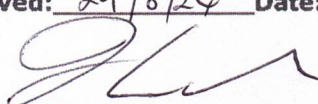
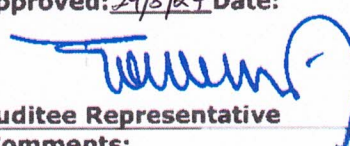


**Attachment A:**

**International Cyanide Management Code (ICMC)  
Corrective Action Plan**



Demir Export A.Ş  
İzmir Caddesi Koç Han No: 25/7  
Kızılay Çankaya 06440 Ankara  
Ankara Kumrular V.D.  
2780067101  
T: +90 312 415 45 00  
F: +90 312 418 01 51  
info@demirexport.com  
www.demirexport.com

<b>CORRECTIVE ACTION PLAN</b> <b>ICMC Audit – Bakirtepe Mine</b>		<b>Control No.:</b> <b>DE-ICMC-CAR-01</b> <b>Date issued:</b> 8 August 2024
<b>ICMC Standard of Practice Section Reference:</b> 4.3(2), 4.3(5)		
<b>Description of Deficiency:</b> The operational water balance is managed through the <i>TES.PR.1201.012 - Process Solution and Water Cycle Management Procedure</i> which is used to track the volumes of solution in the process ponds and water in the storm pond, as well as to regulate the application of barren solution to the heap leach facility, to ensure sufficient capacity remains in the ponds to accommodate precipitation and heap leach facility drawdown in the event of a design storm and so prevent discharge to the environment. The procedure tracks precipitation but does not specifically address the influence of potential freezing and thawing conditions, or losses to evaporation. The probabilistic design storm is also based on historic precipitation data from Kangal meteorological station recorded over a period of 22 years (1988 to 2010). The design storm has not been updated to incorporate the last 13 years of available data and due to the relatively short period of available data used to derive the design storm, together with a potential influence of climate change, it may no longer be representative.		
<b>Corrective Action Request (describe/attach supplemental information as necessary):</b> <ul style="list-style-type: none"><li>• Provide evidence that evaporation has been considered in the water balance and update <i>TES.PR.1201.012</i> to include its influence on the water balance or the rationale for excluding its consideration.</li><li>• Provide evidence that freezing and thawing has been considered in the water balance and update <i>TES.PR.1201.012</i> to include its influence on the water balance or the rationale for excluding its consideration.</li><li>• Re-evaluate the design storm by incorporating the last 13 years of available data and update <i>TES.PR.1201.012</i> as applicable.</li></ul>		
<b>Evidence Required for Verification of Corrective Action Completion:</b> Copy of updated <i>TES.PR.1201.012 - Process Solution and Water Cycle Management Procedure</i> , that incorporates each of the above bulleted items, and documentation showing the updated evaluation of the probabilistic design storm.		
<b>Proposed Corrective Action Completion Date:</b> 31 January 2025		
<b>Approved:</b> <u>29/8/24</u> <b>Date:</b>  <b>Lead Auditor</b>	<b>Approved:</b> <u>29/8/24</u> <b>Date:</b>  <b>Auditee Representative</b>	
<b>Closure</b> <b>Verified:</b> _____ <b>Date:</b> _____	<b>Comments:</b>	
<b>Lead Auditor</b>		

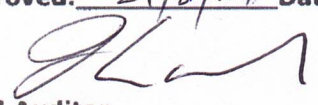
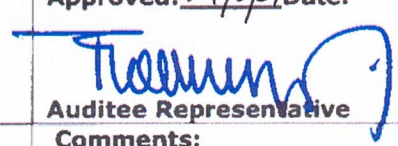
Bakirtepe Mine  
Name of Mine

8 August 2024  
Date





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İzmir Caddesi Koç Han No: 25/7  
Kızılay Çankaya 06440 Ankara  
Ankara Kumrular V.D.  
2780067101  
T: +90 312 415 45 00  
F: +90 312 418 01 51  
info@demirexport.com  
www.demirexport.com

<b>CORRECTIVE ACTION PLAN</b> <b>ICMC Audit – Bakirtepe Mine</b>		<b>Control No.:</b> <b>DE-ICMC-CAR-02</b> <b>Date issued:</b> 8 August 2024
<b>ICMC Standard of Practice Section Reference:</b> 5.2(4)		
<b>Description of Deficiencies:</b>  As there is no established jurisdictional financial assurance mechanism in Türkiye to cover estimated costs of cyanide related decommissioning activities, Demir Export has been pursuing financial institutions to provide insurance to cover these costs. However, due to a recent large heap leach failure incident in the country and the unfamiliarity in such assurance mechanisms by financial institutions in Türkiye, Demir Export have to date been unable to establish a financial guarantee to cover the costs of cyanide related decommissioning activities.		
<b>Corrective Action Request (describe/attach supplemental information as necessary):</b> <ul style="list-style-type: none"><li>• Obtain a letter or credit, form of cash, bond, or insurance certificate from a financial institution that covers the estimated cyanide related financial evaluation costs, or</li><li>• Establish self-insurance or self-guarantee as a financial assurance mechanism</li></ul>		
<b>Evidence Required for Verification of Corrective Action Completion:</b> <ul style="list-style-type: none"><li>• Copy of a letter or credit, form of cash, bond, or insurance certificate from a financial institution that covers the estimated cyanide related financial evaluation costs, or</li><li>• Statement (most recent or no more than one year old) from a qualified financial auditor that Demir Export has sufficient financial strength to fulfill this obligation. The evaluation must be based on an accepted financial evaluation methodology as set out in Standard of Practice 5.2.5 of the <i>International Cyanide Management Institute Guidance for the Use of the Mining Operations Verification Protocol</i>.</li></ul>		
<b>Proposed Corrective Action Completion Date:</b> 31 July 2025		
<b>Approved:</b> <u>29/8/24</u> <b>Date:</b> 	<b>Approved:</b> <u>29/8/24</u> <b>Date:</b> 	
<b>Lead Auditor</b>	<b>Auditee Representative</b>	
<b>Closure</b> <b>Verified:</b> _____ <b>Date:</b> _____	<b>Comments:</b>	
<b>Lead Auditor</b>		

Bakirtepe Mine  
Name of Mine

8 August 2024  
Date