Gold Mining Operations

Summary Audit Report

for

Pustynoye Operation/ AK Altynalmas JSC.

Kazakhstan, September 2023.

Prepared by NCABrasil Expert Auditors Ltd.

www.globalsheq.com

This report contains 30 (thirty) pages.

24/ July/ 2024

SUMMARY AUDIT REPORT

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FOR GOLD MINING OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.

2. The name of the mine operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report. The lead auditor's signature at the bottom of the attestation on page 3 must be certified by notarization or equivalent.

3. An operation that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.

4. The Summary Audit Report and Corrective Action Plan, if appropriate, with all required signatures must be submitted in hard copy to:

ICMI (International Cyanide Management Institute)
1400 I Street, NW, Suite 550.
Washington, DC, 20005, USA.
Tel: +1-202-495-4020.

5. The submittal must be accompanied with 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report on the Code Website, and 2) a completed Auditor Credentials Form. The letter and lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.

6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable gold mining company.

7. The description of the operations should include sufficient information to describe the scope and complexity of the gold mining operation and gold recovery process.

Altynalmas Pustynoye		24/07/2024
Name of Mine	Signature of Lead Auditor	Date

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Name of Mine: AK Altynalmas JSC/ Pustynoye operation.
Name of Mine Owner: AK Altynalmas JSC.
Name of Mine Operator: AK Altynalmas JSC
Name of Responsible Manager: Abyroy Baktygali
Address: Yelebekov Street, 10/1, Almaty (Head Office)
State/Province: Almaty City Country: Kazakhstan
Telephone: +77717052368
E-Mail: Абырой Бақтығали <abyroy.baktygali@altynalmas.kz>

Location detail and description of operation:

Pustynoye ore field and process plants are located in Aktogai region of Karaganda oblast, 100km east of Balkash city and 25km from Akzhaidak railway station.

The operation process and concentrates mineral ores exploited from two open-pit mines (Pustynoye and Dolynnoye) and uses solid NaCN (where NaCN means sodium cyanide) briquettes. Then sodium cyanide solution is prepared and used only in the leaching processes as below described. The operation does not use sodium cyanide solution in the milling process, neither the industrial water recovered from the TSF (Tailings Storage Facility). The operation also uses fresh water in its hydro-metallurgical process, obtained from water wells and from Balkash lake.

- Solid cyanide warehouse:

The operation buys solid cyanide from Saratovorgsyntez, a cyanide certified producer based in Russia (please refer to Principle 1), packed in one ton wooden boxes, which are transported by LLP Trading and Industrial Company Olimp , a certified cyanide transporter based in Kazakhstan (please refer to Principle 2) and stored in a warehouse specifically designed, constructed and maintained for this purpose (please refer to Principle 3).

The operation hydro-metallurgical process is divided in three phases:

Phase 1
The phase consists of primary crushing process, grinding, flotation, adsorption leaching, gravity concentration and Acacia.
The gold containing ore coming from Pustynnoye open pit being feed to the primary crushing mills (Aimak, Ozborne) where ore crushes until 130 mm of size condition. After that ore being feed to secondary crushing section where ore will be crushed until 30 mm of size condition.
After crushing sections, ore with appropriate condition of size dimensions being grinded until 15 mm of size condition. Grinding section consists of 3 grinding mills where ore being grinded through the cycle. No cyanide solution in added at milling process.
Crushed and grinded ore being transferred to the hydro cyclones where it's being sorted and prepared for flotation process.
In flotation process, prepared gold containing ore being feed to flotation cells where it's being processed and prepared using appropriate reagents and other materials. Prepared product being feed to the tank of flotation concentrate for further transferring to Phase 2, tailings from the flotation process being transferred to tailings tank.

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In adsorption leaching phase ore material concentrate being feed to the CIL (Carbon in Leaching) tanks where gold material being dissolved and absorbed in carbon. Then prepared material and carbon with gold being transferred to CIP (Carbon in Pulp) tanks from CIL tanks in accordance with process cycle.
To the Acacia process gold containing ore comes from Nelson gravity screen. Gold containing ore with size conditions of less than 2 mm being feed to Nelson gravity screen where its being processed and prepared for Acacia. Prepared product from Nelson gravity screen transferred to Acacia tank. In Acacia process prepared material being intensively leached by using sodium cyanide solution, sodium hydroxide and Leachaid. Final gold product being transferred to the electrolysis bath for final preparation.

Phase 2
In Phase 2 being processed product materials from Phases 1 and 3.
From the buffer tank where flotation concentrate being stored, concentrate material transferred to the screen where unnecessary material parts (chips) being excluded. Filtered material being transferred by hydro cyclones to the contact tank for further leaching process. Outcoming materials from hydro cyclones being feed to ISA (trademark of the original equipment manufacturer Mount Isa Mines Limited) mill where its being milled to the appropriate size condition and transferred back through hydro cyclone. No cyanide solution in added at milling process. To the prepared material being added lime and reagents for further transfer to the tanks of sorption leaching. Adsorption leaching process being done through 8 leaching tanks. Then during desorption process prepared material being separated from carbon parts and moved to acid bath where carbon being flushed by water and acid (3%). After this material moves to desorption column where saturated gold solution without carbon being formed and being moved to electrolysis bath. In the electrolysis bath gold solution being moved through anodes and cathodes where gold materials deposited in cathode screens. After this, prepared gold materials being moved to the melting and final doré gold bar preparation process.

Phase 3
The gold containing ore coming from Dolinnoye open pit being feed to the primary crushing mill Ozborne where ore crushes until 130 mm of size condition. After that ore being feed to secondary crushing section where ore will be crushed until 30 mm size condition and moved to vibration screen where being crushed until 12.5 mm size condition.
After crushing sections, ore with appropriate condition of size dimensions being grinded until 15 mm of size condition in ball mill. Grinding section consists of 3 grinding mills where ore being grinded through the cycle. No cyanide solution in added at milling process.
Crushed and grinded ore being transferred to the hydro cyclones where it's being sorted and prepared for leaching and cyanidation processes.
Nelson gravity screen being feed with outcoming from mills where it's being grind until 2 mm of size condition. To the Acacia process gold containing ore comes from Nelson gravity screen. Prepared product from Nelson gravity screen transferred to Acacia tank. In Acacia process prepared material being intensively leached by using sodium cyanide solution, sodium hydroxide and Leachaid. Final gold product being transferred to the electrolysis bath for final preparation.
Cyanidation process in Phase 3 starts from the hydro cyclone drain which feeds cyanidation tanks (04-TNK-01, 04-TNK-02, 04-TNK-03, 04-TNK-04). After cyanidation tanks materials being moved adsorption area where it's being leached by using cyanide in adsorption tanks (CIL tanks).
Then during desorption process prepared material being separated from carbon parts and moved to acid bath where carbon being flushed by water and acid (3%). After this material moves to desorption column where saturated gold solution without carbon being formed and being moved to electrolysis bath.
In the electrolysis bath gold solution being moved through anodes and cathodes where gold materials deposited in cathode screens. After this, prepared gold materials being moved to the melting and final doré gold bar preparation process.

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Auditor's Finding

This operation is:

X in full compliance
□ in substantial compliance ***** (see below)
□ not in compliance

with the International Cyanide Management Code.

***** The Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company: NCA Brasil Expert Auditors Ltd. (www.globalsheq.com)
Audit Team Leader: Celso Sandt Pessoa
E-mail: celsopessoa@ncabrasil.com.br or celso@globalsheq.com (ICMI qualified lead auditor, since 2006, and TEA (Technical Expert Auditor).
Names and Signatures of Other Auditors: none

Date(s) of Audit: 13 ~21/04/2023 (on-site), 18 ~22/09/2023 (on-site) and 14 ~ 15/05/2024 (off-site).

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

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the Mining Operations Verification Protocol, using standard and accepted practices for health, safety and environmental audits.

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

Standard of Practice1.1: *Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.*

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 1.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The operation buys solid cyanide from Saratovorgsyntez, a cyanide producer based in Russia and certified by the International Cyanide Management Institute (ICMI) since 2017 and its last certification was on 31/July/2023, according to the information available at ICMI website. Reviewed the contract signed-off by the two parts where the cyanide producer/ seller (Saratovorgsyntez) is responsible to deliver the solid cyanide at the buyer´s (Pustynoye) warehouse, using ICMI certified transporters.

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.*

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 2.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
All transportation documentation from Saratovorgsyntez plant in Russia and from the transporter (Olimp LLP Kazakhstan) is retained by the mining operation. The transportation documentation includes: Saratovorgsyntez certificate of origin and road transportation document (waybill) issued by the Kazak transporter (Olimp LLP), an ICMI certified transporter, since 09/April/2024). Reviewed such transportation documentation, issued 17/April/2024. Olimp LLP is certified by ICMI since 09/ April/2024, in accordance with the information available at ICMI´s website.

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3. HANDLING AND STORAGE: Protect workers and the environment during cyanide 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.*

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 3.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that Pustynoye designed and constructed two receiving/storage areas for the reception of the solid cyanide according to Kazakhstan engineering standards (refer to SoP/ Standard of Practice 4.8). The cyanide mixing and distribution facilities were also designed and constructed according to Kazakhstan engineering standards. These facilities were designed and constructed in accordance with acceptable Kazakhstan engineering standards. Receiving and storage areas were evidenced, in the field audit, to have concreted floor, bricked wall separating materials, under roof, locked access, adequate ventilation and exhaustion and HCN sensors. Both warehouses are specifically assigned to store NaCN boxes. The cyanide solution preparation and distribution area has also concreted floor and forced ventilation and exhaustion system. The two warehouses are included in the inspection and preventive maintenance programs, as well as the cyanide preparation and distribution area. During the field audit it was evidenced that the access to the process plants is controlled, through security control gates and only authorized persons are allowed to go into the process plants. The entire process plants are fenced. Once inside the process plants, the unloading, storage and preparation areas are separated from people and far from surface waters. These areas have a drainage system, with a sump and a floor pump. During the unloading, storage and preparation activities only authorized operators are allowed to circulate in these areas. The operation uses solid cyanide and not liquid one. Anyway, as previously mentioned, the unloading areas have a concreted floor. As evidenced during the field audit, the cyanide preparation tanks have an HCN sensor, pH sensor and level sensor (all calibrated and maintained against international standards). After preparing, the solution is transferred to distribution tanks, which are equipped with a calibrated and maintained level sensor. It was evidenced that the cyanide reception, storage and preparation areas were constructed in structural concrete, inside a secondary containment (preparation area), as evidenced in the design/ construction documentation and in the field audit.

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The cyanide mixing and storage tanks are fixed over structural concrete bases and placed inside secondary containments, also constructed in structural concrete, as previously mentioned. In my professional experience, structural concrete is an effective impermeable barrier that can prevent seepage to the subsurface. All structural concrete bases and secondary containments are included in a preventive maintenance and inspection program. Cyanide solution storage tanks are constructed of carbon steel. It was evidenced that the operation stores solid NaCN boxes in specific warehouses (under roof), as previously mentioned, in well ventilated areas, over wooden pallets. HCN detectors and alarm systems are in place as evidenced in the field audit. Both warehouses were designed and constructed with adequate ventilation and exhaustion systems, as evidenced during the field audit. The cyanide solution preparation and distribution areas were also designed and constructed with a ventilation and exhaustion system. It was evidenced that the operation controls the access to the process plants (security control gates) and the warehouses (both inside the fenced process plant). The warehouses are inside fenced areas, well signed and locked. During the field audit it was observed that only authorized and qualified operators are allowed to access these areas. The cyanide solution preparation and distribution areas are inside the fenced process plants. The cyanide storage areas (warehouses) are isolated and apart from other storage areas and specifically assigned to store only solid sodium cyanide. It was evidenced that they are well maintained, clearly signed, clean and ordered. Food and tobacco products are not allowed in these areas. During the field audit this was clearly evidenced. Cyanide solution storage and distribution tanks are constructed of carbon steel, which offer a good barrier to avoid mixing with other incompatible materials, that are not allowed to be stored in that area. Cyanide solution preparation and distribution areas are exclusively used to prepare and distribute cyanide solution. It is not a storage area for other materials. Leaching tanks with cyanide are also constructed of carbon steel, which offer a good and effective barrier to avoid mixing with other incompatible materials. This leaching area is not a storage area for any type of materials. It is only used to leach the milled ore.

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

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 3.2
☐ not in compliance with

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Summarize the basis for this Finding/Deficiencies Identified:

After neutralization, big bags are dried and disposed inside wooden boxes, stored inside a fenced area, concreted floor and then sent to incineration. The incineration system is inside the operation area. All big bags are neutralized during 24 hours into a sodium hypochlorite (10%) solution tank, as evidenced during the field audit. All big bags and wooden boxes are sent for incineration as previously mentioned. All trucks, before returning to the transporter base, are inspected and cleaned (brushed). All valves, pumps, tanks, secondary containments, are included in the operation preventive maintenance plan. It was not evidenced that hoses are used during the preparation of cyanide solution. Particularly, valves are replaced when necessary. It is cheaper to have this approach (predictive maintenance) instead including them in a preventive maintenance plan, as previously mentioned. The valves´ replacement time is defined by the type of valve, the manufacturer definition and by the planned inspection program. Operational procedures are in place defining the steps to be followed during cyanide solution preparation, including the operation of valves. Such operations are performed from the control room or manually at the tanking area. Please refer to SoP 4.1. All NaCN boxes are handled with the help of forklifts, operated by qualified operators. It was evidenced, during the field audit, that all NaCN boxes are kept in order, without puncturing or rupturing. The stacking limit is three boxes, according to the producer instructions. This was evidenced during the field audit. Evidenced, during the field audit, that the cyanide solution preparation areas are kept clean, in accordance with a documented operational procedure. The cyanide solution preparation is always performed by two operators and monitored from the control rooms. Specific PPEs are defined, in a documented operational procedure, to be used during the NaCN solution preparation. Evidenced, during the field audit, the preparation of one NaCN solution batch. Saratovorgsyntez supplies solid NaCN with dye colorant (red), as evidenced during the field audit.

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 utilizing contingency planning and inspection and preventive maintenance procedures.*

The operation is:

X in full compliance with
☐ in substantial compliance with Standard of Practice 4.1
☐ not in compliance with

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Summarize the basis for this Finding/Deficiencies Identified:
The operation designed, documented, implemented and maintains a SHEQ (Safety, Health, Environmental and Quality) management system which includes the management of cyanide. This SHEQ management system is certified, by a third party, according to ISO 45001, ISO 14001 and ISO 9001 standards. The system includes operational procedures such as reception, storage and handling of solid cyanide, strong cyanide solution preparation, leaching operational control, TSF (Tailings Storage Facility) operational control, Acacia operation (intensive leaching process), decontamination of cyanide installations prior to maintenance activities, working at confined spaces, among others and management procedures such as change management, incident reporting and investigation, water balance management, emergencies and crisis management, communication management, among others. All operational procedures are based on the design premises and were updated along the time, in accordance with the change management procedure. Legal requirements are also addressed at the operational and management procedures. Examples of such aspects are the design or required freeboard for impoundments and the design storm events for process solution impoundments. Another example is the operation´s environmental monitoring plan where WAD (Weak Acid Dissociable Cyanide is an operationally defined group of cyanide species that undergo dissociation and liberate free cyanide when refluxed under weakly acidic conditions) cyanide, where design and legal acceptance criteria (< 50 ppm) are addressed (please refer to Standards of Practices 4.4 and 4.9). All operational and management procedures describe specifically the actions to be done in order to achieve the planned results. Hazards, risks and operational controls are addressed in the operational procedures. The required PPEs and prework inspections are also addressed in such operational procedures (or safe work procedures). The preventive maintenance management system and the maintenance inspection management system are included in the documented management system. Related to the operation´s water management procedures, it was evidenced that the operation defined, documented and implemented a water management program which includes the design storage capacities of the TSF (please refer to Standard of Practice 4.3). The operation designed, documented, implemented and maintains a change management procedure which is applicable to several types of changes such as engineering changes, employees' changes, documentation changes among others. The change management procedure demands the participation of different stakeholders in order to review the proposed change, always including representatives of the environmental, health and occupational safety processes. The operation developed a contingency plan related to the management of any upset in the water balance, in the dry season and in the rainy/ snowy season. There were no such upsets in the water balance since December 2021. Any problem related to monitoring results (e.g: free cyanide content in open or underground waters) or detected during process plant inspections (e.g: pump leakages) are managed through the corrective actions management process. Since December 2021 there were no environmental monitoring nonconformances. Minor mechanical problems were evidenced during maintenance inspections and corrective maintenance orders were issued and timely implemented. The operation developed and implemented a crisis management plan. Since December 2021, the operation did not face any situation requiring the trigger of the crisis management plan.

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The operation considers the temporary closure or cessation its activities as a crisis and, independent of the causes that resulted in such situations, these ones will be managed in accordance with the crisis management plan. The operation decommissioning and closure plan (please refer to Standard of Practice 5.1) is considered in the crisis management plan as well as the operation emergency response plan (when an emergency progress to a crisis). Both documents address typical responses such as how the dispose solid NaCN available in the warehouses and not used (will be transferred to another Altynalmas´ mining operations), how to maintain the leaching process plant in neutral process (not leaching, only agitating), how to empty process tanks and store the content in secondary containments, how to perform environmental monitoring, how to neutralize, wash and dismantle cyanide containing facilities, among other usual and specific actions during such situations.The operation defined, documented and implemented specific inspection checklists focused on the process plants installations. Records of such inspections are retained by the operation. Reviewed inspection records performed between December 2021 and September 2023. The inspections are performed per area and includes all the installations included in that area (e.g: tanks, secondary containments, valves, pumps, piping, instrumentation). All cyanide containing tanks are inspected on a monthly basis. The inspection scope is focused on corrosion signs, leakages, pipelines, joints, valves and structural integrity. It is an integrated inspection, including the secondary containment, the tanks concreted bases. Records of such inspections are retained and were reviewed during this opportunity. During the field audit, it was evidenced that those installations are well maintained. As previously mentioned, the inspection of secondary containment, for tanks and piping, are included in the monthly inspection scope. During the field audit, it was evidenced that such installations are well maintained. The operation does not have leach pads and ponds but has a tailings storage facility. This installation is monthly inspected. Inspections results performed between December 2021 and September 2023 were reviewed. Pipelines, pumps and valves are included in the inspection scope. All cyanide installations are included in a preventive maintenance program, and inspections are performed in order to confirm the effectiveness of the preventive maintenance program. The operation has a tailings storage facility, which configuration includes perimetral water diversions channels, used to retain rainwater and snow, beyond the process tailings, that is inspected on a monthly basis. Records of such inspections are retained by the operation. Inspections results performed between December 2021 and September 2023 were reviewed. Cyanide containing installations (tanks, pipes, pumps, valves, secondary containment) are inspected on a monthly basis, in between preventive maintenance activities. In my professional experience the inspection frequency is adequate and provides evidence about the effectiveness of the preventive maintenance program. Inspection checklists were developed and implemented. The inspection results are recorded in this checklist, that are retained by the operation in accordance with the quality records management procedure. The checklist addresses the quality aspects to be inspected and the acceptance criteria to be observed. If opportunities of improvement are identified, corrective or preventive maintenance orders are issued and implemented. The inspection checklist addresses the name of the inspector and the date of the inspection.

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Such cases were evidenced during this opportunity. Corrective maintenance orders are issued when the inspection result demands one. All corrective maintenance orders are dated and, when concluded, are retained by the operation. Some corrective maintenance orders issued between December 2021 and September 2023 were sampled and reviewed during this opportunity.
The operation designed, documented, implemented and maintains a preventive maintenance program focused on tanks, pipelines, pumps, valves, secondary containments and instrumentation (e.g: pHmeter, HCN detector, level transmitter). The frequency of preventive maintenance is variable. For process tanks, for example, every five years they pass through a complete check in accordance with API 650 and API 653 standards (where API means American Petroleum Institute). Topographic evaluations are included in the preventive maintenance plan. In my professional experience, the defined preventive maintenance frequency is adequate to maintain the process installations in a safe way. Records of preventive maintenance orders performed during the last three years were reviewed. It was evidenced that the operation has emergency power resources (diesel generators/ four Caterpillar 3516B model) to operate pumps and other equipment (e.g: agitators) to prevent unintentional releases and exposures in the event its primary source of power is interrupted. The back-up power generator equipment is covered by a preventive maintenance program (annual) and inspections (every 15 days). The generator system is turned on every week. Records of such activities are retained by the operations and were reviewed during this audit.

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

The operation is:	**X** in full compliance with □ in substantial compliance with □ not in compliance with □ not subject to	Standard of Practice 4.2

Summarize the basis for this Finding/Deficiencies Identified:

The operation conducts a program to determine appropriate cyanide addition rates and optimize gold recovery. This program is based on a geo-metallurgical test model. On a monthly basis, the metallurgical laboratory defines the cyanide consumption target (theoretical) and informs the production process. The cyanide solution consumption is monitored on a daily basis, which is adjusted when necessary. Cyanide consumption metrics are defined and the results until August 2023 indicates that the planned results for cyanide consumption are being reached and decreasing. The addition of cyanide solution in the leaching process is automatic through a cyanide and pH analyzer and controller (TAC 1000) device.

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Standard of Practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.

The operation is:	**X** in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.3

Summarize the basis for this Finding/Deficiencies Identified:

Altynalmas´Pustynoye operation developed a comprehensive, probabilistic and dynamic water balance system, focused on the process plants and the TSFs, which includes the reference to the design assumed inputs and outputs, and the real inputs and outputs. The water balance is managed and monitored on a daily basis, in accordance with the water balance model defined by a technical study developed by Kazmechanobr Ltd. (TSF designer). The model considers the storm rain return of 100 years/ 84 mm/ 24 hours (0,1% probability to fall during the life of mine, which is 2030) and maximum evaporation rate per day is 14 mm. The model is updated on a yearly basis according to bathymetric evaluations results. Reviewed operational water balance report dated 31/09/8/2023. Available volume and freeboard values remains adequate to keep the water balance in conformance. There are no leach pads at the operation. The rates which tailings are disposed into the TSFs are considered in the water balance model. The model considers the storm rain return of 100 years/ 84 mm/ 24 hours (0,1% probability to fall during the life of mine). The operation has the precipitation and evaporation data since 1989. The precipitation resulting from surface run-on from the up-gradient watershed did not enter entirely in the TSFs, due the existing perimetral channels. Effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and any upgradient watershed is considered in the water balance model. Dewatering is not a critical aspect to the operation water balance because in most of the cases, piezometers installed in different places around the operation, show insignificant water level or are dry. The operation has a power backup system that provides sufficient energy to maintain the pumping and agitation system working. The process plant pumping system has a redundancy of two pumps. There is no leach pad at the operation. All plant effluents are neutralized and discharged in the TSFs. There are no discharges on surface waters. No other aspects are considered in the water balance model. The freeboard of the TSFs is defined, controlled and monitored by the operation. It was evidenced that the operation implemented operating procedures that incorporate inspection and monitoring activities to implement and maintain the water balance and prevent overtopping of the TSFs. Records of such inspections were reviewed. These inspections are performed by the TSF operators.

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It was evidenced that the operation implemented operating procedures that incorporate inspection and monitoring activities to implement and maintain the water balance and prevent overtopping of the TSFs. Records of such inspections were reviewed. These inspections are performed by the TSF operators. The operation monitors precipitation and evaporation and compares with the historical values. The meteorological monitoring station is located close to the TSF.

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

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 4.4
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All the operation perimeter is fenced. The monitors all open waters, in a frequency defined by the local environmental authority. All analysis is performed by an ISO 17025 certified laboratory. All reviewed monitoring reports did not show any result for WAD (Weak Acid Dissociable Cyanide is an operationally defined group of cyanide species that undergo dissociation and liberate free cyanide when refluxed under weakly acidic conditions) cyanide (CNw) exceeding 50mg/l. All results for WAD cyanide are below 50 mg/l. Reviewed documentation were: Environmental Monitoring Plan (2022~2023) and monitoring reports. The operation developed and implemented an environmental monitoring plan, which includes the monitoring of the open waters. The monitoring frequency is defined in accordance with the environmental permits hold by the operation. Effluent samples are taken at the discharge points of the tailings storage facility (TSF). Reviewed monitoring results between 2022 and 2023 for WAD cyanide and all results are below 50 ppm. The TSF inspections are performed every week and includes the verification of dead animals inside the them. There were no cases of fauna mortality since December 2021. The operation has no leach pads.

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

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 4.5
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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The operation does not have direct discharge to surface waters (Balkash lake is more than 20km far from the operation and is the only surface water in the vicinity of the operation), after plant effluents being neutralized and discharged at TSF. 100% of the neutralized effluents are reutilized by the operation. The operation does not have direct discharge to surface waters. It was evidenced that water samples are taken from Balkash lake and all results, for free cyanide, are below 0,005 mg/l (not detectable). It was not evidenced that environmental impacts over surface waters could be caused by the operation activities.

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

The operation is:
X in full compliance with
□ in substantial compliance with Standard of Practice 4.6
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation has implemented a specific water management system, where seepage is not a critical aspect to the water balance (refers to Standard of Practice/ SoP 4.3). Operational controls such soil compaction, HDPE (High Density Polyethylene) liners, structural concrete secondary containments, soil quality aspects and underground water quality monitoring, are effective barriers to protect the underground water to be impacted by cyanide. The operation does not use underground water in its process. The operation monitors the content of total cyanide in underground waters taking samples in all piezometers and wells installed by the operation. All results between 2022 and 2023 were below 0,02 ppm, all in accordance with the defined acceptance criteria. The underground water obtained from water wells are not used directly for human and/ or livestock consumption. It is used for process purposes and the underground water quality is in conformance with legal requirements. The operations do not use tailings as backfill, as evidenced during the field audit. There were no impacts on the underground water between 2021 and 2023.The operation does not use underground water in its process plant.

Standard of Practice 4.7: *Provide spill prevention or containment measures for process tanks and pipelines.*

The operation is:
X in full compliance with
□ in substantial compliance with Standard of Practice 4.7
□ not in compliance with

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Summarize the basis for this Finding/Deficiencies Identified:

All process tanks are constructed inside secondary containments, over concrete base, made of structural concrete, as evidenced in the design specifications, construction records and during the field audit. In my professional experience, process tanks that are fixed over structural concrete bases are adequately fixed and placed inside structural concrete secondary containments. Structural concrete provides a good barrier to prevent seepage for the subsurface. As previously mentioned, (please refer to Standard of Practice 3.1.5), all structural concrete installations where process tanks are installed are included in the operation preventive maintenance and inspections program. All the secondary containments are designed to hold 110% of the biggest tank volume inside the containment. All process installations are constructed inside buildings. All secondary containments are provided with automatic floor pumps, inside a sump. All effluent collected inside a secondary containment is pumped back to the process tank. Evidenced this system during the field audit. All process tanks are constructed inside secondary containments. All cyanide containing pipelines and joints have a secondary containment in order to avoid any spillage or leakage. It was evidenced two types of containment, the first one a pipe inside a pipe, for pressurized pipelines and half pipeline containment and collecting trays for non-pressurized pipelines. This was evidenced in design documentation and during the field audit. Related to the tailings delivery and return pipelines (pressurized ones, due to the pumping system), the operation uses the pipe inside a pipe configuration, being the pipelines made of High-Density Polypropylene (HDPE). The tailings pipelines are placed inside channels. There are no cases where cyanide containing pipelines are a risk to surface waters. All cyanide containing tanks are constructed of carbon steel and pipelines, depending on the diameter are made of carbon steel or HDPE. Evidenced through the design documentation and during the field audit.

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.*

The operation is:
- **X** in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 4.8

Summarize the basis for this Finding/Deficiencies Identified:

The process plants and peripheric installations (e.g: TSF, NaCN warehouses) were designed and constructed in accordance with local and international engineering standards and specifications. Quality assurance (QA) programs were defined, documented and implemented during the operation construction, which were commissioned and approved by local technical authorities. Soil compaction test records, welding procedures for leaching tanks and associated records, material specifications and quality records are retained by the operation, in specific data-books (e.g: Consep Acacia data book).

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The operation implemented a quality assurance plan addressing the materials to be used, the civil installations (structural concrete) and the inspections (receiving, in process and final ones) and tests to be performed. Commissioning activities are also addressed in this QA (Quality Assurance) plan. Records of such inspections and tests are retained by the operation. Commissioning records are also retained by the operation. Commissioning records and as-built documentation are retained by the operation. All commissioning records are signed-off by local technical authorities. The design, construction and commissioning documentation related to cyanide installations are retained by the operation. They were sampled and reviewed in these opportunities and found in conformance.

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

The operation is:
X in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 4.9

Summarize the basis for this Finding/Deficiencies Identified:

The operation, according to the Kazakhstan mining legislation, developed, documented and maintains an environmental monitoring plan for normal and emergency situations. The monitoring plans includes the monitoring of soil, water, air and wildlife. All analytical methods were developed by an ISO 17025/2017 certified analytical laboratory, accredited by the Kazakhstan Accreditation Authority, and are based on the SMWW (Standard Methods for Water and Wastewater/ edition # 23) analytical protocols. The monitoring plan defines were the samples shall be taken, in accordance with the environmental permits and documented protocols, also defines how the samples shall be taken, preserved and transported to the analytical laboratory. The cyanide types to be analyzed are total and WAD, depending on the sampling points. Laboratory´s sampling protocol (and custody record as well) addresses the environmental conditions were the samples were taken. Reviewed such protocol/ record from samples taken between 2022 and 2023. The monitoring frequencies are defined by the environmental permits and, in my professional experience, are adequate to characterize the medium being monitored.

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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 and livestock.*

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 5.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation, in accordance with the Kazakhstan mining legislation (State Geology and Subsoil Use act # 27-10-3-1393, dated 08/08/2019) Committee, developed, documented and approved a detailed mining decommissioning and closure plan, dated 20/Feb/2020. The operation decommissioning and closure plan shall be updated every five years. Related to the cyanide facilities and installations, the plan addresses neutralization, rinsing, dismantle, disposition and after closure activities, such as environmental monitoring. The Life of Mine (LoM) is November 2027. The closure plan defines the implementation schedule for the decommissioning and closure activities along and after the life of mine (LoM=2027). The closure plan must be updated, at least, every five years.

Standard of Practice 5.2: *Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.*

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 5.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation calculated and defined the value of decommissioning and closure plan, in US$ currency, to implement the closure plan by a third party. The closure plan cost estimate is updated annually. There is no specific Kazakhstan legislation defining financial mechanisms to ensure a mining closure plan implementation. It was evidenced that the Ministry of Environmental Protection issued the protocol # 362, dated 08/Sept/ 2021), addressing environmental funds for mining operations, but still under implementation. The operation implemented a self-guarantee to cover the implementation of the closure plan. Annually the operation is audited by independent third-party auditors, using financial audit standards (International Financial Reporting Standards, developed by the International Accounting Standards Board).

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Reviewed financial audit reports performed by Price, Waterhouse and Coopers (accredited according the Kazakhstan Accounting Council) and led by the auditor Dana Inkarbekova (accredited by the Kazakhstan Accounting Council under the number 005/21/10/1999). Reviewed audit reports dated 30/04/2022 (financial years 2021/2020) and 25/04/2023 (financial years 2022/2021). Both audit reports state that the operation has enough financial strength to cover the expenses related to the implementation of the operation closure plan (Asset Retirement Obligations).

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 or control them.

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 6.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The operation designed, documented, implemented and maintains a set of safe work procedures which includes operational and management ones, such as leaching operations, Acacia operation, cyanide solution preparation, solid cyanide handling and storage, sampling activities, neutralization of cyanide containing installations before maintenance activities, filtering activities, working at confined spaces, change management protocol among others. All operational procedures clearly define the necessary PPE that must be used to perform an activity which involves cyanide. Pre-work inspections, such as PPE inspection, forklift inspection, crane inspection, fire extinguisher inspection, shower and eye-washer inspection, among others are addressed at the operational procedures. Records of such inspections are retained by the operation and were reviewed during this opportunity. The draft safe work procedures are prepared by the plant operators who will perform that activity, reviewed by process supervisors and approved by a process engineer.

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.

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 6.2
☐ not in compliance with

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Summarize the basis for this Finding/Deficiencies Identified:

The operation defined two ranges of pH that shall be observed during cyanide solution preparation (between 11 and 12) and during leaching process (between 10.5 and 10.8). Verified during the field audit and through interviews with plant operators, control room operators and supervisors that these values are kept under control. Also evidenced that the operation installed pH meters in specific process tanks. Such pH meters are included in the preventive maintenance plan, and pH meters maintenance and calibration records were reviewed during this audit. The areas with such HCN generation potential, such as cyanide solution preparation tank, cyanide solution addition tanks, leaching tanks, Acacia reactor, were identified and specific and adequate PPEs are mandatory to be used in such areas. Such areas are well identified as evidenced during the field audit. The operation installed fixed HCN detectors in such areas and operators also use portable HCN detectors. Both HCN detector types are included in the preventive maintenance and calibration program. Records of such activities are retained by the operation and were reviewed during this opportunity. Both types of cyanide detectors are calibrated to alarm in two points: 2.5 ppm (alarm 1) where operators must contact and inform the control rooms and 4.5 ppm (alarm 2) where the operators must inform the control rooms and leave the area. The frequency of calibration for both types of HCN detectors are in accordance with the Original Equipment Manufacturer/OEM recommendations. Reviewed calibration records between 2022 and 2023. In accordance with the operation´s quality records management procedure, HCN detectors calibration and maintenance records shall be retained for three years, beginning the retention time reference the year of 2022. Safety signage and safety pictograms are placed in specific places in the process plants, including the solid NaCN warehouses and the TSF, which are inside the fenced perimeter of the process plants, at process plant installations (including pipelines). Safety signage includes information related to cyanide, the PPEs that must be used, that is forbidden to eat, drink and smoke in such places and open flames are not allowed. The cyanide solution is dyed for clear identification. Saratovorgsyntez supplies solid NaCN briquettes with dye colorant. Evidenced dyed solution during the field audit (cyanide solution preparation activity). It was evidenced during the field audit that shower and low-pressure eye-washers are available in specific assigned places at the process plants. Such installations were tested during the field audit and worked adequately. Both equipment are included in the preventive maintenance program. The operation uses dry chemical powder fire extinguishers (ABC type) in the process plant area. Such fire extinguishers are annually maintained and monthly inspected by the occupational safety process. Records of such activities are retained by the operation and were reviewed during this audit. Fire extinguishers are also checked before some cyanide related activities (pre-work inspection). All process tanks are identified by color plate and safety signage that cyanide is present. In the same way all pipelines containing cyanide are identified by color, safety signage and the flow direction identified. Evidenced during the field audit.

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Saratovorgsyntez´s MSDS (Material Safety Data Sheet) are available in the warehouse, in the cyanide solution preparation area and at process plant, documented in Kazakh and Russian, as well as first aid procedures for cyanide intoxication and chemical burning, as evidenced during the field audit. The operation designed, documented, implemented and maintains and incident (real or potential) reporting and investigation procedure. There were no cyanide related incidents (real or potential) since December 2021. The documented procedure was implemented to report and investigate non-cyanide related incidents, addressing dispositions taken, investigation of the causes, definition of corrective (for real incidents) or preventive actions (for potential incidents), implementation of the proposed improvement actions and the verification of the effectiveness of the implemented improvement actions.

Standard of Practice 6.3: *Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.*

The operation is:
X in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 6.3

Summarize the basis for this Finding/Deficiencies Identified:
In the process plant there are first aid resource, such as oxygen and water and communication mean such as radios and telephone, as evidenced during the field audit. The operation has an ambulatory located in front of the process plants, equipped with oxygen bottles, mechanical breathing apparatus (ambu), which may be used manually or associated with pressurized medicinal oxygen, additional antidotes (sodium thiosulphate, sodium nitrite and methylene blue), radio, telephone, external automatic defibrillator and one ambulance. The medical team (per shift) is composed by one doctor and two nurses/ technicians. All medical services and resources are provided by an expert third party contractor. All medical resources are inspected and tested by the nurses/ technicians on a regular basis. Records of such inspections are retained by the operation and reviewed during this audit. All cyanide antidotes were evidenced to be adequately stored and within the valid date defined by the producer. All medical support (installation/ ambulatory) belongs to the operation. The medical expert contractor developed a first aid protocol that includes cyanide intoxication (through ingestion (through the mouth and nose), inhalation (through the mouth and nose) and absorption (through the skin and the eyes)) and chemical burning. The operation has its own ambulatory equipped with necessary resources to attend workers exposed to cyanide. The operation has one ambulance that is able to transport stabilized workers to Balkash regional hospital. The Balkash regional hospital was evaluated by the operation medical team and they concluded that it is adequate to be used.

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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.

The operation is:
- **X** in full compliance with
- ☐ in substantial compliance with Standard of Practice 7.1
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

According to the Kazakhstan mining legislation, the operation designed, documented, implemented and maintains an emergency response plan/ERP (HSF-PLA-AKT-03(1)). The ERP was developed by different internal stakeholders such as process plant team, maintenance team, occupational health professionals, occupational safety team and environmental professionals, in conjunction with an external professional emergency response supplier. The emergencies related to catastrophic release of hydrogen cyanide from storage, process or regeneration facilities is addressed at the emergency response plan (ERP), mainly related to cyanide solution preparation and elution process. The ERP addresses the activities that must be performed in emergencies involving solid NaCN transportation inside the operation and in the vicinity of the operation. The ERP addresses the response to emergencies related to releases during unloading and mixing. The ERP addresses the response activities to be performed during fires, mainly in the solid NaCN warehouses. The ERP describes the activities to be done in the event of pipes, valves and tanks ruptures. The ERP includes the overtopping situation of the TSFs. The ERP addresses the response activities to be done in the event of power outages (backup generator system) and pumps failures (redundancy two system). Uncontrolled seepage is not a critical emergency scenario for the operation, because all the process plant areas and the TSF were designed and constructed (soil compaction, concreted floor (secondary containments) covered with HDPE membrane and the previous TSF, beyond the soil compaction, is covered with HDPE membrane). Underground water monitoring confirms the effectiveness of such operational aspects. Field tests demonstrated the effectiveness of such configuration to avoid seepage. The ERP addresses the response activities to be done in the event of failure of effluent neutralization system. The ERP includes the overtopping and failure situation of the TSFs. The primary responsibility related to solid NaCN transportation emergencies is from the cyanide seller (Saratovorgsyntez) and the cyanide transporter (Olimp LLP). In the event of transport emergencies in the vicinity of the operation, the operation emergency response team will participate also. The cyanide boxes are transported within a 20´/ 40´ tent trailer truck.

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The ERP addresses the activities to be performed related to the clearing of internal stakeholders (the first step is to reunite the site personnel in specific meeting points and then, under an emergency brigade leader orientation, to leave the emergency scene) and also potentially affected external communities (the closest one is at 25 km from the operation). The ERP addresses the use of antidotes, such as oxygen and sodium thiosulphate, and additional first aid measures, as previously mentioned. The ERP was developed by different stakeholders, including the process plant and maintenance teams. This approach ensures that the releases will be controlled in their sources. The ERP addresses, where necessary, containment actions such as containing berms, assessment and mitigation action such as the use of calcium oxide or hydrogen peroxide solution (10%), to neutralize cyanide (solid and solution, respectively) spillage over soil, and the review of the real or potential emergency (learning from incidents approach), resulting in the definition and implementation of corrective and preventive actions.

Standard of Practice 7.2: *Involve site personnel and stakeholders in the planning process.*

The operation is:	**X** in full compliance with □ in substantial compliance with □ not in compliance with	Standard of Practice 7.2

Summarize the basis for this Finding/Deficiencies Identified:

The ERP was developed by different internal stakeholders and submitted to external stakeholders such as Balkash Municipality Hospital and local police station. The ERP includes several external stakeholders such as Balkash Municipalty Hospital and police authorities. In order to maintain the ERP updated, the same process mentioned to create the ERP is observed. Different stakeholders are involved in the ERP preparation and update.

Standard of Practice 7.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

The operation is:	**X** in full compliance with □ in substantial compliance with □ not in compliance with	Standard of Practice 7.3

Summarize the basis for this Finding/Deficiencies Identified:

The operation defined an Emergency Response Committee in order to manage any type of emergencies. The emergency coordinator is Mr. Ulaskhan Koszhanov (Operation Director), that may be replaced by Mr. Tilek Shapiyev (Deputy Operation Director). The emergency committee is composed of distinct internal stakeholders. The operation has a qualified and professional Emergency Response Brigade.

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All requirements to be an emergency response brigade member are clearly defined. All candidates must pass through a medical/ psychological evaluation, theoretical and practical training and a final evaluation to be qualified. All brigade members, including the Emergency Response Committee contact information, are available at the ERP. Call-out procedures includes the communication, by radio, with security and control rooms, which will trigger the emergency contacting the emergency response team coordinator. The emergency communication loop is clearly defined at the emergency response plan. There are specific activities defined to emergency coordinators, brigade leader and brigade members, as well as for external stakeholders. The operation maintains a master list of all emergency response resources that must be available at the site. There is a specific emergency response room were such resources are stored. This was evidenced during the field audit. All emergency response resources are monthly inspected by the brigade members. Records of such inspections are retained by the operation and were reviewed during this audit. As previously mentioned, the role of external stakeholders during an emergency are clearly defined at the ERP. The operation promotes meetings and performs emergency mock drills, involving external stakeholders, where the roles of external stakeholders are communicated, and all involved stakeholders become aware about their roles during an emergency response.

Standard of Practice 7.4: Develop procedures for internal and external emergency notification and reporting.

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 7.4
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ERP addresses the communication loop to be followed during an emergency, which includes the communication with external stakeholders (including ICMI, hospital, public authorities, press, among others). Regulatory agencies are considered as public authorities in Kazakhstan. As previously mentioned, the operation develops a communication loop involving the contact with internal and external stakeholders, including communities' representatives, press institutions and public authorities. Communication to ICMI is included in the operation communication loop. No significant cyanide related incident has occurred between 2021 and 2023.

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

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 7.5
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ERP defines, in the event of solid NaCN leakage or NaCN solution/ pulp spillages, the actions to be performed in both cases. In the event of solid NaCN (briquettes) real incidents, the plan indicates that calcium oxide powder shall be poured over the briquettes, then collected with plastic shovels and brushes, put inside plastic bags and disposed into de NaCN preparation tank. It is important to note, as previously mentioned, that solid NaCN is handled over concreted surfaces. In the event of cyanide solution or pulp spillage, outside the secondary containments, such spillage shall be neutralized with hydrogen peroxide (10%) solution, which is available in the plant inside 1000-liter plastic containers. The operations uses natural absorber to dry the impacted area, which are disposed into plastic bags and sent for final disposition at the TSF. In order to confirm the effectiveness of the neutralization process, soil samples are taken every 5 cm, in depth, until the value of total cyanide is zero (or not detectable). The ERP describes neutralization of soils or other contaminated media. It is important to note that all process tanks and cyanide containing pipelines are protected by a secondary containment and the soil in the process plant was compacted. Any contaminated and neutralized debris, including soil, will be disposed at the TSF. The operation has alternate water sources, such as a water well, a water pool and water suppliers in tank-trucks and mineral water producers. Chemical products are forbidden to be used in the event of surface water impacted by cyanide (emergencies during transportation). There are no surface waters on the vicinity of the operation. The environmental monitoring plan addresses the necessary monitoring of contaminated soil, underground and surface water and air, defining sampling protocols, the type of cyanide to be monitored and the acceptance criteria.

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Standard of Practice 7.6: *Periodically evaluate response procedures and capabilities and revise them as needed.*

The operation is:
X in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 7.6

Summarize the basis for this Finding/Deficiencies Identified:

In the event of real or potential emergencies, after mock drills or external emergencies related to cyanide, the ERP is reviewed and updated if necessary. The operation plans and performs, on an annual basis, emergency mock drills. Reviewed emergency mock drills performed in 2023. The mock drills are integrated impacting three dimensions, safety, health and environment. After the drill the results are reviewed by the attendees in order to confirm if the drill was a real situation the specific ERP would work and if the attendees performed their roles in accordance with the planned activities. In all reviewed cases, opportunities of improvement (corrective and preventive) were identified and implemented, resulting in the update of the ERP. It is important to note that the operation plans and performs integrated cyanide related emergency drills, as above mentioned. This means that the emergency drills, performed in the field, encompasses situations/ scenarios involving intoxication and environmental impacts, for example. External stakeholders (Balkash Municipality Hospital and Police authorities) have a support role in cyanide related emergencies and are included and communicated during the emergency drills. The operation has a professional emergency brigade and internal stakeholders (process operators and supervisors, control room operators, maintenance technicians, ambulatory medical team) also are involved in the emergency drills. There was no cyanide related real incidents or emergencies since December 2021.

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.*

The operation is:
X in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 8.1

Summarize the basis for this Finding/Deficiencies Identified:

The operation developed an integrated safety, health and environmental induction training for all stakeholders arriving in the operation, including the ICMI auditor, where there is a specific chapter about the cyanide management system. Records of such training sessions are retained by the operation and were reviewed during this audit.

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The operation's induction training adequately addresses cyanide related impacts, such as the cyanide effects on the safety and health of the employees, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure. Environmental impacts of the cyanide are also informed. The induction training also includes the cyanide types present at the operation. For internal stakeholders (including permanent contractors), the operation performs a refresh induction training every three years. Records of such refresh training sessions are retained by the operation and were reviewed during this audit.

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 is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 8.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

After passing through the safety, health and environmental induction training, the new employees or contractors that will work in activities involving cyanide are assigned to be trained specifically in the operational procedures for two work shifts (14 days each shift), under supervision. This training time is divided in phases and, after each completed phase, the trainee is evaluated by its mentor. In the end of the training program, the trainee is evaluated by its mentor and the process plant manager, in order to be qualified (or not) to work in the process plant. The operational training is focused on the operational and management procedures that are linked with activities involving cyanide. All operational training is provided by process operators, supervisors and/ or process engineers. It was evidenced that the operation also implemented on-line operational training. The operation´s Human Resources process designed and implemented a robust operational training system. All new employees or contractors that will work in activities involving cyanide are trained and qualified before working with cyanide, as previously mentioned. In order to ensure that the employees that work with cyanide maintain their knowledge, the operation performs refresh training sessions every three years or, in the event of any update in the operational procedures, all involved employees are promptly trained in the new version of the operational and management procedures. The training effectiveness is evaluated in two phases, the first one during the theoretical training through tests and the second phase through planned job observations while they are working under supervision. Records of such evaluations are retained by the operation and were reviewed during this audit. All training related records are retained by the operation, by the Human Resources management process. Initial and refresh training records were sampled and reviewed during this opportunity. The reviewed training records addresses the name of the trainees, the name of the instructors, the dates of the training, the topics covered by the training and the conclusions about the performance of the employees.

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Standard of Practice 8.3: *Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.*

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 8.3
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All employees that work directly with cyanide receive specific emergency related training (general knowledge) which includes first aid procedures, decontamination of workers, neutralization of leakages over soil or other surfaces like concrete. Records of such trainings are retained by the operation and were evidenced during this audit. During the field audit, some plant operators and supervisors were interviewed and demonstrated they are aware about general and specific aspects of emergency response activities. The emergency response coordinators are trained in the response protocols related to emergencies with cyanide and the resources that are necessary to respond to such situations. The Emergency Brigade members are professional ones, that pass through medical / psychological evaluations, theoretical and practical training before being qualified as professional brigade members. Records of such trainings are retained by the operation and were reviewed during this opportunity. Annually, the coordinators and brigade members participate in emergency mock drills, as part of their permanent training program. They also participate in a refresh training, mandatory according to the Kazakhstan legislation. All external stakeholders that are included in the emergency response plan, such as local police and Balkash Municipality hospital professionals are aware about their role in cyanide related emergencies and also participates in emergency mock drills. Records of such meetings and mock drills are retained by the operation and were reviewed during this audit. Beyond the annual mock drill program, the brigade members are requalified/ retrained every year, as previously mentioned. Records of such activities are retained by the operation and were reviewed during this audit. The initial and refresh training records, beyond the emergency mock drill reports, addresses the attendee's names, their performance, the training scope, instructors' names, dates and instructors' feedback about the trainee's performance.

9. DIALOGUE: Engage in public consultation and disclosure.

Standard of Practice 9.1: *Provide stakeholders the opportunity to communicate issues of concern.*

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 9.1
☐ not in compliance with

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Summarize the basis for this Finding/Deficiencies Identified:

The operation has a specific communication process to interact with internal and external stakeholders (e.g: press, communities, public authorities). Such interactions with internal and external stakeholders are performed through planned meetings, emails, information boards, leaflets, press releases, Altynalma´s magazine, environmental & safety daily dialogues, training sessions on documented operational procedures, planned job observations. Where applicable (e.g: meetings, emails, press releases, environmental & safety daily dialogues, training sessions), the operation retain records of such interactions.

Standard of Practice 9.2: *Make appropriate operational and environmental information regarding cyanide available to stakeholders.*

The operation is:
- **X** in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 9.2

Summarize the basis for this Finding/Deficiencies Identified:

The operation designed and documented specific information (e.g: documented procedures (internal stakeholders) and leaflets (external stakeholders)) about the cyanide management at the operation that are available to internal and external stakeholders and are distributed during the meetings with the stakeholders. All provided information are available, at least, in Kazakh and Russian. In addition, and in some cases, information was also available in English. It was evidenced that most of the external stakeholders are educated and literate. The operation has a specific communication process to interact with internal and external stakeholders (e.g: communities, public authorities, press, employees). Between December 2021 and September 2023 there were no critical incidents involving cyanide that resulted in fatalities, hospitalization, major environmental impacts that deserved to be communicated to the general public (internal and external). In the event of such real and confirmed incidents, the operation developed and documented a Crisis Management plan, which was reviewed during this opportunity and includes a specific chapter about the communication management during a crisis situation. The incidents will be made public. The communication will be led by the corporation spokesman through press releases, press conferences, social media publications, meetings with public authorities, phone calls and emails. Cyanide exposure resulting in hospitalization or fatality, cyanide releases off the mine site requiring response or remediation (this is a major environmental impact), cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment (this is a major environmental impact), cyanide releases on or off the mine site requiring reporting under applicable regulations (this is a major environmental impact) and releases that cause applicable limits for cyanide to be exceeded (this is a major environmental impact) are considered critical real incidents.

Altynalmas Pustinoye		24/07/2024
Name of Mine	Signature of Lead Auditor	Date

SUMMARY AUDIT REPORT

Audit team conclusions:

Was evidenced that JSC Altynalmas/ Pustynoye operation maintains a SHEQ management system. This system ensures an adequate cyanide management in accordance with the Cyanide Code principles.

Being usual in all audit process, through sampling, opportunities of improvement (corrective and preventive) may exist and were not identified in this opportunity. Based on the sampled evidences, the physical conditions of the site (installations), in the interviewed personnel and in the reviewed documentation, the audit team concludes that the cyanide management system **is FULLY** implemented and maintained in accordance with the ICMI protocol for gold mining operations.

Rio de Janeiro, RJ, Brasil, 24/July/2024.