Gold Mining Operations

Summary Audit Report

for

Anglo Gold Ashanti Ltd/

Queiróz Facility.

November 2021

Prepared by NCABrasil Expert Auditors Ltd.

www.globalsheq.com

This summary audit report contains 29 pages

SUMMARY AUDIT REPORT

SUMMARY AUDIT REPORT
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:

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

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

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

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

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Name of Mine: Queiróz Mining Operation.
Name of Mine Owner: Anglo Gold Ashanti Ltd.
Name of Mine Operator: Anglo Gold Ashanti Ltd.
Name of Responsible Manager: Daniel Rodrigo Gomes.
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IN THE LAST THREE YEARS THERE WERE NOT ANY CYANIDE RELATED INCIDENT, REAL OR POTENTIAL. IMPROVEMENT ACTIONS (CORRECTIVE OR PREVENTIVE) RELATED TO THE CYANIDE MANAGEMENT SYSTEM WERE NOT NECESSARY. THE CYANIDE MANAGEMENT SYSTEM, AS WELL THE OPERATION, REMAINS THE SAME.

Location detail and description of operation:

The Queiróz mining operation is located in the country zone (~10Km) of Nova Lima town, Minas Gerais State. It is composed by an underground mine complex, Cuiabá mine, situated 20 km from the Queiróz leaching plant and where cyanide is not used (this means that the Cuiabá Plant IS NOT A CYANIDE FACILITY), by a pyrometallurgy plant, a hydrometallurgy plant and by a foundry, where the metallic bullion is obtained. There was not any relevant change in the cyanide management system. The operation configuration (installations) remains the same. In general terms, the operation production steps are as follows:

1. Introduction:

Gold ore production process starts at Cuiabá mine/ plant where the mechanical treatment is situated. After that, the concentrate containing gold goes to Queiróz Plant where the Pyrometallurgy, Hydrometallurgy and Foundry processes are responsible to obtain the final product. A description of each process step is given below:

2. Cuiabá Plant:

As previously said, Cuiabá plant performs the mechanical treatment that consists in reduce the ore size and concentrate material that we have interest, and to do that, it uses these following process: Crushing, Milling (without cyanide solution adding (this means that the Cuiabá Plant IS NOT A CYANIDE FACILITY)), Flotation and Filtering to take-off water from the pulp, so that it can be transported to Queiróz Plant using the Aerial Ropeway.

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- **Crushing:**

  There is a primary crushing inside the mine and after that the ore is sent to the surface crushing. Crushing is just a process to reduce size of ore rocks so that it can feed the Mill with a smaller size.

- **Milling:**

  Milling process is responsible to reduce ore size so that it assumes a powder size. After that the ore goes through gravimetric concentrators, so the free gold can be taken of the gold. However, approximately 85% of the gold is included in sulfur molecule and is necessary additional processes to recovery it. There is no cyanide solution adding at the milling process.

- **Flotation:**

  All the ore coming from milling pass through flotation area that concentrates the sulfur by the reduction of mass. Since the gold molecule is included in sulfur, its grade becomes higher with sulfur concentration. The concentrate produced must have a minimum of 28% of sulfur because that's a very important parameter for the pyro-metallurgy process.

- **Filtering:**

  So, the concentrate can be sent to Queiróz plant through Aerial Ropeway. It is necessary that the amount of water in it be reduced. To get this, the concentrate is filtered, and the amount of water decreases to 11% of mass.

3. **Queiróz Plant:**

   At Queiróz plant the chemical processes are made to recover the gold from

   the concentrate. Queiróz plant process is divided in two distinct ones:

   pyro-metallurgy and hydrometallurgy.

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- **Pyro-metallurgy:**

Once the concentrate receives water to become a pulp again, it is pumped to pyro-metallurgy process, so it can be roasted. The concentrate must have a minimum of 28% of sulfur and a density of approximately 2.0 t/m³ (ton per cubic meter) so the exothermic reaction of oxidation can occur.

In the roaster, the concentrate is oxidized by the addition of atmospheric air and a temperature of 700ºC (degrees Celsius) inside the roaster. In these conditions the sulfur is oxidized generating sulfur dioxide and exposing the gold to cyanide attack in the hydro-metallurgy process.

The sulfur dioxide is then converted into sulfur trioxide and then it's used to make sulfuric acid.

The concentrate coming out of the roaster is called calcine. The calcine is quenched, thickened and finally pumped to hydro-metallurgy process.

- **Hydrometallurgy:**

The calcine received from pyro-metallurgy at this time can be leached by cyanide. The calcine goes to tanks with addition of air. The pH (Hydrogen potential) rate is controlled with addition of lime. Since the pH value is controlled to be between 10.8 – 11.3, a solution with 10% of sodium cyanide is added to the pulp so that the gold can be solubilized. The bigger part of gold is solubilized and after a solid/liquid separation the rich liquor (pregnant) is sent to the precipitation area, that precipitates the gold with addition of zinc and plumb nitrate. This precipitated material is sent to the refinery so that the gold bars can be made.

However not all of gold is taken off the pulp in the first stage of leaching. The pulp returns to leaching and then goes to CIP (Carbon in Pulp) where the soluble gold is adsorbed in activated carbon. Since the carbon is loaded with gold, it passes through an elution process to recover the gold. The rich liquor (pregnant) is sent to precipitation area.

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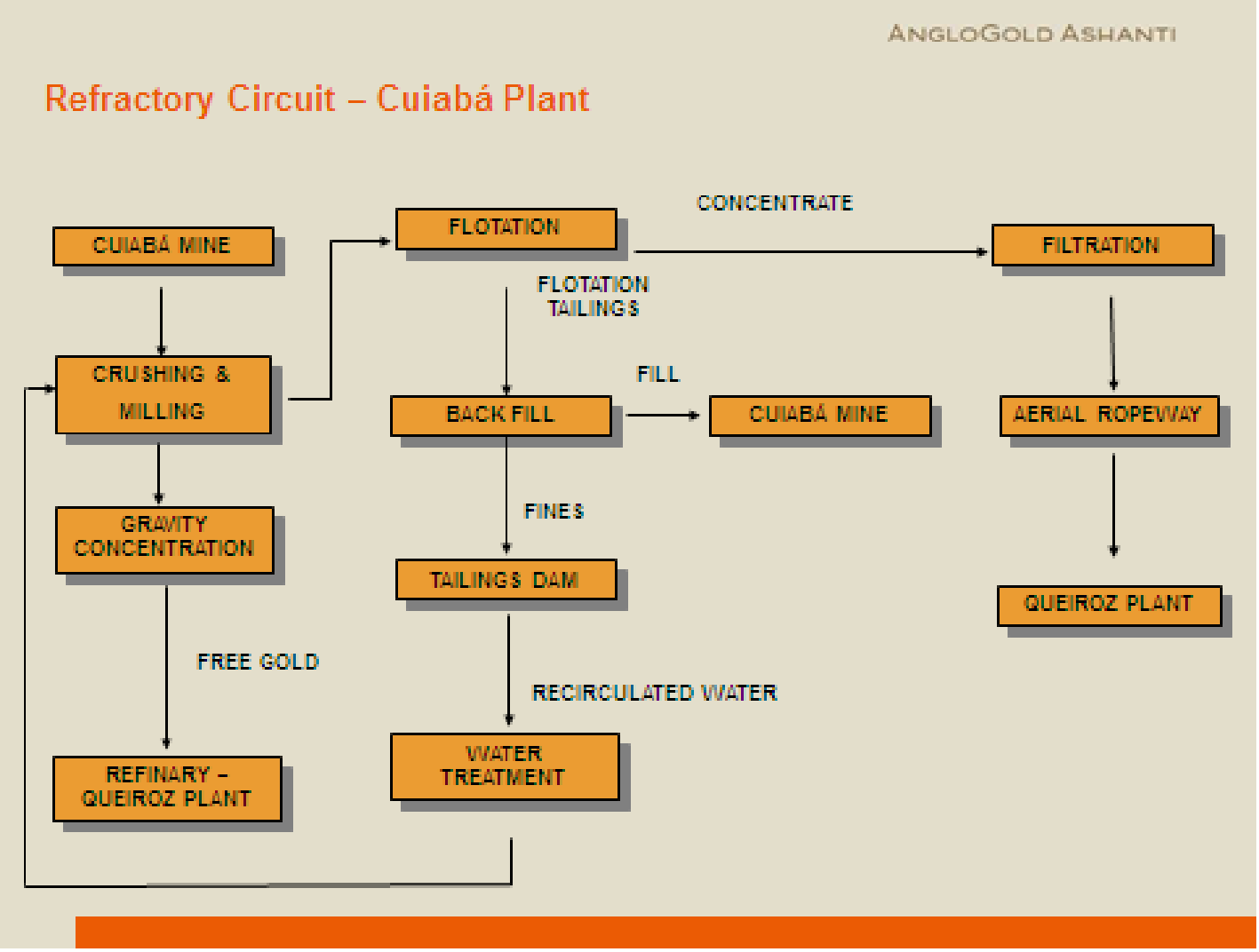
When all the possible gold is taken off (minimum of 94.5%), the pulp and the barren solution (low level of gold) are discharged (after being neutralized) to the calcine dam. However, before that all this pulp receives a solution of ferrous chloride to reduce cyanide level (WAD/ Weak Acid Dissociated) to less than 50 ppm.

4. **Cuiabá Plant Process (not included in the cyanidation process/** (this means that the Cuiabá Plant IS NOT A CYANIDE FACILITY)**):**



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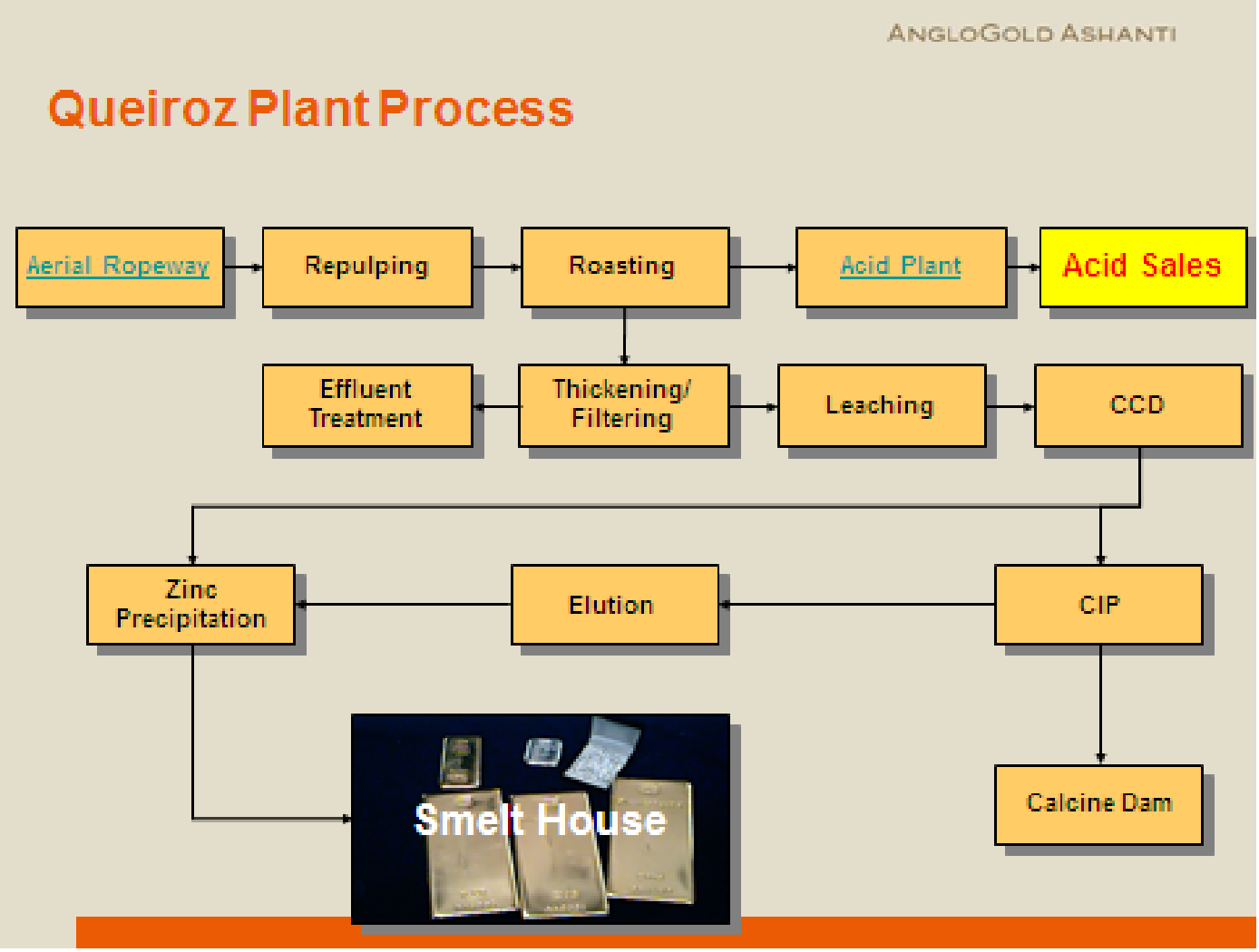
5. Queiróz Plant Process (cyanidation process):



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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.

No significant cyanide incidents were identified during the last three years (2019~2021) that required reporting to ICMI (where ICMI means *International Cyanide Management Institute)* or public disclosure or reporting under Standard of Practice 7.4.3.
This operation has not experienced any compliance issues during the previous three-year audit cycle.

***** 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: NCABrasil Expert Auditors Ltd.
Audit Team Leader: Celso Sandt Pessoa
E-mail: celsopessoa@ncabrasil.com.br (ICMI qualified lead auditor and TEA (Technical Expert Auditor).
Names and Signatures of Other Auditors: none.

Date(s) of Audit: 08~ 12/11/2021 (on-site) and
10~11/02/2022 (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 verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Mining Operations and 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
☐ not in compliance with
Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:
The contract signed by the operation with Australian Gold Reagents (AGR), clearly addresses that the solid cyanide shall be produced by a certified AGR facility. AGR has just one plant, at Kwinana/ Australia, which is currently certified by ICMI **(International Cyanide Management Institute)**, in accordance with ICMI website information. In the last three years, the operation only bought solid NaCN (sodium cyanide) from AGR Australia Pty, in accordance with the reviewed purchasing documentation. All original requirements reviewed during the last recertification audit, remains the same. The contract is applicable for all Anglo Gold Ashanti Operations, in Brazil and abroad.

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
☐ not in compliance with
Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:
It was evidenced, reviewing the contracts and agreements among the operation and the producer (AGR Australia Pty) and the producer with the transporters (AGR Australia Pty. supply chain and Niquini Transportes in Brazil), that general and specific responsibilities are clearly addressed on both of them. Also observed that the AGR Australia Pty. supply chain and Niquini Transportes Ltd. are certified cyanide transporters under the Code. The cyanide transport related documentation (from origin until the operation) is verified in the reception of the solid cyanide and retained by the operation.

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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
- ☐ not in compliance with

Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

The receiving, storage and preparation area remains the same since 2019. This area was constructed in accordance with Brazilian engineering procedures as evidenced in the first certification audit. It was evidenced that this area was adequately maintained in the last years and was found in perfect order in this opportunity.

The cyanide unloading and preparation area was constructed in a restricted area, where only authorized and qualified personnel are allowed to go in, under roof, with a drainage system, **on concreted floor** and HDPE (where HDPE mean High Density Polyethylene) and away from surface waters and people, as evidenced during the field audit. The warehouse and preparation area are provided with HCN (cyanide gas) sensors.

The unloading operation is performed by two qualified operators. All the necessary safety procedures are documented in work instructions as well as the handling instructions. The operators have also portable HCN sensor, during the unloading and preparation activities. The unloading, preparation and storage areas are naturally ventilated, and, in the event of any cyanide leakage, these areas are concreted and the recovering of the solid cyanide is easy.

The preparation and distribution tanks are inside a secondary containment, with adequate thickness that provides a good barrier to avoid contact of the solution with incompatible materials. The cyanide preparation tank (595-TK-01) has an HCN sensor, pH sensor and level sensor (all calibrated), associated with an alarm system. Two levels of alarm were established for each aspect (HCN, pH and tank level). After preparing, the solution is transferred to four distribution tanks, in the tank leaching area, all equipped level sensors (all maintained and calibrated). All these activities are monitored at the control room, through a PLC (Programmable Logic Controller) system.

The cyanide storage area is isolated and apart from other storage areas and specifically assigned to store only solid cyanide. It was evidenced, during the field audit, that they are well maintained, clearly signed, clean and ordered. The cyanide solution preparation tank, as well as the four distribution tanks are installed in well ventilated areas. In the same way, the four cyanide solution distribution tanks are located is specific assigned areas, with restricted access, where no other chemical product is stored, and the own tank provides an effective barrier to avoid the contact of cyanide solution with other materials. Food and tobacco products are not allowed in these areas.

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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
☐ not in compliance with
Standard of Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

The operation uses colorant dyed solid sodium cyanide (briquettes), as previously mentioned, which is brought to the operation in containers, specifically designated for this purpose, which is returned to the cyanide transporter just after the unloading activity is concluded, by the cyanide transporter. Before departing the operation, the truck is verified to be in conformance, without any kind of leakage and completely empty and clean. The empty cyanide containers (big bags) are washed, decontaminated, dried and sent to thermal destruction at a qualified environmental services supplier, as well as the wooden boxes. All cyanide containers (big bags) are washed, decontaminated and dried in a specific installation available for this activity. After that, the decontaminated big bags are sent to thermal destruction at a qualified environmental services supplier (by Brazilian local EPA (Environmental Protection Agency)) for this kind of activity. In the event of any spills during cyanide solution preparation, the area is promptly cleaned-up. The effluent of this activity returns to the leaching process, through a pumping system.

It was evidenced that the operation defined, documented and implemented a procedure to unload the cyanide during the reception. The operators are trained and qualified in this procedure. Records of such training activities and the field audit evidenced that. The operational procedure clearly addresses the steps to be followed and the activity is fully monitored and performed always by two operators and includes the operation and maintenance of all valves and couplings for mixing solid cyanide.

The unloading operators are trained and qualified to perform that activity. Records of such trainings as well as field interviews demonstrated that the operators are prepared to perform the unloading, storage and mixing activities. The required PPEs (personal protective equipment) for the unloading, storage and mixing activities were evidenced to be used during the field audit. The unloading, storage and mixing activities are monitored and always performed by two operators. The cyanide big bags are handled with the help of lifting devices, in a specific area designed for this purpose. The lifting device is included in a preventive maintenance program. Records of its maintenance were evidenced. The forklift operators are trained and qualified, (according to Brazilian legislation). Records of such credentials were evidenced. Interviewed operators demonstrated that they are aware that NaCN boxes shall not be damaged during handling activities. It was not evidenced any NaCN wooden boxes damaged during the field audit. It was evidenced at the cyanide warehouse that the cyanide boxes are stacked in three (maximum).

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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
- ☐ not in compliance with

Standard of Practice 4.1

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation designed, documented, implemented and maintains a SHE (Safety, Health and Environmental) management system in order to manage their SHE aspects, including cyanide.

The operation designed, documented and implemented a change management procedure (PN-0003(4)). Before implement any change in the operation configuration or procedures, an inter-disciplinary team, which includes maintenance representatives, production representatives, occupational safety representatives, environmental representatives, occupational health representatives, engineering representatives evaluate all the potential risks involved with the proposed change. This activity is recorded. No major or relevant changes were implemented in the last three years in the operation.

The operation defined and implemented a site inspection program, performed on a daily basis, just after every shift turns, and also a comprehensive preventive maintenance program, focused on the operation installations (pumping & piping systems, tanks, TSFs (Tailings Storage Facilities) and generator back-up system).

The inspection and preventive maintenance frequencies seem to be adequate in order to ensure that the cyanide installations are working in accordance with the design parameters. During the field audit, it was evidenced that these installations are in good shape and well maintained. Also observed that the plant is dry, without any kind of leakage or spill.

All process tanks are included in the weekly inspection plan. In conjunction with the inspection of the process tanks, the operation inspects all secondary containments. The inspection plan includes the inspection of valves, pumps and piping system, as previously mentioned. Was also evidenced that the operation installed a height indicator, indicating the design freeboard at the TSFs, facilitating the visual inspection of the freeboard. The TSF inspection protocol is in accordance with Brazilian legislation, and the TSF is inspected every two weeks. The inspection scope, documented in a checklist, includes the verification of the physical integrity of any surface water diversions required to maintain water balance.

The operation did develop, document, implement and mantain a specific emergency response plan considering all potential cyanide related emergency scenarios, including upset in the water balance (considering even the cessetion of the operation), any deviation from design and operational criteria (e.g: pH, freeboard, leaching solution concentration and flow, among others).

It was evidenced that all inspection activities (operational and maintenance ones) are recorded, including date, shift, name of the inspector, installation being inspected, conforming/ non-conforming aspects. Any non-conforming aspects are recorded and communicated to the maintenance process in order to fix the identified nonconformity.

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Verified that the operation planned, documented and implemented a preventive maintenance program. Reviewed preventive maintenance plan and associated records for cyanide containing equipment such as tanks, piping and pumps.
Was evidenced that the operation has a back-up generator (450kVA, where kVA means kilo Volt Ampere), which is maintained and tested every two weeks. Reviewed maintenance and testing records of the back-up generator.

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:
Although the operation does not add cyanide solution during the milling process, it designed, documented and implemented a cyanide consumption management model in order to evaluate and determine the best cyanide consumption rate, in accordance with the ore quality.
The operation performs cyanidation tests (rolling bottle testing/ bottle leaching) in order to determine the best ratio between cyanide addition and gold recovery. It is also usual, the practice of re-cyanidation rolling bottle testing, in order to verify and confirm that the calculated gold recovery is being obtained in real conditions. The remaining cyanide in the tailings is also monitored by the operation, every two hours. The operation also monitors the consumption of cyanide related to the amount of recovered gold. NaCN solution addition to the leaching process is automatically controlled.

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:

The operation designed and implemented a water management system. There was not any major change in this management system since the last recertification audit, back in 2018. During 2011, the operation did update the hydro-geological study of the site. This study was performed by Golder Associates Ltd., and all previously assumed assumptions like, storm rain, evaporation rates, rain history, water intake, water outtake, seepage and tailings deposition rate were confirmed as being correct.

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It was evidenced that the study was assisted by a software (modflow), where several circumstances were simulated. Beyond this updated water balance study, and in accordance with a Brazilian legislation (COPAM 87/ 2005, where COPAM means Conselho Estadual de Política Ambiental), the operation performed a hydro-logical evaluation, performed by DAM Engineering Ltd., confirming that the water balance management system of the operation is adequate and the operation is well water balanced. The study performed by Golder Associates indicates that the probability that the storm duration and return is below 0.001%, during LoM (that means Life of Mine), and if the potential storm happens there is no chance to overtop the operation TSF (Calcinados) which was designed and constructed considering the storm data and is connected with two others decommissioned TSFs (Rapaunha and Cocuruto), situated downgradient of Calcinados dam.

The operation has a meteorological station where, on a daily basis, it monitors the rain and evaporation rates, and compares with the design assumed values. Evidenced this control since 01/01/2019.

The operation operates the TSFs with an operational freeboard higher that that one established in the design, focusing the stability and safety of the TSFs. It was evidenced that the operation installed some freeboard datum poles, in order to optimize the visual inspection of the available freeboard.

The water management system is audited by the Anglo Gold Ashanti corporate dam expert, once a year. Reviewed audit records for 2019, 2020 and 2021.

The last updated water balance model was done in the beginning of 2022 and evaluated the regional hydrological aspects considering the indirect hydrological process and used a technique for estimating runoff hydrographs based on the NRCS-CN model (Natural Resources Conservation Service (NSCR), previously known as Soil Conservation Service (SCS)). For this hydrological model it was analyzed and characterized the pluviometric regime of the TSFs, based on the historical series of rainfall stations of the Mineração Morro Velho (located about 4.6 km from the TSFs).

The rainfall design and consequently the designed flood were determined for a return period of 10.000 years. The computational model HEC-HMS (Hydrological Modeling System) - version 4.9, developed by the Hydrologic Engineering Center of the U.S. Army Corps of Engineers was used to carry out the simulations. Accordingly, to the results presented in the model, the current spillway system of the TSFs have sufficient hydraulic capacity considering the rainfall quantiles referring to the return period of 10.000 years. The critical storm rain value is 441.3 mm/ 48 hours. The following aspects were considered in the water balance model:

- The amount of tailings entering the TSF (Calcinados) is a parameter considered in the operation water balance model.
- A design storm duration and storm return interval.
- The quality of existing precipitation and evaporation data in representing actual site conditions.
- 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.
- 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.
- The effects of potential power outages or pump and other equipment failures on the drain-down from a leach pad or the emergency removal of water from a facility.
- The capacity and on-line availability of necessary treatment, destruction or regeneration systems.
- The assumed phreatic surface in a tailing's storage facility.

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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:
It was observed that there is not any open water with CNw (WAD cyanide) higher than 50ppm at the operation. The neutralization process of the final effluent seems to be effective, ensuring CNw < 50ppm.
It was observed that the operation and the TSFs are fenced.
The operation neutralizes the final process effluent with ferric sulphate and monthly monitor the quality of the effluent, before discharged into a decommissioned TSF (Cocuruto dam), as defined by the local Environmental Protection Agency (EPA). Reviewed CNw results from 01/01/19 until 30/09/2021 and was not observed any results above 50ppm (final effluent, before discharge), concluding that the neutralization process is effective. There is no record of wildlife mortality since 2015. The open waters are daily inspected, and records maintained.

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:
After the neutralization process, the effluent pass through two decommissioned TSF (open waters) before reaching the surface water. Reviewed monitoring records between 01/01/2019 and 30/09/2021, where the typical value of CNw is < 0.005ppm.
The operation established a monitoring point, down gradient of the mixing zone, where the the CNw is monitored on a daily basis. Typical value for CNw is < 0.005ppm (CNf (free cyanide) will be even lower). When CNw is higher than 0.022 ppm, the operation determines the CNf (free cyanide) content in the sample, using standard methods (the operation process laboratory is ISO 17025 certified (where ISO means International Standardization Organization), in accordance to the local EPA requirements).
All reviewed monitoring results showed CNf < 0.004 ppm.
The analytical procedures were developed by the operation laboratory team (ISO 17025 certified), in accordance with international standard methods.
The operation does not have any indirect discharge to surface waters. No cases of indirect discharges were evidenced. The monitoring results of surface waters down gradient to the operations clearly shows that there is not any cyanide related contamination.

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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
Beyond the water management system, the operation installed piezometers down gradient of the operation in order to monitor potential seepage and also to monitor the underground water quality. Beyond monitoring activities, the operation TSF (Calcinados) was constructed considering soil compactation and is covered with HDPE membrane. It was observed, reviewing monitoring reports between 2019 and 2021, that there is no seepage. Evidenced that the values for CNt (total cyanide) and CNw are below 0.005 ppm, preserving the quality of underground water. The operation ensures that it may be used, if necessary, by stakeholders living downgradient of the operation through water wells.
The operation does not use mill tailings as backfill.

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

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide unloading, storage, mixing and process solution tanks areas where constructed in order to prevent that any process spill could impact the human life and the environment. All these areas were observed during the field audit (engineering documentation was also reviewed) and confirmed that these areas are concreted, with secondary containments (preparation, leach and CIP (Carbon in Leaching) tanking areas)), providing a good barrier to avoid soil and underground water being impacted. These areas are provided with an automatic pumping system and a drainage system connected to the TSF (Calcinados dam). No chance for any spill to impact directly the environment.

All secondary containments volumes are, at least, 115 % greater than the biggest tank at the area. Beyond that, all secondary containment areas are provided with a pumping system and drainage system, as observed in the field audit, as previously mentioned.

Verified, during the field audit, that all cyanide process solution pipelines are provided with spill prevention systems (pipe into pipe to avoid spraying, pipe inside half pipes with covered connections, to avoid dripping and spraying), to collect leaks and prevent releases to the environment and to prevent the human life to be impacted also.

Although there is not any cyanide containing pipelines presenting a risk to surface waters, all cyanide containing pipelines are within protected areas, with secondary containments.

All cyanide tanks and pipelines are constructed of materials compatible with cyanide and high pH conditions (such as carbon steel and/ or HDPE (High Density Polyethylene)).

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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 operation configuration didn't suffer any major change in its configuration since the certification audit. All the engineering documentation reviewed during the certification audit (2007) remains unchanged and is kept by the operation.

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:
It was evidenced that the operation designed documented and implemented an in-depth monitoring system, focused on open waters, surface and underground waters, being in conformance with the Brazilian environmental legislation and this protocol (see SoP 4.4, SoP 4.5 and SoP 4.6/ where SoP means *Standard of Practice)*). Related to the monitoring of fauna mortality, the operation TSF (Calcinados) is monitored every fifteen days, in accordance to a specific documented protocol (defined by the Brazilian legislation), where several TSF quality and operational aspects, including the verification of the presence of dead animals inside it. Records of such monitoring activities were reviewed during this audit. The monitoring frequency and sampling locations were defined in accordance with the requirements defined at the environmental permit, and are adequate to characterize the medium being monitored and identify any changes in the medium being monitored in a timely manner. The operation's laboratory is ISO 17025 certified by Inmetro (Brazilian accreditation body/ Instituto Nacional de Metrologia), where analytical standards methods were adequately developed by high qualified personnel, as well as sampling procedures, sampling preservation methods, custody procedures, among other aspects, as evidenced in the system and field audit at the operation environmental laboratory. Being an ISO 17025/2017 certified laboratory, all analytical protocols, sampling conditions and other monitoring aspects must be documented, and records retained. No cases of wildlife fatalities were observed at the operation since 2019.

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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 ☐ not in compliance with	Standard of Practice 5.1

Summarize the basis for this Finding/Deficiencies Identified:
The operation developed, documented and implemented a management procedure, focused on the management of the closure activities of the operation. It was evidenced that the operation updated the operation decommissioning and closure plan, which was developed by Arcadis Ltd. (report dated October 2020). This updated decommissioning and closure plan was reviewed during this audit. The plan was developed and updated considering World Bank directives, ICMM directives (where ICMM means *International Council on Mining and Metals)*, ICMI Directives (where ICMI means *International Cyanide Management Institute)* and Brazilian legislation (COPAM 127/08 and NRM 20 (where NRM means *Norma Regulamentadora de Mineração)*) directives.

The decommissioning and closure plan clearly describe the schedule to be followed during the decommissioning and closure activities, including activities (environmental monitoring) that shall be performed after the operation closure. The operation is planned to be closed-out (LoM/ *Life of Mine*) on 2033. In accordance with internal management procedures, the decommissioning and closure plan shall be reviewed and updated every three years. Reviewed plan was updated in October 2020.

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 ☐ not in compliance with	Standard of Practice 5.2

Summarize the basis for this Finding/Deficiencies Identified:
The Arcadis Ltd. report dated October 2021, identifies the required costs related to the implementation of the plan. The total amount was included in the "reclamation cost report" (dated 31/12/2020), which is annually updated. Reviewed values since 01/01/2020. The required values to implement the decommissioning plan are based on a third-party implementation. The operation will not decommission its operation by itself.
The operation updates annually the costs related to the implementation of the decommissioning and closure plan. Reviewed reclamation cost reports from 2019 and 2020 (last updated on 31/12/2020).
The Brazilian Mining Legislation does not demand or establish any financial mechanism to be followed by the operation. The operation implemented a self-guarantee mechanism. Beyond this mechanism, the operation has also insurance certificates related to the operational risks.

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Annually the operation has its financial health audited by independent third-party auditors. The last financial audit was performed by Ernst&Young, a legally established financial auditing company in Brazil (permit CRC-2SP015199/O-6). Last financial audit was related to the financial year ended 31/12/2020 and was led by Mr. Tomas L. A. Menezes, a qualified financial auditor (permit CRC-1MG090648/ O-0). The financial audit was carried out in accordance with International Financial Report Standards (IRFS), which are acceptable either in Brazil and internationally. The financial audit report clearly states that the operation has enough financial health to fund the implementation of the closure plan. The financial audit report was distributed to external stakeholders such as banks, Brazilian stock exchange, Brazilian Public Financial authorities. It is also available at www.anglogoldashanti.com, for public consultation.

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 identified and evaluated all the SHE risks associated with the cyanide and, in order to have the risks under control and mitigated, the operation defined, documented, implemented and maintains specific operational procedures for cyanide related activities, including PE-0333 (7)/ Neutralization and cleaning activities at installations and equipment, which address neutralization and cleaning activities of cyanide containing installations before maintenance activities. Several managements and operational documented procedures were reviewed and verified during the field audit. All operational procedures address pre-operational/ pre-work inspection activities, where necessary. The work force participates effectively in the risk identification and evaluation, and in the development and updating of operational procedures.

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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
□ not in compliance with
Standard of Practice 6.2

Summarize the basis for this Finding/Deficiencies Identified:

The operation determined that the minimum pH value shall be equal or greater than 10.5 (leaching process) and 11 (cyanide solution preparation). The pH is effectively controlled and monitored (through calibrated pHmeters) in the operation. Alarm systems are in place. Verified, during the field audit, that the usual pH value is 11 for cyanide preparation tank and 10.8 pH for leaching tank. The pH is controlled through the addition of caustic soda (during NaCN solution preparation) and through the addition of CaO solution in the first leaching tank. The pH is controlled and kept above 10.8 (alarm level/ cyanide preparation tank), and 10.0/ alarm level for the CIP leaching tank), avoiding the presence of HCN (> 4.7 ppm).The operation has fixed calibrated HCN detectors in the cyanide preparation tanking area and the operators also use portable calibrated HCN detectors. Both cases evidenced in the field audit. Beyond such control through instrumentation, the operation strictly controls the pH, as previously mentioned, in such installations and the operators are always using the adequate PPEs, as evidenced in the field audit. The fix and portable HCN detectors, are maintained and calibrated in accordance with a calibration management system. Reviewed calibration records of all HCN detectors.

Alarm levels are set for 2.5 ppm (inform control room) and 4.5 ppm (operators must leave the area). During the field audit, the portable HCN used by the auditor escort supervisor never alarmed.

It was evidenced during the field audit, that the operation premises (cyanide circuit) and richly signed, including the prohibition of drinking, eating and smoking in these areas. The audited areas during the field audit were: NaCN storage warehouse, cyanide solution preparation area, cyanide solution distribution tanks, tank leaching area, CIP area, detox area and laboratory. Auxiliary emergency installations/ equipment such as low-pressure eye-washers and showers (which are routinely inspected and maintained), fire extinguishers, were evidenced in the operation premises. Some of these auxiliary installations were tested during the audit and worked well. The operation already uses dye colored NaCN solution, as previously mentioned. as evidenced during the field audit, during cyanide solution preparation activity.

Also evidenced that that the operation implemented a fire extinguisher (CO2 (for electrical installations, such as transformers and electrical panels (such electrical installations are not present in cyanide containing areas, such as storage warehouse, leaching tank area, CIP area and detox area) and dry powder) management system, in order to maintain these auxiliary equipments under good operational condition. All interviewed operation professionals were trained in fire extinguishers handling and operation and are aware about that only dry powder (type ABC) fire extinguishers shall be used were cyanide is present. It was evidenced, during the field audit, that the operation installations (tanks, piping, valves, pumps, ponds) are in good shape, the tanks and piping are adequately painted and signed, the cyanide flow identified. Cyanide MSDS is also available (in Portuguese) in the plant. It was evidenced that the operation has defined and implemented procedures to evaluate SHE incidents.

No cyanide related incidents occurred in the plant, during the last three years, confirming that the cyanide management is effective. Unfortunately, there was a real incident involving another chemical hazard and the incident investigation was adequately managed and improvement actions were defined, implemented and are effective.

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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:
The operation has developed emergency procedures for that activities at the leaching plant and has an emergency care center (with medical assistance 24h per day), fully equipped with a resuscitator, one ambulance, antidote kits, telephone, oxygen cylinders. These facilities were evidenced in the field audit. All operators have their own radio to communicate any real or potential incidents involving cyanide, beyond cell phones and fixed telephones. These facilities, resources and procedures were evidenced during the field audit. All the first aid equipment are effectively inspected by the local nurses, including the ambulance (which is ready to be used and was tested during the audit). Evidenced the inspection records. The antidotes (cyanokit) are stored under controlled conditions and their validity is constantly checked. The operation developed specific emergency response procedures for cyanide exposures, including intoxication, chemical burning and first aid response.
The operation qualified the local hospital (Nossa Senhora de Lourdes/ Nova Lima) as a complementary resource in the event of cyanide related emergencies. The transportation procedures between the operation and the local hospital are tested.

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 ☐ not in compliance with	Standard of Practice 7.1

Summarize the basis for this Finding/Deficiencies Identified:
The operation defined, documented and implemented procedures to respond to cyanide related emergencies. Evidenced a documented Cyanide Emergency Response Plan, encompassing cyanide emergency scenarios related to transport, unloading and operations. The plan clearly addresses the required resources, PPEs, communication channels and stakeholders' telephones as well as the specific procedures for each identified scenario (in accordance with ICMI protocol).
Cyanide related emergencies responses during external transportation to the operation are covered by the plan, shared with the NaCN producer (AGR Australia Pty.) and NaCN transporter (Niquini), both ICMI certified, and the operation, that will have a support role in this scenario. The internal NaCN transportation is also covered by this emergency plan.

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The emergency plans clearly address specific responses to the following situations, considering internal and external stakeholders:
Catastrophic release of hydrogen cyanide from storage or process facilities, transportation accidents, releases during unloading and mixing, releases during fires and explosions, pipe, valve and tank ruptures, overtopping of ponds and impoundments, power outages and pump failures, uncontrolled seepage, failure of cyanide treatment, destruction or recovery systems, failure of tailings impoundments and other cyanide facilities.

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:

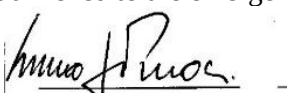
The emergency response plan was developed based on the risk evaluation performed by representatives of each individual process (hydro-metallurgy plant, safety coordination, environmental coordination, health coordination and maintenance process representatives) and were reviewed and approved by the occupational safety manager of the operation.

The emergency plan was internally communicated to the involved workforce through training sessions, including emergency drills. It was observed that before performing planned emergency drills, the operation performs specific meetings with the stakeholders (internal and external ones) in order to review the emergency plan and plan the emergency drill. Focusing the external stakeholders, the operation communicates and discuss, during specific planned meetings the emergency plan to community representatives and also during the emergency drill planning meeting.
The cyanide supplier, the cyanide transporter, the local hospital, the local police and firefighters, the emergency response suppliers are involved in the emergency planning, being directly communicated about their roles in an emergency involving cyanide and also participating in the emergency drill planning and performing.

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, documented and implemented procedures to respond to cyanide related emergencies. Responsibilities and authorities are clearly defined and communicated to all involved stakeholders (internal and external). The emergency plan coordinator is clearly identified. The emergency response brigade members are voluntary and passed through a selection process (medical, theoretical and practical), to be assigned and qualified as a brigade member. The emergency brigade members and contacts are addressed at a master list annexed to the emergency response plan.



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The emergency committee organizational flowchart was also evidenced, as well as the emergency communication loop. The emergency brigade master list addresses all the necessary information about the brigade members, including contact details of internal and external stakeholders.
The emergency response plan identifies the required resources (hardware) that are necessary to each emergency situation. The basic emergency response hardware is consisted of one ambulance (completely equipped, daily tested and ready to be used), auxiliary equipment (PPEs) for the brigade members, such as chemical/flame resistant overall, chemical resistant gloves, oxygen masks and cylinders, chemical masks. The AGR Australia Pty. emergency plan covers that situations outside the operation (during transportation), in conjunction with Niquini Transportes one, both ICMI certified atakeholders.
The emergency response hardware is monthly inspected by the safety and health technicians of the operation. The ambulance is daily inspected and tested. Records of such inspections were evidenced and found in place.
The reviewed emergency plan, clearly defines the role of each potential external responders, such as the cyanide transporter, the local firefighters and the local hospital. As previously mentioned, the operation communicates the emergency plan to external stakeholders and involve them in emergency drill planning and execution. Before the planned emergency drill, the operation performs a specific meeting with all involved stakeholders (internal and external), in order to review the emergency plan and plan the emergency drill, as observed in the last integrated drill performed during November 2021. After the drill, the operation performs another meeting with the participants in order to review the drill results and, if necessary, to propose improvements to the emergency plan. Records of such meetings are kept by the operation and were reviewed in this opportunity.

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
□ not in compliance with
Standard of Practice 7.4

Summarize the basis for this Finding/Deficiencies Identified:
The emergency response plan was reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers, community representatives. A master list addressing all external stakeholders and contact information is annexed to the emergency response plan. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. The emergency communication loop is clearly defined and also contact information is available in the plan. Communication procedures with external media were found in place.
Communication with external stakeholders includes communication with ICMI (International Cyanide Management Institute), in the event of significant incidents involving cyanide.

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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 operation defined, documented and implemented procedures to respond to cyanide related emergencies. Responsibilities and authorities are clearly defined and communicated to all involved stakeholders (internal and external). The emergency committee organizational flowchart was also evidenced.
Solid briquettes are recovered with the aid of plastic cleaning devices and disposed into plastic bags (returned to plant and disposed into cyanide solution tanks). The soil shall be neutralized (where neutralized means no cyanide allowed in the impacted soil) with the aid of specific chemicals products such as hydrogen peroxide solution (10%). Hydrogen peroxide is available at operations specific containers, at reagents warehouse. After neutralization, soil samples shall be taken every five centimeters and analyzed at operations certified laboratory, in order to confirm that the soil is no longer contaminated with cyanide. Cyanide solutions are recovered with the aid of specific pumps and returned to the leaching process pools. Neutralized soil is removed and disposed into plastic bags, returned to the plant and then forwarded to final disposal at a certified brown field area, as well as any contaminated clean-up debris. Open or surface waters are monitored, and no chemical products are allowed to neutralize the open/ surface water.
The operation has the responsibility (shared with the public authorities) to manage and provide drinking water to the affected stakeholders, in the event of any cyanide related emergencies into water supply resources (rivers).The plan clearly defines the required monitoring procedures to be implemented in the event of soil, air and water potential contamination. An environmental monitoring plan is addressed at the emergency response plan.

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 Standard of Practice 7.6
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The operation defined, documented and implemented procedures to respond to cyanide related emergencies. The emergency response plan was reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers, community representatives.

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When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. The emergency communication loop is clearly defined and also contact information is available in the plan.
The plan is, at least, reviewed every year (or before, depending on the results of the simulation exercises). Evidenced the 2019, 2020 and 2021 Annual Emergency Drill plans. Evidenced three emergencies drills (simulating both cyanide release and exposures) performed since 2019 involving cyanide. The last one was performed during this audit (November 2021). After each emergency drill, the drill results are reviewed and discussed among the participants. The opportunities of improvement raise-up during the drill are considered as corrective or preventive actions and managed adequately. After a real or potential emergency, the effectiveness of the emergency response plan will be reviewed and, if necessary, the emergency response plan will be revised and updated. In the last three years there were not any real or potential emergency related to cyanide.
Reports related to the drills and their review were found in place. The emergency response plan is at revision 22, due to the opportunities of improvement identified during the emergency drills performed between 2019 and 2021. This is the protocol to be followed and triggers the updating of the emergency response plan.

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 did design, document and implement an introductory training program which is applied to all new employees and contractors coming to work in the operation. This introductory training program scope is focused on general aspects of sodium cyanide, cyanide related risks, emergency situations related to cyanide and first aid procedures related to cyanide exposures.
The operation implemented a refresh training program, which is applied for all employees and contractors every three years. The refresh training program for that employees that works directly with cyanide is performed annually. The content of the cyanide refresh training program is the same one of the introductory training.
Both introductory training program and refresh training program records are kept by the operation, at Human Resources process. Reviewed records related to introductory training and refresh training performed between 2019 and 2021. The training record is an assistance list with the date, instructor name, attendees name and signatures, training content and general perception about the attendees, made by the instructor. During the field audit, it was evidenced that the employees are aware about the cyanide related risks.

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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 the introductory training, all employees that will work directly with cyanide (operators, laboratory technicians, maintenance technicians, drivers) will pass through an ”on the job training” which consists basically on the training in operational procedures and emergency procedures (40 hours). This operational training is provided by the operation supervisors and process engineers. After the on the job training, the employees will work under supervision for 45 days. After that, the employee is qualified (or not) to work alone.

The operational on the job training consists basically on the operational and emergency procedures. The training is divided in theory and practice. All the operational aspects are clearly identified in the training materials. Reviewed on the job training program for plant operators, plant maintenance technicians and laboratory technicians.

Operational training is provided by supervisors and process engineers, during 40 hours. The on the job training is divided in several topics (depending on the function). Only after the trainee is approved in a specific topic, he is allowed to move forward to another topic. After 40 hours of operational training (theory and practice), the trainee will work, during 45 days, under supervision. In the ending of this period, the trainee is qualified (or not) to work in the operation. Records of such operational on the job training are kept by the operation.

All employees that works directly with cyanide are recycled in cyanide management every year (refresh training program). All employees that works directly with cyanide are recycled in cyanide management every year (refresh training program). Beyond that, when safe work procedures are changed, all involved stakeholders are retrained. If, in a three-year period, a safe work procedure is not changed, the operation performs a refresh training for all involved stakeholders. Records of such trainings are retained by the operation and managed by the Human Resources process.

The operation verifies the effectiveness of the provided training (refresh one too) through testing and planned job observations. Records of refresh trainings, tests and job observations are maintained and were evidenced in this opportunity. The training records addresses the names of the trainees, the name of the instructors, the training scope, the training date and the performance results of each trainee.

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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 the plant personnel (NOT ONLY THE EMERGENCY BRIGADE MEMBERS) are trained in cyanide related emergencies, which includes the decontamination of cyanide exposure victims and first aid procedures. Annually, the process plant employees are re-trained (refresh) in these procedures. Last refresh training was carried out on November 2021. Records of such training were evidenced. The refresh training scope includes, among other aspects, the cyanide exposure and cyanide release scenarios. Reviewed refresh training records performed in 2019 and 2021 for brigade members and emergency coordinators. In 2020, due to Covid 19, refresh training sessions where limited to theoretical ones (except the mock drill) and were performed online.
The emergency response brigade members are voluntary and passed through a selection process (medical, theoretical and practical), where the theoretical and practical training scope includes the use of necessary response equipment, to be assigned as a brigade member. The brigade members were trained and qualified before being assigned as emergency brigade members. Decontamination and first aid procedures are included in the emergency training scope. Emergency coordinators are trained in the cyanide related emergency response plan.All involved emergency members were trained in the emergency plan. Last performed training was during November 2021. Before the emergency simulation exercises, the emergency plan that will be simulated is again, reviewed and discussed among the participants. Records of such briefing meetings were reviewed. As previously mentioned, the operation planned and implemented an emergency response exercise calendar. The performance of the emergency responders is observed and reported. In the event of any identified opportunity of improvement, corrective and/ or preventive actions are defined and implemented, including the revision of the emergency plan (the plan was found at revision 22, which means that it was updated twenty-two times since its creation).

9. DIALOGUE: Engage in public consultation and disclosure.

Standard of Practice 9.1: *Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.*

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

Summarize the basis for this Finding/Deficiencies Identified:
The operation provides the opportunity for stakeholders to communicate issues of concern regarding the management of cyanide through a direct telephone line (0800-7271500). This telephone line is communicated to the stakeholders through newspaper, radio advertisement, leaflets and magnets distributed during specific and programmed meetings with stakeholders.

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All callings are recorded by the operation. It was evidenced that this communication channel is used by the stakeholders, but none of the reviewed records was related to cyanide concerns. The operation also designed and implemented a communication program with all the communities potentially affected by the operation aspects, based on specific and planned meetings. This program is called "Boa Vizinhança", where the operation and communities representatives discuss several matters, such as environmental monitoring results, cyanide management, among other subjects. Records of such meetings are maintained by the operation and were reviewed during this audit.
Stakeholders also may communicate with the operation through specific email address (comunicacao@anglogoldashanti.com.br) which is communicated to the public (internal and external) through the corporate newspaper "Boa Vizinhança" and the magazine "Sintonia". Another opportunity to internal stakeholders to communicate points of concerns related to cyanide management is, for example, through the daily safety dialogues and also through email.

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 implemented and maintains communication channels with stakeholders (internal & external) in order to dialogue with them. The "Boa Vizinhança" program is consisted by programmed meetings with the community representatives, were several matters are discussed. Another program is related to the environmental monitoring with the representatives of surrounding communities.
Monitoring results (surface waters and air quality) are documented and communicated in the meetings with the community (Boa Vizinhança). The operation also distributes a specifically designed newspaper "Boa Vizinhança" and the magazine "Sintonia". The operation contact information is available in all these types of media.
Another opportunity to dialogue with stakeholders, is through programmed meetings with these stakeholders. Records of such meetings are kept by the operation. Unplanned meetings with public authorities are also used by the operation to dialogue with external stakeholders. Finally, the operation training programs, focused on cyanide management, are also used to dialogue with internal stakeholders (employees and contractors).
The operation designed, documented and distributed specific booklets describing how the cyanide is managed and relevant information related to cyanide emergencies. This booklet is available for everybody. The newspaper "Boa Vizinhança" and the magazine "Sintonia", also addresses, on a regular basis, relevant information related to cyanide management, since the production until the destruction of the cyanide. All environmental monitoring results (surface waters and air quality) are documented in booklets and distributed to the communities' representatives and also to public authorities.
Although the local population, in most of the cases, is not illiterate, the operation disseminated, in verbal or visual form, information related to cyanide management at the operation (meetings with community representatives).

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As previously mentioned, there were not any cyanide related incident at the operation or during the transportation, in the last three years. In the event of any type of incident, the operation implemented several communication channels, in order to attend public consultation. The operation has a specific communication protocol to be used in the event of any problem involving cyanide and other aspects.

The following contact information is available to the general public:

0800-7271500 (corporate communication)
0800-7038422 (denounces)
Email: comunicacao@anglogoldashanti.com.br (corporate communication).

TO COMMUNICATE TO REGULATORY AGENCIES IS MANDATORY BY THE BRAZILIAN LEGISLATION, AND THEY ARE STEAKHOLDERS TOO. BEYOND THAT, IN THE EVENT OF ANY EVENT THAT COULD IMPACT IN THE ORGANIZATION REPUTATION, BUSINESS PRESERVATION and BUSINESS VALUE, THE ORGANIZATION WILL TRIGGER THE CRISIS MANAGEMENT PLAN and THE COMMUNICATION MANAGEMENT TO THE GENERAL PUBLIC WILL BE AS BELOW MENTIONED.

The operation will also make information related to cyanide incidents public, through the corporate communication process, through press releases. It was evidenced that the corporate communication process documented and implemented communication procedures with the media (social media, newspaper and television).

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