a major failure.

All cyanide process pipelines are located within concrete containment, with the exception of a reagent line running between the holding tank and the ADR building and a cyanide line running between the CIP tanks containment and the ADR building. These lines cross an access lane via a pipeline bridge. In the event of a leak, the lines are located within a metal containment tray that drains to the ADR building containment. The reagent lines are constructed of pipe-in-pipe HDPE and located within a containment tray the runs the length of the lines. In the event of a line leak cyanide would flow back within the HDPE outer pipeline to a collection tank located within the cyanide preparation containment. The collection tank is fitted with a sensor to detect liquid in the tank.

No surface water bodies are located near cyanide facilities. The only pipelines outside of containment carry water pumped from the DTSF and drainage pond to the process water tank. The concentration of cyanide in the process water is less than 0.5 mg/L WAD CN and therefore these lines are not considered cyanide facilities.

All cyanide mixing, storage, and solution tanks are constructed from carbon steel. Cyanide solution pipelines and piping system components are constructed of HDPE, carbon steel or stainless steel; materials compatible with cyanide and high pH conditions. The DTSF and drainage pond are lined with welded 2 mm HDPE geomembrane construction.

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 2021 detailed audit findings report the Lapseki Gold Mine Project the TÜMAD Engineering, Procurement and Site Team supervised the construction, assigning ProMer Consultancy Engineering Inc. in collaboration with BBA Engineering (BBA) to undertake the detailed engineering design, project and contract management, construction supervision and commissioning consultancy. Detailed design and project and construction management of the DTSF-1 tailings facility was undertaken by Mitto Consultancy Inc. with HES Su Yapilari Denetim Hizmetleri Ltd. Şti. (HES) conducting building inspection and approval.

Throughout the construction quality assurance/quality control (QA/QC) programs were conducted. The project followed a *Commissioning Plan* that set out responsibilities of all parties; the construction, commissioning, and start-up process; and the handover deliverables including engineering drawings and QA/QC records, and requirements for final project completion and sign-off.

Construction work conducted in the three years since the 2021 ICMC certification audit associated with the "Expansion Project" was managed in a similar fashion. As with the previous plant construction ProMer (with input from BBA) were responsible for the detailed engineering design for the project. Contract management, construction supervision and commissioning were undertaken by TÜMAD. DAMA Mühendislik Proje ve Madencilik A.Ş (DAMA) performed procurement and construction management for the ADR modification and FRC Construction were the general contractors for the leach, CIP, filter press, proces water tank, thickner, warehouse and mix plant fabrication. The project followed a *Commissioning Plan* implemented by the TÜMAD project team.

The design of the DTSF-2 and Drainage Pond was undertaken by INR Consulting and Engineering Inc. (INR) with HES conducting building inspection and approval. Contractors were retained for various aspects of the construction. Final project completion reports, and approval were provided by HES on behalf of the Ministry of Environment, Urbanization and Climate Change (MEU&CC).

As with the initial construction, QA/QC verification was undertaken during construction works for the Expansion Project to ensure work was carried out in accordance with engineering specifications, drawings, manufacturer instructions and applicable codes and regulations.

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Inspection of selected records for cyanide facilities showed these verifications included construction observations and field inspection reports; steel quality specifications and tests, weld inspections and tests, paint certificates, and hydrostatic leak tests of pipelines; soil compaction tests of engineered earthworks; and geomembrane quality tests, field weld tests, and leak integrity tests of the tailings storage facility containment liner and drainage pond. Construction specifications, engineering drawings and QA/QC records, including test reports and construction inspections and equipment and component installation verification, are compiled in binders which are retained on file. Electronic copies of records and as-built engineering drawings are also retained at TÜMAD's Ankara office and on the site server.

All engineering design, as-built drawings and construction work completed since the 2021 ICMC certification audit were approved by experienced representatives of engineering companies. The construction for the DTSF expansion and modification and construction of the Drainage Pond was inspected and approved by senior representatives of HES. Final project acceptance and sign-off of construction and commissioning of the Process Plant expansion was by senior project managers TÜMAD.

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:

Has the operation developed written standard procedures for monitoring activities

Since the 2021 ICMC certification audit, TÜMAD continues to use a Water Resources Management Plan to control and manage the water consumption; maintain quality of water to ensure efficient, safe, and sustainable use; protect water resources and ecosystems, and comply with regulatory requirements, international standards and guidelines, and conditions of the operating approval. The Plan is supported by sampling instructions for surface water and groundwater wells. TÜMAD also continues to monitor wildlife through of the Biodiversity Management Plan for management of ecosystems and mitigation of wildlife impact from the operation. The Plan includes monitoring wildlife activity and recording and investigating all hazards, noncompliance and incidents, including wildlife mortalities.

TÜMAD continues to use an accredited and Turkish certified analytical laboratory for all environmental sample collection and analysis. The Water Resources Management Plan was originally prepared by TÜMAD senior environmental managers and this and associated environmental procedures and instructions are reviewed at least annually by the Environmental Chief and/ Environmental Assistant Manager. Both are experienced

environmental engineers, with environmental engineering degrees, and each have over 10 years of mine related environmental monitoring and reporting experience. TÜMAD also retains a senior hydrogeologist to review and make recommendations on proposed changes to the monitoring program.

In the past three years, environmental sampling and analysis has been conducted by trained personnel from an accredited laboratory. Sampling is also conducted with oversight of a MEU&CC "*Water and Waste Water Sampling Training*" certified representative of the E&S Department. Sampling programs follow MEU&CC published sampling procedures that have been specifically adapted by the accredited laboratory for TÜMAD. The procedures 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 Field Sampling Form is used to report sampler, date, sample location, field conditions (temperature, weather, etc.) during sampling and any information that may affect the sampling. For groundwater sampling the form includes entry for well purging record (pH, conductivity, and dissolved oxygen). Also recorded is the sample quantity, container size and type, and signatures of both by the field sampler and TÜMAD observer.

The Lapseki Gold Mine operation is designed and operated as a closed circuit with zero discharge to surface water. To minimize the potential for a cyanide release to the environment secondary containments are provided in all areas where cyanide is stored, handled and used, and tailings are detoxified and filter pressed to reduce moisture content prior to place in the HDPE lined DTSF. Records show that Total CN, WAD CN, and free CN have not been detected in surface water or groundwater. The auditors are therefore of the opinion that the quarterly groundwater and surface water monitoring program is reasonable considering the operational record to date. Because the operation does not have open waters where wildlife is at risk of ingesting cyanide solutions, and there have been no actual or suspect cyanide related mortalities, the current wildlife activity and mortality monitoring program is considered adequate for monitoring potential impact to wildlife.

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 has developed a written plan to decommission facility infrastructure including cyanide facilities at the cessation of operations. This plan was supplemented in June 2021 with a cyanide facilities decommissioning plan and cost estimate prepared by ProMer. In September 2023 TÜMAD contracted ProMer to update the cyanide decommissioning cost estimate to reflect the facility changes resulting from the Expansion Project. This updated plan and cost estimate includes pumping any remaining reagent cyanide solution to the cyanide destruction plant and sending the neutralized residue to the DTSF; draining solution remaining in the leach circuit, flushing tanks, piping and equipment, pumping wash solution to the cyanide destruction plant and sending the neutralized residue to the DTSF; and transporting all remaining hazardous wastes to a licenced hazardous waste facility.

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. Although the plan does not include a detailed schematic schedule for decommissioning cyanide facilities, the order of proposed activities is described in text with the cyanide destruction plant remaining in operation to neutralize cyanide reagent and cyanide solutions during decontamination of the Process Plant, prior to final decontamination and decommissioning of the destruction plant. The decommissioning plan will be reviewed and updated if there is a major change in the process.

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 September 2023 updated cost estimate is 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 the application of an overall capital expenditure contingency of 20% to allow for potential unit price changes and additional works during demolition. The plan states the costs will be reviewed when changes are made to the closure plan that effect cyanide-related decommissioning activities and costs or at a minimum every 5 years.

TÜMAD has a Public, Product and Pollution Liability Insurance Policy with Aksigorta Insurance Group, Istanbul, that includes a decommissioning of cyanide facilities clause if an unexpected shutdown were to occur where TÜMAD could not fulfil its obligations for closure. The insurance policy is valid until 31 January 2025 and will be renegotiated annually to ensure the coverage is applicable if there is an increase on the project value or material change on the project.

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 Cyanide Management Plan and Emergency Action Plan (EAP) that describe the steps and procedures implemented at the Lapseki Gold Mine for safe management of cyanide and cyanide related emergencies. The Cyanide Management Plan which is applicable to all employees, contractors, visitors and service providers has remained in place since the 2021 certification audit references Safe Working Procedures and Standard Operating Procedures as well as a OHS Handbook for Cyanide Management (OHCM) that provide step by step requirements for undertaking specific cyanide related tasks including confined space entry Procedures have been maintained as controlled documents since 2021 as is evidenced by the tracked revision updates recorded on procedures together with the date and approved sign-off by the senior management for each revision.

TÜMAD has mandatory workplace requirements for all employees and contractors as per operating procedures. Operating procedures specify the PPE to be worn as well as other equipment required to safely undertake the task. Helmet, steel-composite toed boots, high visibility protective clothing, hearing protection, gloves and safety goggles with side shields are required in all workplace areas at the mine site. There are also requirements detailed in operating procedures to wear additional items of personal protection (Tyvek coveralls, boots, rubber gloves, and full-face respirators with appropriate filters) as well as use of portable HCN meters when undertaking specific tasks or when working in specific areas where there is a risk of exposure to cyanide. PPE requirements are also posted in areas of the plant where specific PPE is required.

Workplace inspections are undertaken at the start of each shift to check operation of shower/eyewash stations, integrity and pipes, valves, tanks and secondary containments for any signs of leakage. Pre-work inspections are conducted prior to cyanide unloading and mixing operations. These inspections include a visual inspection of PPE condition, the proper operation of the forklift and shower/eye wash stations. Pre-work inspections are also required as part of confined space entry, work permit requirements, and Job Safety Analysis (JSA)/Safe Working Procedures that must be completed prior to undertaking any non-routine operation where there is no written procedure.

Employees are encouraged to seek ways to continually improve workplace safety; this ethic was noticeable in the audit with respect to workforce attitudes and general housekeeping practices. In addition to casual discussions among operators, supervisors, and managers, there are several formal approaches for workers to have an opportunity 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 is described in the Cyanide Management Plan. Solid sodium cyanide briquettes are delivered with a mixture of 1.0-2.0 % caustic soda that provides a pH buffer to prevent the generation of HCN gas. There is a pH meter at the mix plant that can also be observed on the control room Supervisory Control and Data Acquisition (SCADA) screen. The pH is adjusted through addition of caustic to ensure that pH is greater than 11 prior to a mix, to prevent the generation of HCN gas. TÜMAD maintains pH in the leach circuit through addition of lime at the start of the grind circuit and use of caustic addition to the leach circuit as needed to maintain pH at approximately 10.5.

TÜMAD has installed stationary HCN detectors in the cyanide mix area, stripping area of the ADR, cyanide storage warehouse, leach circuit, CIP, cyanide detox plant, and filtration plant where there are 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 fitted with both audio and visual alarms.

Operating procedures specify those tasks where portable HCN detectors are required to be used. The OHCM provides actions to be taken in the event of a HCN release. If HCN concentrations exceed 4.7 ppm, workers must exit the work area and proceed to a designated muster area outside the plant. A worker with full face respirator and appropriate filter

cartridge and portable HCN meter then investigates the reason for the alarm. 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. Full-face respirators with ABEK2P3 filters have been placed within the ADR Plant and the Gold Room for use in the event of emergencies.

TÜMAD has identified tasks and assessed the work areas where there is potential for significant exposure to cyanide. Based on the results of the assessment, fixed HCN detectors were installed in the cyanide mix area, leach circuit, CIP, stripping area at the ADR, gold room, detox tanks, filtration plant, and cyanide storage building. HCN gas is also monitored each shift at frontline locations using a portable HCN device to check for potential concerns. In addition, HCN gas is monitored each shift at 20 locations using a portable HCN device to check for potential concerns. The use of portable HCN monitors is also mandatory. Dust filters and Tyvek overalls are also required when handling sealed IBC boxes during delivery or transfer from the cyanide storage warehouse. If HCN concentrations exceed 10 ppm the area is evacuated and re-entry to the area is only permitted by personnel wearing chemical suits and SCBA.

The fixed and portable detectors are calibrated at a frequency as directed by the manufacturers. The fixed detectors are calibrated semi-annually by qualified contractors and records are available for the past three years. A visual check is carried out at each shift by operators. There are a total of 10 portable detectors at the mine site and these are calibrated semi-annually. Calibration certificates providing the date of calibration and actual calibration information are filed and available for each detector and calibrations are tracked on an Excel spreadsheet maintained by the Maintenance Department. Review of the spreadsheet indicated that calibration of all equipment is current.

Cyanide warning signage was observed to be well maintained. Signage is clearly posted at entrances to the ADR, cyanide preparation area, leach tank unit and cyanide storage warehouses. Signage includes cyanide hazard warning signs; prohibitions on open flames, smoking, eating and drinking; signs restricting entrance to authorized persons only; PPE requirements, and colour coding keys for pipelines and tanks. Cyanide hazard warning signs are also posted on fencing around the cyanide facilities. Pipelines and tanks are clearly colour-coded and labelled to identify the cyanide pregnant and barren solutions in lines. Signage is also posted at the Drainage Pond to identify the name and use 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, CIP tanks and cyanide warehouse.

Since the 2021 certification audit TÜMAD has received solid cyanide from two suppliers (Samsung by 2022 and Hebei). Only Hebei includes dye sachets in each cyanide box as per

their contract with TÜMAD. Carmoisine dye is included in the solution of mix tank to encourage the practice of adding dye to reagent cyanide as a means of visual identification of leaks or spills at mine sites or during transportation.

Shower and eye-wash units (total of 28) are located in strategic areas of the Process Plant where there is a potential for exposure to cyanide. These include units on the ground floor of the mix plant, ground floor of the carbon columns, ground floor of the ADR plant, Leach Tanks, cyanide holding tank, cyanide preparation tank, detox tanks and filtration unit. These stations are plumbed into the fresh water supply circuit that is maintained at a pressure of approximately 3.7 bars (~55 pounds per square inch (PSI)).

Fire extinguishers located strategically about the mine site, and of these 107 fire extinguishers are located in cyanide areas. In addition, all the vehicles are equipped with fire extinguishers. There are also 9 fire extinguishers in the laboratory. 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.

The cyanide warehouse is a locked building that is enclosed within a security fenced compound. Cyanide warning signage is posted on the compound security gate and on the entrance doors to the warehouse. Plywood cyanide boxes are stored inside the warehouse with their original packing signage and labelling that include United Nations (UN) identification and safety data sheets (SDS) information. The tanks and piping in the cyanide preparation area and leach tanks are clearly labelled with cyanide warning signs. Solution pipelines are clearly labeled with name and flow direction, and colour-coded to identify their contents. All signage, first aid procedures, SDS and other information materials are in Turkish, the primary language of the workforce. First response information is posted at strategic areas within the ADR Plant. The information includes the actions to be taken in the event of an HCN alarm being triggered. All departments maintain their own SDS in paper form in departmental folders which are accessible by all employees.

TÜMAD has not experienced any cyanide exposure incidents since operations began in 2021. There is an *Accident and Incident Reporting and Investigation Procedure* in place in the event of an incident. This procedure applies to all employees and contractors and provides instruction and guidance to ensure that investigations (including those that involve cyanide) are completed.

Review of incident report records maintained on the Quality Document Management System (QDMS) and previously in hard copy revealed that no cyanide related incidents or near misses have occurred since operations began. Investigation results and corrective actions are communicated to workers through daily meetings or other means. Corrective action tasks are subject to follow-up through the Action Tracking Process and may also lead to new or additional training requirements, or modification of current operating procedures.

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 are located at strategic areas of the site to provide immediate access to workers in the event of contact to cyanide. Eyewash solution and oxygen kits are available in the Plant Site. In total 19 medical oxygen resuscitator kits (2 units retained in storage) are available in the clinic (which is a 5-minute drive from the ADR Plant), in the ambulance, at the Emergency Response Team (ERT) Station and in the ADR building. In addition to clinic staff, all ERT members are trained to administer medical oxygen. At the time of the audit the ERT comprised 34 members and all are trained in the use of medical oxygen, application of first aid, fire emergencies, confined space entry, vehicle rescue, and chemical emergency responses.

TÜMAD has 5 packs 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, the kits are maintained at the medical clinic.

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. Most workers prefer and use cell phones in place of radio. Light vehicles are equipped with hands-free systems for cell phones.

The oxygen units are inspected monthly by the clinic and a tag on each unit is signed by a nurse or Occupational Physician after inspection. First Aid Kits are present at strategic locations within buildings and emergency response vehicles (ambulance, chemical response/ hazardous materials (HAZMAT) vehicle, rescue vehicle and fire truck) are inspected by clinic personnel with observations noted on a control form. Hydroxocobalamin (Cyanokits) and activated carbon are maintained at the clinic. The clinic inspects the kits monthly and is responsible for replacing the kits prior to expiry.

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 Appendix of the Crisis Management Procedure (CMP), the EAP, and detailed protocols are provided in the OHCM. Specific emergency response procedures to cyanide, cyanide solution or HCN gas releases are detailed in the CMP and OHCM. Cyanide emergency scenarios are also described in CMP 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, overflows from tanks containing cyanide solution, cyanide solution leaks and temporary shutdowns or process and equipment failures. The necessary response to cyanide exposure through ingestion, inhalation and absorption through the skin and eyes are defined in OHCM.

The dominant wind direction of the plant site, the scenarios of the cyanide exposures, the emergency response methods of cyanide spillages, cyanide exposures symptoms, first aid and advanced treatments are identified and detailed in the OHCM. The Handbook details the roles and responsibilities and response actions for potential cyanide release situations. Specific emergency response 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 the capacity to respond to most medical emergencies at the site. The site continues to operate a clinic which is staffed with an Occupational Physician, two nurses and five paramedics who provide 24-hour medical support. Cyanokits kits are available at the clinic. The antidote kits are stored in a refrigerator and checked monthly by clinic personnel to ensure they are available and have not expired. The paramedics receive cyanide awareness training and instruction from the Occupational Physician on the application of medical oxygen and intravenous use of Cyanokits. All workers received cyanide awareness training including recognition of the symptoms of cyanide exposure and poisoning and first response actions to follow; however, apart from the ERT and medical personnel, are not expected to apply medical first aid. Security is responsible to ensure the clinic is notified and to initiate the emergency call-out procedures. In the event of an emergency, workers are required to first ensure his/her own safety and to notify others in the vicinity of the situation, thereafter, to report the emergency to security or the area supervisor who will take the role of a Local Emergency Officer. In addition to 34 Emergency Response Team members there are currently 95 trained first aiders and 81 trained first aiders from subcontractors.

The mine has emergency response vehicles including an ambulance, fire truck, HAZMAT and rescue vehicles which can provide rapid response to emergencies and are located a few minutes journey from the ADR Plant. The clinic is subject to annual inspections by the Health Ministry. TÜMAD has the in-house capability at the clinic to treat cyanide exposure cases, and transport to a hospital. Since 2021, technical communications have been made to the nearest hospitals by the Company Occupational Physician, to gather information on the Lapseki 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:

The EAP, CMP and OHCM that identify the emergency management organization, emergency reporting structure, emergency response protocols, roles and responsibilities, evacuation procedures and emergency communication details, contact information of external support, TAK (ERT Team) equipment and drills scenario, cyanide exposures and symptoms, first aid rules, using of cyanide emergency medical kit and further treatment, and emergency response methods for cyanide spills.

Specific procedures that describe the standard actions to follow in the event of an unplanned release of cyanide or cyanide related emergency are presented in the EAP, CMP and OHCM. Cyanide related emergencies are also addressed in the CMP. The EAP and OHCM are regularly updated and representative of the current operational situation at the site.

TÜMAD has identified and periodically evaluates possible emergency response scenarios and in the EAP provides detailed protocols for responding to scenarios of cyanide emergencies. 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.

In the past three years TÜMAD has purchased cyanide from two suppliers (Hebei since 2021 and Samsung, ended in April 2022) under contracts in which the supplier is responsible for cyanide transport including route planning and emergency response between their respective production plants and the mine site. These supply companies use TO-PET for road transport from İzmir Port to the Lapseki Mine Site. TO-PET has contracted emergency response company Hidra to accompany each transport convoy to respond to the emergencies. A Specific Emergency Action Plan has been developed by Hidra for responding to potential transportation emergencies between İzmir Port and Lapseki Gold Mine Site.

TÜMAD has developed safe work procedures for transportation and off-loading of shipping containers at the above-mentioned locations. Trucks that carry the cyanide containers are accepted by the Security Officers and directed to the "Heavy Vehicle Control" parking area after reaching the mine site entrance. By initiating the field acceptance process, the drivers that take part in the transportation process are required by the Security Officer to complete the visitor induction training and exam. The OHS Department takes responsibility for onsite transportation once the Maintenance Planning Department has performed the heavy vehicle controls inspection. Information is received from the Process Plant Department that the preparations for the cyanide unloading process have been completed.

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The TÜMAD EAP classifies emergencies into five levels (level five being the most serious) based on the level of response required, and each level has different response and notification requirements. In all cases the 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 EAP and OHCM.

The OHCM includes protocols that present specific response actions to be followed for various types of cyanide emergency. The EAP 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.

TÜMAD has a site clinic with a doctor, two nurses, and five health staff (including paramedics during the day and paramedics on the night shifts) trained in application of cyanide antidote. Cyanokits are maintained at the clinic and checked monthly by clinic personnel to ensure they are available and have not expired. Medical oxygen sets are available in the clinic, ambulance, ET station and designated locations around the process plant. The ERT are trained on how to apply oxygen and resuscitator in case of cyanide exposure. The oxygen sets are visually inspected monthly to ensure proper function.

The site continues to operate emergency response vehicles comprising an ambulance, chemical response /HAZMAT vehicle, rescue vehicle and fire truck which are stationed adjacent to the clinic and administration buildings. The ADR and leaching areas have fire-rescue stations, and all necessary fire-rescue materials are available. Locations of first aid stations, assembly points, fire and rescue stations, emergency response vehicles and other facilities are shown on the site layouts for reference by response personnel. 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.

Measures are in place to prevent or mitigate future releases. 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 contain a minimum of 110% of the largest tank within a containment as well as precipitation from a design storm events 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 readily available in the HAZMAT vehicle.

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:

TÜMAD continues to maintain opportunities for the workforce to provide input into emergency response planning, including monthly worker Health and Safety (H&S) committee meetings, semi-annual H&S 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 management of transportation accidents or other emergencies involving cyanide. Semi-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. The EAP contains requirements to develop communication plans and notify external stakeholders in the event of an emergency. Annual meetings are also held with the provincial Governor, Police Chief, University Director, Army and Gendarme commanders and with surrounding local hospitals. In the last three years TÜMAD employment policies have resulted in over 70% of the mine workforce being drawn from local communities many of whom have relatives or friends within those communities.

Formal communications with external stakeholders extend beyond the Lapseki Gold Mine to the other stakeholder interests. Mutual Medical staff operating the onsite clinic input into emergency response planning and provide cyanide first aid training and participate in emergency response and mock drill exercises and follow up debriefings. TÜMAD has the capacity to respond to all probable emergencies that may occur from the mine operation. If additional support or backup is required, medical and emergency response assistance can be requested from the fire departments and hospitals of Lapseki and Çanakkale. A 24-hour ambulance service (4-wheel drive) is available on the site, and additional ambulance and medical personnel can be requested from Lapseki and Çanakkale emergency medical services.

TÜMAD periodically reviews the CMP, EAP and OHCM, and conducts reviews following emergency drills with input obtained from site personnel, workers and internal stakeholders. External stakeholders (Fire Brigade, Gendarmerie and Disaster and "Emergency Management Presidency Government Agency Provincial Directorate" (AFAD)) are also directly consulted to provide input when updating the EAP. Off-site emergencies associated with transportation are the responsibility of subcontractors. Consultation with communities, government agencies, hospitals, emergency services and other external stakeholders provides opportunity to provide indirect input into the EAP, CMP, OHCM and site procedures.

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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:

The cyanide-related elements of the emergency response are detailed in the EAP and the CMP and remain essentially unchanged as observed in the 2021 ICMC certification audit. Roles and responsibilities of employees and emergency response personnel are defined in the EAP and OHCM. The local incidents and emergency teams are designated in the EAP with roles and responsibilities for initial response in a cyanide related emergency. Their alternates are also defined in the EAP. 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.

TÜMAD has a 24-hr security service, and security manage the call out procedures for relevant coordinators and ERT members. An up-to-date list of emergency contacts and telephone numbers is maintained by security at the main security office. TÜMAD has extensive emergency response equipment and personal gear on site to respond to cyanide related emergencies. Emergency response equipment is inspected monthly. The EAP and OHCM provide contact information for outside responders, medical facilities and communities to be notified in emergencies.

Meetings held with stakeholders such as hospitals, fire departments, government and civil service representatives, Gendarme and Army representatives and communities through semi-annually community meetings, provide awareness of potential emergency situations where outside emergency response assistance may be requested.

In accordance with Turkish regulations, TÜMAD is currently undertaking a site assessment aligned with the European Union (EU) Seveso Directive for control of major accident hazards. An outcome of this assessment was the revision of the EAP which was shared with AFAD to 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 EAP and OHCM details the types of cyanide incidents that are required to be reported to the government agencies and designates responsibilities and details the communication chain to coordinate and communicate with regulatory agencies, outside responders, and hospitals. The CMP defines which communities the Crisis Management Group will notify in case of the event of a cyanide emergency. Depending on the nature of the emergency, community and media relations guidelines in the EAP and OHCM provide detailed information on media statement preparation, next of kin notification, and spokesperson/news briefing procedures. The CMP provides detailed information on media statement preparation, next of kin notification, and spokesperson/news briefing procedure. TÜMAD has procedures for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such significant cyanide incidents have occurred or been reported to ICMI since certification audit in 2021.

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:

Emergency Response Protocols in the OHCM and Cyanide Management Plan address recovery and of cyanide solution and solid cyanide spills. Ferrous sulphate and sodium hypochlorite are two neutralizing agents available for spill response but are prohibited for use where there is a potential for reaching surface water. Sodium Hypochlorite may also be used 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. Spill response procedures are in place for investigation and remediation of solid and liquid cyanide spills. These procedures include collection and analysis of soil samples from the area of impact, decontamination, and/or excavation and disposal of contaminated media to remediate the impacted area to regulatory standards. The CMP 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

program to monitor water quality in cases where cyanide solution enters surface water. The program defines the sampling locations, sampling frequency, sampling quantity and reference values. In the unlikely event that an alternate drinking water supply is needed for local communities, TÜMAD will purchase and provide adequate drinking water supplies from Lapseki or Çanakkale.

Sodium hypochlorite, hydrogen peroxide, and lime are chemicals referred to in the EAP to neutralize spills. But as a supplementary part of EAP and OHCM clearly state that use of sodium hypochlorite and ferrous sulphate for cyanide neutralization is strictly prohibited where it may reach a natural surface water body due to toxic nature of those chemicals to aquatic life.

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 a requirement in TÜMAD's accredited integrated management system, 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.

The Emergency Control Group (ECG) requires that simulation exercises are undertaken annually to test the understanding of the ECG roles and responsibilities and adequacy of the response plans. The simulation exercise scenarios are identified in the EAP which states that a least two mock drills are to be conducted annually. Mock drills are undertaken that include both worker exposures and environmental releases. In the past three years (2021-2024) TÜMAD has undertaken five mock drills involving cyanide. All drills were undertaken with internal and external participation of the Gendarme, Provincial Directorate of Health, AFAD and Hidra. The ERT conducts monthly drills to test various emergency scenarios. Each drill is evaluated to assess the effectiveness of the EAP and CMP, 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. These reports are also filed on the QDMS and contain a scenario description, participant list, response actions diary, debriefing observations (both positive and negative), and action plans for improving future responses and minimizing potential incidents.

TÜMAD maintains a formal incident reporting and investigation program which categorizes incidents as lost time, restricted work injuries, injuries of different grade of severity, medically treated injuries, first aid injuries, property damage, spills, and near-misses. None of the incidents that occurred over the past three years warranted revision of the EAP or CMP 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:

Prior to being permitted on the mine site, induction training is mandatory for all employees and contractors entering the site. Induction training is a 4-hr program that includes topics such as site policies, procedures, site safety, signage, workplace hazards, PPE, SDS, alarms, emergency response, incident reports and safety meetings. This training includes forms of cyanide, recognition, hazards, signage, safe handling guidelines, exposure routes, control of the generation of HCN gas, symptoms of cyanide poisoning, and first aid treatment in the event of exposure. Visitors to the operation receive a basic induction which includes cyanide awareness and information on cyanide hazards.

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 two-months on-the-job training from experienced operators under supervision of the day shift supervisor. During this training period the new employee is always accompanied in the workplace. The employee is then evaluated on whether he/she is proficient to work alone. On passing the evaluation the employee automatically begins shift work and is permitted to work unattended while receiving hands-on training for another two months. At the end of this second two-month period the worker qualifies as a supervised operator.

Annual cyanide refresher training is required for those that work with cyanide (including ADR operators and supervisors, leach tank operators, safety officers, maintenance workers, electricians, firefighters, rescue teams and those working in cyanide areas (e.g. safety

engineers, environmental engineers, etc.). Employees specifically working or engaged on cyanide related tasks are also required to complete additional 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, expiry dates for HCN gas canisters, cyanide facility inspections, working on cyanide pump/valve/pipeline/tank, wet and dry sodium cyanide decontamination. Induction and refresher training records are tracked on SAP software and retained by the Process and OHS& Department Offices separately. Prior to the establishment of the system, training records were stored on the company intranet server.

8.2 Train appropriate personnel to operate the facility according to systems nd 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 continues to maintain a 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 three-step process comprising a preliminary interview, theoretical exam and practical exam in which a minimum score of 70% is required in the exams. 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, 32 plans, 10 handbooks, 128 procedures and 686 work instructions for mine operations. A training matrix is used to track those cyanide related requirements which include: a Cyanide Management Plan, two routine operation procedures, and 153 instructions. These include those specific to transport, cyanide unloading/loading, storage, and mixing; preparation of stripping solutions; cleaning of sumps/tanks/screens, sample collection; disassembly of cyanide boxes, detox, and other production and maintenance tasks. 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.

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 annually 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).

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 two-month probationary period, a new employee is monitored and work with an experienced employee. After passing the two-month probationary period, the worker is allowed to undertake assigned tasks without being monitored by an experienced employee and shift supervisor. The worker then receives a further two months of hands-on-training with the shift foreman and senior operator before qualifying as a supervised operator.

All personnel are required to attend induction training which includes cyanide awareness and hazard training. Each new worker receives pre-work training specific to the department or area of work. New employees are also required to work under supervision for a minimum of two month to their supervisor's satisfaction before being allowed to work unaccompanied and provide a sign off confirming understanding of the procedures, instructions and JSA. Induction, Long - Period OHS training is provided by safety department trainers under the guidance of the OHS Chief.

Each department is required to conduct at least two task observations per annum to evaluate operator safety: including performance of operator activities, operator behaviour, and management of task related risks.

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 PowerPoint 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.

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:

Cyanide unloading, mixing, process and maintenance personnel are trained in the requirements of operational procedures as well as relevant cyanide management procedures, including emergency response procedures. All employees that work with cyanide complete induction and refresher training in cyanide awareness. Employees undertaking cyanide specific tasks receive task specific training on standard operating procedures for that task, as well as procedures to follow in the event of a cyanide exposure. The induction materials include description of 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.

Operators are issued with radios and are trained to contact security and their supervisors via the emergency call channel in case of an emergency. Operating procedures include pre-work checks on the location and access to emergency response equipment and for 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 storage, preparation area, alert operators of HCN gas releases and when to evacuate a work area.

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 2 or 3 ERT members will always present at the ADR Plant during the shift. The ERT members have been trained to apply first aid including the use of medical oxygen and advanced medical first aid. Medically trained personnel from the mine's clinic provide further assistance such as administering Hydroxocobalamin (Cyanokit). Since 2021, the ERT members have completed chemical response, firefighting, vehicle extrication, rescue from the wreckage and refreshment trainings.

The ERC has training meetings with the ERT members whereby a range of topics are covered including emergency call out procedures, cyanide awareness and management, first aid procedures, and cyanide exposures. Topics discussed in the training sessions include evacuation drills, hazardous materials handling, fire extinguisher use, basic firefighting, cyanide management, basic first aid and mock drill rehearsal. Additionally, cyanide awareness and refresher training is periodically provided to ERT members in accordance with a training matrix.

Lapseki 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 mutual on-site paramedics, nurse and doctor. This includes onsite capability in HAZMAT, firefighting, and medical response to the extent that outside responder would only be required for a Level 3 emergency crises. The mine meets annually with local community stakeholders and has also communicated with local government agencies, including the Ministry of Health Department in Çanakkale to provide information on the Lapseki 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 that includes medical oxygen, and the nurse/paramedic/doctor emergency kits also contain cyanide antidotes.

Cyanide awareness is included as a specific topic and covers hazard signage, safe working with cyanide, the CMP and ICMC requirements. During the last 3 years cyanide hazard recognition refresher training was undertaken by all workers including members of the ERT as part of annual general cyanide refreshment training. Additionally, ERT members receive specific training in hazardous materials training including cyanide releases, cyanide exposures, first aid, firefighting, eye wash/shower scenarios, entry into enclosed spaces and mock drills that involve cyanide emergency scenarios. Records of ERT training are retained as hard copies by the OHS Department and include the names of the employee and trainer, the date of training, the topic covered and the results of testing to demonstrate trainee understanding of the training materials. The clinic nurse and paramedics receive annual cyanide awareness training and instruction from the medical Doctor on the application of medical oxygen and intravenous use of Cyanokits.

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 continues to maintain a transparent community outreach program similar to that noted in the 2021 ICMC certification audit. TÜMAD has implemented plans and procedure to engage with local government, non-government organizations (NGOs), media and the press. TÜMAD Lapseki Gold Mine manages its environmental and biodiversity activities in accordance with EBRD PR 1: Assessment and Management of Environmental and Social Risks and Impacts, EBRD PR 3: Resource Efficiency and Prevention and Control of Pollution, and EBRD PR 6: Conservation and Sustainable Management of Biodiversity. The mine has demonstrated that its commitments and responsibilities regarding water, air quality and other relevant environmental elements are in line with EBRD Performance Requirements.

TÜMAD public relations staff undertake periodic outreach campaigns in local villages including six small villages (Şahinli, Kocabaşlar, Çamyurt, Yeniceköy, Dumanlı, Mecidiyeköy) located

within 8 kms of the mine. These meetings provide an opportunity for external stakeholders (governmental and private) and members of the public to ask questions or relay concerns related to the use and management of cyanide at the mine site. Local and national-level stakeholder meetings have been conducted with governmental-municipal officials, security and health organizations, police, gendarme, hospitals, and specific communities. TÜMAD continues to communicate with communities and stakeholders through periodic meetings that engage public officials, police and gendarmerie commanders, sub-governors, village leaders, mayors, and local fire and hospital representatives to seek their continued support to maintain an up-to-date and effective the CMP.

TÜMAD's general policy as "Open door policy and open visitor access" is to be as responsive and open as possible with respect to questions or requests for information on the management of cyanide. TÜMAD, on an annual basis, organizes and conducts site tours for hundreds of external stakeholders including NGOs and members of the public. Since 2021, 2,955 people through 639 meetings have visited the site. 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.

TÜMAD organizes semi-annual community meetings in open-forum formats that permit participants to ask questions or voice concerns regarding the management of cyanide. Representative bi-monthly meetings are broad style. All complaints, requests, or suggestions received from relevant communities or local people are reviewed by public relations staff, and where necessary, discussions are held with other concerned departments. Responses are communicated back to the relevant party in person or by telephone/online. All complaints submitted with a grievance form are recorded on a complaint registration form and then forwarded to the relevant departments for necessary action following the approval of the Operations Manager.

Public Inquiry Forms are completed should external stakeholders contact the mine by telephone with a concern or issue. These are provided to the General Manager. Follow-up actions are taken as necessary, and verbal or written feedback is provided to the complainant. A review of complaints records covering the past four years show that TÜMAD received a total of 149 complaints (30 in 2021, 42 in 2022, 64 in 2023, and 13 to June 2024) related to issues around employment, infrastructure support, service requests, course centre material support, etc., with most complaints being requests.

Communities are also engaged in mock drill scenarios to that provide them with awareness on actions to be taken in the event of a cyanide emergency. During these engagements, discussions are also held around topics of cyanide management within plant operations. The Mock Drills have been performed with the transportation HAZMAT Response Service Company (Hidra) for management of the cyanide transportation. The Mock Drill findings and emergency hazards are discussed, and these discussions include review of community awareness.

The TÜMAD's web page https://www.tumad.com.tr contains information on the mines operations and provides contact forms where issues of concern can be raised for action by TÜMAD's management or the public relations department.

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 presentation materials in Turkish (the local language). These include flyers, leaflets, brochures for communities and stakeholders including brochures that describe the effects of cyanide on health and the environment and its management at the mine site. The presentation materials, both audiovisual and written, are freely distributed at public meetings and upon request. 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.

Regular mine tours are arranged throughout each year during which cyanide awareness and management information is provided in the form of booklets and presentations. In addition to appropriate verbal presentations, all site visitors are provided a double-sided, brochure (prepared in Turkish and English) presenting basic site safety information and the use of cyanide in mining. Video presentations (Turkish with English subtitles) 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 company journals 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 Lapseki Gold Mine. TÜMAD is also a signatory to the UN 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.

Literacy around the local population is extremely high so illiteracy is not considered a significant issue (average rate: 97% as per 6 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).

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TÜMAD has procedures in place to notify the public of all "major" cyanide incidents. A "major" incident is any incident that is not classified a "minor". 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. A minor incident being an incident or near miss in which there is no adverse effect on health or the environment and is not reportable to the regulators. Since 2021, there have been no cyanide releases on or off the mine that have resulted in adverse effects to health or impact to the environment or required to be report under applicable regulations. However, if such an incident were to occur, the Operational Manager in Lapseki will inform the General Manager in Ankara, who would in turn take the lead in informing regulators and government authorities in both regions.
As the guidelines specifically require the inclusion of information on environmental or social impacts to properly inform external stakeholders, information on cyanide exposures or releases information from this mine site would be reported on the company website in the next issue of the TÜMAD Sustainability Report, 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, making use of the media.

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