



Öksüt Gold Mine International Cyanide Management Code Certification Audit

Summary Audit Report

Öksüt Madencilik Sanayi ve Ticaret A.Ş

Prepared by:

SLR Consulting (Africa) Proprietary Limited

Suite 1 - Building D, Monte Circle, 178 Montecasino
Boulevard, Fourways, Johannesburg, Gauteng, 2191

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Project Manager	Ed Perry
Project Manager Email	eperry@slrconsulting.com
Author	Ed Perry
Reviewer	ICMI
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Basis of Report

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1.0 Summary Audit Report for Gold Mining Operations

Name of Cyanide User Facility:	Öksüt Gold Mine
Name of Cyanide User Facility Owner:	Centerra Gold Inc.
Name of Cyanide User Facility Operator:	Öksüt Madencilik Sanayi ve Ticaret A.Ş
Name of Responsible Manager:	Pelin Usta Ozkayhan
Address:	Reserve District 504, Sokak No: 701, Develi
Country:	Turkey
Telephone:	+90 312 408 87 00
E-mail:	Pelin.Ozkayhan@centerragold.com

2.0 Location and description of operation

Öksüt Madencilik Sanayi ve Ticaret A.Ş, a subsidiary of Centerra Gold Inc. operates the ÖKSÜT Gold Mine (ÖKSÜT) that is an open pit gold mine located within the border of Develi district, 48 km from Kayseri city (Turkey). Following the preliminary economic assessment, exploration and feasibility studies, the permitting processes were completed in 2018 based on the Environmental Impact Assessment (EIA) Positive decision taken in 2015. The first gold casting was realized on 31 January 2020, and the first commercial gold production was realized on 31 May 2020. Approximately 106 thousand ounces of gold were produced in 2020 and 111,703 ounces in 2021.

In the light of continuous development, always in search of a better method and technique, it has continued to work with great sensitivity to ensure that production continues safely. However, in March 2022, mercury was detected in the gold room due to process activities and production was stopped. All public institutions were informed about the issue. The EIA report prepared and approved in 2015 did not include any information or precautions regarding mercury and the work was stopped due to the risk to human health. A new EIA report preparation process was initiated due to both capacity increase studies and the addition of the mercury removal units (retort and scrubbers) to the process. During this period, work continued for some time, except for hot operations in the gold casting chamber. The loaded solution absorbed in activated carbon was stored in containers on the heap leach pad. In August 2022, even the cyanide addition was discontinued and only the water cycle was continued. In March 2023, the mercury removal units were completed, and a trial run was conducted with government approval. On 31 May 2023, a new 'EIA Positive Certificate' was obtained, and works were resumed on 05 June 2023.

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ÖKSÜT produces gold by processing the ore extracted from the open pit mining method by heap leaching. The activity is carried out in accordance with the operating license IR:85712.

Within the scope of the ÖKSÜT Gold Mine Operation Capacity Increase Project including Open Quarries, Heap Leaching and Ore Enrichment Plant, 35,000,000 tonnes of ore is planned to be enriched and 105 million tonnes of waste rock will be extracted. It is estimated that 982,951 ounces of gold and 1.75 tonnes of silver production will be realized as a result of the activity. According to the feasibility studies, the average grade value of the ore to be extracted from the open pit area was determined as 1.14 g/tonne for gold and 0.39 g/tonne for silver. The cut-off grade in the open quarry was determined as 0.16 g/tonne for gold. The ore to be extracted from the open pit area is piled up in the heap leach area after being reduced in size. The loaded leach solution containing gold is processed in the Adsorption, Desorption, Regeneration (ADR) Plant to produce dore (unrefined) gold ingots.

The rock that does not contain ore is stored in the waste rock storage area located within the project area. The project includes an open pit, a waste rock storage area, a heap leach area, three ore stockpiles, a crushing and screening plant, an ADR plant, topsoil storage areas, and other infrastructural elements and auxiliary facilities that ensure the operation of the system.

The anticipated life of mine is 7 years with the project life being 9 years including the rehabilitation phase.

ÖKSÜT only uses solid cyanide briquettes filled in solid-to-liquid system (SLS) received in marine shipping containers and stored in a dedicated cyanide warehouse. The cyanide warehouse, mix plant and reagent solution holding tank are located in secure compounds accessible only to approved personnel.

The ÖKSÜT Gold Mine became a signatory to the International Cyanide Management Code (ICMC) on 26 June 2020.

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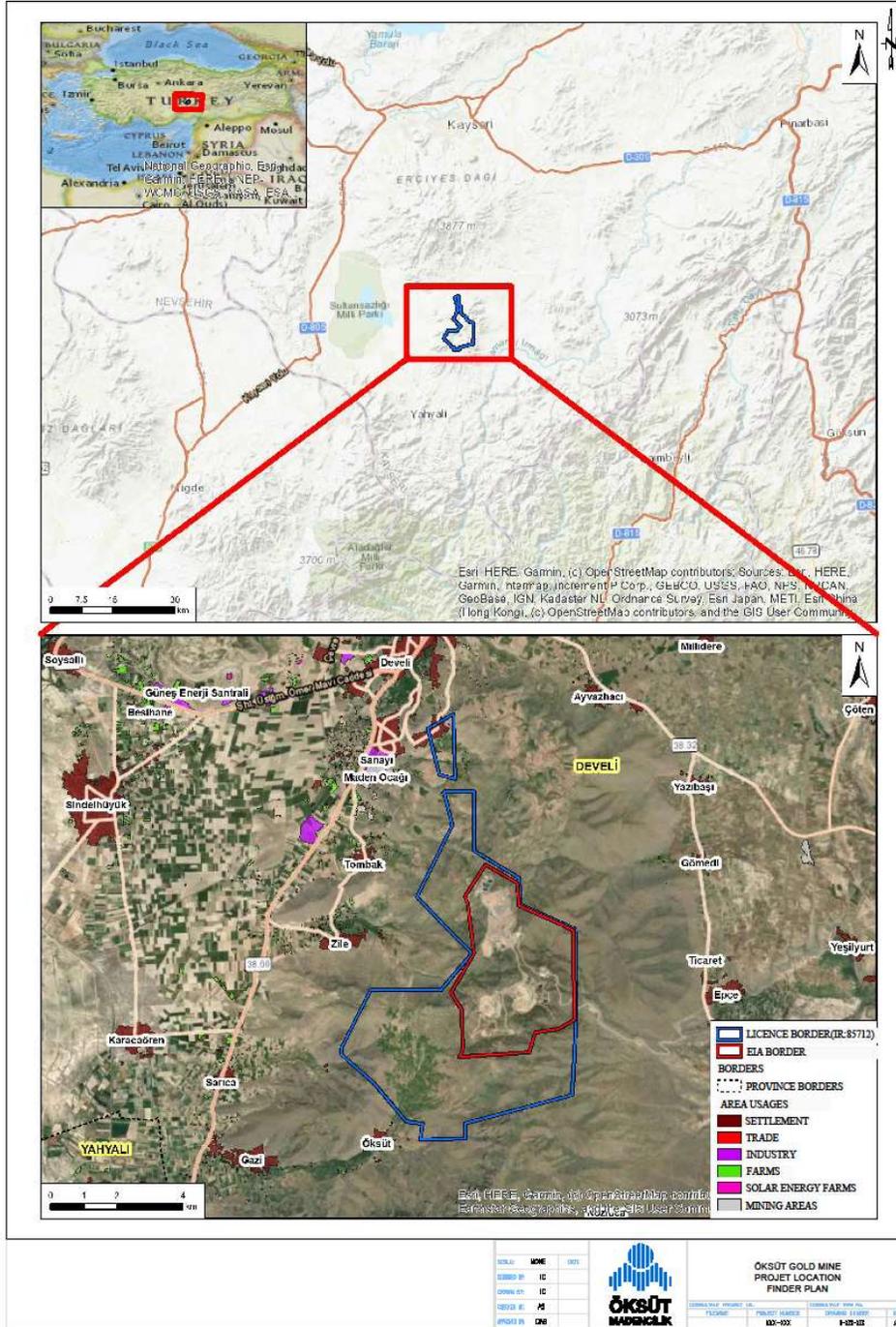


Signature of Lead Auditor

January 2024

Date





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 Date



SUMMARY AUDIT REPORT

Auditors Findings

in full compliance with

**The International
Cyanide Management
Code**

ÖKSÜT Gold Mine is:

in substantial compliance with

not in compliance with

Audit Company:

SLR Consulting (Africa) (Pty) Ltd

Audit Team Leader:

Ed Perry, Lead Auditor

Email:

eperry@slrconsulting.com

Mine Technical Auditor

Dr. Ata Akcil, Jeoser Yerbilimleri Servisi Ltd.

DATES OF AUDIT

The Re-certification Audit was undertaken between 7 August 2023 to 10 August 2023.

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

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

The “International Cyanide Management Code for The Manufacture, Transport, And Use Of Cyanide In The Production Of Gold and Silver” (the Code) was developed by a multi-stakeholder Steering Committee under the guidance of the United Nations Environmental Program (UNEP) and the then, International Council on Metals and the Environment.

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

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

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Principle 1 – Production and Purchase

Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmental protective manner.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 1.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 1.1; to purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

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

ÖKSÜT has only purchases cyanide from ICMC certified suppliers. ÖKSÜT has procured solid to liquid system (SLS) forms of cyanide from CyPlus GmBbH (CyPlus) in Wesseling, Germany since 15 October 2019 under the purchase agreement. ÖKSÜT has not changed its cyanide supplier since this date. The last shipment (22 February 2023) of cyanide was confirmed by the auditors to have been purchased from CyPlus. CyPlus has a Lease and Maintenance Agreement with ÖKSÜT from 16 October 2019 to 30 June 2027.

CyPlus was initially certified on 24 July 2006 with the latest recertification on 23 February 2022.

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Principle 2 – Transportation

Protect communities and the environment during cyanide transport

Standard of practice 2.1: Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 2.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has chain of custody records or other documentation identifying all transporters and supply chains responsible for transporting cyanide from the producer to the operation.

The chain of custody records show that the cyanide originates at CyPlus's production plant in Wesseling, Germany and is then transported to Cologne (Jenusch Trucking company), then truck to train (DUS Köln), and transfer by rail (DB Cargo) to the Samar port of Trieste where it is loaded on to a ship operated by DFDS (shipping company) and shipped to the Port of Mersin (Turkey). The cyanide shipment is then unloaded onto trucks operated by ITT Logistics in Turkey and delivered to the ÖKSÜT Gold Mine.

The SLS containers are returned back to CyPlus's production site in Wesseling, Germany.

All identified transporters are included in the following supply chains for the supply of cyanide from CyPlus's production site in Wesseling, Germany to ÖKSÜT Gold Mine in Turkey.

- Supply Chain No.1 – Wesseling Plant to International Ports of Entry; and recertified 30 March 2021.
- Supply Chain No.10 – Turkey Supply Chain – recertified 5 December 2023.

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Principle 3 – Handling and Storage

Protect workers and the environment during handling and storage.

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

in full compliance with

The operation is

in substantial compliance with **Standard of Practice 3.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The facilities for unloading, storing and mixing cyanide have been designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules and/or other sound and accepted engineering practices for these facilities.

The cyanide supplier is CyPlus with the cyanide delivered as dry briquettes, contained within a reusable steel container tank trailer, which serve as both delivery containers and mixing unit and forms the solid-to-liquid (SLS) system. All briquettes are delivered buffered with sodium hydroxide to maintain high pH in mixing operations. SLS containers are stored in a dedicated warehouse. The containers, which are Intermodal, are lifted from the trailer using a mobile crane with a 32 tonne capacity.

The truck with the SLS container parks in a concrete bunded area adjacent to the cyanide storage tank. The container is connected by hose to a water supply, which then, through an automated system, fills the container with water dissolving the cyanide briquettes before this liquid is discharged into the cyanide storage tank.

The offloading, and storage facilities and associated infrastructure for SLS delivery of cyanide was designed and purpose built in accordance with CyPlus's instructions.

The cyanide storage tank is located within a concrete containment adjacent to the ADR, a short distance from the cyanide storage warehouse.

The mine is located 4 km from the nearest residencies and watercourses. All unloading, storage and mixing facilities, are located 3 km from the mine's administration buildings.

Cyanide is offloaded as a liquid after the dissolution of the cyanide briquettes in the SLS container. The SLS Unloading Facility has several design features to prevent potential

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seepage to the subsurface. The facility is constructed over the existing leach pad containment liner which provides secondary containment beneath the facilities reinforced concrete floor. During the SLS mixing operation the isotainer is located on a truck parked over the facility's concrete floor covered with epoxy. The floor drains to sump with a mobile pump that directs any spillage to the bunded area for the cyanide storage tank and from there to the Barren Solution Tank.

There are systems in place to prevent the overflowing of cyanide storage tanks, and are the systems are tested and maintained on a routine basis. The cyanide holding tank is fitted with tank level indicators and high-level alarms that are monitored from the central control room at the ADR facility and SLS Unloading Facility control station. The SLS unloading procedure requires the operators to check the level of the storage which is observed by the operators from the Supervisory Control and Data Acquisition (SCADA) system. The storage tank should be less than 30% full prior to offloading with the level following an offloading event being approximately 75% - 80%.

The high-level sensors in the storage tank are maintained within the preventative maintenance program and routinely checked and tested on a 6 monthly schedule. There is a high level alarm at 80% and a high high level alarm at 90%. If the tank level exceeds 90% the offloading process must be immediately stopped, and the shift supervisor notified.

Secondary containments for cyanide storage and mixing tanks are constructed of materials that provide a competent barrier to leakage. The cyanide storage tank is seated on a concrete plinth located within a concrete floored bunded area to prevent seepage to the subsurface. The bunded area has a metal grill covered concrete trench equipped with a sump pump that directs any spillage to the Barren Solution Pump Box via the pipeline. The ADR facility is located within a building that has a concrete bunded floor under a metal roof that prevents any spillage to the subsurface. Any spillage is directed to the Barren Solution Tank within the building. Any leak from the Barren Solution Tank is directed to the Pregnant Leach Solution (PLS) Pond after being pumped to the waste collection pipe. There are pipelines between Barren Solution Tank, Pump Box and PLS Pond to divert the solution in case of possible overflows.

The solid cyanide is stored within steel intermodal SLS tanks, which are used for the transport of cyanide from Germany. Theses SLS tanks are stored within a warehouse close to the ADR prior to their transport to the offloading facility. The empty SLS containers are then returned to the warehouse prior to being return to the Cyplus in Germany.

The following was confirmed during the site inspection. The warehouse has a concrete floor and is fully enclosed with metal roof and walls. The exterior pavement around the warehouse drains away from the building to prevent water entering. The openings for the ventilation grills are protected from precipitation with porches.

Adequate ventilation in the warehouse is provided by open grills to prevent the buildup of hydrogen cyanide (HCN) gas. The warehouse is monitored with fixed HCN sensors that reports to the electronic display outside the warehouse and are equipped with an audible and visual alarms located on the outside of the building. The alarms automatically sound if HCN levels reached 4.7 ppm.

Following the dissolution process the liquid sodium cyanide is transfer to a storage tank, which is located in an open area covered with a canopy. The tank includes ventilation pipes fitted to the top of the tank. A fixed monitor is also fitted at the top of the storage tank again the alarms automatically sound if HCN levels reached 4.7 ppm.

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The ADR area is fenced and securely locked. Access to the compound is limited to authorized personnel only. Only ADR personnel may enter unless approved and accompanied by an authorized person. The compound and warehouse are monitored by 24/7 security cameras (CCTV). The ADR area includes the cyanide storage warehouse and the ADR building where the offloading area and liquid sodium cyanide storage tank is located.

The cyanide warehouse compound and cyanide offloading area are dedicated for cyanide and therefore cyanide is physically separate from incompatible materials such as acids, strong oxidizers and explosives.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 3.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Procedures are in place and implemented to manage empty cyanide containers. ÖKSÜT only uses solid cyanide briquettes delivered in SLS tanks and stored in a dedicated cyanide warehouse. The cyanide warehouse, offloading area, and reagent solution holding tank, are located in secure compounds accessible only to approved personnel. After completion of an offloading event the empty SLS tank is stored within the warehouse and subsequently returned to the CyPlus production facility in Germany for re-filling. Therefore, there are no empty cyanide containers that require management.

No drums, crates, plastic bags, or liners are used for the delivery of cyanide.

After offloading, the empty SLS tank is rinsed with water and air to remove any residual cyanide in the tank in accordance with procedures. Once the dissolution process is completed, the SLS is automatically cleaned with water and air. During this process, the hose connections and couplings on the SLS tanks are also cleaned. The responsibility of these operations is the process department as detailed in OMAS.PRC.ADR.PRO.0001_2, ADR Plant Operating Procedure.

The operation has developed and implemented plans or procedures to prevent exposures and releases during cyanide unloading and mixing activities.

The following were observed.

OMAS.SFT.INS.0003_1, SLS Preparation and Tank Filling Instruction includes the operation and maintenance of all hoses, valves and couplings for unloading liquid cyanide and mixing liquid cyanide. The procedure requires the tank level of the holding tank to be checked prior to operation of the valve to transfer the dissolved cyanide to the holding tank.

OMAS.PRC.ADR.JSA.0012_0, Unloading of the SLS Container to the Storage Area; requires that the crane to be used for unloading the cyanide tanks has a maximum capacity of 32 tonnes and that utmost care is taken to ensure that the tank is not damaged during the operation.

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OMAS.SFT.INS.0002_1, SLS Container Loading-Offloading, Transport and Storage Instruction addresses the maximum stacking height of 2 tanks in the warehouse, which is in accordance with the load limits of the tanks as indicated by CyPlus.

OMAS.SFT.PLN.0007_3, Emergency Response and Crisis Management Plan provides direction on the safety measures and clean-up procedures to address solid and liquid cyanide spills. Spill kits are stationed at the SLS Storage Area, ADR Plant and each of the cyanide storage locations in the event of a spill in the cyanide storage area. During dissolution and offloading any spillage of solution would flow via sumps, pumps and drainage channels to one of the solution ponds.

OMAS.PRC.ADR.PRO.0001_2, ADR Plant Operating Procedure, OMAS.SFT.INS.0003_1, SLS Preparation and Tank Filling Instruction, and OMAS.PRC.ADR.INS.0026_1, Making SLS Connections Instruction provide directions on the required Personal Protective Equipment (PPE) (Chemical resistant suit coveralls for single use, full face respiratory mask with ABEK2P3-Hg filter, chemical resistant rubber gloves and rubber boots), for two operators and an observer for the dissolution and offloading. In addition, remotely monitored video cameras are observing the offloading area. The procedures also require that operators inspect respirator and filters prior to starting an offloading event.

OMAS.PRC.ADR.PRO.0003_0, Solution Dying Procedure, addresses the addition of colorant dye in the cyanide storage tank. CyPlus does not include dye with the cyanide supplied to ÖKSÜT. It is specified that the addition of dye is a safety requirement for the easy detection of spills or leaks. If cyanide is used from a supplier that does not include colorant in its tanks, the instruction requires the dye to be added to the cyanide tank in accordance with the amount declared by the company just before the start of the cyanide preparation operation. This action is undertaken in accordance with the procedure (as observed by the auditors) provided by CyPlus with 120 g of Carmoisine powder added to the storage tank per litre of cyanide solution.

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Principle 4 – Operations

Manage cyanide process solutions and waste streams to protect human health and the environment.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has written management and operating plans or procedures been developed for cyanide facilities including unloading, mixing and storage facilities, process plants, heap leach operations, tailings impoundments, and cyanide treatment.

The operation has written management and operating plans or procedures been developed for cyanide facilities including unloading, mixing and storage facilities, process plants, heap leach operations, tailings impoundments, and cyanide treatment.

The facility has developed 89 Health and Safety Plans, Procedures and Work Instructions, 53 Process Procedures and Work Instructions, and 57 Environmental Plans and Procedures.

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

A pH of 10.5 has been determined for offloading cyanide and application to the Heap Leach and during the carbon in column (CIC) process. This is detailed in the *OMAS. PRC. ADR. PRO.0001_2 ADR Plant Operating Procedure*. Samples are undertaken hourly from the CIC, the Barren Solution Tank, the Heap Leach Return, and recorded on the ADR Daily Log Sheet.

The Solution Ponds have been designed for a 1 in 100 year, 24 hr storm event as seen in the water balance and associated reports by Golder Associates (now WSP).

The freeboard for the Solution Ponds is defined at 1.0 m. Pond levels are monitored via the SCADA system on an hourly basis.

The cyanide set point for addition to the heap leach is 250 ppm.

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

A preventive maintenance program is implemented and activities documented to ensure that equipment and devices function as necessary for safe cyanide management.

The planned maintenance system is managed using the SAP system software. The cyanide facilities are listed within the SAPS system and the planned maintenance is undertaken on a weekly, monthly, or 6 monthly basis as required. This is defined in the *OMAS.MNT.PRO.0004_1 Preventative Planned and Incidental Maintenance Procedure*.

This includes the following: all overhead cranes are serviced 4 times a year by the manufacturing company (E-Sistem Erkuşlar). Tank thickness testing is undertaken 4 times a year by the Plant staff and once a year by an external company (Szutest).

Caustic Dosage Pumps and Cyanide Pumps are maintained on a weekly, monthly and six monthly basis. The Control Panel for the SLS offloading is serviced twice a year by Cyplus. The emergency generators are serviced every 250 hours and on an annual basis.

The following inspections are undertaken.

OMAS.PRC.ADR.LST.0001_ADR Environmental Monitoring Daily Checklist;

OMAS.PRC.ADR.LST.0002_0_ADR OHS Daily Checklist;

OMAS.PRC.ADR.LST.0004_0_SLS_Cyanide Preparation and Finishing Checklist – for each offloading event;

OMAS.PRC.ADR.LST.0005_0_SLS_Overhead Crane Checklist - on a shiftly basis;

OMAS.ENV.FRM.0005_Mine Site Culverts and Drainage Interception Channels Observation Check List - on a daily basis;

OMAS.PRC.ADR.LST.0006_0_ADR Safety Showers Checklist - on a shiftly basis;

OMAS.PRC.ADR.LST.0007_0_Eskort_Vehicle Emergency Response Equipment Checklist - prior to escorting a cyanide delivery; and

OMAS.PRC.ADR.LST.0008_0_Heap Leach Solution Ponding Checklist - on a shiftly basis.

Fire extinguishers are checked on a monthly basis and have an annual service by an external competency fire company.

The operation implements procedures to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures, and incorporate any measures necessary to protect worker health and safety and the environment. This is detailed in the following procedures. The change management requires approval from the Health and Safety Department, Environment Department and Operations Director.

OMAS.GEN.PRO.0001_Method of Change Procedure; and

OMAS.GEN.FRM.0008_Change Request Form.

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

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In the event of an upset in the water balance the PLS Pond overflows to the PLS Overflow Pond, if necessary, this can also overflow into the Northern Storm Water Pond which has a capacity to cope with a 1 in 100 year, 24 hour storm event and is kept empty.

ADR Plant Operating Procedure, Section 5.14 Anti-Proliferation Measures states "at each shift, the ADR On-Site Checklist is filled in, in-order to detect possible leaks and defects, and in case of leakage or improper detection according to the list, immediate intervention is taken."

Section 5.15 Emergency Generators states "Repair, maintenance and servicing of energy supply lines and generators are carried out by the Maintenance and Construction Department, and emergency generators are automatically activated in case of interruption."

Where a problem is identified by monitoring or inspection a work order is raised via the SAP system.

In the event of a temporary closure or cessation of operations it is possible for the emergency generators to keep the cyanide circuit operational. If the closure lasts any significant period of time cyanide would no longer be added to the circuit and therefore the cyanide will gradually be replaced with water until such time as there is no cyanide left within the circuit i.e there will be no cyanide left within any tanks, vessels, pipelines, ponds or impoundments. The sodium cyanide stored within the warehouse and in the storage tank can either be used until there is no sodium cyanide left in storage or it can remain in storage without presenting any risk to the environment, depending on the anticipated length of the shutdown. The loaded carbon produced by this shutdown procedure is taken out of the process and stockpiled for later use.

The shutdown and restart of the Heap Leach for short or long periods is detailed in "*OMAS.PRC.ADR.INS.0005_Leach Cycle Shutdown and Restart Procedure*".

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

The cyanide storage tank and other process tanks are visually inspected for signs of corrosion, leakage and structural integrity as part of the *ADR Environmental Monitoring Daily Checklist* The structural integrity of the sodium cyanide storage tank is also undertaken as part of the thickness testing which is undertaken 4 times a year by mine staff as part of the planned maintenance and once a year by an external contractor (Szutest).

The inspection of secondary containments provided for tanks and pipelines for physical integrity, the presence of fluids and available capacity, and to ensure that any drains are closed is undertaken as part of the *ADR Environmental Monitoring Daily Checklist*. It is not necessary for drains to be locked as there are no releases to the environment.

Leak detection and collection systems at leach pads and ponds, as required in the design documents are inspected as part of the *Mine Site Culverts and Drainage Interception Channels Observation Check List* on a daily basis, together with the integrity of surface water diversions.

Pipelines, pumps and valves are inspected for deterioration and leakage as part of the ADR Environmental Monitoring Daily Checklist.

Ponds and impoundment inspections are undertaken for the parameters identified in their design documents as critical to their containment of cyanide and solutions and maintenance

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of the water balance, such as available freeboard. This is undertaken through level sensors in the various ponds which are connect with the SCADA system to show the levels in the ponds and show that a freeboard of 1 m is maintained.

The operation inspects the cyanide facilities on an established frequency sufficient to ensure and document that they are functioning within design parameters.

The planned maintenance system is managed using the SAP software.

The cyanide facilities are listed within the SAP system and the planned maintenance is undertaken on a, monthly, or 6 monthly basis, as required. In addition, there are various inspections which are undertaken on a shiftly, daily, and weekly basis.

The inspections are documented. The inspection reports and checklists identify the specific items to be observed and include the date of the inspection, the name of the inspector, and any observed deficiencies, the corrective actions are documented, and the records are retained.

The operation has the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted.

The operation has 3 emergency generators that will provide sufficient power to operate the pumps and CIC. The Heap Leach drains by gravity to the Pregnant Solution Ponds. If necessary pregnant solution can also be stored in the Northern Storm Water Pond, which has sufficient capacity to prevent any unintentional releases.

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

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 4.2

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.2; introducing management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.

The operation does not use cyanide in the mill as the operation is a Heap Leach operation and does not use mill-based mineral extraction technology.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Öksüt Gold Mine Water Balance includes the ADR Plant and the Heap Leach.

The operation has developed a comprehensive, probabilistic water balance. This was created for the site by WSP using GoldSim. This was observed during the site visit.

The water balance considers the following in a reasonable manner and as appropriate for the facilities and the environment. The water balance model was observed by the auditors to include the following.

- a) Rates of supply to heap leach.
- b) Design storm duration of 1:100 years, 24 hour duration.
- c) Precipitation and evaporation data is measured on a daily basis from a weather station on site.
- d) The amount of precipitation entering a pond or impoundment resulting from surface run-on from the up-gradient watershed. including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground.
- e) Effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and the up-gradient watershed. This is limited to snow that accumulates on the Heap Leach as diversion channels around the Heap Leach and Pregnant Solution Ponds prevents additional run off entering the system. This is accounted for within the model as run-on to the Heap Leach.
- f) The only applicable solution losses is the allowable seepage to subsurface, which is minor and accounted for by the model.
- g) In the event of a power outage or pump failure the pregnant solution from the Heap Leach will flow by gravity into the PLS Pond and if necessary into the PLS Overflow Pond and from there into the Northern Stormwater Pond, which together have sufficient capacity to contain the heap leach solution inventory, if necessary. There will be no emissions to the environment in the event of a power outage.
- h) No solution is discharged to surface water. There is no treatment, destruction or regeneration system.
- i) There are no other aspects that can affect the water balance.

Ponds and impoundments are designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations.

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The PLS Pond and PLS Overflow Ponds are designed and operated with a freeboard of 1 m. The Northern Stormwater Pond is kept empty to allow for the accommodation of a storm event.

The operation's operating procedures incorporate inspection and monitoring activities as necessary to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment.

The available capacity of the Ponds is monitored through the online monitors connected to the SCADA system and the average is recorded on a daily basis and this is used to calibrate the water balance model. Any exceedance of the Pond's capacity will trigger a high level alarm in the Control Room.

The operation measures precipitation, comparing the results to design assumptions and revising operating practices as necessary. Precipitation is measured on a daily basis at the site and this is entered into the water balance model to determine the likelihood of the Ponds overtopping. It was observed that the maximum levels are reached at the end of the winter period due to increased runoff from melting snow. However, the ponds were not predicted to overtop.

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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.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.4**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has open water where it is necessary to implement measures to restrict access by wildlife and livestock as the Weak Acid Dissociable (WAD) cyanide exceeds 50 mg/l.

The PLS Pond and the PLS Overflow Pond are covered in bird balls to prevent access by birds. In addition, they are fenced and located inside the wider fenced mine area. The Northern Stormwater Pond is kept empty. Concentrations of WAD cyanide in the Make up Pond were shown not to exceed 50 mg/l.

Wildlife mortalities are recorded as part of the daily inspections. Any wildlife mortality is recorded on the *Wildlife Loss/ Destruction Observation Form*. An example was observed for a dead snake on a road dated 20 June 2023.

No wildlife mortalities have been observed at the ADR, Heap Leach or Ponds.

The operation applies leach solutions in a manner designed to avoid significant ponding on the heap surface and limit overspray of solution off the heap liner.

The pipes are laid on the surface of the Heap Leach and therefore there is no overspray of the solution. No ponding was observed during the site visit (summer). In winter the piping for the application of leach solutions is buried to avoid the pipes freezing.

The *ADR Plant Operating Procedure* includes Section 5.4.3 Precautions Against Ponding and Dry Areas. There is also a work instruction *Intervention Instruction to the Area with Ponding*.

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

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 4.5

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

There is no direct discharge to surface water.

There is no direct discharge to surface water by the site. If there is excess stormwater this may have to be discharged following analysis of the stormwater.

The operation monitors for cyanide in surface water downgradient of the site and the operation can demonstrate that concentrations of WAD cyanide in surface water downgradient of the facility are below the detection limit of 0.005 mg/l. Turkey does not have any numerical standard for cyanide in surface water.

There are no known indirect discharges to surface water.

Monitoring of the surface water demonstrates that no cyanide is discharged indirectly to the surface water as all monitoring downstream of the facility is below the detection limit of 0.005 mg/l.

No seepage from the operation has caused cyanide concentrations in surface water to rise above levels protective of beneficial use.

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Standard of practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.6**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

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

Specific measures are undertaken to avoid seepage through a liner and drainage/ leak detection layer for the Heap Leach. The liner consists of the following: low permeable soil placed on the compacted subgrade prepared in 2 layers and with a minimum thickness of 0.5 m; 2 mm double-sided rough high density polyethylene (HDPE) geomembrane.

The leach recovery system for the lined Heap Leach area is located along the cell separator bumps where solutions are collected and therefore the risk of leaking is higher. The recovery/detection system was constructed of 2 mm HDPE on the bottom layer. Perforated pipes were then placed on the bottom layer and drainage filler was laid on top. Then 400 gr/m² geotextile material was laid on this material. The recovery/detection system transitions to a rigid pipe at the end of the heap leach cell. The hard pipe discharges directly into the Pregnant Solution Pond. This arrangement allows monitoring of any leakage in the heap leach cells and facilitate control of the leach recovery system.

The Process Ponds are lined with 1.5 mm single-sided rough geomembrane, 1.5 mm smooth geomembrane, conductive textile, and geonet materials.

The operation monitors for cyanide in groundwater downgradient of the site and can demonstrate that concentrations of WAD cyanide (or other species of cyanide for which there is a numerical standard established by the applicable jurisdiction) in groundwater at compliance points below or downgradient of the facility are at or below levels that are protective of identified beneficial uses of the groundwater. The beneficial uses of groundwater down gradient are limited to irrigation for agriculture. All potable water is supplied by the municipality.

No seepage from the operation has caused the concentration of groundwater to rise above levels protective of beneficial use.

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

Mill tailings are not used as underground backfill.

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

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 4.7

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Procedures in place and being implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area.

The bund for the Cyanide Storage Tank is located within a concrete floored bunded area. The bunded area has a metal grill covered concrete trench equipped with a sump pump that directs any spillage to the PLS Pond via the waste collection pipe. The ADR facility that contains all of the other tanks is located within a building with a concrete bunded floor i.e. no tank is installed on ring beam foundations. Any spillage is directed to the Barren Solution Tank within the building. Any leak from the Barren Solution Tank is directed to the PLS Pond after being pumped to the waste collection pipe.

The secondary containments are all sized greater than 110% as detailed below.

Cyanide Storage Tank -128 m³, bund 150 m³.

Barren Solution Tank – 357 m³, bund 474.5 m³.

CIC Tank – 96 m³, bund – 437.4 m³.

There are no cyanide process tanks without secondary containment.

Spill prevention or containment measures are provided for all process solution pipelines to collect leaks and prevent releases to the environment. All pipelines are within a lined trench i.e. pregnant solution pipeline or over a bunded area, i.e. pipelines within the process area.

There are no areas where cyanide pipelines present a risk to surface water.

Cyanide tanks are constructed of mild steel, pipelines are constructed of either mild steel or HDPE. Both materials which are compatible with cyanide and high pH conditions.

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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.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.8**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Quality assurance and quality control programs were implemented during construction of the cyanide facilities.

The cyanide warehouse, cyanide offloading area, ADR, Heap Leach and Ponds were constructed as part of the within the ÖKSÜT Gold Mine Project that was executed under the supervision of the ÖKSÜT Engineering, Procurement and Site Team in collaboration with Çiftay (earthworks), CH Engineering (ADR design, civil, structural steel works), Yesti (Geomembrane works), Birikim (mechanical works with CH Engineering), Siemens and Safer (electrical works with CH Engineering), Hidro Group with Golder WSP (heap leach and ponds design with QA/QC works), Dorçe (SLS storage area) for the detailed engineering design, project and contract management, construction supervision and commissioning consultancy. A quality control/quality assurance program was used through construction and all engineering works were approved and signed off by the engineering management company and ÖKSÜT. Engineering design drawings and quality assurance/quality control (QA/QC) sign-off records are held in the process department database.

The auditors observed the following documenting the quality assurance and quality control programs.

Heap Leach Facility

Technical Specifications Civil Works, June 2016, Golder (now WSP).

TD02-GAT-349-C-S-0008_YLT_Heap Leach Technical Specifications - March 2018.

OMAS.MNT.PLN.0002_0_Construction Quality Management Plan.

The ADR Plant

Designed by CH Engineering and Consultancy A.S. *Drawing TD02-CHE-624-B-D-0017 ADR Plant Building Tank Foundations Anchor Bolt Layout* was observed to be signed off For Construction dated 30 April 2019.

Geological And Geotechnical Investigation Report For The ADR, Substation, Storage, Maingate And Main Pump Station Areas, Akademi, April 2017.

Steel Connection Calculation Report, CH Engineering and Consultancy A.S, October 2018

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The SLS Offloading Area

Is detailed in *Drawing TD02-CHE-641-R-D-0004* and signed off by CH Engineering and Consultancy for Construction.

The Cyanide Storage Area was designed by Dorco Prefabricated Building and Construction Industry Trade Inc. The following drawings were observed detailing the design of the building and signed off for construction; *TD02-DOR-510 to TD02-DOR-900*.

Process Ponds

Process Ponds Facility Application Process Report, March 2018, Golder Associates (now WSP) including ore characterisation, seismicity, weather and meteorological features, geotechnical features, design criteria, design of pools, stability analysis and monitoring program.

The as-built drawing were observed for the ADR (including SLS offloading area), the Heap Leach including the Solution Ponds (*drawings 01-28, Project number 1532227*), and the Cyanide Storage Area. These drawings have been signed off by Golder Associates and Hidro Group, 30 March 2018 as issued for construction.

The documents observed by the auditors addressed the suitability of materials and adequacy of soil compaction for earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used in ponds and leach pads, and for construction of cyanide storage and process tanks.

The following were observed by the auditors.

The Geosynthetic Material Test Result Certificates for the Heap Leach.

Piping Materials Test Certificates.

DSI Stockpile Geotechnical Investigation, March 2016, Golder Associates (now WSP).

Overliner Material Testing Report, July 2016, Golder Associates (now WSP).

Updated Slope Stability Analyses of ÖKSÜT Mine Heap Leach Facility, August 2021, Golder Associates (now WSP).

The quality control and quality assurance records for the cyanide facilities have been retained on the mine's database.

An appropriately qualified person reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved. Handover documents for the Cyanide Storage Facility including; civil, structural, architectural and electrical inspection with the documents being signed off by an appropriately qualified representative of Dorco.

Handover documents for the Heap Leach including details of earthworks, roadworks, pipelines, gabion walls and drainage works. These documents were signed off by the Golder Associates Site Engineer.

Handover documents for the ADR Facility including foundations, tank installations, safety shower installations, dosing and sump pump installations. These documents were signed off by the QA/QC Engineer for CH Engineering. In addition, all of these documents were signed off by the engineer representing the mine as evidence of acceptance.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.9**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Written standard procedures have been developed for monitoring activities including procedures specifying how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, cyanide species to be analysed and quality assurance and quality control requirements for cyanide analyse.

The following were observed.

The map showing the locations for surface water and ground water locations was observed during the site visit. Procedure *OMAS. ENV. PRO.0001 Environmental Monitoring Measurement* shows the parameters to be analysed for surface water and groundwater.

Environmental Monitoring Procedure details monitoring locations, monitoring parameters etc. The procedure for collecting the sample is held by the Government Accredited Laboratory who come to site to collect the samples on a monthly basis. This includes the following.

Ta. 18 Soil Sampling Instructions, rev 04, dated 04 January 2023, Cinar Laboratory Group.

Ta. 30 Sample Container Preparation Instructions, rev 03, dated January 2023, Cinar Laboratory Group.

Ta. 31 Instructions for Sampling Water and Wastewater, rev 13, dated 04 January 2023, Cinar Laboratory Group.

Wildlife mortalities are recorded as part of the daily inspections. Any wildlife mortality is recorded on the *Wildlife Loss/ Destruction Observation Form*. An example was observed for a dead snake on a road dated 20 June 2023.

The Sampling and Analytical Protocols have been developed by the laboratories and approved for use by the government.

Ta. 18 and *Ta. 31* have been prepared by the Water Quality Operations Officer, and approved by the Laboratory Manager. *Ta. 30* has been prepared by the Quality Manager, and approved by the Laboratory Manager.

Fieldwork conditions are recorded on a fieldwork monitoring form, detailing the sampling conditions (e.g. weather, livestock,/wildlife activity, anthropogenic influences, etc.) and procedures.

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Monitoring is undertaken at frequencies to adequate to characterise the medium being monitored, and to identify changes in a timely manner. Monitoring of groundwater and surface water is undertaken on a monthly basis.

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Principle 5 – Decommissioning

Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.

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

in full compliance with

The operation is

in substantial compliance with **Standard of Practice 5.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The facility has developed written procedures to effectively decommission cyanide facilities at the cessation of operations. These include the following:

OMAS.SFT.PLN.0044_0_OMAS_Cyanide Closure Plan 19 July 2023, and

OMAS.SFT.PLN.0043_0_OMAS_Cyanide Decommissioning Plan, 19 July 2023.

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

The *Cyanide Closure Plan* includes a schedule for the actions to be undertaken, on a month by month basis, for the 12 months following shutdown. Environmental monitoring will be undertaken for a further 4 years following this. The two plans are reviewed on an annual basis or as required by changing conditions on site.

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Standard of practice 5.2: Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

in full compliance with

The operation is

in substantial compliance with **Standard of Practice 5.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

OMAS. SFT. PLN.0043 Cyanide Decommissioning Plan for Öksüt Madencilik Gold Mine, dated 19 July 2023, contains a cost estimate to fully fund third party implementation of the cyanide-related decommissioning measures, which are identified in the Plan.

The *Cyanide Decommissioning Plan* and *Cyanide Closure Plan* and therefore the cost estimate to fully fund third party implementation of the cyanide-related decommissioning measures, are updated annually.

There is no financial mechanism required by the Turkish jurisdiction.

The operation has established a self-guarantee mechanism to cover the estimated costs for the cyanide-related decommissioning activities as identified in the Decommissioning Plan.

The operation provided a statement by a qualified financial auditor (KPMG) that it has sufficient financial strength to fulfil this obligation as demonstrated by an accepted financial evaluation methodology (Canadian Standard on Related Services (CSRS) 4400).

The Statement, dated 25 May 2022, found the ratio of total assets as at 31 December 2021 to the amount of cyanide related decommissioning activities to be correctly calculated and in agreement with the internal memorandum, which details that the Net Worth and Tangible Net Worth is 145 times the estimated cost of the cyanide related decommissioning activities as detailed in the Decommissioning Plan.

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Principle 6 – Worker Safety

Protect workers health and safety from exposure to cyanide.

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

in full compliance with

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

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has developed procedures describing how cyanide-related tasks such as unloading, mixing plant, operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure, including, but not limited to, the following.

OMAS.PRC.ADR.PRO.0001 ADR Plant Operating Procedure (details how the ADR plant is operated including all cyanide related tasks);

OMAS.PRC.ADR.INS.0011 Instruction to Intervene in Ponding Area (actions to be undertaken in the event of ponding on the Heap Leach);

OMAS.MNT.INS.0013 Barren Solution (Booster) Pumps Worn Parts Replacement and Maintenance Instructions (includes decontamination prior to maintenance);

OMAS.MNT.INS.0055 Instructions for Safe Working on Chemical Lines and Equipment (includes decontamination prior to maintenance); and

OMAS.SFT.PRO.0025 Confined Space Entry Procedure.

The procedures require, where necessary, the use of personal protective equipment and address pre-work inspections including the following.

OMAS.PRC.ADR.PRO.0001_2, ADR Plant Operating Procedure, OMAS.SFT.INS.0003_1, SLS Preparation and Tank Filling Instruction, and OMAS.PRC.ADR.INS.0026_1, Making SLS Connections Instruction provide directions on the required PPE (Chemical resistant suit coveralls for single use, full face respiratory mask with ABEK2P3-HgP3 filter, chemical resistant rubber gloves and rubber boots), for two operators and an observer for the dissolution and offloading. The procedures also require that operators inspect respirator and filters prior to starting an offloading event.

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The SLS unloading procedure requires the operators to undertake a pre-task assessment, which includes the *OMAS. PRC. ADR. LST.0004 SLS Cyanide Preparation and Finishing Checklist*.

Work Permits includes Section 8 – PPE, and atmospheric test requirements as part of the pre-work inspection.

The operation solicits and actively consider worker input in developing and evaluating health and safety procedures. This is undertaken through the following.

There is a suggestion box where anybody with any ideas including changes to health and safety procedures can submit their ideas. There are Daily Tool Box Talks at the start of each shift where a variety of topics will be discussed including current and new health and safety procedures. Monthly Health Safety and Environment (HSE) Committee Meetings are undertaken where the development of new or evaluation of current health and safety procedures is undertaken.

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Standard of practice 6.2: Operate and monitor cyanide to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 6.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has determined the appropriate pH for limiting the evolution of HCN gas during mixing and production activities.

A pH of 10.5 has been determined for offloading cyanide and application to the Heap Leach and during the CIC process. This is detailed in the *OMAS. PRC. ADR. PRO.0001_2 ADR Plant Operating Procedure*. Samples are undertaken hourly from the CIC, the Barren Tank, Heap Leach Return and recorded on the ADR Daily Log Sheet, as observed by the auditors.

The operation has determined various hotspots, where workers may be exposed to hydrogen cyanide gas in excess of 10 parts per million (ppm) (11 mg/m³) on an instantaneous basis and 4.7 parts per million (ppm) 5 mg/m³) continuously over an 8-hour period, as identified by signage observed during the site visit. These locations include the SLS Offloading Area, Cyanide Storage Area, CIC Area inside the ADR, and the Heap Leach.

Cyanide dust is not applicable as sodium cyanide is offloaded and stored as a liquid.

The facility uses monitoring devices in process areas and for activities involving the management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas 10 parts per million (ppm) on an instantaneous basis and 4.7 parts per million (ppm) continuously over an 8-hour period, as cyanide

There are fixed monitors at the locations that have been identified as hotspots i.e. the SLS Offloading Area, Cyanide Storage Area, CIC Area inside the ADR, and the Heap Leach.

The *ADR Plant Operating Procedure* states In cases of exceeding the limit (momentary 10 ppm and over 4.7 ppm for one shift i.e. 8 hours), the relevant ADR supervisor is informed immediately. The ADR supervisor (process engineer, team leader(s) in his absence) assesses the situation and, if necessary, ensures evacuation and puts an emergency action plan in place. The incident investigation and reporting process is initiated to identify the situation that caused the increase and to find a solution.

Personnel hydrogen cyanide monitors also have to be worn when undertaking work at these locations. The alarms for the fixed monitors and personal monitors are set at A1 4.7 ppm and A2 10 ppm.

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Monitoring equipment is calibrated in accordance with the manufactures' requirements. Draeger for the personnel monitors and SET Technical Safety and Environmental Technologies on behalf of Honeywell for the fixed monitors.

The personnel monitors are calibrated every 6 months. Calibrating certificates were observed for the last 2 years. The fixed monitors are calibrated annually. The calibration certificates for the last 2 years were observed by the auditors.

Warning signs are located at all of the hotspot areas, (SLS Offloading Area, Cyanide Storage Area, CIC Area inside the ADR, and the Heap Leach) advising workers that cyanide is present, of any necessary personal protective equipment that must be worn, and that smoking, open flames, eating and drinking are not allowed.

OMAS.PRC.ADR.PRO.0003_0, Solution Dying Procedure, addresses the addition of colorant dye in the holding tank. CyPlus does not include dye with the cyanide supplied to ÖKSÜT. This action is undertaken in accordance with the procedure provided by CyPlus.

Showers, low-pressure eye wash stations and dry powder fire extinguishers are available at all of the hotspot areas (SLS Offloading Area, Cyanide Storage Area, CIC Area inside the ADR, and the Heap Leach) as observed during the site visit.

Fire extinguishers are checked on a monthly basis and have an annual service by an external company SZUTEST. Safety showers are inspected on a shiftly basis in accordance with *OMAS.PRC.ADR.LST.0006_0_ADR Safety Showers*. They are also included on the planned maintenance system being serviced monthly.

Unloading, storage, mixing and process tanks and piping containing cyanide are identified to alert workers of their contents, and the direction of cyanide flow in pipes is designated.

OMAS.PRC.ADR.PRO.0001_2, ADR Plant Operating Procedure, Section 5.14.2 Solution Lines and Tanks, details the various colours used for the designation of pipes and tanks with purple being used to denote cyanide in addition to other signs stating the presence of cyanide. This includes the solution pipeline running between the ADR Plant and the Heap Leach including an indication of the direction of flow.

Safety Data Sheets, and first aid procedures are available in Turkish, the language of the workforce, at all of the designated cyanide hotspots. Other information such as the plans and procedures are also in Turkish and kept on the site intranet.

Procedures are in place and being implemented to investigate and evaluate cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety, and to respond to cyanide exposures, are adequate or need of revising.

OMAS.GEN.PRO.0012_1 Incident Investigation and Reporting details the procedure to be used.

The form *OMAS.GEN.FRM.0001 Incident Investigation and Reporting Form* is used to document the investigation and evaluation of an incident.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 6.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has water, oxygen, a resuscitator, at the identified hotspots, i.e. SLS Offloading Area, Cyanide Storage Area, CIC Area inside the ADR, and the Heap Leach. The cyanide antidote (Cyanokit) is kept at the mine clinic. Radio's are used for communication throughout the mine with the security control centre co-ordinating the response for all emergencies.

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

The equipment in the ambulance is inspected at the start of every shift using *OMAS.SFT.FLM.0070 Patient Transport Ambulance Hand Over Form*.

The oxygen cylinders are inspected on a weekly basis, and this is documented on *OMAS.SFT.FRM.0144 Oxygen Cylinder Control Form*.

OMAS.PRC.ADR.LST.0009_0_ADR_Facility Checklist includes the inspection of emergency and first aid equipment on a shiftly basis.

The cyanide antidote is stored as directed by the manufacturer and replaced on a schedule that assures it will be effective when needed. The expiry date is detailed on *OMAS.SFT.FRM.0164 Health Clinic Material Control Form*. All of the antidotes were observed to be within their use by date.

The operation has developed specific written emergency response plans and procedures to respond to cyanide exposures including the following.

OMAS.SFT.PLN.0007_EN_3 Emergency Response and Crisis Management Plan (ERCMP) updated 15 February 2022.

OMAS.SFT.INS.0019_0_First Aid in Cyanide Poisoning.

OMAS.SFT.PLN.0001_EN_3 Cyanide Management Plan.

The procedure for *First Aid in Cyanide Poisoning* details the necessary response to cyanide exposure through ingestion, inhalation, and absorption through the skin and eyes.

The operation has its own on-site capability to provide first aid and medical assistance to workers exposed to cyanide. The site trains all of the plant operators in first aid. The Front

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Line Supervisors constitute the Emergency Response Team. There is an ambulance with 2 paramedics to transport the patient to the on-site clinic that has a full time doctor and support staff.

The operation has developed procedures to transport workers exposed to cyanide to locally available qualified off-site medical facilities, which includes the following.

OMAS. SFT. PRO.0047_1 Ambulance and Emergency Medical Team Procedure. This includes; qualifications and duties of ambulance staff, access to and coordination of the service, evaluation of patient, equipment management, vehicle maintenance and repair.

The *ERCMP* Section 10.2 Medical Emergencies that the Ambulance must be escorted to the scene of the incident by the security staff, who coordinate the response to any emergency on site.

The operation has informed local medical facilities of the potential need to treat patients for cyanide exposure, and the operation is confident that the medical facility has adequate, qualified staff, equipment, and expertise to respond to cyanide exposures. The staff at the hospital have been trained in cyanide treatment by the doctor at the clinic.

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Principle 7 – Emergency Response

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

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.1; prepare detailed emergency response plans for potential cyanide releases.

The operation developed an Emergency Response Plan to address potential accidental releases of cyanide and cyanide exposure incidents. These include the following.

OMAS.SFT.PLN.0007_EN_3 Emergency Response and Crisis Management Plan (ERCMP) updated 15 February 2022.

OMAS.SFT.INS.0019_0_First Aid in Cyanide Poisoning.

OMAS.SFT.PLN.0001_EN_3 Cyanide Management Plan.

The Plans consider the potential cyanide failure scenarios appropriate for the operations site-specific environmental and operating circumstances. These scenarios include specific response actions such as clearing site personnel, potentially affected communities and the control of release at their source.

The auditors observed the following.

- a.) ERCMP Section 10.1 - Fires and explosions (which is the only scenario where a catastrophic release of HCN gas will occur). Release of HCN from any part of the process will result in the liquid being contained within a bund and from there pumped back into the process e.g. Barren solution tank. ERCMP Section 12.1 Cyanide Spill at the mine site.
- b.) ERCMP Section 10.9 Vehicle Accidents (on and off the site)
- c.) ERCMP Section 12.1 Cyanide Spill at the mine site.
- d.) ERCMP Section 10.1 - Fires and explosions and Section 12.6 Fire in cyanide containers and vehicles.
- e.) ERCMP Section 12.1 Cyanide Spill at the mine site due to pipe, valve or tank ruptures.
- f.) ERCMP Section 12.8 Overflow of Cyanide Solution from Ponds
- g.) ERCMP Section 10.13 Power, Grid, Telecommunication Outages and Pump Failures.

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- h.) ERCMP Section 12.9 Cyanide Solution Leakage from Heap Leaching and Ponds, and Section 10.7 Slippage in the Heap Leaching Area.
- i.) Not applicable
- j.) ERCMP Section 10.5 Sidewall Failure in Heap Leach, and Section 10.7 Slippage in the Heap Leaching Area.

Planning for response to transportation-related emergencies has considered the transportation route, physical and chemical form of the cyanide, method of transport, the condition of the road or railway, and the design of the transport vehicle.

In addition to ERCMP Section 10.9, ÖKSÜT has also developed an Internal Route Assessment from the Security Access to the Cyanide SLS Store and ADR Plant (01 June 2023). Cyplus have also developed a route assessment for transportation of cyanide to the mine as part of their supply route certification.

ERCMP Section 12.4 First Aid for Patients Exposed to Cyanide details the first aid measures to be undertaken in the event of a cyanide exposure. Cyanide antidotes are only to be administered by the doctor at the on-site clinic. In addition, there is a Cyanide First Aid Procedure displayed at each of the hotspots. Containment, assessment, mitigation, and future prevention of releases is included in ERCMP Section 8 Research and Reporting.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation has involved its workforce in the cyanide emergency response planning process.

There is a suggestion box where anybody with any ideas including the cyanide emergency response planning process can submit their ideas.

There are Daily Tool Box Talks at the start of each shift where a variety of topics will be discussed including the cyanide emergency response planning process.

Monthly HSE Committee Meetings are undertaken where the development of new or evaluation of the current cyanide emergency response planning process is undertaken. Records for the 2023 meetings were observed by the auditors.

The operation involves external stakeholders the cyanide emergency response planning process.

Annual meetings are held with the District Governor, Mayor, District Agriculture Director, University Director, Fire Chief, Police Chief, village leaders, Non-Governmental Organisations (NGO's), District Health Director and representatives of surrounding local hospitals. These representatives are invited to attend a meeting at the mine; however, if this not possible the Environmental Social Governance (ESG) Department will attempt to arrange a meeting offsite at the representative's location.

Minutes of various meetings were observed dated 28 April 2022, 16 May 2022, and 01 November 2022.

Local communities are unlikely to be affected by any incident on the mine as the nearest community is 3 km away and therefore are just informed of the cyanide emergency response process, and the risks associated with accidental cyanide releases as part of the community meetings detailed in 9.1. They are therefore not involved in the Emergency Response Planning Process or keeping the Emergency Response Plan current.

The operation has identified external entities having emergency response roles. Section 4.0 Emergency and Crisis Management Organisation of the ERCMP details that the local fire brigade and police departments should be notified by the Security Control Centre in the event of an emergency.

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The role of the Police and Fire Brigade are detailed in the various scenarios described in the ERCMP, and they are involved in the Emergency Response Planning Process and keeping the Emergency Response Plan current through the meetings detailed above.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

- a.) ERCMP Section 2 Definitions, this includes the Roles and Responsibilities of the Site Emergency Commander, Emergency Co-ordinator, Emergency Response Team (ERT) Leader, ERT, Local Crisis Management Team (LCMT) Leader and LCMT. The includes the Site Emergency Commander as the primary emergency response co-ordinator having the explicit authority to commit resources necessary to implement the ERCMP.
- b.) A list of ERT members was observed at the identified hotspots and on the Intranet.
- c.) Training of ERT includes; First Aid, Fire and Rescue, Hazardous Materials, Rescue from Heights, Remediation, Search and Rescue, Cyanide Awareness, Confined Space, Emergency Response Plan as detailed in the training matrix the was observed by the auditors.
- d.) ERCMP Section 4. Emergency and Crisis Management Organisation details the call-out procedures and 24 hour contact information for the Security Control Centre who organises the response in the event of an emergency. In addition, the emergency number is on the mine ID cards. A full list of all of the relevant emergency service and ERT telephone numbers was observed.
- e.) ERCMP Section 2 Definitions, includes the Roles and Responsibilities of the Site Emergency Commander, Emergency Co-ordinator, ERT Team Leader, ERT, LCMT Leader and LCMT.
- f.) ERCMP Section 9. Review, Training and Drills, lists the emergency response equipment available on-site, including personal protection gear.
- g.) Checklists for emergency response equipment was observed. The equipment in the ambulance is inspected at the start of every shift using *OMAS.SFT.FLM.0070 Patient Transport Ambulance Hand Over Form*. The completed form was observed for 09 August 2023. *OMAS.PRC.ADR.LST.0009_0_ADR_Facility Checklist* includes the inspection of emergency response equipment on a shiftly basis. A completed form was observed for 31 July 2023. The cyanide antidote is stored as directed by the manufacturer and replaced on a schedule that assures it will be effective when needed. The expiry date is detailed on *OMAS.SFT.FRM.0164 Health Clinic Material Control Form*, which was observed for 17 July 2023. All of the antidotes were observed to be within their use by date.

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- h.) There is no role in the ERCMP for local communities. Local communities are unlikely to be affected by an emergency situation on the mine as it is 3 km from the nearest community. External responders will act as detailed in the various scenarios in the ERCMP.

The operation has confirmed that external entities with roles and responsibilities identified in the Emergency Response Plan are aware of their involvement. The Fire Department were an observer at the Mock Drill in March 2023 as detailed in 7.6.2.

Annual meetings are held with the District Governor, Mayor, District Agriculture Director, University Director, Fire Chief, Police Chief, village leaders, NGO's, District Health Director and representatives of surrounding local hospitals. These representatives are invited to attend a meeting at the mine; however, if this not possible the ESG Department will attempt to arrange a meeting offsite at the representative's location.

A meeting was undertaken at the Dr Ekrem Karakaya State Hospital, regarding the presentation of ICMC Information, from the mine to the hospital.

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Standard of practice 7.4: Develop procedure for internal and external emergency notification reporting.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.4**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

The ERCMP includes in Section 4. Emergency and Crisis Management Organisation, procedures and contact information for notifying management, regulatory agencies, external response providers and medical facilities of the cyanide emergency.

OMAS.SFT.LST.0001_2 Emergency Contact Information dated 16 January 2023.

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

The nearest community is 3 km from the mine and therefore unlikely to be affected by any emergency on the mine. Section 7 of the ERCMP Emergency Communication details the communication to be undertaken with local communities and the media in the event of an emergency.

The communications will be undertaken by the Communications Coordinator with approval of the LCMT Leader and the Canadian Crisis Management Team.

The operation has a procedure for notifying the ICMI of any significant cyanide incidents, as defined in the ICMI's Definitions and Acronyms document. There have been no significant cyanide incidents to date.

The operation has a procedure in the ERCMP Section 12.16 Reporting and Investigation, for notifying the ICMI of any significant cyanide incidents as defined in the ICMI's Definitions and Acronyms document.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.5**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The emergency response plans describe specific remediation measures as appropriate for the likely cyanide release scenarios, in the following documents.

- a) Recovery or neutralisation of solutions or solids?
- b) Decontamination of soils or other contaminated media:
- c) Management and/or disposal of spill clean-up debris?
- d) Provision of an alternate drinking water supply?

Calcium hypochlorite is used for neutralisation prepared as a 5% solution. This material is kept SLS Storage Building and ADR ERT Room. The end point for neutralisation is 1 ppm free cyanide. The material is to be flush to collection ponds where possible. If there is contaminated material this will be collected and placed in a suitable container ready for collection and disposal by appropriately licenced companies. It is also stated that if needed clean drinking water must be sourced for affected communities.

All of these elements are described in the ERCMP Section 12.1 Cyanide Spill at The Mine Site and Section 12.2 Cyanide Spill Outside the Mine. It is unlikely that there will be a spillage of solid cyanide as this is contained within the SLS tank for transportation. The liquid cyanide on site is contained within tanks and pipelines that all have secondary containment. These sections of the ERCMP also prohibit the use of chemicals to treat cyanide that has been released into surface water or that has the potential to reach surface water and addresses the need for monitoring to identify the extent and effect of any cyanide release.

The details of sampling methodologies, parameters, etc. are included in the OMAS. ENV. PRO.0001 Environmental Monitoring Measurement Procedure. This details the methodologies and parameters for analysis of surface water and groundwater. There is also a map showing the surface water and groundwater monitoring locations. The procedure *OMAS.ENV.PRO.0009 Sampling and Conservation* states that *TS 9923 Soil Quality - Standard for Surface Soil Sampling, Transport and Preservation of Samples* will be used for taking soil samples. This details how the soil samples will be taken and what analysis will be performed.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.6**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

Section 9. Review, Training and Drills of the ERCMP states: "This ERCMP will be reviewed annually and when changes in legislation or feedback during drills or emergencies necessitate changes."

Mock cyanide emergency drills are conducted periodically.

The Emergency Response Team members (ERT) are trained in responding to chemical releases including cyanide. The ERT team members receive the same training as above and conduct at least one cyanide spillage and man-down drill per year.

Annual meetings are held with the District Governor, Mayor, District Agriculture Director, University Director, Fire Chief, Police Chief, village leaders, NGO's, District Health Director and representatives of surrounding local hospitals, where emergency response to cyanide incidents is discussed. However, they do not take part in the mock drills for the mine. They would take part in mock drills for the transportation company.

Mock drills are conducted as per the schedule for mock drills observed by the auditors. There are 7 mock drills planned for 2023. There is at least one physical mock drill involving cyanide every year. In March 2023 a mock drill was conducted that involved a tanker overturning with a spillage of solid cyanide and a man down event. The mock drill report includes, the scenario, sequence of events, assessment of the drill, good practices, improvement areas, evaluation, and recommendations. Following the completion of a drill there is a meeting to assess the performance during the drill.

Provisions are in place to evaluate and revise the Emergency Response Plan, as necessary, following mock drills and following an actual cyanide-related emergency requiring its implementation as detailed in Section 9 of the ERCMP.

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Principle 8 – Training

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

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

in full compliance with
The operation is in substantial compliance with **Standard of Practice 8.1**
 not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

Cyanide training is mandatory for all new employees and contractors who will work in cyanide facilities. All Occupational Health and Safety (OHS) trainings are defined and detailed in *OMAS.GEN.PRO.0009, Expertise, Awareness Training Procedure*. The training requirements are set out in the *OMAS.HRT.TBL.0004 OMAS ISG Training Matrix* according to the job titles. The Induction training is a 16-hour program for ÖKSÜT staff that includes topics such as site policies, procedures, site safety, signage, workplace hazards, PPE, SDS, alarms, emergency response, incident reports and safety meetings etc. This program also includes instruction on cyanide awareness and the Cyanide Code as training modules *OMAS.SFT.PLN.0001, Cyanide Management Plan* and *OMAS.SFT.PLN.0007, Emergency Response and Crisis Management Plan*.

This training includes forms of cyanide, recognition, hazards, signage, safe handling guidelines, exposure routes, control of the generation of HCN gas, symptoms of cyanide poisoning, and first aid treatment in the event of exposure.

Cyanide awareness training is a part of a 3-hour session on chemical awareness including mercury and cyanide issues that forms part of a 16-hour health and safety training program that is periodically required by all workers including contractors. The cyanide awareness training part of the program is about 1 hour in length and is given by Process and Safety departments. The cyanide awareness training includes cyanide awareness, risks of cyanide, cyanide handling procedures and emergency response. For those that work with cyanide including ADR operators and supervisors, leach pad operators, security officers, maintenance workers, electricians, firefighting, rescue teams and who works the cyanide contained areas (i.e., safety engineers, environmental engineers, etc.), this awareness training is required to be refreshed annually.

All induction and refresher training records (for the Mine and Plant direct employees) are retained by the Human Resources (HR) Department Office and tracked on ÖKSÜT's database including software records and Bridge as the e-learning platform. Prior to the establishment of the system, training records were archived in hard copy at the HR Office.

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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.

in full compliance with

The operation is

in substantial compliance with **Standard of Practice 8.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation trains workers to perform their normal production tasks, including unloading, mixing, production, and maintenance, with minimum risk to worker health and safety in a manner that prevents unplanned cyanide releases.

ÖKSÜT continues to maintain a detailed training program for normal production tasks, including unloading, mixing, production, and maintenance, with minimum risk to worker health and safety in a manner that prevents unplanned cyanide releases.

Workers are trained prior to working with cyanide. All workers that undertake cyanide related tasks are required to complete cyanide awareness training as well as task specific training.

As per a legal requirement, Plant operators must also receive "Occupational Certification" before being permitted to work. Certification is gained through a 180 hours and 40 hours practice training program provided by an authorized training company. The program provides a general understanding of safety legislation. Prior to conducting operational tasks without direct supervision, workers must receive site-specific training in safe work instructions.

Operating procedures form the basis of the written materials for training. These procedures provide the information on the primary hazards of the task, required, PPE, step by step instruction on performing the task, and reference to related safety and operating procedures.

The training requirements program identifies the safety and monitoring equipment in-place, warning signage, PPE requirements, and procedures to be followed to minimize risks associated with task related hazards. Additional training in cyanide management procedures applicable to specific work assignments is provided to the workforce by the shift supervisor. All staff receives cyanide awareness training. The refreshment training includes *OMAS.SFT.TRN.001, General Topics, OMAS.SFT.TRN.002, Technical Topics, OMAS.SFT.TRN.003, Other Topics, and OMAS.SFT.TRN.010, Cyanide and Mercury Awareness Training.*

A training matrix is used to track cyanide related requirements by the HR Department. These procedures/instructions include those specific to transport, unloading/loading, storage, mixing/preparation in the SLS station, preparation of stripping solutions, cleaning of pits/tanks/screens, sample collection, and other production and maintenance tasks. All

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procedures contain instructions to be followed for each task, the hazards identified, PPE to be used, and precautions to be followed for safe working. The heap leach pipe irrigation crew receive instruction trainings, pipe installation and maintenance specific tasks that are based on an annual schedule. The training matrix is retained on the ÖKSÜT's database and Bridge systems. All workers receive annual cyanide awareness refresher training, emergency response training, and additional training in cyanide risk and management for specific work tasks to manage risks as required.

Refresher training on cyanide management is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. The cyanide refresher training includes cyanide awareness, risks of cyanide, cyanide handling procedures and emergency response. The refresher training that Process and ADR operators receive is more extensive than the refresher training other employees receive. Cyanide awareness is included as a specific topic and includes hazard signage, safe working with cyanide, the Chemical Management Plan (CMP) and ICMC requirements. Additional training sessions are organized by the HR for the employees who could not participate due to their leaves or absenteeism.

Employee task training is undertaken by supervisors or managers who are experienced in cyanide process operations. This training is supplemented by monitors assigned in each area who have been trained to provide cyanide training. In general, the supervisor of an area is assigned the role of monitor. Monitors have received detailed training on the management of cyanide in the workplace.

Cyanide awareness training is provided by the Process Training Superintendent and Occupational Health and Safety (OHS) Superintendent who have 17 years and 13 years of cyanide process experience and OHS experience including completion of Technical Trainer Training, and Work Safety Leadership Training.

Health and safety training is undertaken by the OHS Department is provided by professionals who are government certified with each trainer required to sit an exam to be qualified. Trainers are certified by experience into classes A, B and C. The ERT is trained by a certified health and safety expert from within the OHS Department with 13 years of experience in health and safety and other safety specialists who have over 4 years experience.

The Emergency Response Coordinator who provides training to ERT Members, is professionally trained, and has 20 years' experience as a Health and Safety Professional.

Cyanide induction and refresher training is evaluated through examination using a multiple-choice test paper. The pass mark is 70% and additional instruction and examination is required for trainees that do not make the grade. Trainees are required to take training again if the exam's pass mark is not achieved.

For task training, a 1-day long process plant orientation training is completed by all new employees who will work in Process Department. Then over a 2 month period, new employees are observed in accordance with the requirements of the Planned Task Observation (PTO) Procedure. This is followed by an additional 4 month probationary period during which the employee is observed by the shift supervisor and process engineers. When deemed proficient by the supervisor the employee is evaluated by the Process Superintendent over one shift and if satisfied the Superintendent approves a completion of training form *OMAS.HRT.FRM.0011, Probation 2 months Period Assessment Form* and *OMAS.HRT.FRM.0016, Probation 6 months Period Assessment Form* which is filed by the

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HR department. Each department is required to conduct the planned task observations; including performance of operator activities, operator behaviour, and management of task related risks. The employee's name and employee number, task observed, date of observation, comments and any corrective actions are recorded on the *OMAS.SFT.FRM.0161, Planned Task Observation Form*. Critical tasks should be covered by a PTO at least once a year.

Records for cyanide training are retained throughout an individual's employment. Records are in the form of signoff sheets; that include the training topic(s), trainers name and signature, date of training, and sign-off by each attendee. Hard copies of training records are kept by the Process Department. Copies of training records are entered into ÖKSÜT's Database, since its implementation in 2020, and may be searched and retrieved through this system.

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Standard of practice 8.3: Train appropriate workers and personnel to respond to worker exposure and environmental releases of cyanide.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 8.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

All cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released, including decontamination and first aid procedures.

All employees that work with cyanide complete induction and refresher training in cyanide awareness. Employees undertaking cyanide specific tasks receive task specific training on standard operating procedure(s) for that task as well as procedures to follow in the event of a cyanide exposure. The induction materials include description of solid and gaseous cyanide, safe handling guidelines, exposure routes, symptoms of cyanide poisoning, incident management, emergency call out procedures and first aid treatment including administering oxygen and decontamination steps. Refresher training includes CMP and ICMC requirements, including emergency response, hazard awareness, risk minimization, spill response, cyanide first aid and emergency scenarios.

The ERT members are trained in responding to chemical releases including cyanide. The ERT members receive the same training as above and conduct at least one cyanide spillage and man-down drill per year.

Emergency Response Coordinators and members of the Emergency Response Team are trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment. Depending on the shift and type of emergency, all shifts are covered by trained ERT team members who are working around mine site.

The ERT members have been trained to apply first aid including the use of medical oxygen and advanced medical first aid. Medically trained personnel from the mine's clinic provide further assistance such as administering the Cyanokit. Since 2020, the ERT members have completed training in chemical response (HAZ-MAT), firefighting, working at height, self-contained breathing apparatus training and vehicle extraction.

The ERT, like all employees, also receive annual cyanide first aid training from the clinic doctor. The ERT conduct monthly emergency response training exercises. Since 2020, these exercises have included a cyanide solution spill and HCN release in the ADR; a vehicle rollover and solid cyanide spill with release of HCN, a man-down cyanide exposure scenario, and pond overflow.

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The operation has made external responders, such as local fire brigades and emergency medical services familiar with those elements of the Emergency Response Plan related to cyanide.

The ÖKSÜT Gold Mine has the resources to handle all probable emergency situations through an onsite team of well trained emergency personnel, emergency response vehicles and equipment, and medical capability is available from the on-site paramedics, nurse and doctor. The mine meets annually with local community stakeholders and has also communicated with local government agencies, including the Ministry of Health Department in Kayseri.

Annual meetings are held with the District Governor, Mayor, District Agriculture Director, University Director, Fire Chief, Police Chief, village leaders, NGO's, District Health Director and representatives of surrounding local hospitals. These representatives are invited to attend a meeting at the mine; however, if this not possible the ESG Department will attempt to arrange a meeting offsite at the representative's location. These meeting include; discussion of the emergency response plan and in-house capabilities, provision of information on the ÖKSÜT mining operation, the use of cyanide in the gold recovery process, the potential risks associated with the operation, and the potential additional services and support that may be requested in the event of an accident.

Refresher training for ERT members and other Plant employees with regards to response to cyanide exposures and releases is undertaken on an annual basis.

Training meetings with the ERT members cover a range of topics including emergency call out procedures, cyanide awareness, cyanide hazards and management, first aid procedures, and cyanide exposures. Topics discussed in the training sessions include evacuation drills, hazardous materials handling, fire extinguisher use, basic firefighting, vehicle extraction, cyanide management, basic first aid and mock drill rehearsal. Additionally, the ERT members also take part in annual desk-top emergency scenarios in accordance with the CMP and emergency response plan intended to test understanding and readiness of the Emergency Coordination Group members, the Crisis Management Group (CMG), and the ERT members in emergency response. The CMP specifically includes emergency response coordinators as part of the drills. In addition, cyanide awareness and refresher training is periodically provided by the OHS Superintendent to ERT members in accordance with a training matrix.

Cyanide awareness is included as a specific topic and is refreshed on an annual basis. The training is provided by the Process and Health Departments. In addition, the ERT participates in the emergency training sessions which periodically include hazardous materials training including cyanide. ERT members receive specific training in HAZMAT including cyanide releases, cyanide exposures, first aid firefighting, eye wash/shower scenarios and entry into enclosed spaces. The clinic nurse and paramedics receive annual cyanide awareness training and instruction from the medical Doctor on the application of medical oxygen and intravenous use of Cyanokits.

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

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Principle 9 – Dialogue and Disclosure

Engage in public consultation and disclosure.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 9.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

The operation provides stakeholders with information on its cyanide management practices and regularly engages with them regarding any concerns they may have.

ÖKSÜT has implemented the following plans and procedures to engage with local government, non-government organizations (NGOs), media and the press.

ÖKSÜT's community relations staff undertake periodic outreach campaigns in local villages including 11 small villages (Öksüt, Gazi, Sarıca, Zile, Tombak, Yukarı Develi, Yazıbaşı, Gömedi, Epçe, Ayvazhacı, Gümüşören) located within 4-9 km of the mine. These meetings provide an opportunity for external stakeholders to verbally communicate any concerns related to the use of cyanide and its management at the mine site. Many local and national-level stakeholder meetings have also been conducted with governmental-municipal officials, security and health organizations, police, gendarme, hospitals, and specific communities. The ESG Department is responsible for engaging with governmental offices and local people, affected by mine's activities. The ESG Department meets with interested local stakeholders at least twice a year.

ÖKSÜT has various types of informative audio-visual tools and brochures including a General Visitor Brochure, which includes cyanide awareness, PowerPoint presentations tailored for specific audiences, website/press releases (ESG Report), company internal magazine (OMAS Bulletin in Turkish version) and televised presentations.

ÖKSÜT, on an annual basis, organizes and conducts numerous site tours for external stakeholders including NGOs and members of the public. On average these visits have included 144 individuals a year. All visitors receive basic information on the use of cyanide in the mining process as well as basic practices employed for the safe management of cyanide in transportation and use.

Since 2020, ÖKSÜT has also attended a large number of unplanned and planned meetings with villagers at their villages and with other stakeholders. Records show that there were 171 meetings in 2020 with 347 people, 189 meetings with 254 people in 2021, 203 meetings with 804 people in 2022, and 77 meetings with 1,334 people by the end of July 2023.

If comments or complaints are received from outside parties, they are documented on a *OMAS.COR.FRM.0004, Grievance Form* and a *OMAS.COR.FRM.0003, Grievance Resolution Form*, as stated in the *OMAS.COR.PRO.0006, Stakeholder Engagement Procedure* and

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OMAS.COR.PRO.0007, Grievance Procedure. All such complaints, requests or comments received are examined by the ESG Department, and where necessary, discussions are held with other concerned departments and responses are communicated back to the relevant party. All complaints with a grievance form are recorded on in the *OMAS.COR.FRM.0010 Grievance Register* which is then submitted to the ESG Director for action.

There have been no grievances regarding cyanide to date.

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

in full compliance with

The operation is in substantial compliance with **Standard of Practice 9.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

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

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

ÖKSÜT has developed several written and electronic materials (flyers, leaflets, brochures) for stakeholder groups, local communities, and meeting purposes in Turkish, that describe the use of cyanide in mining, the Cyanide Code and the management of cyanide during production, transportation and operations.

In addition to appropriate verbal briefings, all site visitors are provided with a double-sided, brochure presenting basic site safety information and the use of cyanide in mining.

The operation has disseminated information on cyanide in verbal form where a significant percentage of the local population is illiterate.

Literacy around the local population remains extremely high and is not considered a significant issue (average rate: 95.87% in Develi district). The site has developed a descriptive video of site operations; however, and all visitors to the site are provided verbal briefings in a visual presentation format. Public meetings are supported by verbal presentations as well as audio-visual materials.

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

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

Since the commissioning of the operations, there have been no reported cyanide releases on or off the ÖKSÜT mine that have resulted in adverse effects to health or the environment. However, if such an incident were to occur, the Site General Manager in Develi will inform

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the Country Manager in Ankara, who would in turn take the lead in informing regulators and government authorities in both regions. *OMAS.GEN.PRO.0013, Communication, Participation and Consultation Procedure* requires that appropriate press releases be prepared by or at the direction of the Site General Manager to accurately describe the particulars of the event, probable cause, the individuals involved, the actions taken, and other appropriate information. If a cyanide exposure incident were to occur, communications will be controlled via the *OMAS.SFT.PLN.0007, Emergency Response and Crisis Management Plan*, and *OMAS.SFT.PLN.0001, Cyanide Management Plan*.

The Emergency Management Team and Contact Group for the incident would coordinate with the ESG Director and General Manager to ensure that 1) responsible regulatory agencies and officials are immediately notified; 2) ICMI is notified; and 3) the causes of the incident and associated corrective/preventive actions are discussed in subsequent meetings with communities and regulatory authorities.

In case of emergency, the Communication Controller would coordinate all press and community relation functions.

With respect to wider release of such information it should be noted that ÖKSÜT prepares an annual Sustainability Report (<https://wp-centerra-2023.s3.ca-central-1.amazonaws.com/media/2023/08/28170123/Centerra-Gold-2022-ESG-Report.pdf>) in accordance with the Global Reporting Initiative guidelines, and information on such incidents would be separately identified for the mine in this report and posted on the company website in the next issue of the ÖKSÜT Sustainability Report.

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

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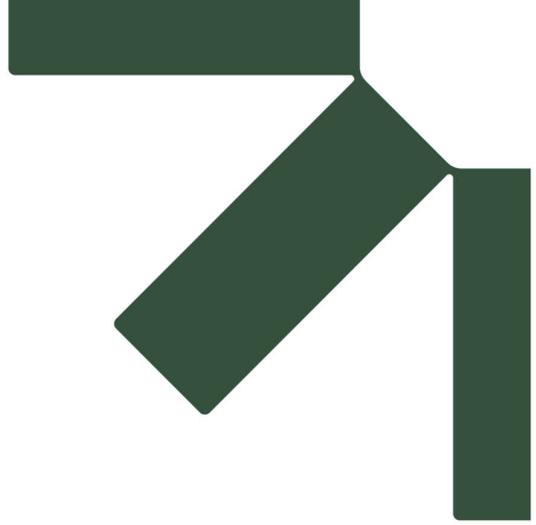


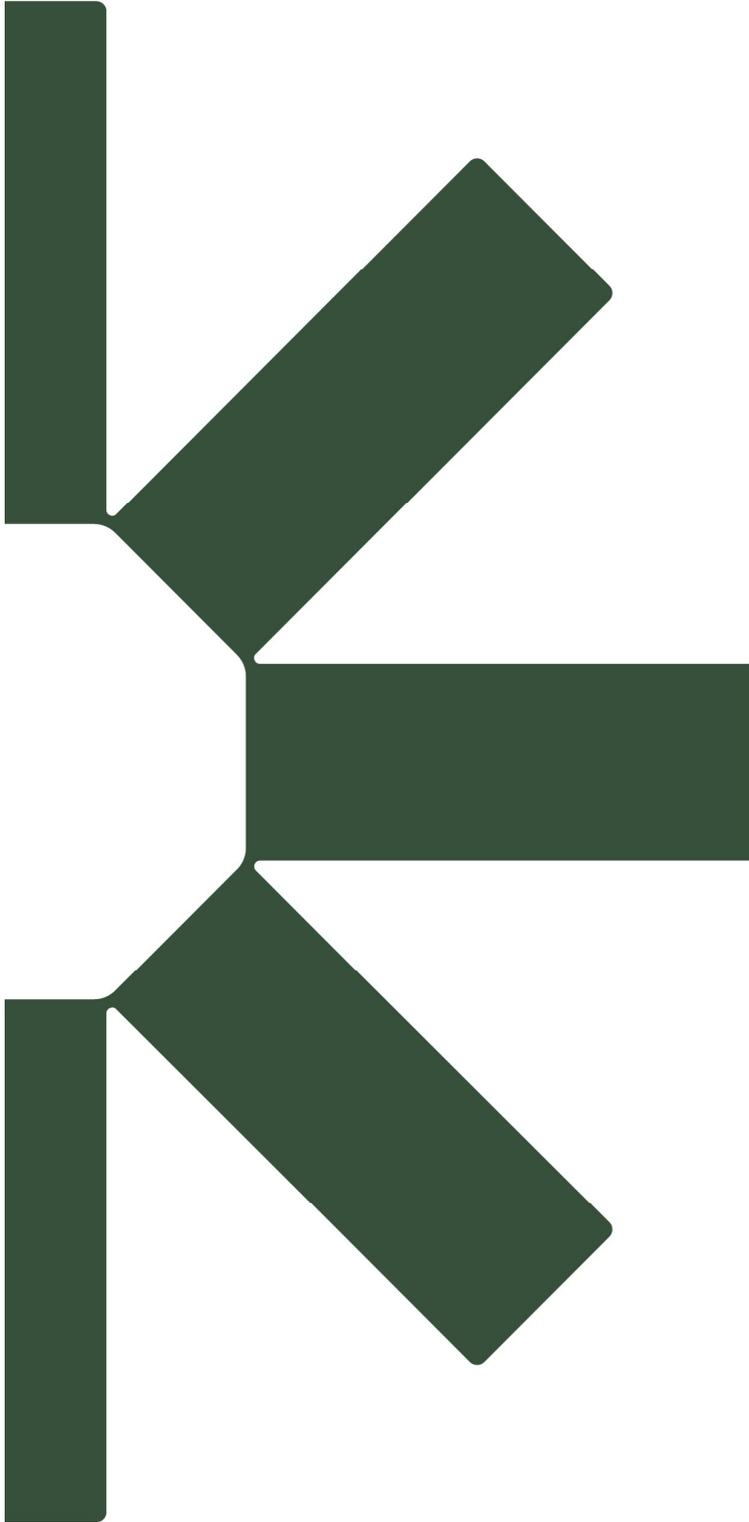
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