



Söğüt Gold Mine - International Cyanide Management Code Certification Audit

Summary Audit Report

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Basis of Report

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Table of Contents

Basis of Report	ii
1.0 Summary Audit Report for Gold Mining Operations.....	1
2.0 Location and description of operation.....	1
Principle 1 – Production and Purchase	10
Principle 2 – Transportation.....	11
Principle 3 – Handling and Storage	12
Principle 4 – Operations	17
Principle 5 – Decommissioning	37
Principle 6 – Worker Safety	39
Principle 7 – Emergency Response.....	48
Principle 8 – Training.....	61
Principle 9 – Dialogue and Disclosure.....	71



1.0 Summary Audit Report for Gold Mining Operations

Name of Cyanide User Facility:	Söğüt Gold Mine
Name of Cyanide User Facility Owner:	Gübretaş Maden Yatırımları A.Ş.
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2.0 Location and description of operation

Location detail and description of operation:

Location

The Söğüt Gold Mine Operation is located within the borders of Söğüt district of Bilecik province and is an operation where mining activities for gold and silver production are carried out.

Within the scope of the project, ore production is carried out through open pit and underground mining methods, and the produced ore is processed at the beneficiation plant established on site to recover precious metals. The economic life of the project is planned to be approximately 20 years, during which ore and waste rock production will be carried out.

Various main and auxiliary units related to mining, ore preparation and waste management activities are located within the operation site. In this context, the site mainly includes the open pit area, underground mines, underground portal areas, crushing-screening plant, ore stockpile areas, beneficiation plant, tailings storage facility, waste rock (WR) storage areas, topsoil storage areas, explosive material storage area, service roads, and administrative and technical support units.

Description

Open Pit Production

Production activities in the open pits are carried out using the drilling and blasting method, and the loosened material is loaded by construction equipment and transported by trucks to ore stockpile areas or waste storage areas.

Underground Production

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Within the scope of underground mining activities, ore production is carried out through galleries, and the extracted material is brought to the surface and transported to the beneficiation plant. Waste rock generated from underground activities is managed in appropriate areas.

Ore Preparation and Beneficiation

Within the scope of the planned mining activities, ore beneficiation processes will be carried out through separate processes due to the differences in the characteristics of the ore obtained from the Akbaştepe and Korudanlık areas.

There are two different ore types at the site, namely oxide ore and sulphide ore, and the beneficiation processes for these ores have been planned in phases. In this context, the oxide ore process has been developed in three phases as Phase-1, Phase-2 and Phase-3, and currently the Phase-1 process is actively operating.

Within the scope of Phase-1, the process begins with a mobile crusher with an approximate capacity of 33 tons/hour. The ore is subjected to crushing-screening and grinding processes to reduce it to the appropriate particle size, followed by gravity and leaching (tank leaching – Carbon-in-Leach (CIL)) processes for precious metal recovery.

Within the process, gold dissolved and adsorbed onto activated carbon in the leaching and adsorption units is recovered through stripping and electrowinning processes, and the final product is obtained as dore bullion in the gold room. Solutions remaining after the process are treated in the chemical destruction unit to control environmental impacts.

All processes carried out in the ore beneficiation plant are operated with a closed-loop water management approach, and process-related waters are recycled and reused.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



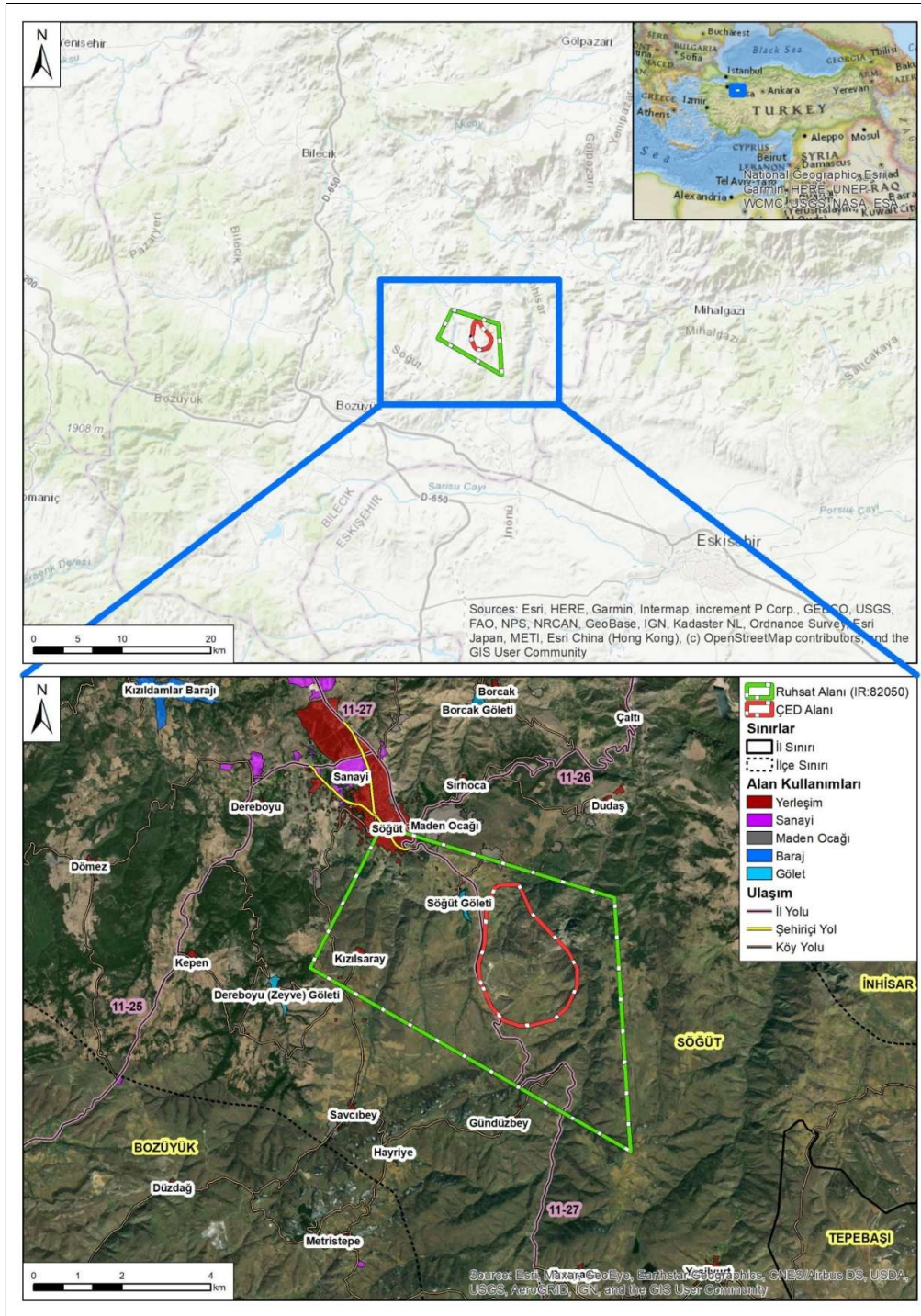


Figure 1: Location Map

Söğüt Gold Mine
Name of Facility


Signature of Lead Auditor

September 2026

Date



The oxide ore Phase-1 process plant is currently in operation; therefore, only the process information related to Phase-1 is operational.

Crushing Unit

Ore extracted from the open pit and underground mine is first fed into a mobile crushing unit with a capacity of 33 tons/hour for size reduction. The crushing unit consists of a mobile-type crusher including one jaw crusher, one cone crusher, and a double-deck vibrating screen. Ore extracted from the open pit and underground are transported to the stockpile area by trucks and fed into the crushing unit by loader. Annual crushing capacity for the mobile crusher (33 tonnes/hour (tph)) is 239,936 tonnes/year. Design capacity for stages after crushing is 22.5 tph/180,000 tonnes per annum (tpa)).

Grinding Unit

The purpose of the grinding unit is to reduce the ore, which has already been crushed to the desired size, to the optimum size required for the continuation of the process. For this purpose, the unit includes one ball mill and a cyclone battery for classification.

While the ore is transported to the ball mill by the final conveyor belt in the system, solid hydrated lime is added onto the ore. The purpose of lime addition is to achieve the pH level required by the process in the leach unit. While the ore is fed into the ball mill, process water (with a concentration of Weak Acid Dissociable (WAD) Cyanide less than 0.5 mg/l) is also added in order to reach a 75% solids ratio inside the mill.

The ground material discharged from the mill, gravity unit tailings, and process water are fed into the cyclone feed tank. Approximately 25% of this tank content is pumped to the gravity unit, while the remaining 75% is pumped to the cyclone battery through slurry pumps for classification purposes. The cyclone battery consists of a total of 4 hydrocyclones. Material smaller than 100 microns exits from the cyclone overflow and is first fed to a trash screen and then to a 9-meter diameter high-rate thickener. The pulp, whose solids ratio is increased in the thickener with flocculant addition, is pumped to the leach unit. The cyclone underflow returns to the ball mill for regrinding.

Use of Solid Cyanide

The gold plant purchases solid cyanide from CyPlus GmbH (CyPlus). The solid cyanide is transported to the Port of Izmir in Türkiye from where it is transported to the mine by To-Pet Petrol Ürünleri Dağ. ve Paz. San. Tic. A.Ş. (To-Pet) a transportation company (latest recertification by International Cyanide Management Institute (ICMI) on 14 April 2026). Solid cyanide briquettes are stored in solid form in the cyanide storage area. They are then transferred from the cyanide storage area to the cyanide preparation unit, which contains mixing and solution storage tanks. Here, they are prepared in liquid form in the mixing tank and transferred to the storage tank for dosing into the CIL circuit.

Gravity Concentrator and Intensive Leach Unit

The pulp material pumped from the cyclone feed tank is fed into a gravity concentrator. Above the concentrator, there is a vibrating screen preventing coarse material from entering the equipment. The vibrating screen dimensions are 0.9 m width x 2.4 m length with a 2 mm screen opening. After the pulp passes through these screens, it is fed into the semi-continuous concentrator.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



The concentrators are designed to operate for a certain period and produce concentrate during a certain period. The concentrator, upon completion of its operating cycle, feeds the concentrate accumulated inside it to the “Intensive Leach Gold Recovery” equipment. Tailings generated during concentrator operation are returned to the cyclone feed tank.

The required leach time is ore-specific. However, high leach recoveries can generally be achieved in less than 16 hours. In order to recover the gold in the concentrate, a 1 m³ intensive cyanide solution is prepared and heated, then passed through the concentrate to dissolve the gold into the liquid phase. The loaded solution containing metals is transferred to the electrowinning cell. Gold and silver in the loaded solution are collected on the cathodes, periodically washed, and excess water is filtered.

Leach and Adsorption, Desorption, Regeneration (ADR) Unit

The pulp, whose solids ratio is increased to 45% by the Leach Feed Thickener, is first transferred to Leach 1 tank. Air/oxygen is supplied from the bottom of the tank in order to dissolve the oxygen required for the leach reaction into the solution. The pulp overflowing from Leach 1 tank is fed into Leach 2 tank. Each tank has a volume of 224 m³, a diameter of 5.8 meters, and a height of 9.3 meters. Air/oxygen is supplied to the CIL tanks 1-2 tanks to ensure dissolution of the oxygen required for the leach reaction into the solution. The pulp overflowing from Leach 1 tank is fed into Leach 2 tank. Air/oxygen supply continues in this tank as well.

Air flow rates to the tanks are adjusted using manual valves and monitored through rotameters. The pulp overflowing from this tank enters the CIL Tanks where it contacts activated carbon. The unit consists of a total of 8 tanks, including 6 ADR tanks and 2 leach tanks. Depending on ore mineralogy, the leach tanks may also be used as CIL tanks. The pulp in each tank is mixed with mechanical agitators in order to keep the ore suspended. While the pulp fed into the ADR tanks flows from Tank 1 to Tank 6, the activated carbon inside the tanks moves from Tank 6 to Tank 1 through special carbon pumps. All CIL tanks are equipped with customized carbon pumps to ensure carbon movement and carbon screens to prevent uncontrolled carbon transfer between tanks.

The pulp discharged from the final CIL tank is fed into a carbon safety screen to separate any possible activated carbon content. Subsequently, the pulp is fed into the cyanide detoxification and heavy metal precipitation unit.

Cyanide Detoxification and Heavy Metal Precipitation Unit

The pulp discharged from the Leach–ADR unit is first fed into the cyanide detoxification and heavy metal precipitation unit in order to oxidize and destroy the free cyanide it contains. The unit consists of a total of 4 tanks, including 2 cyanide detoxification tanks and 2 heavy metal precipitation tanks. Cyanide compounds in the pulp are oxidized within a certain pH range by adding sodium metabisulfite as the SO₂ source. During this process, air is supplied into the tank to enable the reaction. Copper sulphate solution is used as a catalyst to increase the reaction rate. If necessary, the same chemicals are also added to the second tank.

Following cyanide destruction, ferric chloride fed into the 3rd and 4th tanks converts the dissolved heavy metals remaining in ionic form into solid form, and the insoluble solid waste is pumped to the tailing’s thickener. The pulp, whose solids ratio is increased in the tailing’s thickener, is pumped to the mine tailings storage facility through underflow pumps.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Carbon Stripping, Gold Recovery and Smelting Unit

The stripping process consists of acid washing and carbon stripping stages. Acid washing and stripping columns each have a capacity of 2 tons. After acid washing with diluted hydrochloric acid, the loaded carbon is transferred to the stripping column. For stripping, a heated mixture of caustic, raw water, and cyanide solution (when required) is passed through the stripping column. During the stripping process, the metal loaded onto the carbon passes into the solution and is fed into the loaded solution tank.

After stripping, the carbon is cooled with raw water and fed into the carbon regeneration furnace. The carbon regeneration furnace activates the carbon by reopening its pores before it is returned to the system. For this purpose, the carbon is heated to 700°C and passed through the furnace before being fed into the furnace discharge tank.

The loaded solution obtained during stripping is fed into the electrowinning cell. Through the potential difference generated in the cells, valuable metal ions are collected in solid form on the cathodes. The metal sludge accumulated on the cathodes is later washed off from the cathodes and dewatered using a filter press. The dewatered cathode sludge is transferred to the calcination furnace. The cathode sludge is calcined, and any possible mercury content is collected by the mercury capture unit integrated with the calcination furnace.

The dried gold cake is mixed with suitable type and amount of flux, melted in the smelting crucible, and poured into moulds.

Mine Tailings Storage Facility

The North Tailings Storage Facility (TSF), also referred to as the Waste Storage Facility, when complete will have a surface area of 59.19 hectares and a total capacity of 9,803,400 m³. The tailings storage facility consists of membrane-faced rockfill embankments and will be undertaken in 4 stages. Stage 1 and 2 have currently been constructed. Within the scope of the Mining Waste Regulation, an implementation project for the TSF, was prepared, and the implementation project was approved by the General Directorate of Environmental Management with its letter dated 12 January 2022 and numbered 2653920, following which construction activities at the site commenced in January 2022.

The North TSF operates according to the zero-discharge principle, and no discharge is released to the receiving environment. Process water recovered from the tailings storage facility is returned to the process plant through a closed-loop system where it is mixed with clean water achieving a WAD Cyanide concentration of less than 0.5 mg/l before being used. During the operation period, at least 1 meter of freeboard will be maintained in all phases of the North TSF.

The North TSF project was designed in four stages. Stage 1 of the North TSF was constructed at the 825 elevation on the southern side of the project area in a manner connected with future stages. Stage 2 TSF was constructed at the 775 elevation on the northern side of the project area as a completely new embankment. The other stages will be formed by raising this embankment in a downstream manner for future phases.

Process water recovered from Phase 2 is pumped to Phase 1 from where it is subsequently pumped to the process water tank by process water pumps and is therefore reused within the plant in a closed-loop system without being discharged. Phase 2 of the TSF currently

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



has capacity of approximately 800,000 m³, which is more than enough to accommodate a 1 in 500 year, 24 hour storm event of 143.7 mm.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



SUMMARY AUDIT REPORT**Auditors Findings**☒ in full compliance with**The International****Söğüt Gold Plant is:**☐ in substantial compliance with**Cyanide****Management Code**☐ not in compliance with**Audit Company:**

SLR Consulting (Africa) Ltd

Audit Team Leader:

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Email:

eperry@slrconsulting.com

Mine Technical Auditor

Dr. Ata Akcil, PhD, (ICMI pre-certified Mine Technical Specialist).

Söğüt Gold Mine

Name of Facility



Signature of Mine Technical Auditor

23 September 2026

Date

NAME OF OTHER AUDITORS

Dr. Ata Akcil PhD.

DATES OF AUDIT

The Certification Audit was undertaken from between 18 May 2026 and 22 May 2026.

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 (ICMI) and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Code Verification Auditors.

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

The "International Cyanide Management Code for The Manufacture, Transport, And Use of Cyanide in the Production of Gold and Silver" (the Code) was developed by a multi-

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



stakeholder Steering Committee under the guidance of the United Nations Environmental Program (UNEP) and the then, International Council on Metals and the Environment.

The Code is a voluntary industry programme for gold and silver mining companies, and companies involved with the production and transport of cyanide to gold and silver mining companies; it focuses exclusively on the safe management of cyanide. Companies that adopt the Code must have their operations, which manufacture cyanide, transport cyanide or use cyanide to recover gold and silver, audited by an independent third party to determine the status of the Code's implementation. Those operations that meet the Code's requirements can be certified and are able to use a unique trademark symbol, which identifies the company as a certified operation. Audit results are made public to inform stakeholders of the status of cyanide management practices at the certified operation.

The objective of the Code is to improve the management of cyanide used in gold and silver mining and assist in the protection of human health and the reduction of environmental impacts (refer to www.cyanidecode.org). The Code is managed by the International Cyanide Management Institute (ICMI).

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Principle 1 – Production and Purchase

Encourage Responsible Cyanide Manufacturing by Purchasing from Manufacturers that Operate in a Safe and Environmentally Protective Manner.

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

☒ in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 1.1**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 1.1; to 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.

Söğüt purchases cyanide from a supplier that manufactures cyanide at a facility that is certified as being in compliance with the Code.

The mine has obtained solid cyanide briquettes from the following company since 2024.

- CyPlus Wesseling, Germany;

No long term contract has been entered into with the cyanide being purchased on an individual load basis.

Review of the International Cyanide Management Institute (ICMI) website confirmed that the solid cyanide supplier is certified as being in full compliance with the Code.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Principle 2 – Transportation

Protect Communities and the Environment During Cyanide Transport.

Standard 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.

☒ in full compliance with

The operation is

☐ in substantial compliance with

Standard of Practice 2.1

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has chain of custody records or other documentation identifying all transporters and supply chains responsible for transporting cyanide from the producer to the operation. All of the solid cyanide is shipped to the Port of Izmir in Turkey and subsequently transported by road to the mine by To-Pet. The Supply of solid cyanide is undertaken in compliance with Cyplus Supply Chain #1 Wesseling Plant to International Ports of Entry.

All identified transporters are included in the Cyplus Supply Chain #1. To-Pet is certified with the ICMI to transport solid cyanide and transports all of the solid cyanide, from the Port of Izmir to the mine.

Review of the International Cyanide Management Institute (ICMI) website confirmed that the Cyplus Supply Chain #1 and the Turkish transporter To-Pet are all certified as being in full compliance with the Code.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Principle 3 – Handling and Storage

Protect Workers and the Environment During Handling and Storage.

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

☒ in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 3.1**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 3.1; design and construct unloading, and storage facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

The facilities for unloading, storing and mixing cyanide including the solid cyanide storage sheds, cyanide mixing tanks, cyanide storage tanks, tank foundations, piping, and secondary containment structures have been designed and constructed in accordance with sound and accepted engineering practices for these facilities by Como Engineers. Como Engineers were named the 2025 Western Australian Exporter of the Year for their expertise in modular plant design and construction for the minerals processing sector. These facilities were constructed by Teknokon Group (Teknokon) as the main contractor.

Söğüt mine only receives cyanide as dry briquettes in wooden boxes, bag-in-box. The boxes are delivered in shipping containers that are unloaded into the storage shed.

The cyanide offloading and storage facilities were inspected during the site visit and found to be in good condition with the correct signage, and the facility was securely locked.

The unloading and storage facility are inspected periodically and recorded on the Chemical Preparation Area Control Form.

The solid cyanide unloading and storage facilities, mixing and liquid cyanide storage tanks are located away from people and surface waters as observed by the auditors during the site visit.

The mine is located several kilometres from the nearest domestic residencies and all unloading, storage and mixing facilities are located several hundred metres from the mine's administration buildings. All facilities have been designed so that cyanide releases would report to the Detoxification Facility.

The mine only receives cyanide as dry briquettes in wooden boxes, bag-in-box form.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



The unloading area is located on concrete preventing any seepage to the subsurface. Any spillage will be of solid cyanide briquettes. Any rainfall in the area or hosing down of the area will flow to the perimeter drain that flows to the Detoxification Facility.

The Cyanide Mixing Area was constructed on a concrete floor with epoxy coating preventing any seepage to the subsurface. Any leaks from the Cyanide Mixing Tank or Cyanide Storage Tank will go into the bunded area surrounding the tanks. The bund contains a sump and an automatic sump pump that will pump any liquid back to the Mixing Tank. This can be changed so that any liquid is pumped to the Detoxification Facility.

There are systems in place to prevent the overfilling of Cyanide Storage Tanks, and the systems are tested and maintained on a routine basis.

The auditors observed the following procedures.

GMY_SGT_TES_TL.062_3 Sodium Cyanide Preparation and Transfer Instructions.

GMY_SGT_TES_PL.002_EN_3 Cyanide Management Plan states the following:

Cyanide preparation and storage tanks are constantly monitored by cameras located in the chemical area.

Preparations and storage tanks:

- Each tank must have an overflow line and the overflow line must discharge any possible debris that may overflow from the tanks into the bund.
- Pump lines must have drain valves. Drain valves must discharge the solution into the relevant tank's basin.
- All valves on the pump suction, outlet and drain lines must be labelled indicating "Open/Close" direction.
- All tanks must have a suitable type of level sensor; level sensors must transmit High and High-High Alarms to the control room automation system.
- The cyanide preparation tank water supply line must contain two manual and one automatic valve. When the system triggers a High Alarm, the automatic valve will be closed under system control and must not be returned to the open position until the level alarm is triggered.

These systems are tested and maintained on a regular basis through the Planned Maintenance System, see 4.1.

Cyanide Mixing and Storage Tanks are located on concrete plinths in a concrete lined bunded area with an epoxy coating preventing any seepage to sub-surface. This was verified by the auditors during the site inspection.

Secondary containments for cyanide storage and mixing tanks are constructed of materials that provide a competent barrier to leakage.

All cyanide mixing and storage tanks are located within concrete containments coated with an epoxy resin designed to contain greater than 110% of the largest tank volume and to prevent seepage to the subsurface. The concrete containments were observed during the site visit to be in good condition.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



The following was confirmed during the site inspection.

- a) To prevent contact with water the wooden boxes of cyanide are stored on concrete floors in a dedicated warehouse, away from incompatible materials. The cyanide warehouse is roofed and enclosed to prevent water ingress.
- b) It was observed during the site inspection that the warehouse storing solid cyanide was adequately ventilated through the use of fans in the wall of the warehouse. In the event of a power failure these fans will continue to provide ventilation through the use of the back-up generators.

The cyanide Mixing Tank and Storage Tank are all in an open air environment fitted with ventilation pipes.

- c) Entry to the cyanide warehouse is restricted to authorized personnel. It is locked when cyanide is not being handled and is surrounded by perimeter security fencing, locked gates, and monitored 24/7 by security cameras.

The Mixing and Storage Tanks are located within the Plant, which is part of the larger mine site that is fenced and accessed controlled. The areas where the tanks are located is monitored 24/7 by security cameras.

- d) The solid cyanide is stored in a dedicated warehouse with no other materials. The Cyanide Mixing and Storage Tanks are also located separately from any incompatible materials being situated within their own dedicated bund.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 3.2: Operate unloading, storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.☒ **in full compliance with****The operation is**☐ in substantial compliance with **Standard of Practice 3.2**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 3.2; operate unloading and storage using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

Procedures are in place and implemented to manage empty cyanide containers as detailed below.

- The empty storage containers (comprising wooden boxes, bulk bag inners and plastic bags liners) are dismantled and stored in a dedicated area of the cyanide warehouse. The empty containers are subsequently packed in containers to prevent any unauthorized use of the boxes and transported by a licensed hazardous waste transportation company to a licensed incinerator in Ankara that is able to take hazardous waste. This is detailed in *GMY_SGT_TES_TL.062_3 Sodium Cyanide Preparation and Transfer Instructions*, *GMY_SGT_PL.001_4 Non-mining Waste Management Plan*.
- The woven polypropylene bags, outer plastic bags, and boxes are not washed prior to being stacked in the cyanide warehouses and subsequently transported to the incinerator. This is acknowledged by the hazardous waste transporter and the incinerator as standard procedure and the necessary health and safety precautions are undertaken when unloading the containers. This is detailed in *GMY_SGT_TES_TL.062_3 Sodium Cyanide Preparation and Transfer Instructions*, *GMY_SGT_PL.001_4 Non-mining Waste Management Plan*.
- The empty storage containers (comprising wooden boxes, bulk bag inners and plastic bags liners) are incinerated at a licensed incinerator in Ankara that is able to take hazardous waste and includes energy recovery.
- The woven polypropylene bags, outer plastic bags, and boxes are not washed prior to being stacked in the cyanide warehouses and subsequently transported to the incinerator. This is acknowledged by the hazardous waste transporter and the incinerator as standard procedure and the necessary health and safety precautions are undertaken when unloading the containers.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026Date

The operation has developed and implemented the following standard operating procedures (SOPs) to prevent exposures and releases during cyanide unloading and mixing activities.

- a) *Sodium Cyanide Preparation and Transfer Instructions* details the operation of all hoses, valves and couplings for the mixing of solid cyanide. The maintenance of all hoses, valves, and couplings are included in the preventative maintenance system.
- b) *Sodium Cyanide Preparation and Transfer Instructions* detail how cyanide containers should be handled without rupturing or puncturing.
- c) Stacking of individual cyanide boxes within the warehouses is limited to two high, well within the maximum loading capacity of the wooden boxes. The warehouse can only accommodate boxes being stacked two high.
- d) Spill kits are stationed at the cyanide storage warehouse in the event of a spill and in the Cyanide Mixing Area. During mixing, spillage of solutions would be contained by the bund for the Mixing and Storage Tanks. The bund contains a sump and an automatic sump pump that will pump any liquid back to the Mixing Tank. This can be changed so that liquid is pumped to the Detoxification Facility. The response to any spill is detailed in the *Sodium Cyanide Spill Clean-Up Instructions*.
- e) The *Sodium Cyanide Preparation and Transfer Instructions* stipulate personal protective equipment (PPE) requirements (disposable chemical coveralls, chemical gloves, boots, portable hydrogen cyanide (HCN) gas meter, full-face gas mask, A2B2E2K2HgP3 mask filter). The *Sodium Cyanide Preparation and Transfer Instructions* require a minimum of two operators in full PPE during the mix with a third person acting as a spotter (buddy) that will stop the process in the event of a dangerous situation occurring or raise the alarm as required.
- f) The red colourant dye Carmoisine is added to the bag containing the solid sodium cyanide briquettes by the manufacturer, such that it automatically mixes with the dissolving briquettes during the mixing process.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Principle 4 – Operations

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment.

Standard of practice 4.1: Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.

☒ in full compliance with

The operation is

☐ in substantial compliance with

Standard of Practice 4.1

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.1; to implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.

The operation has written management policies, operating plans, and procedures that have been developed for cyanide facilities including unloading and storage facilities, process plants, and tailings impoundments.

Gübretaş Maden Yatırımları A.Ş. (Gübretaş Maden) carries out underground and surface gold mining activities at Söğüt Gold Mine. While carrying out the activities; ISO 9001:2015 Quality Management System, ISO 14001:2015 Environmental Management System, ISO 45001:2018 Occupational Health and Safety Management System, ISO 50001:2018 Energy Management System and ISO 46001:2019 Water Efficiency Management System have been established in an integrated manner and are audited and certified within the scope of these management systems.

The general application steps related to the processes and processes are defined with 37 procedures.

The operation's plans and procedures identify and account for the assumptions and parameters on which the facility design was based and any applicable regulatory requirements as necessary to prevent or control cyanide releases and exposures consistent with applicable requirements, which includes the following.

pH

The *Cyanide Management Plan* states "The pH in the leach circuit must be maintained at 10.5. For this purpose, the lime feed dosage rate is automatically adjusted via the Supervisory Control and Data Acquisition (SCADA) using a pH meter located on the thickener surface"

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Set Point

The free cyanide set-point for addition of liquid cyanide to the CIL tanks is determined through the relevant test on the ore, as detailed in 4.2. This currently set to an average of 160 ppm free cyanide. This is confirmed through titrations undertaken every 2 hours.

Weak Acid Dissociable (WAD) Cyanide

The *Cyanide Management Plan* states “The WAD CN content in the tailing slurry pumped into the tailing dam must not exceed 10 ppm. TSF operations are conducted in accordance with the principles set forth in the “*Periodic Inspection of Tailing Plants Instructions*”. This is in accordance with relevant national legislation.

Storm Event

Process water recovered from the North TSF Phase 2 is pumped to Phase 1 from where it is subsequently pumped to the process water tank by process water pumps and is therefore reused within the Plant in a closed-loop system without being discharged. Phase 2 of the TSF currently has capacity of approximately 800,000 m³, which is more than enough to accommodate a 1 in 500 years, 24 hours storm event of 143.7 mm.

The Plant has a negative water balance with top up water being extracted from groundwater boreholes located on the site.

Freeboard

The North TSF Phase 1 and Phase 2 both have a requirement for a 1 m freeboard. This is marked on the side of the TSF so that a visual assessment can easily be made. The freeboards observed during the site visit were in excess of 1 m.

The operation’s plans or procedures describe the standard practices necessary for the safe and environmentally sound operation of the facility including the specific measures needed for compliance with the Code, such as water management, inspections and preventive maintenance activities.

Water Management

Water Management for the Mine is described in procedure *GMY_SGT_CEV_PL.002_2 Water Resources and Wastewater Management Plan*. This includes a description of the water flow from the Plant to the TSF and back to the Plant in a closed loop. The Plant has a negative water balance and therefore additional water is required from on-site groundwater boreholes.

Non-contact water is diverted around the Mine, Plant and TSF providing base flow for local streams, depending on local weather conditions. Non-contact water (clean water) is collected via perimeter diversion channels and directed into the diversion pond, where it is stored for reuse. In addition, contact water from the mine site is collected in 3 contact water ponds located on site. The water accumulated in these ponds is reused as needed. In the event of overfilling, it may be discharged, provided that it meets the required discharge standards. The diversion channels around the TSF prevent rainwater (clean water) from coming into contact with the TSF, allowing it to maintain its natural flow. In instances of exceptionally wet conditions this water can be released into the environment following the appropriate testing to ensure legal compliance. This discharge has not occurred to date with 2025/6 being an especially dry year.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Inspections

The operation continues to inspect cyanide facilities on an established frequency sufficient to assure and document that they are functioning within design parameters, including the following.

- Shiftly TSF Control Form;
- Ambulance Daily Check Form;
- Chemical Preparation Area Control Form (weekly);
- Cyanide Storage Area Inspection Form (weekly);
- Detox Unit Control Form (weekly);
- Emergency Shower Control Form (weekly);
- Ambulance Weekly Inspection Form;
- Weekly TSF Inspections;
- Weekly Occupational Health and Safety (OHS) Inspections;
- Monthly Spill Response Station Materials Control Checklist; and
- Monthly Environment Inspections.

All staff have been trained to report any sightings of wildlife, which are recorded on Fauna and Flora Observation Forms.

Preventative Maintenance

The mine uses the Systeme, Anwendungen und Produkte (SAP) software for managing the preventative maintenance system (PMS). The PMS addresses major machinery, tanks, pumps, valves, and other equipment associated with the management of cyanide as well as sensors, alarm systems operation, electrical wiring integrity, connection of the alarms to the (Supervisory Control and Data Acquisition) SCADA, and non-destructive testing programs for tanks, piping and pumps. This includes the critical equipment that is listed in the *GMY_SGT_BKM_PR.002 Critical Equipment Procedure* having been identified through a Hazard and Operability Study (HAZOP).

The SAP system generates actions based on a predetermined maintenance schedule, or upon generation of Work Orders (WOs) in daily response to specific inspection observations or observed operational needs. Work orders are also raised through the SAP system where ad hoc maintenance is identified by inspections.

The operation implements procedures to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures and incorporate any measures necessary to protect worker health and safety and the environment.

The mine has *GMY_EYS_PR.002_8 Change Management Procedure* to evaluate the environmental and safety impacts of new or modified processes, equipment, or materials. The proposed change is documented and reviewed by the Health and Safety Superintendent and Environmental and Permits Superintendent together with managers from the responsible departments prior to the implementation.

The Change Management Request Form includes the following;

- Change Managers and Change Type;
- Explanation of the Proposed Change;

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



- Areas That will be Affected by the Change;
- Amendment Requirements;
- Approval of the Amendment (including approval from the OHS Department Manager, and the Environment and Permits Department Manager); and
- Post Application Review.

The operation has cyanide management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases as detailed below.

- a) an upset in the operational water balance that presents a risk of exceeding the design containment capacity.

Water Management for the Mine is described in procedure *GMY_SGT_CEV_PL.002_2 Water Resources and Waste Water Management Plan*. This includes a description of the water flow from the Plant to the TSF and back to the Plant in a closed loop. The Plant has a negative water balance and therefore additional water is required from on-site groundwater boreholes.

Non-contact water is diverted around the Mine, Plant and TSF providing base flow for local streams, depending on local weather conditions. Non-contact water (clean water) is collected via perimeter diversion channels and directed into the diversion pond, where it is stored for reuse. In addition, contact water from the mine site is collected in 3 contact water ponds located on site. The water accumulated in these ponds is reused as needed. In the event of overflowing, it may be discharged, provided that it meets the required discharge standards. The diversion channels around the TSF prevent rainwater (clean water) from coming into contact with the TSF, allowing it to maintain its natural flow. In instances of exceptionally wet conditions this water can be released into the environment following the appropriate testing to ensure legal compliance. This discharge has not occurred to date with 2025/6 being an especially dry year.

- b) problems identified by facility monitoring or inspection.

The SAP PMS raises a work order and records the corrective actions and corrective maintenance that is being undertaken when inspections or monitoring identifies a problem.

- c) temporary closure or cessation of operations due to situations such as work stoppages, lack of ore or other essential materials, economics, civil unrest, or legal or regulatory actions.

A temporary cessation of operations due to issues such as a power failure will be managed in accordance with *GMY_SGT_TES_FR.040 Drain and Cleaning Point Checks During Facility Shutdown*. This procedure details all the pumps, pipeline, valves and tanks that need to be drained and cleaned in order for the Plant to be in a 'safe condition'. The solid cyanide would remain in the dedicated storage shed. The liquid cyanide would remain in the storage tank.

Abnormal or emergency conditions relating to long-term shutdowns would be managed through the implementation of the *GMY_SGT_TES_TL.121_0 Plant Final Closure Instructions*.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



The operation's contingency procedures as detailed above account for how cyanide would be safely managed during short-term and long-term shutdowns or cessations in operation. This includes the management of any cyanide on site, and cyanide solution within tanks, vessels, pipelines, ponds and impoundments.

The operation inspects the following at unloading, storage, and process areas, including tanks, secondary containments, leak detection systems, pipelines, pumps, valves, and ponds as detailed below.

- a) Tanks holding cyanide solutions are inspected for structural integrity and signs of corrosion and leakage through the following inspections.

- Corrosion Assessment (every 2 years).
- Thickness Testing Cyanide Mixing Tank (every 3 months).

Due to the age of the Plant the inspections show that the tanks are still in good condition.

- b) All cyanide mixing and storage tanks are located within concrete bunds designed to contain greater than 110% of the largest tank volume and to prevent seepage to the subsurface. The concrete bunds were observed to be in good condition and provide a competent barrier to leakage. The bunds are fitted with automatic sump pumps that will pump any spill to the Detox Facility.

All pipelines within the Plant that contain solution strength cyanide are located inside launders that drain back to the bund for the Cyanide Storage Tank. The other pipelines with the Plant that contain cyanide are located within bunded areas.

The secondary containments for tanks and pipelines within the Plant are inspected as part of the weekly and monthly inspections detailed above.

The tailings pipeline from the Detox Facility, that is adjacent to the CIL Tanks, to the TSF is an high density poly-ethylene (HDPE) pipe-in-pipe with inspection boxes every 100 metres showing the inner pipe and to which any leaks will drain. Any major leak for the Tailings Pipeline will drain to the TSF Phase 1 via the channel within which the Tailings Pipeline is located. The first half of the channel is constructed of concrete, and the second half is constructed of HDPE. The HDPE will be replaced by concrete, in time.

The Tailings Pipeline is inspected on a shiftly basis and the inspection boxes are inspected on a weekly basis. Any leak in the Tailings Pipeline will be detected through pressure changes observed on the SCADA in the Control Room.

- c) Leak detection and collection systems at ponds, as required in the design documents. TSF 1 and 2 have an underliner leak detection layer that pumps back to the TSF and both of these are inspected on a weekly basis. The other ponds do not have leak detection layers
- d) Pipelines, pumps and valves for deterioration and leakage. The Tailings Pipeline is inspected on a shiftly and weekly basis as detailed above. The pipelines within the Plant are inspected on a weekly basis as part of the inspections detailed above.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



- e) Ponds and impoundments are inspected for the parameters identified in their design documents as critical to their containment of cyanide and solutions and maintenance of the water balance, such as available freeboard and integrity of surface water diversions. The freeboard of TSF 1 and 2 are labelled on the liner of the TSFs such that it can be easily observed. This is recorded as part of the weekly inspections and shiftly inspections detailed above. The runoff diversion channels around the TSFs are also inspected as part of the weekly inspections and shiftly inspections.

The operation inspects the cyanide facilities on an established frequency sufficient to ensure and document that they are functioning within design parameters. The Plant is inspected on a weekly and monthly basis. Thickness testing of tanks is undertaken every three months. A structural inspection (Corrosion Assessment) is undertaken every 2 years. The cyanide facilities are listed within the SAP system and the planned maintenance is undertaken on a weekly, monthly, or 6 monthly bases as required. All staff have been trained to report any sightings of wildlife, which are recorded on Fauna and Flora Observation Forms.

The inspections are deemed to be undertaken on a frequency that is sufficient to assure and document that they are functioning within design parameters.

The inspections are documented. The inspection reports and checklists identify the specific items to be observed and include the date of the inspection, the name of the inspector, and any observed deficiencies. The corrective actions are documented through the Audit Report Forms and retained through the Quality Document Management System (QDMS) online system. Work orders are also raised through the SAP system where ad hoc maintenance is identified by inspections.

The SAP system used for the Preventative Maintenance identifies specific items to be observed and the date of the inspection. The name of the inspector, and any observed deficiencies are detailed on the work order.

A PMS is implemented, and activities documented to ensure that equipment and devices function as necessary for safe cyanide management. This is detailed above.

The operation has the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. The Mine is connected to the national grid via a local substation. In addition, the mine has two 1,500-electric kilowatt (eKW) diesel generator sets onsite dedicated to the backup operation that is able to power all aspects of the Plant.

The generators undergo routine maintenance every 500, 1000, 2000, and 4000 hours as detailed in the PMS.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 4.2: Introduce management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.☒ in full compliance with**The operation is**☐ in substantial compliance with**Standard of Practice 4.2**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 4.2; introducing management and operating systems to minimise cyanide use.

The operation implements a program to evaluate cyanide use in the Plant and adjust the addition rate to minimize its use. A cyanide optimisation program is in place, including analyses and improved metallurgical process work management, bottle roll and diagnostic leach testing, pilot leach test works. This is detailed in An Investigation into the Recovery of Gold from Korudanlık Project Samples, Project 15614-02, dated 12 March 2019 by the accredited laboratory operated by SGS.

Bottle roll tests have been conducted at third party accredited Argetest laboratories and are undertaken to simulate the leaching process and determine whether the target cyanide concentration should be modified in order to maintain optimum gold recovery as ore characteristics change. Cyanide concentrations in the leach circuit are closely monitored using a manual silver nitrate titration analysis as per *GMY_SGT_TES_TL.006 – Free Cyanide Measurement Instruction by Titration Method*, conducted on samples collected by process operators every 2-hours from first CIL Tank (2420-TK-002) and last CIL Tank (2430-TK-009). The results are entered onto the *GMY_SGT_TES_FR.001 – Leach/ADR Log Sheet*. The cyanide addition rate to Leach Tank (Leach 1 Tank) is monitored on the Supervisory Control and Data Acquisition (SCADA) screen in the control room and adjusted manually to maintain the cyanide concentration within an average optimal target of 140 - 160 mg/L which is lower values stated in the metallurgical reports, resulting in a residual concentration in last CIL Tank (2430-TK-009) of about 90 - 100 mg/l. Cyanide may also be added at second CIL Tank (2420-TK-003) if required.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026Date

Standard of practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.☒ **in full compliance with****The operation is**☐ in substantial compliance with**Standard of Practice 4.3**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 4.3; implement a comprehensive water management programme to protect against unintentional releases.

The operation has developed a comprehensive, probabilistic water balance. The model uses GoldSim as a probabilistic software to undertake the modelling. This is detailed in Söğüt Gold Mine - International Cyanide Management Code Certification Audit Gold Mine, Probabilistic Water Balance, (PWB) Reviver Consulting. March 2026.

The report states “although a meteorological station has been operating on site since 2023, the available dataset has not been considered sufficient to represent the long-term climatic variability required by the model. Therefore, meteorological stations operated by the Turkish State Meteorological Service (DMI) in the vicinity of the site and with long-term historical records were evaluated”.

The model uses the daily precipitation records from the Bilecik Weather Station 25 km from the site for the last 86 years, to model the uncertainty and variability in the prediction of precipitation patterns, including the ability to consider the frequency and distribution of precipitation events along with extremes and seasonal variations.

The auditors observed the Söğüt Gold Mine, Probabilistic Water Balance Report, Reviver Consulting, March 2026 in addition to interviewing the authors of the report. The report states “PWB is a forward-looking tool that incorporates variability in future water consumption, production rates, potential pump failures, and a range of meteorological conditions, including storm events, etc. It enables a risk-based evaluation of system performance, particularly for critical mining infrastructure such as Tailings Storage Facilities (TSFs), to help their safe operation under uncertain conditions.

- The rates at which tailings are deposited into tailings storage facilities was observed as one of the input parameters for the model.
- A design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility. The TSF can accommodate a 1 in 500 year storm of 143.7 mm.
- The quality of existing precipitation and evaporation data in representing actual site conditions. The mine has a weather station that represents actual site conditions and

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



provides rainfall data on a daily basis. This is used to validate the outputs from the model. Due to the limited history of the on-site weather station (3 years) the municipal weather stations are used to provide historic rainfall data.

- d) The amount of precipitation entering a pond or impoundment resulting from surface run-on from the up-gradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground. The mine is located at the highest point locally and on a water catchment divide. Non-contact water is diverted around the Mine, Plant and TSF providing base flow for local streams, depending on local weather conditions. Non-contact water (clean water) is collected via perimeter diversion channels and directed into the diversion pond, where it is stored for reuse. In addition, contact water from the mine site is collected in 3 contact water ponds located on site. The water accumulated in these ponds is reused as needed. In the event of overfilling, it may be discharged, provided that it meets the required discharge standards. The diversion channels around the TSF prevent rainwater (clean water) from coming into contact with the TSF, allowing it to maintain its natural flow. In instances of exceptionally wet conditions this water can be released into the environment following the appropriate testing to ensure legal compliance. This discharge has not occurred to date with 2025/6 being an especially dry year. The reduced watershed for the ponds and TSFs are included within the water balance to determine the amount of run-on.
- e) Effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and the up-gradient watershed. Freeze, thaw conditions on site are limited but are included within the model.
- f) Solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface, and allowable discharges to surface water. There is no discharge to surface water except during an extreme rainfall event from the stormwater ponds. Allowable seepage from the TSF is a calculated number albeit very small due to the lining of the TSF being composed of two layers of compacted clay each 25 cm thick with an HDPE liner overlaying this. Evaporation data from the municipal weather stations was used within the model.
- g) The effects of potential power outages or pump and other equipment failures on the emergency removal of water from a facility. The flow of water from TSF Phase 2 to TSF Phase 1 and subsequently back to the Plant is undertaken by pumps. In the event of a power outage. Water from TSF Phase 1 can overflow by gravity to TSF Phase 2 that has sufficient capacity to accommodate a 1 in 500 year storm. Water will not be pumped back to the Plant limiting the Plant's operating ability. The Plant has two back-up generators that is sufficient to run all aspects of the Plant. The site has back up pumps and other equipment such that any failed equipment can be replaced.
- h) Where solution is discharged to surface waters, the capacity and on-line availability of necessary cyanide treatment, destruction, or regeneration systems. This is not applicable as there is no discharge to surface waters except during an extreme rainfall event, which has not happened to date. The cyanide Detoxification (Detox) Facility is for the tailings prior to it being discharged to the TSF. If the facility were to be non-

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



operational the Plant would cease operations until such time as the deficiencies were corrected.

- i) Other aspects of facility design that can affect the water balance, such as the assumed phreatic surface in a TSF. The model includes retained water as part of the characteristics of the Tailings incorporated into the model.

Ponds and impoundments are designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations. The mine is located at the highest point locally and on a water catchment divide. Non-contact water is diverted around the Mine, Plant and TSF providing base flow for local streams, depending on local weather conditions. Non-contact water (clean water) is collected via perimeter diversion channels and directed into the diversion pond, where it is stored for reuse. In addition, contact water from the mine site is collected in 3 contact water ponds located on site. The water accumulated in these ponds is reused as needed. In the event of overfilling, it may be discharged, provided that it meets the required discharge standards. The diversion channels around the TSF prevent rainwater (clean water) from coming into contact with the TSF, allowing it to maintain its natural flow. In instances of exceptionally wet conditions this water can be released into the environment following the appropriate testing to ensure legal compliance. This discharge has not occurred to date with 2025/6 being an especially dry year.

The TSF Phase 1 and Phase 2 have freeboards of 1 m each. Phase 2 has only recently been commissioned and therefore has capacity to accommodate greater than a 1 in 500 years storm. Any overflow from Phase 1 will flow by gravity to Phase 2.

The operation's operating procedures incorporate inspection and monitoring activities as necessary to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment and include the following. The TSF freeboard is monitored on a daily basis by Gübretaş Mining employees and on a quarterly basis by the Environment and Permits Department. In addition, the diversion channels are inspected on a shiftly and weekly basis as per the inspections for the various different areas. The stormwater ponds are inspected on a weekly basis.

The operation measures precipitation, comparing the results to design assumptions and revising operating practices as necessary. The Probabilistic Water Balance Report states "although a meteorological station has been operating on site since 2023, the available dataset has not been considered sufficient to represent the long-term climatic variability required by the model. Therefore, meteorological stations operated by the Turkish State Meteorological Service (DMI) in the vicinity of the site and with long-term historical records were evaluated". The last update of the model included historical rainfall data from Bilecik Weather Station for 1939-2025.

The PrecipGen sub-model was driven using historic daily total precipitation data recorded at the Bozüyük station 16 km from the site. Based on 1,000 stochastic realizations covering the period between 2025 and 2035, the model was able to generate precipitation events corresponding to a 24-hour, 100-year flood in each simulation.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



In one of these realizations, a precipitation event exceeding the 24-hour, 200-year flood threshold (113.2 mm) was observed. The TSF Phase 2 can currently accommodate in excess of a 1 in 500 years storm event.

Söğüt Gold Mine
Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 4.4: Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.☒ in full compliance with**The operation is**☐ in substantial compliance with**Standard of Practice 4.4**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

The operation does not have any open water where it is necessary to implemented measures to restrict access by wildlife and livestock as the WAD cyanide in open water does not exceeds 50 mg/l. The operation can also demonstrate that the cyanide concentration in open water in the TSF and solution ponds does not exceed 50 mg/l WAD cyanide

The tailings sent to the TSF has a WAD cyanide concentration of less than 10 mg/l in accordance with Turkish Regulations. The pool in TSF Phase 1 and Phase 2 are monitored on a weekly basis with all of the readings for 2026 showing a concentration of WAD cyanide less than 1.0 mg/l. All other ponds contain stormwater with monitoring showing a WAD cyanide concentration of less than 0.02 mg/l.

Maintaining a WAD cyanide concentration of 50 mg/l or less in open water is effective in preventing significant wildlife mortalities. The Plant has daily inspections with the results detailed in checklists, including wildlife mortalities. The TSF undertakes daily monitoring of wildlife. All staff have been trained to report any sightings of wildlife, which are recorded on Fauna and Flora Observation Forms No wildlife mortalities have been recorded

It is thus concluded that maintaining a WAD cyanide concentration of 50 mg/l or less in open water is effective in preventing significant wildlife mortalities.

It is noted that there is no heap leach on site.

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Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026Date

Standard of practice 4.5: Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.☒ in full compliance with**The operation is**☐ in substantial compliance with**Standard of Practice 4.5**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard 4.5 to implement measure to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

The operation does not have a direct discharge to surface water. Water Management for the Mine is described in procedure *GMY_SGT_CEV_PL.002_2 Water Resources and Wastewater Management Plan*. This includes a description of the water flow from the Plant to the TSF and back to the Plant in a closed loop. The Plant has a negative water balance and therefore additional water is required from on-site groundwater boreholes.

Non-contact water (clean water) is collected via perimeter diversion channels and directed into the diversion pond, where it is stored for reuse. In addition, contact water from the mine site is collected in 3 contact water ponds located on site. The water accumulated in these ponds is reused as needed. In the event of overfilling, it may be discharged, provided that it meets the required discharge standards. The diversion channels around the TSF prevent rainwater (clean water) from coming into contact with the TSF, allowing it to maintain its natural flow. In instances of exceptionally wet conditions this water can be released into the environment following the appropriate testing to ensure legal compliance. This discharge has not occurred to date with 2025/6 being an especially dry year.

The operation monitors for cyanide in surface water downgradient of the site although there is no direct discharge from the site to surface water. The results for 2026 for surface water downstream of the site shows all of the results to be less than 0.005 mg/l free cyanide.

There are no known indirect discharges to surface water. Monthly monitoring of surface water surrounding the Plant and TSF show that all results for 2026 are below 0.005 mg/l free cyanide.

The local watercourses are transitory due to the seasonal rainfall and any indirect discharge would be observable as seepage into the dry watercourses due to the mine being at the head of the catchment.

No indirect discharge from the operation have caused cyanide concentrations in surface water to rise above levels protective of beneficial use.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.☒ in full compliance with**The operation is**☐ in substantial compliance with**Standard of Practice 4.6**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 4.6 to implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

The operation implements specific water management and other measures to manage seepage to protect the beneficial use of ground water beneath and / or immediately down gradient of the operation. This includes the following.

The tailings storage facility consists of membrane-faced, clay lined, rockfill embankments located at the head of a valley. Phase 1 and Phase 2 of the TSF have been constructed. Both Phases of the TSF have leak detection layers that collect any seepage and pump it back into the TSF.

The stormwater ponds are HDPE lined and do not have leak detection /seepage layers.

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

The beneficial uses of groundwater downgradient of the site are limited to irrigation for agriculture. Packaged water is used for drinking purposes.

In office areas, potable water is treated using water treatment systems. Potable water analyses are conducted monthly from both the supply wells and the points of use. No seepage from the operation has caused the concentration of groundwater to rise above levels protective of beneficial use.

All WAD cyanide concentrations in the groundwater samples taken for the last two years were observed to be below the detection limit of 0.005 mg/l. Turkey does not have a numerical standard for cyanide in groundwater.

The operation does not use mill tailings as underground backfill.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 4.7: Provide spill prevention or containment measures for process tanks and pipelines.☒ in full compliance with**The operation is**☐ in substantial compliance with**Standard of Practice 4.7**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 4.7; Provide spill prevention or containment measures for process tanks and pipelines.

Spill prevention or containment measures are provided for all unloading, storage, and process solution tanks. All cyanide containing tanks are placed inside bunded areas.

The bunds have a capacity to contain 110% of the largest tank. They are also linked by concrete lined trenches to the Detox Facility. The liquid cyanide storage tanks, elution tanks, and CIL tanks are all constructed on solid concrete plinths, which was confirmed during the site inspection.

Secondary containments for cyanide unloading, storage, and process tanks are sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event. There are no cyanide process tanks without secondary containment

The auditors observed bund capacity calculations as detailed below:

- Cyanide Mixing and Storage Tanks 14 m³ per tank, bund capacity 35.8 m³.
- CIL Tanks 223.7 m³ per tank, bund capacity 300 m³.
- Detox Tank 44 m³, bund capacity 85.5 m³.
- Intense Leach Reactor 1 m³, bund capacity 4.6 m³.
- Elution 5.7 m³, bund capacity 15.3 m³.
- Tailings Thickener 145 m³, bund capacity 172.4 m³.

Procedures are in place and being implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. All bunded areas are equipped with manual spillage pumps that can pump any spilled cyanide back to the tank or to the Detox Facility. Any spillage of tailings will be contained within the trench containing the Tailings pipeline that will flow by gravity to the TSF Phase 1.

The *Sodium Cyanide Spill Clean-Up Instructions* were observed, which prevent the discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in the secondary containment area.

Spill prevention or containment measures are provided for all process solution pipelines to collect leaks and prevent releases to the environment. The reagent strength cyanide

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



pipelines are located within secondary containment (launders) or above competent secondary containment and flanges are covered with flange covers. Any spillage in the launders flows back to the cyanide tank bunds or other secondary containment.

The tailings pipeline from the Detox Facility to the TSF Phase 1 and 2 is an HDPE pipe-in-pipe with inspection boxes every 100 metres showing the inner pipe and to which any leaks will drain. Any major leak for the Tailings Pipeline will drain by gravity to the TSF Phase 1 via the channel within which the Tailings Pipeline is located. The first half of the channel is constructed of concrete, and the second half is constructed of HDPE. The HDPE will be replaced by concrete, in time. Any leak in the Tailings Pipeline will be detected through pressure changes observed on the SCADA in the Control Room.

There are no areas where cyanide pipelines present a risk to surface water. The mine is located on a ridge at the head of the catchment.

Cyanide tanks and pipelines constructed of materials that are compatible with cyanide and high pH conditions. The Tailings pipeline is a pipe-in-pipe design constructed of HDPE. Cyanide tanks are constructed of mild steel. Pipelines containing cyanide within the Plant are constructed of either mild steel or HDPE. Both materials which are compatible with cyanide and high pH conditions.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of Practice 4.8: Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.☒ in full compliance with**The operation is** ☐ in substantial compliance with **Standard of Practice 4.8**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 4.8; to implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Quality assurance and quality control programs were implemented during construction of the Mine. The construction has been split into three phases with only Phase 1 having been constructed where the oxide ore is currently processed. This includes the construction of the Plant, Cyanide Storage Shed, and TSF. The construction of Phase 1 was completed in December 2022. For the Phase 1 construction Teknokon was the main contractors.

The following were observed by the auditors.

- Sogut Gold Mining Project Phase 1 dated 24 November 2022 (signed off by Emre A., Metallurgical Engineer) this includes the following;
 - Site Works Confirmation File;
 - Technical Specification for Piping Materials and Identification, Como Engineers
 - Technical Specification for Shop and Site Fabricated Steel Tanks, Como, Como Engineers.
 - Technical Specification for Installation of Mechanical Equipment, Como Engineers.
 - Technical Specification for Steel Fabrication and Erection, Como Engineers.
 - Various Quality Procedures, Teknokon.
 - Technical Specification for Surface Treatment, Como Engineers.
 - Personnel Qualifications.
 - Equipment Calibrations.
 - Material Certificates.
 - Welding Consumables and Paint Certificates.
 - Equipment Survey Reports (including as-built reports).
- Inspection and Test Plan for Installation of Leach Tank 1 dated 29 November 2022.
- North TSF Stage II Construction Project Audit Services, Hidro Group, November 2023. This is a monthly construction audit report to confirm the construction is being undertaken in accordance with the specifications.
- Tailing Storage Facility Implementation Project, VIA Engineering Consulting, 18 October 2021. This details the specification for the construction of TSF Phase 1.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



- Northern TSF Project Impermeable Material Study, Hidro Group,
- Evaluation of Geosynthetic Test Results for TSF Phase 1., Hidro Group, August 2022.

Various other reports were also observed detailing the QA/QC testing of the various materials etc. The original quality control and quality assurance programs in 2022 addressed the suitability of materials and adequacy of soil compaction for earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used in ponds and TSF Phases, and for construction of cyanide storage and process tanks.

The documentation for the quality control and quality assurance programs have been retained as part of the electronic document control system, QDMS.

An appropriately qualified person reviewed cyanide facility construction and provided documentation that the facility has been built as proposed as detailed above with appropriate company representatives signing off the documents. The various companies involved in the design and construction of Phase 1 have all been accredited by the Turkish Government to undertake such work.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.☒ in full compliance with**The operation is**☐ in substantial compliance with **Standard of Practice 4.9**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 4.9; to implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

The operation has developed written standard procedures for monitoring activities as detailed below. The *Water Resources and Waste Water Management Plan* includes Section 8. Monitoring. This section details the coordinates of the surface and groundwater monitoring locations. It also contains a table detailing the parameters to be measured, together with the frequency.

The *Instructions for Sampling Water and Wastewater Procedure*, includes the procedures for taking samples from surface water and groundwater including details for labelling and sending to the certified laboratory.

All staff have been trained to report any sightings of wildlife, which are recorded on Fauna and Flora Observation Forms.

The *Instructions for Sampling Water and Wastewater Procedure* was compiled by Samet Akbas. He has a Degree in Environmental Engineering and a Masters Degree in Occupational Health and Safety. He has 8 years experience as an Environmental Engineer.

The *Water Resources and Wastewater Management Plan* specifies:

- where samples should be taken;
- the constituents to be analysed for; and
- the frequency of monitoring.

The *Instructions for Sampling Water and Wastewater Procedure* specifies:

- how samples should be taken;
- sample preservation techniques;
- chain of custody procedures and shipping instructions and analyses required (cyanide species to be analysed); and
- quality assurance and quality control requirements for cyanide analyses.

Sampling conditions are documented in a *Field Water Quality Measurement Record Form*, including weather, livestock/wildlife activity, anthropogenic influences, etc., as detailed by the *Instructions for Sampling Water and Wastewater Procedure*.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Monitoring is undertaken at frequencies to adequately characterise the medium being monitored, and to identify changes in a timely manner. The groundwater monitoring boreholes and surface water monitoring are undertaken monthly in accordance with the *Water Resources and Wastewater Management Plan*. Monitoring of the TSF pools and the Stormwater Dams are undertaken on a weekly basis. Monitoring of WAD cyanide in tailings leaving the Detox Facility is monitored on a continual basis and shown on the SCADA system and recorded. The wildlife mortalities for both the Plant and the TSF are undertaken on a daily basis.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026Date

Principle 5 – Decommissioning

Protect Communities and the Environment from Cyanide Through Development and Implementation of Decommissioning Plans for Cyanide Facilities.

Standard of practice 5.1: Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

☒ in full compliance with

The operation is

☐ in substantial compliance with

Standard of Practice 5.1

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 5.1; to plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

The operation has developed written procedures to effectively decommission cyanide facilities at the cessation of operations including the following.

- *Söğüt Gold Mine Project, Conceptual Closure Plan, WSP, December 2024.*
- *GMY_SGT_TES_TL.121_0 Plant Final Closure Instructions, dated 24 February 2026.*

These plans adequately address decommissioning, which is the aspect of closure that addresses the cyanide remaining on site upon cessation of production activities and prepares the site for its closure and post closure period.

The *Conceptual Closure Plan* includes Table 15 Gold Mine Project Closure Schedule, which details the actions to be undertaken on a yearly basis during the Operation-Partial Closure Period (2024-2034), Closure Period (2035-2039), and Post Closure Period (2040-2064).

Due to the mine having recently started production (2023), this is the first version of the Conceptual Closure Plan. It is anticipated that the Mine Closure Plan will be reviewed and updated at the end of 2026.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 5.2: Establish a financial assurance mechanism capable of fully funding cyanide related decommissioning activities.☒ **in full compliance with****The operation is**☐ in substantial compliance with**Standard of Practice 5.2**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 5.2; to establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

The operation has developed an estimate of the cost to fully fund third party implementation of the cyanide-related decommissioning measures identified in its site decommissioning or closure plan.

The Conceptual Closure Plan, Section 9 Financial Provisions, includes Table 16: Conceptual Closure Cost Estimate, and Table 17: Breakdown of Direct Costs of Cyanide Related Facilities. Table 17 includes direct and indirect costs of decommissioning cyanide related facilities. The costs were calculated using the Standardised Reclamation Cost Estimator (SCRE).

Due to the mine having started production recently (2023) this is the first version of the Conceptual Closure Plan and the costs estimate for decommissioning the cyanide facilities. The Closure Plan provides for the cost estimate to be reviewed whenever changes occur that affect cyanide-related decommissioning activities and costs, or at a minimum every five years.

There is no established financial assurance required by the Turkish jurisdiction to cover estimated costs of cyanide related decommissioning activities. The operation has established an insurance guarantee mechanism to cover the estimated costs for the cyanide-related decommissioning activities as identified in the Decommissioning Plan.

A letter from Bereket Insurance covering the period 30 April 2026 – 30 April 2029. This includes a "Declared Project Exposure" of the estimated decommissioning costs for the cyanide facilities.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026Date

Principle 6 – Worker Safety

Protect Workers' Health and Safety from Exposure to Cyanide.

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

☒ in full compliance with

The operation is ☐ in substantial compliance with **Standard of Practice 6.1**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 6.1 to identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

The operation has developed procedures describing how cyanide-related tasks such as unloading, operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure.

The following procedures have been developed describing how cyanide-related tasks at the Plant should be conducted and were reviewed:

Unloading

GMY_SGT_TES_TL.061, Instructions for in-Field Transportation and Storage of Cyanide

Mixing Plant

GMY_SGT_TES_TL.062, Sodium Cyanide Preparation and Transfer Instructions

Operations

GMY_SGT_TES_PR.003, Leach and Adsorption Unit Procedure

GMY_SGT_TES_PR.008, Tailing Storage Facility (TSF) Operation Procedure

GMY_SGT_TES_PR.012, Cyanide Decomposition and Heavy Metal Precipitation Unit Procedure

Entry into Confined Spaces

GMY_SGT_ISG_FR.015, Confined Space Entry Permit Request Form

GMY_SGT_BKM_TL.038, Tank and Working Instructions in Closed Areas

GMY_SGT_BKM_PR.002, Critical Equipment Selection Procedure

Equipment Decontamination

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



GMY_SGT_TES_TL.121, Plant Final Closure Instruction (this includes the decontamination of equipment prior to maintenance).

The procedures detail the PPE required. In addition, there are various signage at the Plant and the TSF detailing the PPE required. *GMY_SGT_TES_TL.085, Chemical Area Work Instruction*, *GMY_SGT_TES_PR.008, Tailing Storage Facility Operating Procedure*, *GMY_SGT_TES_TL.062*, and *Cyanide Preparation and Tank Filling Instruction*, provide directions on the required PPE (single-use Type 3 chemical protective coveralls, full face respiratory mask with ABEK2P3-HgP3 filter, chemical resistant rubber gloves and chemical resistant rubber boots, sealed with chemical resistant duct tape). The procedures also require that operators inspect respirator and filters prior to starting an offloading event.

Pre-work inspections are undertaken as detailed in the various SOPs. Pre-work inspections are conducted prior to cyanide unloading and mixing operations as detailed in Section 7.1.1 Controls Before Cyanide Preparation of the procedure for *Cyanide Preparation and Tank Filling Instruction*. These inspections include a visual inspection of PPE condition, shower/eye wash stations, and when used, checks on the operation of the forklift.

The operation solicits and actively considers worker input in developing and evaluating health and safety procedures. This is undertaken through the following. There is a suggestion box where anybody with any ideas including changes to health and safety procedures can submit their ideas. There are Daily Toolbox Talks at the start of each shift where a variety of topics will be discussed including current and new health and safety procedures.

Monthly Health, Safety and Environment (HSE) Committee Meetings are undertaken where the development of new or evaluation of current health and safety procedures is undertaken. These meetings are held to evaluate existing health and safety procedures and to review new initiatives. Furthermore, weekly Occupational Health and Safety Representative meetings involving representatives from all departments are conducted to discuss safety performance and action follow-up. In addition, monthly Process Safety meetings are carried out to monitor process safety performance, verify critical controls, and support continuous improvement activities.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 6.2: Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.☒ in full compliance with**The operation is**☐ in substantial compliance with **Standard of Practice 6.2**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 6.2 to operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

The operation has determined the appropriate pH for limiting the evolution of HCN gas during storage and production activities. The *Cyanide Management Plan* states “The pH in the leach circuit must be maintained at 10.5. For this purpose, the lime feed dosage rate is automatically adjusted via SCADA using a pH meter located on the thickener surface”.

However, due to the significant carbonate content of the ore, particularly the presence of limestone (CaCO_3) in the host rock, the process slurry exhibits a strong natural alkalinity and buffering capacity. As a result, the target leach pH is consistently maintained without the routine addition of lime. Process monitoring data demonstrate that the pH remains above the minimum operating requirement throughout the leach circuit, and therefore lime addition is generally not required under normal operating conditions. The lime dosing system remains available and can be utilized if ore characteristics change or if additional pH control becomes necessary.

The operation has determined various hotspots, where workers may be exposed to hydrogen cyanide gas in excess of 8 parts per million (ppm) (8.9 mg/m^3) on an instantaneous basis and 4.7 parts per million (ppm) (5 mg/m^3) continuously over an 8-hour period, as identified by signage observed during the site visit. These locations include the Cyanide Preparation Area, Cyanide Storage Area, Leach and Adsorption Unit, Detox Unit, and TSF. Personnel hydrogen cyanide monitors have to be worn when undertaking work at these locations. The exposure of workers to cyanide dust is not applicable as sodium cyanide is contained in double lined boxes prior to being used in a mixing event i.e. dust will not be present in the storage area due to the containment of the solid cyanide. The exposure of workers is not applicable during a mixing event as the workers will be wearing full PPE (disposable chemical coveralls, chemical gloves, boots, portable HCN gas meter, full-face gas mask, A2B2E2K2HgP3 mask filter) The cyanide is subsequently stored as a liquid.

The facility uses monitoring devices in process areas and for activities involving the management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas or cyanide dust exceeding 8 parts per million (ppm) on an instantaneous basis and 4.7 parts

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



per million (ppm) continuously over an 8-hour period, as cyanide, which includes the following.

There are fixed monitors at the locations that have been identified as hotspots i.e. the Cyanide preparation area, Cyanide Storage Area, Leach and Adsorption Unit, Detox and TSF, Gold Room and ILR Area. Personnel hydrogen cyanide monitors also have to be worn when undertaking work at these locations. The alarms for the fixed monitors and personal monitors are set at A1: 4.7 ppm and A2: 8 ppm.

The Cyanide Management Plan states in cases of exceeding the limit (momentary 8 ppm and over 4.7 ppm for one shift i.e. 8 hours), the relevant Process Plant Supervisor is informed immediately. The Process Plant Superintendent (process engineer(s), team leader(s) in his/her absence) assesses the situation and, if necessary, ensures evacuation and puts an emergency action plan in place. The incident investigation and reporting process is initiated to identify the situation that caused the increase and to find a solution.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained for at least three years. Dräger (Ankara, Türkiye) and its authorized service provider, İnmar, are contracted to perform calibration and maintenance of both fixed and portable gas detection systems. Calibration activities are conducted either on-site or at authorized service facilities, depending on operational requirements and maintenance schedules. The site is equipped with a total of 12 fixed and 21 portable gas detectors. Fixed detectors are calibrated semi-annually, while the calibration frequency of portable detectors is maintained in accordance with the manufacturer's recommendations.

Calibration activities and records are tracked through the QDMS Document Management System and an Excel® spreadsheet (GMY_EYS_TB.002) maintained by the Integrated Management Systems Unit. The QDMS system provides automated reminder notifications prior to scheduled calibration dates to ensure timely execution of calibration activities and prevent overdue equipment. Review of the records confirmed that all equipment calibrations are current, and calibration records for each detector were available for review. In addition, operators perform a visual inspection of gas detection equipment at the beginning of each shift.

Warning signs have been placed where cyanide is used advising workers of the following; that cyanide is present, the use of any mandatory personal protective equipment, and that smoking, open flames, eating and drinking are not allowed. Signage is clearly posted at entrances to the Leach and Adsorption Unit, Detox, Mixing Area, TSF, Cyanide Storage Areas.

Cyanide hazard warning signs are also posted on fencing around the cyanide facilities. Pipelines are clearly colour-coded and labelled to identify the cyanide solutions in lines in the Process Plant. Instructions for actions to be undertaken in the event of HCN releases and alarm triggers are prominently posted at locations around the Process Plant. In addition, all workers and contractors are required to complete induction and workplace hazard training that includes cyanide hazard, awareness, and safety training.

Designated smoking areas are clearly defined, and all employees are made aware of designated smoking locations and applicable smoking restrictions through induction training and ongoing awareness programs. Furthermore, eating and drinking are prohibited in

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



chemical handling and processing areas to minimize the risk of contamination and inadvertent exposure to hazardous substances.

High strength cyanide solution is dyed for clear identification. The mine has received solid cyanide from CyPlus since 2024. The supplier includes Carmoisine in each cyanide box as per their contract with the mine. Colourant dye is sent with the cyanide briquettes inside the bag-in boxes so that at the mixing operation, the high strength cyanide solution is coloured red.

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

Shower and eye-wash units are located in strategic areas of the process plant where there is a potential for exposure to cyanide. There are a total of 23 shower and eyewash stations strategically located throughout the process plant, including next to the caustic preparation tanks, the upper and lower floors of the cyanide preparation area, the acid wash area, the caustic storage tank, the ore feed hopper, gravity concentrator unit, mill area, control room, carbon safety screen, stripping unit, thickener, Leach 1 containment bund, ADR Tank 2 and 3 areas, Detox Tank 1 and 2 areas, flocculant preparation tank, Chemical Preparation Areas 1, 2 and 3, ADR 1 containment bund, ADR 4 containment bund and ADR 5 containment bund.

These stations are plumbed into the fresh water supply system and maintained at a pressure of approximately 2 bar (30 psi); or gravity fed from an overhead supply tank that provides a safe pressure for eye wash and are refilled after every operation. Showers and eye wash stations are checked weekly for flow, condition, mechanical and visual control, and access. Showers and eyewash stations are inspected every weekly for working condition and the OHS Department also conducts monthly inspections of shower/eyewash condition, water pressure, working condition of green indicator lights, eyewash seals and expiry dates and that eyewash filters are free from blockages. Observations are noted on the *GMY_SGT_TES_FR.042, Phase-1 Plant Emergency Shower Control Form*.

There are 696 fire extinguishers located strategically about the mine site, and of these 64 are located in cyanide containing areas. Fire extinguishers in the cyanide use areas (Leach and Adsorption Unit, Detox, Storage and TSF) are all dry chemical extinguishers (90% Mono ammonium phosphate dry chemical powder). Fire extinguishers are inspected every three months by the OHS Department and labelled with color-coded inspection tags in accordance with the inspection schedule. All fire extinguishers and fire detection systems are inspected and serviced annually by an authorized external contractor. Inspection, maintenance and replacement records are maintained on the *Fire Extinguishers Control Form*.

Unloading, storage, and process tanks and piping containing cyanide are identified to alert workers of their contents, and the direction of cyanide flow in pipes is shown. The Tailings Pipeline from the Detox Facility is also labelled as Pulp and the flow direction shown. The Cyanide Awareness Training includes details that the Pulp contains cyanide.

Safety Data Sheet (SDS), first aid procedures, and other informational materials on cyanide safety is in the language of the workforce and available in areas where cyanide is managed. All signage, first aid procedures, SDS and other information materials are in Turkish, the primary language of the workforce.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



SDS manuals containing hard copies of SDS are strategically located at the warehouse, cyanide preparation area, process plant, and laboratory. The SDS are filed in binders and segregated by mine area for ease of reference. The short form SDS sheets are also posted in strategic areas of the plant where chemicals are used. There is also signage at the entrances to the cyanide warehouse compounds and process plant that provide the procedures for first aid response to cyanide emergencies in the event of an HCN gas alarm.

First aid procedures are described in the *Cyanide Management Plan (CMP)* and include a description of the properties of cyanide, use of PPE and first aid response to cyanide exposure. First aid response information in Turkish, the primary language of workers, is also posted at strategic areas within the process plant describing the actions that are to be taken in the event of an HCN alarm being triggered. All departments maintain their own SDS forms in paper form in departmental folders which are accessible by all employees. Additionally, SDSs are located in the process plant office and the Administration Building. SDS sheets are available in Turkish which is the primary language of the workforce in addition to them being in English.

All computer users have access to *GMY_ISG_FR.016, Chemical Request and Approval Forms*, as well as original SDSs, through the QDMS document management system, ensuring availability of up-to-date chemical safety information.

Procedures are in place and being implemented to investigate and evaluate cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety, and to respond to cyanide exposures, are adequate or need of revising. The mine has not experienced any major cyanide exposure incidents since 2023. If there is an incident, the mine has systems in place to investigate through the *GMY_EYS_TL.001 Instruction for Reporting and Investigation of Accidents and Incidents*, rev 3, dated 19 January 2026. The procedure provides instruction and guidance to ensure that investigations (including those that involve cyanide) are completed and applies to all employees and contractors. Upon an incident or near miss, the observer is required to report to their Supervisors and/or the OHS Department and complete the *GMY_EYS_FR.011, Accident/Incident Notification Form* rev 3, dated 11 December 2025 either in paper copy or directly into the electronic system.

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.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 6.3: Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.☒ **in full compliance with****The operation is**☐ in substantial compliance with**Standard of Practice 6.3**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 6.3; develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The operation has water, oxygen, a resuscitator, antidote kits and a radio, telephone, and alarm system readily available for use at cyanide unloading, and storage locations and elsewhere in the Plant.

Sixteen medical oxygen resuscitator kits (6 units retained in storage) are available for use. These are located in the clinic (which is a less than four-minute drive from the Process Plant), in the ambulance, at the Fire and Rescue Station and in the hazardous materials (HAZMAT) vehicle. The units are inspected monthly by clinic personnel and recorded on control forms which also note the expiry date of cylinders. In addition to clinic staff, all Emergency Response Team (ERT) members are trained to administer medical oxygen. At the time of the audit the ERT comprised 32 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. In addition, a total of 243 first aiders are trained with the official first aider certificate on the mine site.

The mine has 6 packs of cyanide antidote available in the event of a cyanide first aid emergency. Hydroxocobalamin is applied intravenously and can therefore only be administered by Occupational Physician or paramedic.

Communication is through radio, cell phone, or fixed phone or satellite phone if needed. All workers including security personnel are equipped with radios for use in the field and plant. The radios are tuned to Channel 1 to allow for emergency communication. In addition, radios remain readily available for all workers, although cellular phones are the preferred method of communication and cellular phone reception is available across the site.

Certain areas in the Process Plant including the Cyanide Preparation Area and Cyanide Warehouse are monitored by camera, which is linked to security, the Plant Process Superintendent and Operation Manager. Additionally, emergency push buttons or pull cords are located at key areas within the Process Plant, Cyanide Warehouse, and Gold Room.

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

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



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. The Cyanokits are kept in room temperature in a cabinet as directed by the manufacturers. The expiry date on each kit is clearly marked, and all kits were all within the manufacturer's expiry date. The clinic is responsible for replacing the kits prior to expiry. *GMY_SGT_ISG_FR.041, Clinic Medication and Consumables Stock and Expiry Tracking Form* dated 07 November 2023 and *GMY_SGT_ISG_FR.040, Ambulance Medication and Consumables Stock and Expiry Tracking Form* dated 07 November 2023 are used to track the expiry date of each kit and the monthly inspections. After each inspection the form is signed by a nurse and the clinic Occupational Physician. The clinic also maintains a supply of activated carbon powder and liquid for oral ingestion in the event of cyanide ingestion.

First aid kits are present at strategic locations within buildings and emergency response vehicles (ambulance HAZMAT vehicle, rescue vehicle, and fire truck). The kits are inspected by clinic personnel with observations noted on a control form. First aid kits and response equipment are also included on the checklist control form used by the OHS Department for their monthly inspections.

The operation has developed the following specific written Emergency Action Plan and associated procedures to respond to cyanide exposures. Emergency response procedures in the event of a cyanide release are set out in the CMP and the *GMY_SGT_ISG_PL.002 Emergency Action Plan* (EAP) rev 10, dated 26 January 2022. Specific emergency response procedures to cyanide, cyanide solution or HCN gas releases are detailed in the CMP and EAP. 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 EAP.

The operation has its own on-site capability to provide first aid and medical assistance to workers exposed to cyanide. The mine 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, 4 nurses and 4 paramedics who provide 24-hour medical support. The paramedics receive cyanide awareness training and instruction from the Occupational Physician on the application of medical oxygen and intravenous use of Cyanokits. The Occupational Physician and paramedics have participated with the emergency brigade in mock drill exercises since 2023.

All workers receive 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, workers 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 their 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. The officer initiates first actions and the incident will be notified to security if not already done so and the OHS Department depending on the type of incident. The ERT members are also trained to provide cyanide exposure first aid and the use of medical oxygen until the arrival of medical personnel for further treatment. Each shift in the Plant has at minimum of two to

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



three ERT members present. At the time of the audit there were 32 ERT members and 243 trained first aiders and 29 subcontractors trained as first aiders.

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 four-minute journey from the Plant. The clinic is subject to annual inspections by the Health Ministry.

The operation has developed procedures to transport workers exposed to cyanide to locally available qualified off-site medical facilities. The mine provides Occupational Physician, nurse and paramedics on a 24-hr basis at the mine site that are certified to respond to all cyanide emergencies and stabilize a patient. The mine has an ambulance to follow-up through the Action Tracking Process located at the clinic in readiness for an emergency response. The ambulance driver is from the Administrative Affairs Department and the response time to the Plant in the event of an emergency is around four-minutes. This ambulance is available to transport patients to Söğüt Regional State Hospital in Söğüt, 8 km (approximately 10 minutes) away by highway.

The transport to a hospital would only be required for more intensive care outside the capability of the clinic, or for subsequent monitoring. The operation has informed local medical facilities of the potential need to treat patients for cyanide exposure, and the operation is assured that the medical facility has adequate, qualified staff, equipment and expertise to respond to cyanide exposures.

The mine has communicated with the Ministry of Health and Hospitals (Emergency Units) in Söğüt and Bilecik. The nearest hospitals are the Söğüt Regional State Hospital (8 km away) and the Training and Research Hospital in Bilecik 39 km away). Since 2023, technical communications have been made to the nearest hospitals by the Company Occupational Physician, to gather information on the mining operation, the use of cyanide in the gold recovery process, the potential risks associated with the operation, the Emergency Action Plan and in house response capability, and the potential additional medical services that may be requested in the event of an accident. A local ambulance service is also available in Söğüt if additional ambulance capability is needed.

The auditors observed a training form dated 17 July 2025 regarding the training of healthcare professionals by the Mine Occupational Physician.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Principle 7 – Emergency Response

Protect Communities and the Environment Through the Development of Emergency Response Strategies and Capabilities.

Standard of practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.

☒ in full compliance with

The operation is

☐ in substantial compliance with **Standard of Practice 7.1**

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.1; prepare detailed emergency response plans for potential cyanide releases. The operation developed Emergency Response Plans to address potential accidental releases of cyanide and cyanide exposure incidents. These include the following.

The operation has developed an Emergency Action Plan to address potential accidental releases of cyanide and cyanide exposure incidents.

The Mine has developed the EAP and CMP 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, 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. Potential emergencies other than cyanide related emergencies are separately addressed in the EAP, Crisis Communication Plan, and Internal Emergency Plan.

Potential emergencies other than cyanide related emergencies are separately addressed in the EAP. The 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. Cyanide related emergencies are also addressed in the CMP. The CMP references the EAP for identifying potential detailed release scenarios and addresses the response protocols for each of the scenarios including the initial response, first aid, medical response, spill response, spill control and clean-up activities in a systematic order.

The EAP identifies the events or incidents that could result in the implementation of the Plan that includes all of the potential cyanide failure scenarios. In addition, there are various procedures applicable to the identified scenarios as detailed below.

a) Catastrophic release of hydrogen cyanide - *EAP Section 7.10.3.2 Cyanide Leak.*

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



- b) Transportation accidents - *EAP Section 7.10.3 Chemical Substance Leakage/ Overflow/ Spill*, including spills during transportation.
- c) Cyanide releases during unloading and mixing - *GMY_SGT_TES_TL.067_2 Sodium Cyanide Spill Clean-up Instructions*.
- d) Cyanide releases during fires and explosions – *EAP Section 7.10.11 Explosive Related Emergencies*, includes fire.
- e) Pipe, valve and tank ruptures – *EAP Section 7.10.3.2 Cyanide Leak*.
- f) Overtopping of ponds and impoundments – *EAP 7.10.8.2 Inundation /Flood*, this includes “if the source of the overflow is internal operational elements”.
- g) Power outages and pump failures – this will not result in an emergency situation with all cyanide liquid draining back to the relevant tanks or sumps. The tailings in the tailings pipeline will drain by gravity to the TSF. The TSF has sufficient capacity to retain the contents of the pipeline. In addition the site has two back-up generators that are sufficient to run the Plant.
- h) Uncontrolled seepage – *EAP 7.10.12 Dam Damage*
- i) Failure of cyanide treatment systems – If the Detox Facility were to become inoperational the Plant would stop processing ore until such time that the issue was corrected.
- j) Failure of Tailings impoundment– *EAP 7.10.12 Dam Damage*. There are no heap leach facilities on site.

The protocols also address other types of probable emergencies including releases from low potential catastrophic events such as accidents with injuries, food poisoning, health problems, fire, chemical spillage, traffic accident, security crisis, natural disaster, flood, slope failure, uncontrolled explosion, collapse, occupational disease, and those where communities down gradient from the site might be affected.

The Mine has also developed an Internal Route Assessment from the Security Access to the Cyanide Warehouse and Process Plant, which is evaluated within the Cyanide Management Plan this has considered the transportation route, physical and chemical form of the cyanide, method of transport, the condition of the road, and the design of the transport vehicle. Cyplus as an ICMI certified transportation company have also developed an assessment for the transportation of cyanide to the mine within the scope of the Journey Management Plan as part of their supply route certification.

The Emergency Action Plan and associated procedures include the following.

- Specific response actions such as clearing site personnel and potentially affected communities are detailed in the various sections in the EAP which address the different scenarios. All further details are issued in Search and Rescue General Operating Procedure dated 21 May 2025.
- EAP Section 7.10.3: “Chemical Substance Leakage/Overflow/Spillage” of the Emergency Action Plan, the subsection “Cyanide Spill” describes the first aid and emergency response measures to be applied in cases of cyanide exposure. This section defines steps such as application of medical oxygen support, preparation/use of the Cyanide Response Kit (Cyanokit), approval by the workplace physician, and referral to the nearest healthcare facility when necessary. Cyanide antidotes shall be administered in accordance with *GMY_SGT_ISG_TL.014 Cyanide Response Kit Usage Instruction* and with the approval of the workplace physician. In addition, cyanide first aid/response information is provided at critical points.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



- The control of releases at their source is included in the various sections in the EAP which address the different scenarios stating that “the relevant valves will be shut off”.
- Containment, assessment, mitigation, and future prevention of releases is included in the section for each scenario titled “Actions to be Taken After an Emergency”. Assessment, mitigation and future prevention of releases are also addressed in the incident investigation reports.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 7.2: Involve site personnel and stakeholders in the planning process.☒ **in full compliance with****The operation is**☐ in substantial compliance with**Standard of Practice 7.2**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 7.2; involve site personnel and stakeholders in the planning process.

The operation has involved its workforce and stakeholders in the cyanide emergency response planning process. There is a suggestion box where anybody with any ideas including the cyanide emergency response planning process can submit their ideas.

Daily shift meetings and Weekly Toolbox Talks are conducted within each shift cycle where a variety of topics are discussed, including the cyanide emergency response planning process. Monthly HSE Committee and Process Safety Unit Meetings are undertaken to develop new or evaluate the current cyanide emergency response planning process. The operation involves external stakeholders such as Cyplus, To-Pet, and Hydra in the cyanide emergency response planning process.

Annual meetings are held with the District Governor, Mayor, Fire Chief, Police Chief, village leaders, non-governmental organisations (NGOs), District Health Director, and representatives of surrounding local hospitals. These representatives are invited to attend emergency drills at the mine. Minutes of 2023 (9), 2024 (9), 2025 (5) total number of 23 different meetings dated between 2023-2025 were observed.

The operation has made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases and consulted with them directly or through community representatives regarding appropriate communications and response actions. Gübretaş Maden holds regular meetings with community representatives, and the meeting records with attendance lists were provided for review. These include discussions around cyanide awareness, risks, the mine's emergency preparedness and actions that would be taken in the event of an emergency.

Local communities are unlikely to be affected by any incident on the mine as the nearest community is 1.3 km away, however they are informed of risks associated with accidental cyanide releases, as part of the community meetings. These stakeholders are consulted with directly and through the stakeholder communications.

The operation has identified external entities having emergency response roles.

Because of the remoteness of the site, the operation has developed the capacity (i.e., skills, materials, and equipment) to respond to all probable emergencies that may occur from the mine operation. If additional support or backup is required, medical and emergency

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



response assistance can be requested from the fire departments and hospitals of Söğüt and Bilecik that are capable to respond to cyanide related medical emergencies.

Regular dialogue with these services is maintained by the mine. A 24-hour ambulance service (4-wheel drive) is available on the site, and additional ambulance and medical personnel can be requested from Söğüt and Bilecik emergency medical services. All contact numbers are included in the EAP Section 7.13. Involvement with potential responders such as hospitals and fire departments are maintained through the meetings and dialogue.

The operation engages in consultation or communication with stakeholders to keep the Emergency Action Plan current. The operation periodically reviews the CMP and EAP 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 Authority) are also directly consulted to provide input when updating the EAP. Off-site emergencies associated with transportation are the responsibility of the transportation company. Consultation with communities, government agencies, hospitals, emergency services and other external stakeholders are undertaken by the Public Relations (PR) Department, and the OHS Department is provided with opportunities to provide indirect input into the EAP, CMP, and site procedures.

Annual meetings are held with the District Governor, Mayor, District Agriculture Director, District National Education Director, University Director, Fire Chief, Police Chief, village leaders, NGO's, District Health Director and representatives of surrounding local hospitals. These representatives are invited to attend a meeting at the mine where the EAP is discussed.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 7.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.☒ **in full compliance with****The operation is**☐ in substantial compliance with**Standard of Practice 7.3**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 7.3 to designate appropriate personnel and commit necessary equipment and resources for emergency response.

The cyanide related elements of the Emergency Action Plan include the following.

- a) Designation primary and alternate emergency response co-ordinators who have explicit authority to commit the resources necessary to implement the Plan is detailed in the EAP. The local incidents and emergency teams are designated in the Plan with roles and responsibilities for initial response in a cyanide related emergency. Alternates are also defined in the Plan. For Level 1, 2, and 3 emergencies, the duties and responsibilities of the Emergency Coordinator, Incident Controller, OHS Department Manager, Search and Rescue Coordinator, Spill Response Officer, Security, Public Relations Officer, and the relevant departments/units are defined within the EAP.
- b) Identification of Emergency Response Teams is detailed in EAP. Emergency response personnel comprise 32 ERT members (fire and rescue team members) from different departments, distributed in multiple shifts.
- c) The appropriate training for emergency responders is detailed on the *Search and Rescue General Operating Procedure* and includes First Aid Certificates that are renewed on a 3 yearly basis. ERT members are trained according to an annual training plan. Training records are retained and were reviewed during the audit on topics such as HAZMAT training including cyanide emergency response; drills have included training with Disaster and Emergency Management Authority and Hydra, a company specializing in HAZMAT response to provide observational feedback to ERT members. The training materials (PowerPoint presentation files, soft documents, videos and drills) were reviewed during the audit.
- d) The operation has a 24-hour 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.
- e) The duties and responsibilities of coordinators and team members are defined in detail under Section 7.6 "Duties and Responsibilities of the Emergency Management Team" of the Emergency Action Plan.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



- f) Emergency response equipment available on site, including personal protective equipment, is listed in the EAP Section 7.14.5 "Search and Rescue Equipment List" and in the relevant cyanide response documents. The operation maintains emergency response equipment and personal protective gear on site to respond to cyanide-related emergencies, including fire-fighting, rescue, HAZMAT, first aid and decontamination equipment. Cyanide-specific response equipment, including the Cyanide Response Kit (Cyanokit), medical oxygen and related response arrangements, is addressed in the Cyanide Response Kit Use Instruction and the cyanide spill/leak response provisions of the EAP. The CMP lists emergency response equipment required by truck drivers transporting cyanide and escort vehicles.
- g) The procedures to inspect emergency response equipment and to ensure its availability are detailed in the site procedures. Emergency response equipment is inspected monthly by the OHS Department. The checklist records on emergency response equipment are maintained, and records were reviewed during the audit.
- h) A description of the role of external responders, medical facilities, and communities in the emergency response procedures is detailed below. EAP Section 7.13 provides contact information for outside responders, medical facilities, and communities to be notified in emergencies. With the exception of the Disaster and Emergency Management Authority, outside responders will be under the direction of the ERT or coordinate closely with mine management if contacted to aid during an emergency. Because of the remoteness of the site, the mine has developed the capacity (i.e., skills, materials, and equipment) to respond to all probable emergencies; therefore, except for requesting possible medical assistance from hospitals, outside responders do not have a direct role in the Emergency Action Plan for the site.

The operation has confirmed that external entities with roles and responsibilities identified in the Emergency Action Plan are aware of their involvement and are included as necessary in mock drills or implementation exercises.

Meetings held with stakeholders such as hospitals, fire departments, government and civil service representatives, Gendarme and Army representatives and communities through community meetings; provide awareness to outside entities about potential emergency situations where outside emergency response assistance may be requested. Changing regulation sets out requirements by companies to conduct mutual emergency response exercises with outside entities. Since 2023, the mine has been able to conduct one joint mock drill with external stakeholders (including To-Pet). This drill was conducted in 2025 and involved a sodium cyanide briquette spill scenario along the mine road.

In accordance with Turkish regulations, the operation is currently undertaking a site assessment aligned with the EU Seveso Directive for control of major accident hazards. An outcome of this assessment was the development of an Emergency Action Plan which was shared with the Disaster and Emergency Management Authority and may include requirements for joint responses in the event of a major accident potentially including cyanide release.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 7.4: Develop procedure for internal and external emergency notification and reporting.☒ **in full compliance with****The operation is**☐ in substantial compliance with**Standard of Practice 7.4**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 7.4 to develop procedures for internal and external emergency notification and reporting.

The Plan includes procedures and contact information for notifying management, regulatory agencies, external response providers and medical facilities of the cyanide emergency.

The EAP Section 7.3 “Emergency Communication” and Section 7.3.1 “Security Department Emergency Level Communication Matrix” provide the notification process for relevant internal personnel and responsible functions according to the emergency level. The EAP Section 7.13 “Emergency Telephone Numbers and Radio Channels” and Section 7.14 “Emergency Management Team/Contact Information” provide contact details for the Emergency Coordinator, Security, relevant internal personnel, the occupational physician/mine clinic and external emergency services, including ambulance, fire brigade, law enforcement and other public authorities. *GMY_KI_PL.001 The Crisis Communication Plan* also defines the external stakeholder communication process during emergencies.

The EAP Section 7.4 “Legal Authority” defines the competent legal authorities for emergency situations, including law enforcement, municipal fire brigades, Disaster and Emergency Management Authority, Central Mine Rescue Station, and other agencies depending on the type and level of emergency. The EAP assigns the responsibility for communication with external authorities, local/provincial stakeholders and media to the Public Relations Chief & Corporate Communication Chief under the approval/coordination of the Operations Director.

The Plan includes procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures and for communication with the media as detailed in the CMP.

The CMP states “The potentially affected communities shall be informed about the cyanide and associated risks through meetings held with local leaders and public authorities and shall be informed about communication and response actions in case of emergencies. Depending on the nature of emergency and scenarios of impact, direct contact shall be established with the communities who might be affected from the incident, as well as their leaders or representatives.”

The EAP Section 7.6.5 provides details of the Communication Coordinator/Spokesperson’s responsibilities during an emergency including; to assist in developing communication plans, to monitor media coverage, coordinate public messages and to consult with the Operation’s Coordinator before responding any media questions.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



The Crisis Communication Plan Section 7.4.7 Public and Media Relations explains the communication procedures and the information that may be shared with the press and the public during an emergency.

The Cyanide Management Plan states that ICMI notification is made using the Incident Notification Form or by notifying ICMI at info@cyanidecode.org. Initial notification is requested within 24 hours of the incident, with more detailed information to be provided within seven days.

There have been no significant cyanide incidents to date that would require notification to the ICMI.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



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

☒ in full compliance with

The operation is

☐ in substantial compliance with

Standard of Practice 7.5

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.5 to incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The Emergency Action Plan and associated procedures describe specific remediation, control, clean-up, waste management and monitoring measures appropriate for likely cyanide release scenarios through the CMP, EAP, Sodium Cyanide Spill Clean-up Instruction, Spill Response Procedure, Soil Management Plan and Water Resources and Wastewater Management Plan.

The CMP, EAP and related procedures address the recovery, control and neutralization of cyanide solution and solid cyanide spills. The Sodium Cyanide Spill Response Instruction specifies the use of lime, sodium hypochlorite 12.5% and ferrous sulphate, depending on the spill type and location. Lime is added before sodium hypochlorite or ferrous sulphate to increase the pH, and both chemicals are added slowly due to the potential for a violent reaction. Sodium hypochlorite is not preferred for large spills.

In the event of a cyanide spill, the spill type, location, control status and environmental impact are assessed. The area is barricaded, unauthorized access is prevented, required PPE is used and HCN measurement is conducted before response. Spills outside bunded areas are treated with lime followed by sodium hypochlorite or ferrous sulphate and controlled with absorbent socks and pads. Solid spills are collected with shovels or similar tools and placed into sealed plastic-lidded drums. The chemicals are stored on the Hazmat vehicle and at labelled Spill Response Stations located around the mine.

In the case of small or large spills contaminated absorbents, solid cyanide spill residues and neutralized contaminated soil are labelled with the applicable hazardous waste codes and temporarily stored in the cyanide storage area until hazardous waste shipment is arranged by the Environment and Permits Department. Equipment used during clean-up is washed with sodium hypochlorite within the bunded area.

The soil is monitored following treatment such that the final concentration is less than 0.1 mg/l Total Cyanide in accordance with Turkish regulations. Surface water that is affected is also monitored to ensure conformance with the Cyanide Code's standard of 0.022 mg/l Free Cyanide for the protection of aquatic life

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



The Soil Management Plan requires contaminated or spill-affected soils to be managed as hazardous waste, reported as an environmental accident/incident and sampled through the Non-Routine Sampling Request Form where required. The Water Resources and Wastewater Management Plan defines the site water supply and monitoring arrangements; since drinking water is supplied to site as bottled water purchased externally, it is not expected to be affected by any cyanide-related incident and therefore the provision of an alternative drinking water supply is not applicable. The supply of potable water to local communities is through the municipal water supply and therefore is also unlikely to be affected by any cyanide related incident.

The Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate, and hydrogen peroxide to treat cyanide that has been released into surface water or that has the potential to reach surface water.

Sodium hypochlorite is referred to in the CMP as the chemical that is to be used for the neutralization of cyanide spills. This is also the chemical that is stored on-site for this purpose. The *GMY_SGT_TES_TL.067_2 Sodium Cyanide Spill Clean-up Instructions* prohibits chemicals such as sodium hypochlorite from potentially contaminating surface water. The use of chemicals such as sodium hypochlorite, ferrous sulphate, and hydrogen peroxide for the treatment of cyanide solution in case of any mixing or possibility of reaching surface water is strictly prohibited.

The Plan addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methodologies, parameters and, where practical, possible sampling locations.

The following procedures were observed, which include the requirement for environmental monitoring to identify the extent and effects of a cyanide release and the sampling methodology:

The EAP and CMP define spill clean-up procedures in detail and refer to sampling after the residue has been cleaned up to confirm that remediation has been completed. These plans also define a monitoring program for water quality to be applied in cases where cyanide solution enters surface water. The program defines the sampling locations, sampling frequency, sampling quantity, and limit values (total cyanide concentration of 0.1 mg/l according to Turkish regulations). The surface water quality is also monitored to ensure conformance with the Cyanide Code's standard of 0.022 mg/l free CN for the protection of aquatic life, and the results are recorded in the *GMY_SGT_CEV_TB.007, Water Quality Database Table*.

The operation has arrangements with accredited environmental laboratories for the analysis of environmental samples. The auditors also reviewed the current monitoring map showing the surface water and groundwater monitoring locations.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.☒ in full compliance with**The operation is** ☐ in substantial compliance with **Standard of Practice 7.6**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 7.6; to periodically evaluate response procedures and capabilities and revise them as needed.

The operation reviews and evaluates the cyanide related elements of its Emergency Action Plan for adequacy on a regular basis.

Gübretaş Maden continues to maintain ISO 45001: 2018, ISO 14001:2015, ISO 9001: 2015, ISO 50001:2018 accreditation which require management procedures and plans to be reviewed and maintained up to date to account for changes in operation, procedures, and legislation. There is a requirement in the mine's integrated management system that 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 EAP is the Operations Director.

Mock cyanide emergency drills are conducted at least annually. The following were observed by the auditors.

Mock cyanide emergency drills are conducted periodically. The EAP and CMP require drills to be conducted to test the understanding and readiness of the ERT and relevant emergency response personnel. Emergency drills are conducted throughout the year and include scenarios appropriate for the operation, including environmental release and worker exposure scenarios. The operation has conducted 21 cyanide-related drills, including 14 practical field drills and 7 tabletop exercises since 2023.

The drills included cyanide exposure at the following locations: cyanide preparation tank, sodium cyanide storage tank, solid sodium cyanide spill during transport, cyanide solution transfer, cyanide warehouse fire, the TSF, The Detox Facility, and Leach Tanks.

On 16 May 2024, a drill simulating an overflow from the Sodium Cyanide Preparation Tank was conducted with the participation of Disaster and the Emergency Management Authority, Gendarmerie, Provincial Directorate of Health, Provincial Security Directorate, Provincial Directorate of Environment and the local fire brigade in addition to the Mine emergency response personnel. This drill tested the entire cyanide emergency process from the initial emergency call out notification through to the close-out of the response process.

Practical field drills involved personnel expected to respond to the simulated emergency, including operations, security, HAZMAT/search and rescue, health / ambulance and

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



emergency management functions. A drill involving the cyanide transport contractor, To-Pet, was also conducted for an on-site cyanide transport spill scenario.

Drill reports are maintained in the OHS archive and include the scenario, participants, response timeline, observations, photographs, and strength, weakness, opportunity, and threat evaluation, where applicable, and post-drill action plans. The drill evaluations did not identify deficiencies requiring the revision of the EAP or CMP; however, improvement actions were identified and followed through in the relevant action plan.

Provisions are in place to evaluate and revise the Emergency Action Plan, as necessary, following mock drills and following an actual cyanide-related emergency requiring its implementation. The EAP is on revision 10 with the revision history at the front of the document. The CMP is on revision 4 with the revision history at the front of the document.

The operation has not experienced any cyanide-related emergencies requiring implementation of the EAP and CMP. Provisions are in place to evaluate and revise the EAP and CMP as necessary following mock drills and actual incidents. The evaluations conducted on the mock drills undertaken since 2023 did not identify any deficiencies that would require revisions to improve the EAP and CMP.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Principle 8 – Training

Train Workers and Emergency Response Personnel to Manage Cyanide in a Safe and Environmentally Protective Manner.

Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 8.1

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 8.1; train workers to understand the hazards associated with cyanide use.

The operation trains all personnel who may encounter cyanide in cyanide hazard recognition.

All departments continue to implement an intensive training program. The mine provides mandatory cyanide training for all new employees and contractors who will work in cyanide facilities. This training includes the following;

- the forms of cyanide,
- recognition,
- hazards,
- signage,
- safe handling guidelines,
- exposure routes,
- control of the generation of HCN gas,
- health effects of cyanide, symptoms of cyanide exposure, and
- first aid treatment in the event of exposure.

This training adequately addresses cyanide hazards.

Visitors to the operation receive a basic induction which includes cyanide awareness and information on cyanide hazards including the CMP, EAP, Cyanide Code, cyanide properties, exposure symptoms, hazards, usage, and safety systems and general environmental rules and environmental management system (Cyanide Awareness Training). For visitors, an induction video is watched in Turkish with English subtitles, and a short exam is administered.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



The Induction training is a 16-hour program for the mine staff that includes topics such as site policies, procedures, site safety, signage, workplace hazards, PPE, SDS, alarms, emergency response, incident reports and safety meetings etc.

Regarding these training programs, records for the induction training are maintained by the OHS Department, while records for the cyanide-specific training are maintained by the Process Plant Department. All records are stored on the QDMS system. Evidence of these training records were observed by the auditors for a variety of Plant personnel both in hard copy and electronically.

Cyanide hazard recognition refresher training is conducted periodically. Cyanide awareness and environmental induction trainings are provided separately from the 16-hour occupational health and safety training program that is periodically required for all workers, including contractors. This cyanide-focused awareness training lasts approximately 2 hours and is delivered by the Process Plant Department. The training covers cyanide awareness, the risks of cyanide, cyanide handling procedures, and emergency response. For personnel working directly with cyanide or within cyanide-contained areas-including Plant operators and supervisors, security officers, maintenance workers, electricians, firefighters, rescue teams, and safety or environmental engineers, this awareness training must be refreshed annually. Training records providing evidence of this training were observed by the auditors for a variety of Plant personnel, both in hard copy and electronically.

Cyanide training records are retained for the life of the mine. All induction and refresher training records for Gübretaş Maden employees are maintained by the training units of the respective departments and tracked through the mine's digital database. Prior to the implementation of the current electronic system, training records were archived as hard copies within the departments' training units, and scanned copies of the records were stored on the server. The auditors reviewed training records for selected operators and managers, confirming that the records were available and complete. Paper copies of the training attendance sheets are filled out and archived directly within the training units of the respective departments.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



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

☒ in full compliance with

The operation is

☐ in substantial compliance with

Standard of Practice 8.2

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 8.2; Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

The operation 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. All workers receive annual cyanide awareness refresher training, emergency response training, and additional training in cyanide risk and management for specific work tasks to manage risks as required.

As per a legal requirement, Plant operators must also receive "Occupational Certification" before being permitted to work. Certification is gained through a 5 day program provided by government trainers.

Gübretaş Maden continues to maintain a detailed training program for normal production tasks, including unloading, mixing, production, and maintenance, with minimum risk to worker health and safety in a manner that prevents unplanned cyanide releases. The training requirements program identifies the safety and monitoring equipment in-place, warning signage, PPE requirements, and procedures to be followed to minimize risks associated with task related hazards. The portions of the training programs related to cyanide are retained in the Process Plant Department archive, while records regarding OHS training are maintained in the OHS Department archive. All staff annually receive cyanide awareness and Long-Term OHS training (covering OHS Training, Physical and Chemical Risk Factors, Major Industrial Accidents, SDSs, Emergency Procedures, PPE Training, Health Training, Hand Tools, Working at Heights, Risk Assessment, Lockout/Tagout, and Fire Training). In addition, all workers who work with cyanide receive training on cyanide management procedures applicable to their specific work assignments. These training sessions are delivered by the Process Plant Department Training Foreman and Process Plant Engineers.

Gübretaş Maden's health and safety training program is managed by the OHS Department and requires that health and safety training requirements are set at the end of each year to next year as required by government regulation.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



The SOPs form the basis of the written materials for training. These procedures provide information on the primary hazards of the task, required PPE, step-by-step instructions on performing the task, and references to related safety and operating procedures. Training requirements associated with the operating procedures applicable to each area or 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.

The portions of the training programs related to cyanide are retained in the Process Plant Department archive, while records regarding OHS training are maintained in the OHS Department archive. All staff annually receive cyanide awareness and Long-Term OHS training (covering OHS Training, Physical and Chemical Risk Factors, Major Industrial Accidents, SDSs, Emergency Procedures, PPE Training, Health Training, Hand Tools, Working at Heights, Risk Assessment, Lockout/Tagout, and Fire Training). In addition, all workers who work with cyanide receive training on cyanide management procedures applicable to their specific work assignments. These training sessions are delivered by the Process Plant Department Training Foreman and Process Plant Engineers.

Task training related to cyanide management activities is provided by an appropriately qualified person. Employee task training is conducted by supervisors, managers, and the Department Training Foreman who are experienced in cyanide process operations. These training sessions are supplemented by the Training Foreman, who has been specifically trained and assigned to deliver cyanide awareness training. Along with cyanide training, employees are also provided with legally required regulatory training. Employees who complete their training work in the field alongside experienced foremen during this process.

Foremen have received detailed training on workplace cyanide management. During a three-month probationary period, new employees are closely monitored and work alongside an experienced colleague. Upon successful completion of the three-month probationary period, workers are permitted to perform their assigned tasks independently without direct supervision from an experienced employee or shift supervisor.

Cyanide awareness training is delivered by the Process Superintendent and the Occupational Health and Safety Superintendent, who possess 10 years of cyanide process experience and 16 years of OHS experience, respectively. Both superintendents have completed Technical Trainer Training and Work Safety Leadership Training.

Health and safety training conducted by the OHS Department is provided by government-certified professionals, with each trainer required to pass an official examination to become qualified. Trainers are classified into A, B, and C categories based on their experience. The Emergency Response Team (ERT) is trained by a certified health and safety expert within the OHS Department who has 16 years of professional experience, along with other safety specialists holding 4 years of experience. First aid trainers hold first aid trainer certificates issued by the Ministry of Health, which are renewed every five years, and have completed government-approved train-the-trainer courses. The Emergency Response Coordinator, who trains ERT members, is professionally qualified and has 16 years of experience as an OHS professional.

Workers are trained prior to working with cyanide. All personnel are required to attend induction training, which includes cyanide awareness and hazard training. Each new worker receives pre-work training specific to their department or area of work. New employees are also required to work under supervision for a minimum three-month period until their

Söğüt Gold Mine

Name of Facility



Signature of Lead AuditorSeptember 2026Date

supervisor is satisfied that they can work unaccompanied and provides a sign-off confirming the worker's understanding of the procedures, instructions, and Job Safety Analyses (JSAs). Induction and Long-Term OHS training (covering OHS Training, Physical and Chemical Risk Factors, Major Industrial Accidents, SDSs, Emergency Procedures, PPE Training, Health Training, Hand Tools, Working at Heights, Risk Assessment, Lockout/Tagout, and Fire Training) are provided by the OHS Department trainers under the guidance of the Occupational Health and Safety Superintendent.

All employees who may encounter cyanide in the workplace are trained in cyanide hazard recognition, and refresher training is provided annually. During basic cyanide training, trainees are required to take and pass an examination with a minimum passing score of 70 percent.

Refresher training on cyanide management is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. Health and safety refresher training is mandatory for all workers, including subcontractors, on an annual basis and comprises a minimum of 16 hours of training. All workers are required to complete cyanide refresher training (including cyanide awareness, risks of cyanide, cyanide handling, current preventative measures, and emergency response) annually. Topics include chemical risk factors, safe use of work equipment, safety and health signs, use of PPE, OHS rules, evacuation and rescue, hazard identification and risk assessment, JSA preparation and incident reporting.

The cyanide refresher training is 2 hours in duration and is provided specifically outside of the general OHS training. This training covers hazard signage, safe working with cyanide, and CMP and International Cyanide Management Code (ICMC) requirements. The refresher training received by the Process Plant and TSF operators is more extensive than that provided to other employees. The training matrix defines the task-specific training required for each job role and is used to track each worker's required training on an annual basis. Regarding Cyanide Refresher Training, as of May 2026, the auditors observed that no employees are overdue for their refresher training. All Mine employees have received cyanide awareness training, and all contractor workers assigned to work in the Process Plant Department have also successfully completed their cyanide awareness training.

The operation evaluates the effectiveness of cyanide training by testing and observation. Records reviews and discussions with training personnel indicate that worker understanding of basic cyanide hazard recognition and spill response training is evaluated via written examinations. The examination format is robust, requiring a substantial explanation of key points as a demonstration of the trainee's knowledge. Cyanide induction and refresher training are evaluated through examinations using a multiple-choice test paper. The passing mark is 70 percent, and additional instruction and re-examination are required for trainees who do not achieve this grade.

For task-specific training, a 1-day Process Plant Orientation Training is completed by all new Process Plant Department employees. Following this, over a three-month period, new employees observe the tasks performed by experienced operators during day shifts. When deemed proficient by the supervisor, the employee is evaluated by the Process Superintendent over the course of one shift. If satisfied, the Superintendent approves the *GMY_IK_FR.009 - Blue Collar Probation Period Assessment Form*, which is subsequently

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



filed by the HR department. At the end of this process, the worker qualifies as an unsupervised operator.

Cyanide training records are retained for the life of the mine. Records are maintained in the form of sign-off sheets that include the training topic(s), the trainer's name and signature, the date of training, the signature of each attendee and how the employee demonstrated an understanding of the training materials. Course materials consist of either videos and PowerPoint presentations as used for induction and annual cyanide awareness refresher training or the actual SOPs for task-specific training. Hard copies of cyanide-related training records are kept in the Process Plant Department archive. Since 2023, these records have been uploaded to designated folders on the mine's shared server system, through which they can be easily searched and retrieved. This process was observed and verified by the auditors.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 8.3: Train appropriate workers and personnel to respond to worker exposure and environmental releases of cyanide.☒ **in full compliance with****The operation is**☐ in substantial compliance with **Standard of Practice 8.3**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 8.3; train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

All cyanide unloading, production and maintenance personnel are trained in the procedures to be followed if cyanide is released, including decontamination and first aid procedures. 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 protocols. All employees who work with cyanide complete induction and annual refresher training in cyanide awareness. Employees undertaking cyanide-specific tasks receive task-specific training on SOPs for those tasks, as well as procedures to follow in the event of cyanide exposure. The induction materials include descriptions 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 oxygen administration and decontamination steps. Refresher training covers CMP and ICMC requirements, including emergency response, hazard awareness, risk minimization, spill response, cyanide first aid, and emergency scenarios.

Operators are issued radios and are trained to contact security and their supervisors via the dedicated emergency channel (Channel 1) in the event of an emergency. Operating procedures include pre-work checks on the location of and access to emergency response equipment, as well as testing safety showers prior to cyanide mixing. Operators are also provided with and trained in the use of personal HCN monitors. In addition to the fixed HCN monitors strategically located in the CIL area, detox area, gold room, cyanide storage, and preparation area, these personal monitors alert operators to HCN gas releases and indicate when to evacuate a work area.

ERT members are trained to respond to chemical releases, including cyanide. They receive the same training as detailed above and conduct at least three cyanide spillage and man-down drills per year. Emergency Response Coordinators and members of the Emergency Response Team are trained in the procedures included in the Emergency Action Plan regarding cyanide, including the use of necessary response equipment.

All employees who work with cyanide complete cyanide hazard training and annual refresher training. This training includes the recognition of cyanide exposure symptoms, decontamination procedures, and first aid protocols. Depending on the shift and the nature

Söğüt Gold Mine

Name of Facility

Signature of Lead AuditorSeptember 2026Date

of the emergency, all shifts are fully covered by trained ERT members working across the mine site, ensuring ERT personnel are present on every shift.

ERT members are trained to administer first aid, including the use of medical oxygen and advanced medical first aid. Medically trained personnel from the mine's clinic provide advanced medical assistance, such as administering the Cyanokit antidote. The ERT conducts monthly emergency response training exercises. Since 2023, these exercises have included a cyanide solution spill and HCN release in the Plant, a TSF overflow scenario, an HCN gas release in the Detox Facility, a vehicle rollover involving a cyanide box resulting in a solid cyanide spill and subsequent HCN release, and a man-down cyanide exposure scenario. These exercises involve the ERT, security personnel, and medical staff from the clinic.

The EAP and CMP also require that desktop simulations be conducted semi-annually to test the readiness of the Emergency Coordination Group, the Crisis Management Group, and the ERT to respond to emergencies, including cyanide release scenarios (representing a total of 21 different scenarios). Details of the drills and subsequent observations are recorded, along with corrective actions that are tracked until completion.

The operation has made external responders, such as emergency medical services familiar with those elements of the Emergency Action Plan related to cyanide. The mine possesses the necessary resources to handle all probable emergency situations through an on-site team of well-trained ERT personnel, an emergency response station and equipment, and medical capabilities provided by on-site paramedics, nurses, and doctors. The mine meets annually with local community stakeholders and communicates with local government agencies, including the Bilecik Provincial Directorate of Health, to provide information regarding the operation, the use of cyanide in the gold recovery process, potential operational risks, the EAP, internal response capabilities, and potential additional support or services that may be requested in the event of an accident. One well-equipped ambulance is maintained on-site, fully stocked with medical oxygen and emergency medical kits containing cyanide antidotes.

The Emergency Response Coordinator conducts training sessions with ERT members covering a wide range of topics, including emergency call-out procedures, cyanide awareness and management, first aid procedures, and cyanide exposure management. Topics discussed in these training sessions also include evacuation drills, hazardous materials handling, fire extinguisher use, basic firefighting, and mock drill rehearsals. Additionally, cyanide awareness and refresher training is periodically provided to ERT members by the Process Plant Department Training Foreman in accordance with the training matrix. Enhanced training is implemented in situations where previous emergency response performance was identified as weak. Ambulance drivers receive specialized equipment training from the clinic doctor, wishes, or paramedics. ERT members receive advanced training as first responders, and the ERT serves as an internal training resource for EAP implementation. In the event of an actual emergency, the EAP assigns primary emergency coordinator responsibilities to either the General Manager, the Operations Manager, or a designated representative appointed by them.

Refresher training for ERT members and other Plant employees with regards to response to cyanide exposures and releases is undertaken on an annual basis. Training meetings with ERT members cover a range of topics, including emergency call-out procedures, cyanide

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



awareness, cyanide hazards and management, first aid procedures, and cyanide exposure management. Topics discussed in these training sessions include evacuation drills, hazardous materials handling, fire extinguisher use, basic firefighting, urban search and rescue, rope access systems, vehicle extraction, Industrial Fire Training with Joint Organisation for the Identification of Fire Fighters certificate, cyanide management, basic first aid, and mock drill rehearsals.

Additionally, ERT members take part in annual desktop emergency scenarios in accordance with the CMP and Emergency Action Plan, which are designed to test the understanding and readiness of the Emergency Coordination Group members, the Crisis Management Group, and the ERT. The CMP specifically includes emergency response coordinators as active participants in these drills. In addition, cyanide awareness and refresher training are periodically provided to ERT members by the Process Plant Department Training Foreman in accordance with the training matrix. Emergency coordinators conduct tabletop and mock drills to hone their response skills and evaluate the effectiveness of the Emergency Action Plan. Briefings are held during these exercises to review and discuss responses to cyanide-related emergency scenarios.

As a major hazard installation handling large quantity of dangerous substances, the mine is required under the Prevention of Major Industrial Accidents Regulation (Seveso Directive) to maintain readiness for HAZMAT emergencies. In addition to implementing the CMP and EAP consistent with these regulatory requirements, the mine has conducted joint drills with external emergency responders (To-Pet, Fire Department, Law Enforcement, Provincial Directorate of Health, etc.) and has maintained an official cooperation protocol between Gübretaş Maden and the Disaster and Emergency Management Presidency since 2023. Furthermore, as part of Seveso Directive compliance, official government inspectors periodically audit the mine's Safety Report (prepared in accordance with the Seveso Directive), the EAP, dangerous substance storage areas, and operational sectors.

Records are retained documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

Cyanide awareness is included as a specific topic, covering hazard signage, safe working practices with cyanide, and CMP and ICMC requirements. Since 2023, cyanide hazard recognition refresher training has been periodically undertaken by all workers, including members of the ERT, as part of the annual general cyanide refresher training. This training is delivered by the Process Plant Department and includes the recognition of cyanide exposure symptoms, decontamination procedures, and first aid protocols.

In addition, the ERT participates in emergency training sessions that periodically incorporate HAZMAT training and mock drills involving cyanide emergency scenarios. Furthermore, ERT members receive specialized training in HAZMAT management, including cyanide releases, cyanide exposure response, first-aid firefighting, eyewash/safety shower scenarios, and confined space entry. The clinic nurses and paramedics receive annual cyanide awareness training and direct instruction from the workplace physician (medical doctor) regarding the administration of medical oxygen and the intravenous use of Cyanokit.

It was observed by the auditors that records of emergency response training are retained. A review of a selection of these records for ERT members confirmed that they comprehensively document the names of the employee and trainer, the date of training, the

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



specific topics covered, and the test results demonstrating the trainees' thorough understanding of the training materials.

Söğüt Gold Mine
Name of Facility



Signature of Lead Auditor

September 2026

Date



Principle 9 – Dialogue and Disclosure

Engage in Public Consultation and Disclosure.

Standard of practice 9.1: Promote dialogue with stakeholders regarding cyanide management and responsibility address identified concerns.

☒ in full compliance with

The operation is

☐ in substantial compliance with

Standard of Practice 9.1

☐ not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 9.1; provide stakeholders with the opportunity to communicate issues of concern.

The operation provides stakeholders with information on its cyanide management practices and engages with them regarding their concerns. Gübretaş Maden has implemented the following policies, plans and procedures to engage with local communities, village residents, governmental authorities, NGOs, media representatives and other external stakeholders regarding its operations and cyanide management practices:

These include:

GMY_HLK_PO.001, Public Relations Policy;

GMY_CEV_PO.001, Environmental Policy;

GMY_ISG_PO.001, Occupational Health and Safety Policy;

GMY_IK_PO.001, Human Resources Policy;

GMY_SGT_HLK_PR.002, Public Relations Management Procedure;

GMY_SGT_HLK_PL.001, Stakeholder Engagement Plan;

GMY_SGT_HLK_PR.001, External Stakeholder Grievance and Request Procedure;

GMY_IK_PR.004, Internal Stakeholder Request, Grievance and Feedback Management Procedure;

GMY_IK_PR.005, Mandatory Internship Program Procedure;

GMY_TIC_PR.001, Procurement Department Management Procedure;

GMY_SGT_HLK.FR.001, External Stakeholder Grievance and Request Form;

GMY_SGT_HLK.LS.002, External Stakeholder Grievance List;

GMY_SGT_HLK.LS.003 External Stakeholder Request List;

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



GMY_SGT_HLK.LS.004, Stakeholder Engagement Record List;

GMY_SGT_HLK.LS.008, External Stakeholder List;

GMY_SGT_HLK.LS.009, Visitor Contact List;

GMY_KI_PL.001, Crisis Management and Communication Plan;

GMY_SGT_ISG_PL.002, Emergency Action Plan;

A review of records and discussions conducted with the PR Supervisor and Public Relations staff confirmed that Gübretaş Maden has maintained extensive stakeholder engagement records since the commissioning of the operation in 2023.

Gübretaş Maden's Public Relations Department conducts regular engagement activities within the operation's area of influence. The villages within the operation's area of influence include Sırhoca (0.5 km), Dudaş (2.5 km), Rızapaşa (5.5 km) Çaltı (4.3 km), Gündüzbey (1.8 km), Hayriye (3.6 km), Kızılsaray (2.5 km), Oluklu (7.4 km), Savcıbey (3.5 km), Borcak (4.2 km) and Dereboyu (5.5 km) together with the Söğüt neighbourhood administrations of Balaban, Cumhuriyet, Kayhan, Orta and Türkmenbaşı located within 1.3 km of the mine.

Community meetings, village visits, stakeholder consultations and site visits (records were observed for 2023, 2024, 2025 and 2026) provide opportunities for stakeholders (governmental institutions, private sector representatives) and members of the public to receive information regarding mining activities, verbally communicate and ask questions or relay any concerns related to the use of cyanide and its management at the mine site.

Many local and national-level stakeholder meetings have also been conducted with governmental-municipal officials, security and health organizations, police, hospitals, and specific communities.

The PR Department is responsible for engaging with governmental authorities and local communities potentially affected by the mine's activities. The PR Department meets with interested local stakeholders at least twice a year (e.g., bi-annual community consultancy meetings) and physical meetings were continued in 2023, 2024, 2025 and 2026.

Attendance records reviewed during the audit confirmed participation by local government representatives, village headmen, public institutions and community members from Söğüt, Bilecik and surrounding settlements.

Gübretaş Maden utilizes a variety of communication tools to provide information to stakeholders, including visitor brochures, cyanide awareness materials, PowerPoint presentations tailored for specific audiences, public meetings, sustainability reports, website announcements, audio-visual communication tools and televised presentations.

Consistent with its "Open Door Policy and Open Visitor Access", Gübretaş Maden aims to maintain transparent, responsive and proactive communication with stakeholders and provides information upon request regarding all aspects of its operations, including cyanide transportation, storage, handling and emergency preparedness.

Gübretaş Maden, on an annual basis, organizes and conducts numerous site tours for external stakeholders including NGOs, local communities, public institutions, universities, other interested stakeholders and members of the public. During these visits, participants

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



receive basic information regarding the role of cyanide in mining process as well as basic practices employed for the safe management of cyanide in transportation and use.

Since 2023, Gübretaş Maden has also attended a large number of unplanned and planned meetings with villagers at their villages and with other stakeholders. Records show that PR Department conducted meetings with 2375 (336 women, 1935 men and 104 children) people in 2023, meetings with 5858 (1397 women, 3776 men and 685 children) people in 2024, meetings with 4990 (1054 women, 3646 men and 290 children) people in 2025, and meetings with 1489 (95 women, 1311 men and 83 children) people by the end of April 2026.

If comments or complaints are received from outside parties, they are documented, investigated and managed in accordance with the *GMY_SGT_HLK.PR.001, External Stakeholder Grievance and Request Procedure*; *GMY_SGT_HLK.FR.001, External Stakeholder Grievance and Request Form*; *GMY_SGT_HLK.LS.002, External Stakeholder Grievance List*, *GMY_SGT_HLK.LS.003 External Stakeholder Request List*; and *GMY_SGT_HLK.PL.001, Stakeholder Engagement Plan*.

All such complaints, requests or comments received are examined by the PR Department, and where necessary, discussions are held with other concerned departments and responses are communicated back to the relevant party.

The grievance and request mechanism is accessible through multiple channels, including face-to-face communication, Request and Complaint Boxes, telephone, e-mail, village visits, stakeholder meetings and direct contact with Public Relations personnel.

All grievances and requests are recorded form are recorded in the *GMY_SGT_HLK.LS.002, External Stakeholder Grievance List*, *GMY_SGT_HLK.LS.003, External Stakeholder Request List* and are subsequently submitted to the PR Supervisor for review and action. The enquiry or complaint is then provided to the General Manager or other departments depending on the nature of the complaint. The issue is entered into the Grievance Register system and the response, together with any actions are tracked to completion. Information recorded in the database includes a unique ID for each issue, the date of complaint, complainant name, the community in question, a description of the complaint, the status of investigations, responsible person for actions, the planned completion date, and the resolution date.

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Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



Standard of practice 9.2: Make appropriate operational and environmental information regarding cyanide available to stakeholders.☒ **in full compliance with****The operation is**☐ in substantial compliance with**Standard of Practice 9.2**☐ not in compliance with**Summarise the basis for the findings/deficiencies identified.**

The operation is in full compliance with Standard of Practice 9.2 to make appropriate operational and environmental information regarding cyanide available to stakeholders.

The operation has developed written descriptions of how their activities are conducted and how cyanide is managed. These descriptions are available to the communities and other stakeholders.

Gübretaş Maden has developed a range of written and electronic communication materials, including brochures, leaflets, visitor information packages, stakeholder presentations and awareness materials in Turkish, describing the use of cyanide in gold mining, the International Cyanide Management Code, and the management of cyanide during transportation, storage, handling and operational activities.

Gübretaş Maden has continued to maintain a strong and active stakeholder engagement program and engages with community stakeholders on a yearly basis; and community leaders, university representatives, mayors, public officials, NGOs, police, Disaster and Emergency Management Authority representatives, local fire departments 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 briefings in English or Turkish as appropriate, all site visitors are provided with a double-sided brochure presenting basic site safety information and the use of cyanide in mining. Information regarding cyanide management is communicated verbally during stakeholder meetings, community consultations, village visits, public information sessions and guided site tours conducted in the local language.

Although literacy levels within the local population are high (average rate: 98,56% in Söğüt district) and illiteracy is not considered a significant issue in the Söğüt district, Gübretaş Maden utilizes a combination of verbal, visual and written communication methods to ensure that information is accessible and understandable to all stakeholder groups.

The operation has developed visual presentations and informational videos describing mining activities and cyanide management practices. Community meetings are supported by verbal presentations, PowerPoint materials, photographs, videos and other visual communication tools.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026Date

Review of presentation materials and associated photographs associated with current initiatives indicates that the PR Department has provided general information about the management and use of cyanide to various stakeholder groups, in a verbal, visually supported, and culturally sensitive format.

The operation makes information publicly available on confirmed cyanide release or exposure incidents including the following.

- Cyanide exposure resulting in hospitalisation or fatality.
- Cyanide releases off the mine site requiring response or remediation.
- Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment.
- Cyanide releases on or off the mine site requiring reporting under applicable regulations.
- Releases that are or that cause applicable limits for cyanide to be exceeded.

The auditors observed the following procedures, which describe how the information will be disseminated; *GMY_SGT_ISG_PL.002, Emergency Action Plan, and GMY_KI_PL.001, Crisis Management and Communication Plan.*

Since commencement of operations in 2022, there have been no cyanide exposure incidents resulting in hospitalization or fatality, no reportable cyanide releases, and no cyanide-related incidents resulting in adverse effects to human health or the environment. However, if such an incident were to occur, the Operations Director in Söğüt will inform the General Manager in Ankara, who would in turn take the lead in informing regulators and government authorities in both regions.

GMY_KI_PL.001, Crisis Management and Communication Plan requires that appropriate press releases be prepared by or at the direction of the Operations Director to accurately describe the particulars of the event, probable cause, the individuals involved, the actions taken, and other appropriate information. If a cyanide exposure incident were to occur, communications will be controlled via the *GMY_SGT_ISG_PL.002, Emergency Action Plan and GMY_KI_PL.001, Crisis Management and Communication Plan.*

The Emergency Management Team and Contact Group for the incident would coordinate with the PR, Corporate Communication, Operations Director and General Manager to ensure the following:

- 1) Responsible regulatory agencies and officials are immediately notified;
- 2) ICMI is notified as required;
- 3) Potentially affected stakeholders and communities receive timely and accurate information; and
- 4) The causes of the incident and associated corrective/preventive actions are discussed in subsequent meetings with communities and regulatory authorities.

The operation maintains up-to-date contact lists for governmental agencies, local authorities, village representatives, emergency response organizations and other key stakeholders. Draft communication templates and press releases have been prepared for potential

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

September 2026

Date



emergency scenarios to facilitate timely and transparent communication. Other Gübretaş Maden management staff may be involved in the coordination of such discussions, as appropriate for the nature and scale of the incident.

The responsibilities of the Communication Controller/Spokesperson (delegated by General Manager) require that an up-to-date list of local and regional public institutions, organizations and stakeholders is available and that draft press releases for various likely scenarios have been prepared in readiness should a crisis occur. In case of emergency, communication on incidents would be related to all governmental agencies, especially Bilecik Governorship and local authorities and executive members of surrounding villages. The Communication Controller would coordinate all press and community relations functions.

In accordance with its commitment to open, effective, honest and transparent communication, Gübretaş Maden would disclose any reportable cyanide-related incident through appropriate communication channels, including regulatory notifications, stakeholder meetings, community consultations, public announcements, press releases and the company website, as applicable.

The regulators and authorities will in turn inform communities of the incident, through direct communication to the local elders, stakeholders, and media. Both the ICMI and Disaster and Emergency Management Authority would be notified of such incidents in a timely manner. Reportable spills data according to their levels is also required to be recorded to the company and governmental stakeholders.

Söğüt Gold Mine

Name of Facility



Signature of Lead Auditor

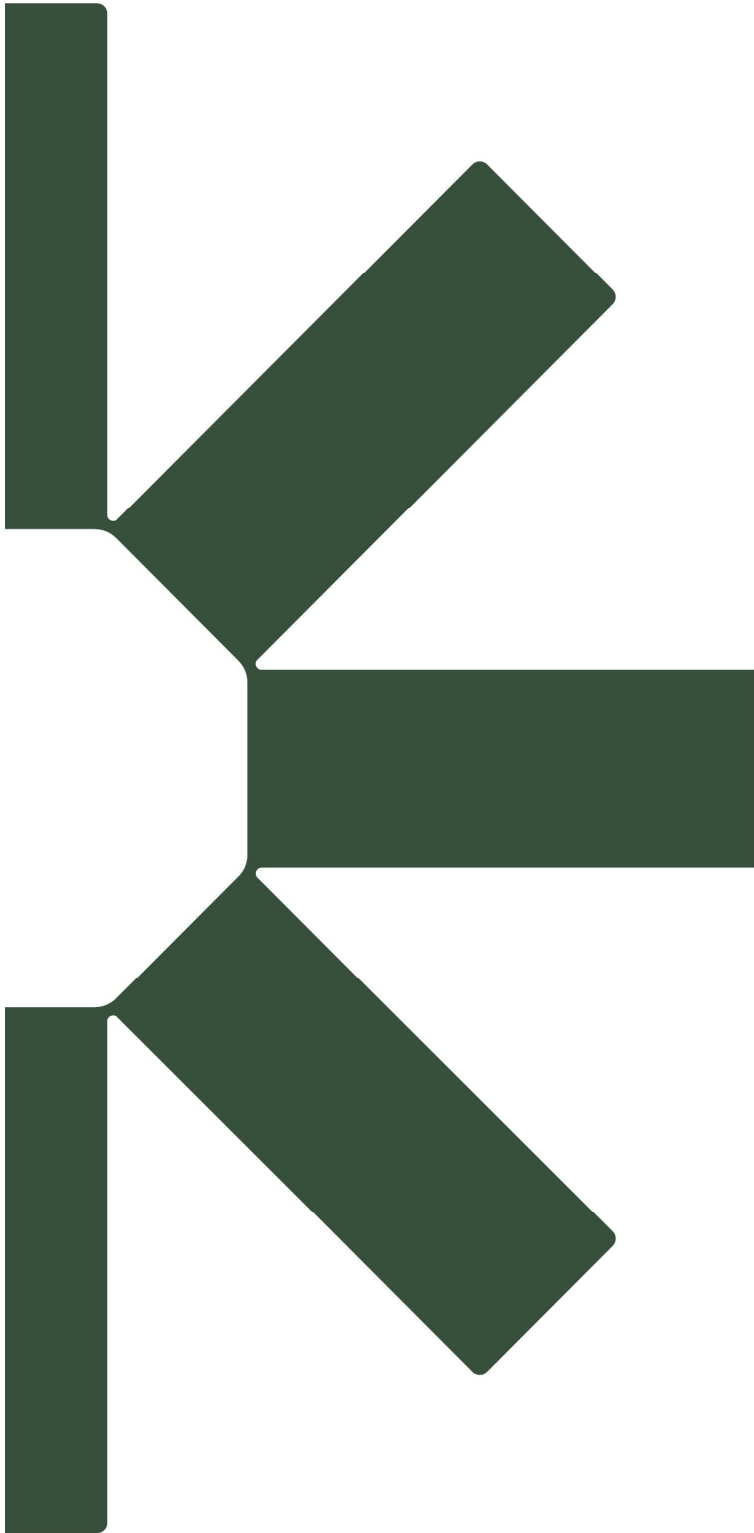
September 2026

Date





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