

SUMMARY AUDIT REPORT

1

Cyanide Production Operation

Summary Audit Report

for

The International Cyanide Management Institute

and ProMS LLP (producer)/ Republic of

Kazakhstan/ 2023

Prepared by NCABrasil Expert Auditors Ltd.

www.globalsheq.com

This report contains 16 (sixteen) pages



SUMMARY AUDIT REPORT

SUMMARY AUDIT REPORT FOR CYANIDE PRODUCTION OPERATIONS

Instructions

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

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

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



SUMMARY AUDIT REPORT

Name of Producer: ProMS LLP.
Name of Producer Owner: ProMS LLP.
Name of Producer Operator: ProMS LLP.
Name of Responsible Manager: Olga Sher
Address: Aksu village, street Podkhoz 2, plot 11/8, Stepnogorsky.
Country: Republic of Kazakhstan
Telephone: +7 (727) 228-25-65
Fax: not applicable
E-Mail: Olga.Sher@proms.kz

3

Location detail and description of operation:

ProMS LLP is a company existing under the laws of the Republic of Kazakhstan, with its administration headquarter at the city of Almaty and, its operational facilities for cyanide storage, distribution and transportation at the city of Stepnogorsky. ProMS imports solid NaCN from Korund-Tsian JSC, a Russian NaCN producer that is certified by the International Cyanide Management Institute since December 2014. Korund-Tsian JSC is responsible to transport (by rail) the solid cyanide and deliver it at a remote terminal at the Stenogorsky Railway station. The carriage of sodium cyanide (UN No. 1689) by rail in the Russian Federation (RF) and in the Republic of Kazakhstan (RK) is carried out according to the internal rules for the transport of dangerous goods by rail, which, in turn, are based on the recommendations of the rules for the transport of dangerous goods by rail developed by the UN (United Nations). The Russian Federation and the Republic of Kazakhstan are parties to the Agreement on International Freight Transport by Rail (SMGS), effective from 01.11.1951. Railways are owned by the signatories of the SMGS, which ensure compliance with the rules for the transport of dangerous goods by rail. Packaging and labeling requirements are in line with the UN Recommendation on the Transport of Dangerous Goods and the Agreement on International Carriage of Goods by Rail and International Road Transport Regulations. Packages and containers are certified according to the Standards of the UN Recommendations on the Transport of Dangerous Goods, the International Maritime Dangerous Goods Code (IMDG), the European Agreement on the International Carriage of Dangerous Goods by Road (ADR) and the Regulations concerning the International Carriage of Dangerous Goods by Rail (RID). The resulting cyanide is packaged in packages that fully comply with international regulations for the transport of dangerous goods. The NaCN boxes are transported inside 20' containers, that belong to Korund-Tsian JSC. Each container transports 20 (twenty) boxes of solid NaCN. After the arrival of the train at the remote terminal at the railway station, ProMS unload the 20' containers (which are returned to the cyanide producer), with the help of 40 ton cranes, and transport them, by truck, to ProMS warehouses, where the solid NaCN boxes are unloaded from the containers and stored inside the two warehouses, specifically designed and constructed for this purpose. Each warehouse is able to store up to 200 solid NaCN boxes, with three layers stacking configuration. The two warehouses are located inside two layers of protection (external wall with barbed wire and internal fence with barbed wire, both locked, with a mechanical ventilation/exhaustion system, under roof, on concreted floor and an automatic fire extinguisher system (dry chemical powder). This facility is under security surveillance 24 hours per day, with armed security and CCTV (closed-circuit television) system. There are lightning installations outside and inside (explosion proof ones) the warehouses. The two warehouses are exclusively used to store solid NaCN boxes. There are no other materials stored in these warehouses. The stored solid NaCN boxes are sold to mining operations in the Republic of Kazakhstan and transported by ProMS LLP specifically designed trucks and trailers.



ProMS LLP
Name of Producer

Signature of Lead Auditor

18/02/2024
Date

SUMMARY AUDIT REPORT

Auditor's Finding

This operation is:

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

with the International Cyanide Management Code.

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

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

Acting Audit Team Leader: Celso Sandt Pessoa

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


Names and Signatures of Other Auditors: not applicable.

Date(s) of Audit: 04/04 ~ 07/04/2023 (on-site) and 14~15/08/2023 (off-site)

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

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

ProMS LLP
Name of Producer


Signature of Lead Auditor

18/02/2024
Date

SUMMARY AUDIT REPORT

Principle 1 | OPERATIONS

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

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

5

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

Summarize the basis for this Finding/Deficiencies Identified:

Both warehouses were designed, constructed and commissioned in accordance with Kazakhstan and international technical standards. Quality assurance (QA) plans were defined and implemented for the design, construction and commissioning of such warehouses. Records of such activities are kept by the operation. Reviewed QA documentation related to the construction of the warehouse floor (structural concrete), warehouse walls and roof (sandwich panels), ventilation/ exhaust system and fire extinguisher system (dry chemical powder). The commissioning records of the operation facilities are retained by the operation and the initial and new installation were reviewed approved by qualified engineers. Reviewed environmental operational commissioning certificate # C-07-X-KZ92VBS00127973 (11/12/2017), Act of Construction and Commissioning dated 30/11/2017 (signed-off by Mrs. Vagapova Asel Zhanatovna/ chief engineer) and fire extinguisher system commissioning performed by AAE Engineering Group, according to the document AAE-024-AKS-06-1-12-4482-1-1-2 (as-built certification). the operation facilities were commissioned by qualified engineers as evidenced in the sampled commissioning records. Although the solid NaCN is not produced at the operation, all the materials used to construct the warehouses are compatible to store NaCN wooden boxes. Although the solid NaCN is not produced by the operation, both warehouses have automatic fire extinguishers systems, which are automatically triggered when the environment temperature is bigger than 50 degrees Celsius. Both warehouses were constructed with structural concrete floor, which are included in the preventive maintenance plan and in the operational inspection plan. During the field audit, it was evidenced that the warehouse floor is maintained in order and the warehouses are kept clean. Although the solid NaCN is not produced by the operation, all monitoring and alarm instruments, such as HCN detectors and fire alarms are included in the preventive maintenance system and inspected and calibrated on a regular basis.



ProMS LLP
Name of Producer

Signature of Lead Auditor

18/02/2024
Date

SUMMARY AUDIT REPORT

6

Reviewed maintenance, inspection and calibration records for fire extinguisher system dated 20/02/2023, fix HCN detectors Drager Polytron 7000 and portable Drager PAC 8000, dated 23/03/2023. There are no process tanks in the operation. The solid NaCN is not produced at the operation. There are no solution pipelines at the operation. The solid NaCN is not produced at the operation. All solid cyanide wooden boxes are stored inside the warehouses, where no other product is allowed to be stored. The operation only stores solid NaCN in these installations as evidenced during the field audit. Both warehouses are provided with mechanical ventilation/ exhaust system, as evidenced during the field audit. Before stating any operation related to NaCN boxes handling, the warehouse's doors are open and the ventilation /exhaustion system is turned-on 15 minutes before any person be allowed to enter the warehouse, using appropriate personal protective equipment (PPE). All operation perimeter is fenced (external wall with barbed wire and internal fence with barbed wire), and the access is controlled and only allowed personnel have access to the process plant, as evidenced during the field audit. Armed security and CCTV are available 24 hours per day. Both warehouses are kept locked. Both warehouses are used only to store solid NaCN wooden boxes. No other materials are stored in the warehouses.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation developed, documented, implemented and maintains a documented management system, composed by work instructions, maintenance and inspection plans, emergency response plans, among other documentation. Reviewed safe work procedures for the unloading activities (from train to truck), transport from the railway station to the warehouses, unloading, storage, stacking and maintenance of solid NaCN wooden boxes, loading of cyanide boxes at the trailers, maintenance and inspection plan and emergency response plan. Safe work procedures (work instructions) and emergency response plan (ERP) address non-standard operating situations and how to manage them. The operation developed, documented, implemented and maintains a documented change management procedure (where all proposed changes must be reviewed and approved (or not) by a multidisciplinary team which includes representatives of the environmental, occupational health and safety processes). No cases of change management process were evidenced.



ProMS LLP
Name of Producer

Signature of Lead Auditor

18/02/2024
Date

SUMMARY AUDIT REPORT

7

The operation developed, documented, implemented and maintains a preventive maintenance program. Reviewed preventive maintenance plans and associated records for the following equipment: cranes (40, 50 and 70 ton), forklifts (1,5 and 3 ton), ventilation/ exhaust system, fire extinguisher system and alarm system and the warehouses general maintenance. The preventive maintenance frequency for all equipment and installations is annual. Inspections of such equipment and installations are performed on a monthly basis. HCN detectors and alarm system are maintained and calibrated, as previously mentioned. There is no cyanide solution in the operation. The warehouses are not washed, and no effluent potentially contaminated with cyanide is generated. Both warehouses have sumps, not connected with the external sump located outside the warehouses. This main sump is closed and covered, constructed of structural concrete and has no connection with external environment. During the field audit it was evidenced that all sumps were empty and dry. All cyanide contaminated material (real or potential) are packed, identified and sent to a qualified environmental services supplier (Ecopromethod-AS LLP) and incinerated. All transportation containers have mandatory UN (United Nations), Russian and Kazakhstan safety and environmental signage. All cyanide boxes have the same signage (pictograms) and safety, health and environmental instructions in Russian and Kazakh.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

There are no cyanide solution tanks in the operation. There are no secondary containments in the operation. There are no cyanide solution pipelines, pumps and valves in the operation. All containers (used to transport solid cyanide boxes), are maintained by the cyanide producer (Korund Tsyau) and are inspected and cleaned by the operation before returning to the cyanide producer. According to my professional experience, as a mechanical engineer, the defined inspection frequencies are adequate to ensure that that facilities and equipment are working within the design and operational parameters. During the field audit, it was evidenced that the operation facilities (e.g: warehouses, fire extinguishers system, ventilation/ exhaust system) and equipment (e.g: cranes, fork lifters, showers and eye-washers), are well maintained. Inspections of such equipment and installations are performed on a monthly basis. As previously mentioned, there are specific inspection protocols, addressing the quality aspects to be inspected, by the operational team and by the maintenance team. Inspection records address the date of inspection, the scope of inspection, the acceptance criteria, the inspectors name, the results obtained and, if necessary, any correction or corrective action that shall be implemented.



SUMMARY AUDIT REPORT

All corrective maintenance orders, resulting as an output from the inspections, indicates the corrections and corrective actions to be implemented. All corrective maintenance orders address the date when the corrections and/ or corrective actions were implemented. All corrective maintenance orders records are retained by the operation.

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation developed, documented, implemented and maintains operational safe work procedures, as previously mentioned. Please refer to section 6 of this report.

The operational documentation addresses non-standard operating situations and how to manage them. It was also evidenced that the operation developed, documented, implemented and maintains an Emergency Response Plan (ERP). Please refer to Principle 5. The operation developed, documented, implemented and maintains a preventive maintenance program. There are specific documented protocols to be followed by the operational team to prepare a facility to be maintained, including the liberation of the facilities to the maintenance team to work. The operation documentation was developed by a multi-disciplinary team, led by the operational team, but involving other processes such as environmental management and occupational health and safety teams. The operation identified areas (the warehouses) where HCN or NaCN dust may (potentially) exist in instantaneous or continuously basis. Such places are monitored and calibrated HCN detectors installed. Before entering the warehouses, the ventilation/ exhaustion system is turned on and works for fifteen minutes before operators are allowed to go inside the warehouses, always using appropriate PPEs (tyvec overall, full face masks with ABEK1HgP3 filters, PVC gloves and boots, portable HCN detectors). The operation installed HCN detectors in such places where alarm 1 is set for 2.5 ppm and alarm 2 is set for 4.5 ppm (operators must leave the area). Reviewed calibration records for the HCN detectors, as previously mentioned. Reviewed maintenance and calibration records for HCN detectors, as previously mentioned. All plant operators have radios and are in touch with the security room. CCTV (closed circuit television) system is also available, and monitoring of the areas is made from security room. Both systems were evidenced during the field audit. According to the Kazakhstan legislation, all employees must pass an annual occupational health evaluation and obtain a permit to be allowed to work.



SUMMARY AUDIT REPORT

Reviewed occupational health permits from operational (warehouse) and maintenance teams. The annual occupational health monitoring scope includes clinical exams (e.g: blood, urine), visual capacity, hearing capacity, pulmonary studies (e.g: spirometry), cardiologic studies and general examination. There is a clothing policy in the operation where people leaving such areas must change their clothes or disposable overall into identified plastic bags and disposed for washing or incineration. The number of operators transiting in the process plant is very low. The operation facilities are richly identified related to the presence of cyanide and the mandatory personal protective equipment that must be used, as evidenced during the field audit. Smoking, eating, drinking, and open flames prohibited in areas where there is the potential for cyanide contamination signage is available in several places at the operation installations, as evidenced during the field audit.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation developed specific written emergency response plans and procedures to respond to cyanide exposures. It was evidenced during the field audit that the operation installed and maintains, emergency showers and eye-washers in the vicinity of the warehouses and inside the emergency response facility located outside the warehouses, that are inspected and maintained in a routine basis and were tested during the field audit, all operational. All eye-washers are low pressure ones in order to avoid any injury in the eyes caused by the water jet. It was also evidenced that the operation installed ABC type (dry chemical powder) fire extinguishers in different places outside the warehouses and both warehouses have automatic fire extinguisher systems (dry chemical powder), as previously mentioned, that are preventively maintained on a yearly basis. These fire extinguishers are maintained in accordance with the Kazakhstan legislation by a qualified maintenance supplier. Records of such maintenance are retained by the operation and were reviewed during this opportunity. It was evidenced the operation dispose oxygen bottles in the security office, that is located not far than 20 (twenty) meter from the warehouses. Beyond that, the operation has a full operational emergency response facility equipped with oximeters, AED (Automatic External Defibrillator), ambu (Artificial Manual Breathing Unit), antidotes (sodium thiosulfate and sodium nitrite), radio, telephone and a shower + eye washer. The operation has an agreement with the Stepnogorsky Public Hospital that is located fifteen minutes from the operation. Beyond ambulance service, the hospital is able to provide full assistance to cyanide intoxicated persons. During the field audit, this hospital was visited, and the emergency entrance was checked.



SUMMARY AUDIT REPORT

10

The operation developed, documented, implemented and maintains an inspection program related to first aid hardware and resources, including drugs (antidotes' expire date). All antidotes are adequately stored in their original package, inside a foam box, specifically designed by the antidote producer for this purpose. Depending on the resource, the inspection frequency may be daily, weekly or monthly. Records of such inspections are retained by the operation and were reviewed during this audit. Inspections are performed by the operational and security team. Safety data sheets and first aid procedures (intoxication) are available in different places at the operation, in Russian and Kazakh, as evidenced during the field audit. There are no tanks and pipelines containing cyanide in the operation. Warehouses are clearly identified about the presence of cyanide inside them. Cyanide boxes are also clearly identified about its content, as evidenced during the field audit. The operation installed a changing room outside the warehouses, where employees shall change their PPEs, clean them all and dispose the ones (overall) that shall be disposed. During the field audit, it was evidenced that the warehouses are kept clean, in order, with solid NaCN boxes without damage (puncturing). So, the potential for skin exposure to cyanide is very low. The operation has a full equipped emergency response facility, as previously mentioned. The operation has an agreement with the Stepnogorsky Public Hospital that is located fifteen minutes from the operation. Beyond ambulance service, the hospital is able to provide full assistance to cyanide intoxicated persons (first aid (oxygen therapy) will be provided at the operation). During the field audit, this hospital was visited, and the emergency entrance was checked. As previously mentioned, the operation has formal agreements with the Stepnogorsky Public Hospital. The operation has also an agreement with Viamedis Hospital (private one). The operation documented and maintains a procedure to report and investigate incidents (real and potential ones). There were no cases of incidents (real or potential) involving cyanide. There were no cases of lost time injuries (LTI), restricted workday injuries (RWDI), first aid injuries (FAI) or high potential incidents (HPI), in 2022 and 2023.

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

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

The operation is: in full compliance with
 in substantial compliance with Production Practice3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation does not discharge effluents to surface waters and in surface and ground water up and downgradient of the site. The operation does not use ground water. All potable water used by the operation is provided by the public company that supplies water for the municipality. The operation does not have fixed sources of emissions, so the operation is not demanded to monitor air emissions, for HCN.



ProMS LLP
Name of Producer

Signature of Lead Auditor

18/02/2024
Date

SUMMARY AUDIT REPORT

According to the operation operational permit, issued by the local environmental protection agency, the operation is not demanded to monitor surface and underground waters and air emissions, due to the nature of its activities.

Principle 4 | TRAINING

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

11

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation developed and implemented an induction program, addressing cyanide related risks (e.g: cyanide impacts on health, safety and environment, intoxication symptoms and first aid procedures to be followed in the event of cyanide exposure), that is mandatory to all employees and contractors entering the operation. There is a second training program for those that will work in the operation involving cyanide. This second training program is focused on the safe work procedures (work instructions). In both cases, the training effectiveness is verified through a written examination and field observations. Both training programs are refreshed every two years. During this audit, records of such trainings performed between 2022 and 2023 were reviewed. For those employees and contractors that will work in the operation (warehouses), there is a training session focused on the PPEs that must be used in the operation and during emergency situations, where specific PPEs must be used. In all cases, the training effectiveness is verified through a written examination and observations. During this audit, records of such trainings performed between 2022 and 2023 were reviewed. All PPE related trainings are in conformance with Kazakhstan legislation. Such trainings are refreshed every two years. During this audit, a refresh training focused on the use of PPEs was performed. All workers that will work with cyanide must pass through a training program (theoretical and practical), which includes the training in the operational procedures and safe work procedures (e.g: unloading boxes from the containers at the warehouse and loading boxes into trailers for transport to the mining operations (clients)). The trainee receives practical training under the supervision of qualified workers (operators and supervisors) and, if approved, they will work under supervision, before being allowed to work alone. All activities involving cyanide are performed, at least, by three operators. Such operational training program is refreshed every two years. Records of such trainings were reviewed during this audit. All workers that will work with cyanide must pass through an "on the job" training program (theoretical and practical), which includes the training in the operational procedures and safe work procedures.



SUMMARY AUDIT REPORT

The trainee receives practical training under the supervision of qualified workers (operators and supervisors) and, if approved, they will work under supervision, before being allowed to work alone. Such operational training program is refreshed every two years. Records of such trainings were reviewed during this audit. The training program (theoretical and practical), includes the training in the operational procedures and safe work procedures. The training program (theoretical and practical), includes the training in the operational procedures and safe work procedures. The trainee receives practical training under the supervision of qualified workers (operators and supervisors). The effectiveness of all mentioned training programs is verified through written examinations and observations, as previously mentioned.

12

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

Principle 5 | EMERGENCY RESPONSE

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation developed, documented and maintains an emergency response plan/ERP, dated 04/01/2023. The ERP consider the following emergency scenarios: catastrophic release of hydrogen cyanide, releases of solid or liquid cyanide during packaging, storage, loading and unloading operations, releases during fires and explosions and power outages and equipment failures. After a risk evaluation, all potential emergency scenarios were identified and specific responses for each scenario were defined.



SUMMARY AUDIT REPORT

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

13

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

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

Summarize the basis for this Finding/Deficiencies Identified:


The operation ERP was developed by different and multi-disciplinary team including the operational and maintenance team and supervisors, occupational safety and health technicians, environmental technicians and brigade members. External stakeholders are involved also (e.g: local firefighters (State Department of Emergencies), police (Committee of National Safety), public hospital and Ecopromothod AS LLC (environmental emergencies services provider). Related to Ecopromothod AS LLC (environmental emergencies services provider), its main responsibilities include the management and performing all emergency related activities, mitigation of impacts, after emergency cleaning process, disposition of contaminated waste, monitoring activities and recovery of impacted areas. External stakeholders are aware about the operation emergency response plan (ERP). Such stakeholders are informed directly by the operation through planned meetings and participation on emergency response drills.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation designated two emergency response coordinators (Environmental, Occupational Health and Safety Coordinator and the operation manager) with corporate authority to provide the necessary resources to implement the emergency response plan. The operation has a specific and qualified emergency response teams (internal and external).



SUMMARY AUDIT REPORT

The operation emergency response team is trained and qualified in accordance with Kazakhstan legislation and technical specifications developed by the local Firefighters Department. Annually, the emergency response team receives a planned refresh training, in accordance with the Kazakhstan legislation. Records of both trainings' sessions are retained by the operation and were reviewed during this opportunity. There is an annex in the ERP addressing all contact information related to the emergency response team and with the external stakeholders that may be necessary to participate in the emergency response. The responsibilities and authorities of the emergency response coordinators and the emergency response team are clearly defined. In another ERP annex there is a master list of all resources available to the emergency response team. Monthly all the available resources to the emergency response team are inspected. Records of such inspections are retained by the operation and were reviewed during this audit. During the field audit, it was evidenced that such resources are kept in order and in good condition and are promptly available to be used. As previously mentioned, all external stakeholders (local firefighters, local hospitals, local police and environmental services provider) duties are clearly defined in the ERP. As previously mentioned, all external stakeholders' duties are communicated in planned meetings and during the participation of emergency drills.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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



SUMMARY AUDIT REPORT

Production Practice 5.5: Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The operation is: in full compliance with
 in substantial compliance with Production Practice 5.5
 not in compliance with

15

Summarize the basis for this Finding/Deficiencies Identified:

The neutralization of solid NaCN shall be made with the aid of CaO powder that is available in bags at the operation. Recovery of the neutralized solid NaCN/ soil will be made with the aid of plastic shovels. The recovered briquettes/ neutralized soil will be disposed into identified plastic bags and sent to Kazakhaltyn to be disposed. All contaminated materials are neutralized and disposed into plastic bags and send to be disposed at Kazakhaltyn premises. The operation activity has no potential to impact surface and underground waters, so environmental monitoring to identify the impact of cyanide in such waters are not required.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The emergency response plan is reviewed and evaluated after real or potential emergencies and after planned emergency drills (if necessary). The operation annually establishes a mock emergency drill program. In 2023 performed one emergency drill. The scope of the emergency drill included cyanide release into water and intoxication of a person. Records of such emergency drill was reviewed and found in conformity. The emergency response plan is kept updated and is reviewed after real or potential emergencies and after emergency drills. The emergency response plan was updated in 04/01/23.



ProMS LLP
Name of Producer

Signature of Lead Auditor

18/02/2024
Date

SUMMARY AUDIT REPORT

Audit team conclusions:

Based on the sampled evidences, reviewed documented procedures, records, drawings, data sheet, the physical conditions of the site (installations), in the interviewed personnel, the audit team concludes that the cyanide management system **is FULLY** implemented and maintained in accordance with the Cyanide Producers Verification Protocol for the International Cyanide Management Institute – ICMI dated June 2021. Being usual in all audit process, through sampling, opportunities of improvement (corrective and preventive) may exist and were not identified in this opportunity.

16



Celso Sandt Pessoa
Rio de Janeiro, RJ, Brasil.
18/02/2024.