FINAL COMPLETION REPORT

Harmony Target Gold Plant

Introduction

This Final Completion Report presents the evidence to support the successful implementation of the Corrective Action Plan to correct the deficiencies identified in the ICMI certification audit of Harmony Target Gold Plant, held from $8^{th}-12^{th}$ February 2010.

Corrective Action Plan - 1

Principle 4 – Operations: manage cyanide process solutions and waste streams to protect human health and the environment

Operations 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

Deficiencies

 A new Planned Maintenance System (PMS), called Maximo, is being implemented. Critical cyanide equipment is being loaded on the system with certain, but not all, equipment covered to date. Furthermore, there is insufficient history on the system to evaluate the sustainability and effectiveness of the PMS.

Corrective Actions

 The Plant Engineer has a plan to load all critical cyanide equipment on the PMS and generate sufficient historical maintenance data over an eight month period to demonstrate the functionality and effectiveness of the system.

Evidence presented to Auditors

Evidence sighted by the auditors to confirm the corrective actions have been implemented effectively:-

 The Planned Maintenance System, in an Excel spreadsheet format, was confirmed to be operational, covering all critical cyanide equipment, with equipment histories showing records of both planned and breakdown maintenance work dating from January 2010, covering a full 12 month period. A detailed schedule of planned maintenance was sighted for all cyanide equipment with frequencies ranging from weekly to monthly, quarterly and six monthly. • Examples of completed job cards by artisans were sighted, showing work done, time taken, spares used and sequencing of tasks followed.

Corrective Action Plan - 2

Principle 8 – Training: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Training Practice 8.2 Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

Deficiencies

• The whole Harmony Group training system was changed from a historically less formal training structure to a formal structured and well planned system, referencing national unit standards relating to metallurgy. Although the old system ensured competency, the process of training the staff in the revised standards and procedures which are Cyanide Code compliant, is in its early stages. There are currently insufficient records and follow up observations to demonstrate the competency of the staff in the new systems and procedures.

Corrective Actions

• The Harmony Group Training structures, along with the various plant trainers, have planned to complete the training and the appropriate planned task observations within the next eight months.

Evidence presented to Auditors

Evidence evaluated by the auditors to confirm the corrective actions have been implemented effectively:-

- The Target Plant Training Matrix indicating all procedures and the various dates that individual employees undertook training in the procedures (including new Standard Operating Procedures and cyanide procedures and the Emergency Procedures)
- The "live" refresher matrix indicating all refresher training (including cyanide awareness) with warnings of expiry two weeks in advance.
- Confirmation that assessments are carried out in groups or individually are documented through signing off of assessments by assessors and those assessed.



Conclusion

The Lead Auditor, following discussions with the audit team, is satisfied that the corrective actions taken, meet the requirements of the corrective action plans and thus enable substantial compliance in these operations and production practices to be revised to Full Compliance.

Arend Hoogervorst Lead Auditor

Date: 31st January 2011

