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INTERNATIONAL CYANIDE MANAGEMENT CODE GOLD MINING OPERATION VERIFICATION AUDIT AHAFO MINE, GHANA

SUMMARY REPORT

Submitted to:

Newmont Ghana Gold Limited
C825/26 Lagos Avenue
East Legon
Accra
Republic of Ghana

And

International Cyanide Management Institute
1200 G Street N.W, Suite 800
Washington, D.C. 20005

Submitted by:

Golder Associates Pty Ltd.
124 Pacific Highway, Greenwich NSW 2065
Australia

March 6, 2008 077622030/013

Name of Project:	Ahafo Gold Mine
Project Owner / Operator:	Newmont Ghana Gold Limited, a wholly owned subsidiary of Newmont Mining Corporation
Name of Responsible Manager:	Jay Bastian, General Manager Operations
Address and Contact Information:	Newmont Ghana Gold Limited C825/26 Lagos Avenue East Legon Accra Republic of Ghana Phone +233 21 701 1852 Ken Ramsey Newmont Ghana Gold Limited Ahafo Gold Mine Phone +233 244 334 863 Email – Ken.Ramsey@Newmont.com
Audit Dates:	June 25-29, 2007

Location and Description of Operation

The Ahafo Gold Mine, owned and operated by Newmont Ghana Gold Limited (NGGL), a wholly owned subsidiary of Newmont Mining Corporation is located in the Brong Ahafo Region of Ghana, approximately 300 kilometres northwest of the capital city, Accra and 107 km northwest of the city of Ashanti Region capital of Kumasi. The mine is 40 km south of the Brong Ahafo regional capital Sunyani. Access to the mine is by air from Accra to Sunyani and then by road to the mine, or by road from Accra via Kumasi.

The Ahafo Gold Mine had been operational for some twelve months at the time of the Operational International Cyanide Management Code audit. The Ahafo Gold Mine poured its first gold on July 18, 2006 and commenced commercial production in August 2006. Ahafo sold 202,000 ounces of gold in 2006 and is expected to produce between 410,000 and 450,000 in 2007 as the mine enters its first full year of production.

Newmont currently operates two open pits at Ahafo with total reserves contained in fifteen pits. The process plant consists of a conventional mill and carbon-in-leach circuit. Ahafo reserves as of December 31, 2006, were 12.6 million equity ounces. The life of mine is currently estimated to be 20 years to 2027.

Ore is recovered from the pits using conventional surface mining techniques and is transported to a crushing, grinding and milling circuit. Ore processing consists primarily of carbon-in-leach cyanidation, followed by elution, and refining for gold recovery. There is a secondary gravity flotation circuit for collecting gold concentrates for intense cyanidation

and electrowinning prior to refining and gold recovery.

Tailings remaining after completion of the processing and precious metals recovery are conveyed by pipeline to an engineered lined tailings storage facility (TSF) for permanent disposal. Tailings water is recovered from a decant pond back to the process facilities for re-use. The entire process and tailings facilities are designed as a zero-discharge operation.

Cyanide Management

Cyanide is supplied to the mine by Orica Australia Pty Ltd (Orica) from its Yarwun manufacturing plant in Queensland, Australia. Cyanide in solid briquette form is packaged in one tonne plastic bags within plywood boxes and transported by sea in shipping containers to the port of Takoradi in Ghana. From Takoradi the containers are transported by road to Tarkwa by Barbex Technical Services Limited (Barbex), which is subcontracted to Orica for transport of cyanide in Ghana. Barbex operates a cyanide transfer facility at Tarkwa on behalf of Orica where the cyanide briquettes are transferred from boxes into isotanks. Cyanide is delivered to the Ahafo mine in dry briquette form in truck-mounted isotanks by Barbex for solid to liquid sparging. The cyanide mixing facility at Ahafo is specifically designed to handle the sparging operation.

Sparging is a closed circuit mixing process that passes pH adjusted water from a mixing tank through the isotank in a continuous circuit until the required concentration of liquid cyanide is achieved. On completion of the sparging process the liquid cyanide is transferred from the mixing tank to a dedicated storage tank ready for delivery by pipeline to the process plant. All pipelines used for the transfer of cyanide to the process plant or within the process plant are either double piped or installed above containment facilities to prevent escape of leaks or spills to the surrounding ground surface.

The cyanide mixing facility is also capable of handling the one-tonne plywood boxes. However this facility has never been used and at the time of the Operations Audit there are no foreseeable plans to use it.

Ahafo has installed a counter current decantation (CCD) cyanide recovery plant located where tailings is discharged from the process plant to the tailings disposal system. The purpose of this plant, which is scheduled for commissioning in March 2008 and operation soon thereafter is to treat the tailings to recover liquid containing cyanide. The plant is intended to reduce the amount of cyanide used at the mine through recovery of usable cyanide back to the process plant and to deliver WAD cyanide concentrations to the TSF at the discharge spigots of less than 50 mg/L. A short term compliance plan to deliver tailings at the TSF spigots in concentrations less than 50 mg/L WAD cyanide is implemented pending final commissioning of the CCD.

Audit Dates: June 25-29, 2007

Auditors: Hugh Wyndham, Lead Auditor
John McKenna, Auditor, Gold Mining Technical Expert

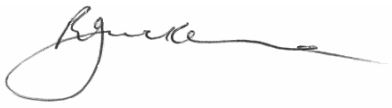
	☐	in full compliance with
The operation is	☒	**in substantial compliance with** **All Code Principles**
	☐	not in compliance with

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Hugh Wyndham

E-mail: hwyndham@golder.com.au

Names and Signatures of Other Auditors:



John McKenna — Name of Auditor
Signature of Auditor
February 15, 2008 — Date

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

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

Hugh Wyndham

Declared at: 124 Pacific Highway, Greenwich. NSW 2065 Australia

This: 12th day of March 2008,

Ahafo Gold Mine — Name of Facility
Signature Lead Auditor
March 6, 2008 — Date

Before me: Kylie Jane Lloyd, Justice of the Peace in and for the State of NSW

Signature JP 178914

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

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

	☐	in full compliance with
The operation is	☒	**in substantial compliance with** **Standard of Practice 1.1**
	☐	not in compliance with

Basis for Audit Finding: Ahafo has committed to purchase cyanide only from a producer that is compliant with the International Cyanide Management Code (ICMC). Ahafo has a supply contract with Orica Australia Pty Ltd, (Orica) to provide sodium cyanide to Ahafo. The contract between Ahafo and Orica requires that Orica will be compliant with the ICMC and that all facilities where cyanide is manufactured or stored will be similarly compliant for the duration of the contract. Orica's manufacturing facility has been audited by third party independent auditors and certified as being in Full Compliance with the ICMC. A transfer facility at Tarkwa, Ghana which is operated by Barbex Technical Services Limited (Barbex) on behalf of Orica is used to transfer sodium cyanide briquettes from one tonne boxes into isotanks for transport to Ahafo. This facility is classified as a manufacturing facility. The transfer facility has been audited by third party independent auditors listed in the ICMI list of Cyanide Code Auditors and found to be in Substantial Compliance with the ICMC. Corrective actions that are required to bring the facility to Full Compliance are identified in the report and Orica has committed to implementing the corrective action by 30 September 2008, and to providing Ahafo with an auditor's statement to that effect. A Corrective Action Plan has been established by Ahafo that identifies actions required by Ahafo to monitor progress and to verify that the Tarkwa transfer facility achieves Full Compliance by the specified date.

2. TRANSPORTATION: ***Protect communities and the environment during cyanide transport.***

Standard of Practice 2.1: *Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.*

	☒	**in full compliance with**
The operation is	☐	in substantial compliance with **Standard of Practice 2.1**
	☐	not in compliance with

Basis for Audit Finding: Ahafo has a sodium cyanide supply contract with Orica, which specifies that the operation take ownership of the cyanide at the time of delivery at Ahafo. Orica is by contract solely responsible for the production and transport of sodium cyanide to the delivery point at Ahafo. The contract between Ahafo (the buyer) and Orica (the seller) clearly establishes responsibility for all of the requirements identified in this Standard of Practice covering production and transport of cyanide to the point of delivery at Ahafo. Specifically the contract requires that in performing its obligations for supply of cyanide to Ahafo the seller must comply with the production and transportation principles and standards of practice as published and amended from time to time by the ICMI. The contract also specifies that the seller is required to maintain complete control of its employees, agents, methods, operations and subcontractors. Orica has engaged subcontractors to provide transportation services from Yarwun to the Port of Brisbane (Toll Resources), shipping from the Port of Brisbane to the Port of Takoradi (Maersk Line and MSC), transport from the port of Takoradi to a transfer facility at Tarkwa (Barbex Technical Services), operation of the transfer facility at Tarkwa, (Barbex Technical Services) and transport from the Tarkwa transfer facility to Ahafo (Barbex Technical Services).

Standard of Practice 2.2: *Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.*

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 2.2**
- ☐ not in compliance with

Basis for Audit Finding: Orica is contracted to supply cyanide to Ahafo gold mine. The supply chain covers transport of cyanide from the Yarwun manufacturing facility at Gladstone, Queensland to the Port of Brisbane, shipment from the Port of Brisbane to the Port of Takoradi in Ghana, transport from the Port of Takoradi to a transfer facility at Tarkwa operated on behalf of Orica by Barbex Technical Services, and transport from the transfer facility to Ahafo mine. In addition to supply the contract requires that Orica must comply with the ICMC's Production and Transportation Principles and Standards of Practice. Under the contract Orica is solely responsible for the transport of cyanide from the production to final delivery and is required to take all actions necessary to ensure the safety of all personnel involved in the transport of product, packaging and labelling suitable for all jurisdictions the shipment will pass through, evaluation and selection of routes to reduce risk, the security of cyanide during transport, release prevention, safety and maintenance of the means of transportation, interim storage and appropriate personnel training and emergency response plans.

Toll Resources is contracted by Orica as the prime contractor for transport of cyanide within Australia. Toll Resources in turn utilises a number of subcontractors and subsidiaries to provide transport services. An independent third party cyanide transport code equivalent non certification audit of transport of cyanide from Orica's Yarwun manufacturing plant to and including the Port of Brisbane found transport operations to be in Full Compliance with the ICMC.

An independent third party cyanide transport code equivalent non certification audit of transport from the Port of Brisbane to Ahafo including the Port of Takoradi and the transfer facility at Tarkwa has been carried out against the International Cyanide Management Code Verification Protocol for Transport Operations. The audit covered shipping between the Port of Brisbane and the Port of Takoradi; the Port of Takoradi; road transport between the Port of Takoradi and the transfer facility in Tarkwa operated by Barbex Technical Services; interim storage at the Port of Takoradi and at the transfer facility in Tarkwa operated by Barbex Technical Services; road transport between the transfer facility in Tarkwa and Ahafo Gold Mine; and operational systems, workshops and administration areas of Barbex Technical Services in Tarkwa and Accra. Orica has carried out a formal due diligence of shipping companies used to transport cyanide on its behalf. The scope of this due diligence assessment and associated documentation is cited in the independent third party cyanide transport code equivalent non certification audit covering shipment of cyanide from the Port of Brisbane to Ahafo Gold mine. Shipping companies covered by that due diligence assessment are Maersk Line (first choice) and Mediterranean Shipping Company (MSC). Barbex Technical Services is contracted by Orica to transport cyanide from the Port of Takoradi to the transfer facility in Tarkwa where cyanide is transferred from box to sparge isotainers and on to Ahafo. Occasionally Barbex use Antrak Transport of Takoradi to transport containers from the Port of Takoradi to the transfer facility at Tarkwa. Antrak is required to comply with all Barbex requirements in respect of transport of cyanide containers. Road transport covering Takoradi to Tarkwa and Tarkwa to Ahafo was found to be in Substantial Compliance with the Code. Operation of the transfer facility at Tarkwa, which is considered to be a production facility and is covered in Standard of Practice 1.1, was found to be in Substantial Compliance with the Code. All other activities covered by the audit were found to be in Full Compliance with Code requirements.

A subsequent Code Certification Audit of Barbex Technical Services transport operations covering shipping by road from Takoradi to Tarkwa and from Tarkwa to Ahafo resulted in a finding of Full Compliance with the International Cyanide Management Code Verification Protocol for Transport Operations.

All audits were carried out by auditors who are on the ICMI list of registered Cyanide Code auditors.

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

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

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 3.1**
	☐	not in compliance with	

Basis for Audit Finding: Cyanide is delivered to the Ahafo mine in dry briquette form in truck-mounted isotanks for solid to liquid sparging, a closed circuit mixing process that passes pH adjusted water from a mixing tank through the isotank in a continuous circuit until the required concentration

of liquid cyanide is achieved. On completion of the sparging process the liquid cyanide is transferred from the mixing tank to a dedicated storage tank ready for delivery by pipeline to the process plant. There is no storage of solid cyanide at present although there is a reagent store adjacent to the reagent mixing area which is suitable for storage of dry cyanide in boxes should the need ever arise. There is a cyanide mixing tank for the addition of dry cyanide briquettes but it has never been used and there is no plan to use it in the foreseeable future. The design of the facility is based on maintaining a closed circuit to minimize the risk of spill during sparging operations.

The reagent mixing area is constructed on concrete pads with containment bunding to prevent any discharges to the sub surface. All surface run off from the area is directed into containment bunds that enclose the reagent tanks. Containment capacity of the bund is 100% of the total capacity of the storage and mixing tanks within the bund. The design and construction of the cyanide mixing and storage facilities have been completed appropriately as documented in final design and construction drawings prepared by qualified Professional Engineers.

There are two on line CN gas monitors mounted at the reagent mixing area which are monitored in the CIL plant control room. These monitors are inspected, maintained and calibrated by the Instrumentation Section of the process plant maintenance department. During cyanide sparging there are two operators and two members of the site emergency response team with an emergency response vehicle present at all times. The emergency response vehicle is fully equipped to respond to a cyanide emergency during sparging.

The sparge and cyanide solution storage tanks are equipped with overfill protection that will result in a shut down of pumps should the alarms be tripped. There is an overflow pipe that links the sparge tank and the cyanide solution storage tank to direct cyanide solution back to the sparge tank.

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

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 3.2**
	☐	not in compliance with	

Basis for Audit Finding: A sample of written procedures covering cyanide mixing at the reagent mixing area that were sighted during the audit cover: Cyanide Sparging; Cyanide Circulation Pump Start Up; Cyanide Solution Transfer; Cyanide Circulation Pump operation; Cyanide Equipment Decontamination; Cyanide Sparging Pre-fill; Liquid Cyanide Spill Emergency. The cyanide sparging procedure covers use of PPE, pre sparge activities, operation of valves and couplings, clean up after sparging, rinsing of the isotainers, cleaning of hoses and the general area, completion of relevant documentation, the completion of checklists, and area monitoring during sparging. Two trained operators carry out the sparging activity with full protective equipment. Sparging procedures cover pre sparging checks, connection of hoses and sparging activities in the correct sequence designed to be carried out safely and methodically, the presence of emergency response support with personnel in PPE and equipment ready for immediate use, and correct documentation provided and

completed as required. Operators responsible for carrying out sparging have been trained by the supplier (Orica) to carry out sparging correctly. Training covers theory, practice and assessment of competence. Certificates of competence have been issued. The Reagent Area Supervisor is responsible for ensuring that procedures are followed correctly.

There are no empty cyanide containers on site. Isotainers are returned immediately to the transporter facility at Tarkwa. Following sparging the isotainers are rinsed to remove residual cyanide solution with the rinse water pumped into the sparge tank. The valves of the isotainer are rinsed with a hose with the rinse water draining into the bunded area, collected in the sump and pumped to CIL tank #1.

4. OPERATIONS: ***Manage cyanide process solutions and waste streams to protect human health and the environment.***

Standard of Practice 4.1: *Implement management and operating systems designed to protect human health and the environment utilizing contingency planning and inspection and preventive maintenance procedures.*

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 4.1**
	☐	not in compliance with	

Basis for Audit Finding: Ahafo has developed and implemented operating procedures covering cyanide related activities such as in the CIL circuit, the carbon stripping circuit, the intensive cyanide reactor, and the TSF. Operating procedures are tailored to the design of cyanide related facilities and include measures for the protection of human health and the environment. The standard for preparation of operating procedures at Ahafo is that PPE is identified and hazards to health, safety and the environment are identified in operating procedures. A broad summary of the management of cyanide at Ahafo is contained in the Cyanide Management Plan. This Plan is aligned to the ICMC with sections covering Cyanide Production and Purchasing; Transportation of Cyanide to Ahafo; management of reagent cyanide; operations; decommissioning; worker safety; emergency response; training; and dialogue. HCN gas detectors are installed at various locations in the plant and linked to the control room. Operational criteria for the cyanide mixing area and the CIL circuit include a structural inspection cycle involving non destructive testing.

A change management procedure has been established to cover changes in mine operating procedures that are the result of changes to operations or to equipment.

Daily and monthly inspections of cyanide related facilities and equipment are documented and cover the mixing tanks and equipment and the mixing area, pipelines pumps and valves, bunding and secondary containment structures, the TSF and its associated leak detection and recovery systems, such as piezometers and under drainage, other ponds and impoundments covering the raw water dam, the event pond, the process water pond and the raw water pond, the tailings pumps area (in the process plant), the elution area, the intensive cyanidation reactor (at the Knelson Concentrators), the CIL tanks and the thickener. Corrective actions are identified and actioned either immediately as a

part of normal operations or through work orders which are documented.

Ahafo uses a computer based preventive maintenance system, Ellipse, to identify, issue work orders and document all preventive maintenance activities. The Ellipse maintenance management system generates work orders for programmed maintenance and activities such as regular inspections. The Ellipse system has the capacity to print programmed work orders and will also accept work orders generated for a specific need, such as associated with inspections. Monthly inspections carried out by the process plant maintenance department are a programmed item and triggered by an automatic work order.

With continuing concern about the reliability of external power supply Ahafo is increasing its internal generating capacity. Ahafo has 10Mw capacity of back up power, which is adequate to power pumps necessary to manage solutions around the plant. The plant is in use weekly in response to power fluctuations/cuts in Ghana. Periodic maintenance is carried out through the mine programmed maintenance system. A power load shedding plan has been prepared and it is designed in part to ensure that cyanide related activities continue to receive power to prevent discharges of cyanide containing materials to the environment.

Standard of Practice 4.2: *Introduce management and operating systems to minimize 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	

Basis for Audit Finding: A Cyanide Management Plan prepared by the mine includes a table that identifies the different pits and the ore types. For each pit there is projected cyanide consumption in kg/tonne based on analysis of the ores. Cyanide addition to the CIL tanks is controlled by a cyanide analyser. The current cyanide use strategy is to control cyanide rates from the back of the circuit and is based on balancing the recovery of gold and the WAD cyanide concentrations at the TSF spigots. Analysis of concentrations of sodium cyanide at tank 1 is used to control the dosing of cyanide solution into tank 1. Additional potential to leach gold has been identified but managing the dosing rate to achieve target WAD cyanide at the TSF restricts the ability to increase the dose rate into tank 1 of the CIL circuit. This restriction will be overcome when the cyanide recovery unit which has commenced construction is commissioned in March 2008. A metallurgical study of the ores that are found at Ahafo was carried out at the Plato Malozemoff Technical Facility, Newmont Metallurgical Services, Colorado in 2006. This study consisted of a detailed review of ore characteristics with reagent consumption at various recovery rates for various grades. The ore body at Ahafo is not complex and on that basis the mine has determined that continual review of the ore/cyanide mix is not considered to be appropriate. Test work is being carried out at intervals that are deemed by the mine to be appropriate to the circumstances.

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	

Basis for Audit Finding: Ahafo has developed a water balance for the site able to process multiple variables and multiple inputs. The Metallurgical Department is responsible for running and maintaining the water balance. The water balance includes production rates and tailings densities according to the latest developed mine plan as well has historical measurements of tailings deposition and density. There is a climate generator, using historic data from the Sunyani weather station and variables allow for modelling under a wide range of conditions. The model simulates the dynamic nature of the reclaim pond with respect to changing beach slopes and incremental increases in embankment height to predict water levels and freeboard available at any point in the mine life, including the most sensitive period just before an embankment raise occurs and during a 1 in 100 yr storm event. Approximately 25 years of regional daily precipitation and evaporation data from the Regional Capital, of Sunyani, which is approximately 40km from Ahafo was evaluated and regressed to 2 to 5 years of local precipitation gauges. Sunyani weather data has been extrapolated for Ahafo mine. Ahafo has installed a weather station, which has been in operation for less that one year that provides updates of data to the water balance. The water balances address evaporation from the reclaim pool and exposed beaches, as well as solution bound in the tailings mass pore space. The incorporation of a seepage collection system under the compact and synthetic lining system of the tailings storage facility, which returns to the reclaim pond, allows the assumption of no net seepage from the tailings impoundment. Decant from the reclaim pool is limited by the design capacity of the return pumping system. Evaporation is greater than precipitation. The TSF has an HDPE liner under the reclaim pool and there is under liner recovery and seepage collection. Daily inspections and measurements monitor the raw water reservoir (above the TSF), the process water dam (at the process plant), the event pond (at the process plant), the raw water pond (at the process plant) and the TSF.

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	

Basis for Audit Finding: From the time that Newmont became a signatory to the International Cyanide Management Code Newmont Ghana has been working to ensure that the WAD cyanide concentration at the point of discharge to the tailings storage facility at Ahafo is less than 50 mg/l. For reasons of lack of surety of supply and transport hazards and the associated risk to local

communities chemical treatment was rejected as an option. The installation of a counter current decantation (CCD) circuit, a non chemical treatment method was approved and construction commenced during the first half of 2007 with construction and commissioning completion confirmed for the end of March, 2008.

Pending installation and commissioning of the CCD, cyanide concentrations at the TSF discharge spigots have been managed through control of cyanide addition to the CIL circuit supplemented by physical deterrents to bird and animal incursions to the TSF. These deterrent measures included installation of wailers and air cannons, fencing of the TSF, control of vegetation surrounding the TSF, permanent patrols during daylight hours, and regular inspections of the TSF and of tailings delivery and decant recovery pipelines.

Records of analysis of tailings discharges into the TSF show that Ahafo has had difficulty in maintaining WAD cyanide concentrations below 50 mg/L at the discharge spigots. An extensive program of sampling and analysis at the spigots and at another eight locations on the perimeter of the TSF where open water is accessible has shown that while the concentration of WAD cyanide at the spigots has regularly exceeded 50 mg/L, cyanide concentrations in samples taken from open water at all other sampling locations have been less than 50 mg/l in 99.8% of samples.

In order to maintain WAD cyanide concentrations at the TSF discharge spigots below 50 mg/L Ahafo has established a Compliance Action Plan for the long term management of discharges into the TSF at WAD cyanide concentrations of below 50 mg/L. The Action Plan covers a short term compliance program, the commissioning of the CCD and verification through a period of sampling and analysis of spigot discharges that the short term compliance program and the CCD can continually deliver tailings to the TSF that contain less than 50 mg/L WAD cyanide. The action plan includes a visit to Ahafo by the Cyanide Code Auditor to verify that the CCD is operating as intended and is delivering tailings to the TSF spigots continually that contain less than 50 mg/l WAD cyanide. The short term compliance program is based on reduction of plant cyanide operating levels, CIL circuit monitoring and CIL circuit cyanide action level excursion management. Results of sampling and analysis since the implementation of the short term compliance program show that WAD cyanide concentrations at the TSF discharge spigots are being maintained at below 50 mg/L. A Corrective Action Plan has been prepared covering the commissioning of the CCD facility and demonstration that it is capable of delivering WAD cyanide concentrations of less than 50 mg/L to the TSF at the discharge spigots.

The decant recovery pond at the process plant contains only trace amounts based on the daily analysis of the reclaim pool at the TSF. Records of analysis of the reclaim pool on the TSF show that the WAD cyanide concentration is less than 5 mg/L. Analysis for 24 June 2007 showed WAD cyanide concentration in the reclaim pool was 0.08 mg/L.

The raw water pond at the process plant does not contain any cyanide in solution.

An event pond for recovery of spills in the CIL circuit and of surface water from the process plant is designed for prompt recovery of any such accumulation. Event pond operating procedures include recovery pumps triggered by level alarms, a requirement for sampling and analysis and measures to maintain the WAD cyanide concentration of residual material in the pond below 50 mg/L.

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	

Basis for Audit Finding: Ahafo does not discharge to surface water from any sources with the potential to contain cyanide. The design of the TSF and its operating procedures are all directed to achieving nil discharge. The TSF is designed for under drain and seepage recovery back to the decant pond. TSF design includes diversion drainage from around the perimeter of the TSF and an emergency spillway. Piezometers installed in the TSF wall are sampled regularly for potential seepage and water quality. Monitoring bores are installed downstream of the TSF and sampled regularly to identify potential impacts on ground water. To date there has been no discharge of surface water from the TSF to the environment and no evidence of impacts on ground water. Surface water sampling has been carried out with no evidence of cyanide contamination of surface water. The tailings pipeline and return water pipeline from the reclaim pool are contained in HDPE lined trench along their full length with any releases directed either back to the TSF or to the event pond.

The process plant is provided with primary (process tank, thickener and tailings tank containment bunds) and secondary containment (secondary perimeter bunding and spoon drains) designed to contain process circuit spills outside the primary bunds and surface water in the plant area. Process spills that are not recovered from the primary bunds and surface water are directed to an event pond which in turn delivers recovered process slurry to the tailings tank or recovered surface water to the process water pond.

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	

Basis for Audit Finding: There is no evidence to date of contamination of groundwater with cyanide. Groundwater monitoring bores have been installed downstream of the process plant and below the TSF. Measures been included in the design and construction of the cyanide mixing area, the CIL circuit and the TSF to prevent seepage. The cyanide mixing area is constructed on a concrete slab with bunding for all tanks and direction of all drainage from the mixing area to the bunds. CIL tanks are constructed on ring beams with an HDPE liner that will divert any leak from tanks floors into the containment bunds. All CIL and associated vessels, such as the tailings tank and the thickener are constructed within containment bunds which have containment sumps. Process

slurry that is spilt outside the primary bunds and surface water that is collected in the plant area is directed via concrete spoon drains to the event pond. The event pond is sized to contain the capacity of the thickener, the largest vessel in the plant and a concurrent 1:25 year rain event. TSF design includes the following protection against seepage to groundwater: a clay liner covering the whole of the TSF, an additional HDPE liner under the reclaim pool within the TSF and underdrainage and seepage collection and recovery. Monitoring bores have been installed downstream of the plant and at the TSF to identify potential impacts on groundwater. Sampling and analysis records provided did not disclose any such impacts. Analytical results from sample analysis are compared against the Ghana EPA draft standard for groundwater quality of 0.07 mg/L free cyanide. This standard is the same as the WHO drinking water quality guideline for beneficial use of groundwater.

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	

Basis for Audit Finding: Spill containment measures have been incorporated in the design of the cyanide mixing, storage, distribution and process facilities. The cyanide mixing area is constructed on a concrete pad with mixing and storage tanks contained in a bunded area designed to contain 100% of the total volume of all tanks within the bunded area. All tanks within the bunded area are constructed on solid concrete foundations.

The cyanide solution pipelines from the cyanide mixing plant are partly double piped and partly installed over a bunded area of the process plant. Pipelines that are double piped drain into the bunded area that is gravity drained to the event pond. All process tanks, the tailings tank and the thickener are constructed on a concrete floor with containment bunds. The process plant is also provided with secondary containment in the form of bunding and concrete spoon drains that direct slurry spills that are outside the primary bunds and surface water to the event pond. The event pond is operated to limit accumulation of process slurry or surface water in the pond and is capable of holding the contents of the thickener, which is the largest vessel in the plant and a concurrent 1:25 year storm event.

Construction materials used for tanks and pipelines are compatible with the storage and handling of liquids containing cyanide and with a high pH.

Water that collects within the cyanide mixing area bunds is pumped to CIL tank #1. Surface water that collects in bunded areas associated with pipelines containing cyanide solution, the CIL tanks, the elution area, the intensive cyanidation reactor, the tails tank and the thickener is directed by gravity flow to the event pond. Surface water collected in the event pond is pumped to the process water pond.

The TSF pipeline is installed in an HDPE lined trench for its full length from the process plant to the TSF. The TSF pipeline is inspected daily and is equipped with pressure monitoring and flow rate deviation to identify a major leak.

Risks to surface water are controlled through purpose built containment bunding and pipelines that are installed across bunded areas or double piped and through protocols that allocate emergency power to critical need facilities in the event of power failure such as for flushing the TSF line with clean water.

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	

Basis for Audit Finding: Documentation held by Ahafo verifies that the construction of foundations and footings and tank and pipeline construction is by qualified engineering companies and in accordance with accepted standards for such facilities. TSF design specifications are contained in the TSF Operations Manual, TSF QA Reports and Ahafo TSF Final Design Report. Quality assurance covering the TSF construction was achieved through technical direction, inspection, supervision and sampling and testing. Quality control records have been retained by Ahafo covering the cyanide mixing area, the CIL plant and the TSF.

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

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 4.9**
	☐	not in compliance with	

Basis for Audit Finding: Monitoring and measurement schedules and sampling and analysis procedures cover the TSF, surface water, the water storage dam, the STP, air emissions, and groundwater. Sampling and analysis and monitoring procedures have been developed by appropriately qualified personnel who possess relevant technical training and extensive experience in the mining industry. Monitoring frequencies were initially established in the EIS for the project and have been agreed with the Ghana EPA. These are reflected in the monitoring and measurement schedule. Monitoring and measurement locations are identified on an Environmental Monitoring map of the whole site. Sampling and analysis procedures have been established for monitoring activities and cover sample collection, sample preservation, transport of samples, sampling equipment and the use of a registered laboratory for sample analysis. Samples collected for the laboratory are covered

by appropriate chain of custody documentation. Field duplicates are collected and check samples are sent for analysis to other laboratories. Monitoring of surface and groundwater downstream of the process plant and the TSF is carried out in accordance with the monitoring and measurement schedule. TSF monitoring includes piezometers installed in the downstream dam wall. There are four people on patrol at the TSF every day and they provide full coverage of the TSF. They are responsible in part for keeping bird life off the dam and for reporting bird and animal visits and for reporting bird and animal mortality. Monitoring data is reported to the Ghana EPA and to the Water Resource Commission monthly.

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

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

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 5.1**
	☐	not in compliance with	

Basis for Audit Finding: Newmont environmental standards require annual closure and reclamation accounting. The most recent Reclamation Closure Plan was prepared in January 2007 as a draft document. It covers all facilities associated with cyanide use including the TSF and decommissioning of the mill and process plant, decontamination of equipment to remove all residual chemicals and disposal of surplus chemicals. The cyanide mixing area is considered to be a part of the plant for decommissioning purposes. TSF reclamation is covered although there is no final land use established to date. A monitoring program following decommissioning and closure is included in the closure plan. Annual reporting is also a part of closure and reclamation. Closure criteria are specified in the draft Reclamation Closure Plan and include consultation with relevant regulatory authorities and social responsibility forum members covering a range of community and government representatives. The Ghana EPA has established closure criteria and there are closure commitments in the project EIS.

In accordance with Newmont corporate requirements the Reclamation Closure Plan is reviewed and updated annually.

Standard of Practice 5.2: *Establish an 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	

Basis for Audit Finding: Ahafo is required to lodge a bond established by the Ghana EPA to cover its mine closure liabilities. Closure cost estimates based on current activities have been established and reviewed with the EPA and accepted by the EPA. Closure costs have been estimated in the Ahafo draft Reclamation and Closure Plan. Detailed cost estimate work sheets have been prepared. Costs have been estimated for both contractor and owner closure work. The highest unit rates have been used to arrive at the cost estimates in the draft Plan. Cost estimates are based on a Newmont standard which reflects a proportion of the as built costs adjusted for inflation. Cyanide related plant and equipment is covered in the Plan and cost estimates are provided. Cleaning and detoxification of pipelines that may have contained cyanides solutions is included in the cost estimate calculations.

In February 2007 Ahafo submitted a closure cost estimate to the Ghana EPA. In June/July 2007 EPA informed Ahafo that the bond would take the form of 10% cash and 90% letter of Credit. The form of the Reclamation Bond was finalised in September 2007 with Ahafo committed to submit the bond at that stage. In late October 2007 the EPA requested that Ahafo increase the amount of bond (which is calculated on decommissioning and reclamation for three years in advance). This has been done and the revised amount has been accepted by the Ghana EPA. Newmont has subsequently issued a letter of credit to the Ghana EPA covering 90% of the closure cost estimate. The letter of credit has been issued to Ghana Environmental Protection Agency, P.O. Box M 326, Ministries Post Office, Accra. Ghana. The letter of credit more than covers the total estimated cost of decommissioning all cyanide related facilities.

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	

Basis for Audit Finding: There are written procedures for all cyanide related tasks. All procedures identify the PPE required for the activities covered by the procedure, potential health and safety risks associated with the procedures and pre work inspections that are required, such as prior to commencement of sparging operations and for confined space work. Area signs reinforce PPE requirements. All induction courses with specific cyanide references cover PPE requirements. Safety & Environment Inspections are carried out once per week involving Process, Safety and Environment personnel. There are pre-shift meetings where safety issues are discussed. Ahafo has a Change Management procedure that requires proposed changes in process operations and cyanide management be formally evaluated to identify the need for amended or new procedures. A procedure covering Risk and Opportunity Management provides a plan for the systemic and structured identification of operational risks, including risks associated with cyanide.

Standard of Practice 6.2: *Operate and monitor cyanide facilities to protect worker health*

and safety and periodically evaluate the effectiveness of health and safety measures.

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 6.2**
	☐	not in compliance with	

Basis for Audit Finding: Operating procedures, referred to in Standard of Practice 3.2 have been established and implemented for all aspects of cyanide management. Operating procedures specify safety and environmental requirements, PPE requirements for each activity and requirements for pre work inspections. Ahafo uses both fixed and personal cyanide monitors. Fixed cyanide monitors have been placed within the process plant and at the cyanide mixing area with locations based on previous experience and verification through a survey of the plant to identify the locations where it is most likely that cyanide gas will be encountered. Fixed monitors have been set to alarm at 5 mg/L in accordance with Code requirement. Fixed Monitors are calibrated monthly by the Instrument Maintenance section. The Instrument Maintenance section is responsible for managing the personal monitors with calibration intervals being entered into the Ellipse work order system so that work orders are issued automatically when calibration is due. The re-calibration period is 3 monthly and the sensor life is 12 months. A new supply of portable HCN monitors has been ordered. Spare parts and a calibration unit are included in the order. There is signage across the plant in areas where exposure to cyanide is considered a risk alerting personnel to the dangers and precautions that must be taken. Emergency shower and eye wash stations are installed at many locations throughout the Delivery area and the Plant. They are inspected regularly through the programmed maintenance system. Eye wash stations have low pressure flow. Flow of eye wash water was observed to be sufficient to deliver a significant volume but it was not under high pressure. Fire extinguishers in the plant are Dry Powder type. There are no CO_2 fire extinguishers in the process plant or in areas where cyanide is handled, stored or used. Vessels and pipes containing cyanide that were sighted during the operations audit are clearly marked with contents and direction of flow displayed at regular intervals. MSDS and operating procedures are placed at the cyanide mixing area. Cyanide emergency response at Ahafo is delegated to the emergency response group which has a trained team on standby 24/7. All employees at Ahafo, including those of Contractors, are required to attend a site induction which includes basic cyanide emergency response. A condition of employment at Ahafo is that employees must be able to read and understand English. MSDS and operating procedures are in English.

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	

Basis for Audit Finding: Ahafo has established dedicated emergency response teams that have responsibility for responding to all cyanide emergencies. An emergency response team is on duty 24/7 and a team is always present at the cyanide mixing area during sparging operations with an emergency response vehicle equipped with full immediate response equipment. Emergency response team members are trained to administer oxygen, which is the primary response to cyanide poisoning at Ahafo. Cyanide antidotes are stored at the clinic for administration under controlled conditions by qualified medical practitioners who are specifically trained to carry out this procedure. The clinic on site is staffed by registered medical practitioners and trained staff. Emergency response teams are provided with special training in cyanide emergency response and the clinic medical staff are trained and equipped to respond to a cyanide emergency. The clinic does not have an ICU capability but can provide primary life saving treatment. Communication of an emergency is by radio, land line or mobile telephone. All operators in the process plant carry portable radios. The mine wide Emergency Management Plan covers cyanide emergencies. In addition there are various specific emergency procedures that have been prepared for specific areas, such as Liquid Cyanide Spill Emergency, Solid Cyanide Spill Emergency, and Tailings Spill Clean Up.

Ahafo mine is located in a relatively remote area of Ghana. There are no local facilities with any capability to assist in the management of medical emergencies. The closest medical support is an ICU at Kumasi which is two hours by road or twenty minutes by air from the site. There is also ICU support in Accra which is seven hours by road or 1 hour 30 minutes from the site. Medevac by helicopter is available but there is a significant lead time. Fixed wing medivac is also available from Sunyani which is approximately one hour by road from the site. Newmont has a general provider agreement with International SOS, which is able to provide medivac services and to source the most appropriate receiving location in a medical emergency. Emergency evacuation procedures are in place. One cyanide emergency drill has been carried out in 2007. The clinic participated in the emergency drill up to the point where the patient reached the clinic. The plan is for each of the four emergency response teams at Ahafo to participate in a cyanide emergency drill at least once per year.

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	

Basis for Audit Finding: A mine wide Emergency Response Plan has been prepared and includes a section covering cyanide emergencies. It us reviewed and updated at least annually. Specific operating procedures have been prepared that focus on cyanide emergencies in specific areas of the site covering liquid cyanide spill and solid cyanide spill and the clean up of a tailings spill. The

procedure for liquid cyanide spill covers releases during unloading and mixing. The clinic has developed its specific procedures for a medical emergency involving cyanide poisoning. The mine wide Emergency Response Plan covers the following cyanide related emergencies: releases during fires or explosions, tank, pipe and valve ruptures, tank overtopping, power outages, which are covered by a load shedding process, and cyanide emergencies associated with transport on site. Transport emergencies off site are the responsibility of the contract transporter although Ahafo is available to provide assistance if needed. Management of seepage from the TSF is built into the design and construction of the TSF and covers clay lining of the TSF and an HDPE liner beneath the reclaim pool in the TSF, under drainage recovery, seepage recovery, dam wall piezometers and downstream monitoring bores. The site does not have a cyanide destruct facility but has commenced construction of a cyanide recovery facility. This facility will be completely contained to prevent discharges to land or surface water. The TSF is subject to an annual audit which includes a risk assessment.

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	

Basis for Audit Finding: In the circumstances of the location of the mine and the capability of local communities to contribute to emergency planning Ahafo has not involved external stakeholders in the development of its Emergency Response Plan. Ahafo has distributed the Plan to external stakeholders such as Ghana EPA for review and comment. The Emergency Response Plan was prepared by the Safety Manager and has been subject to review and amendment by internal stakeholders such as the emergency response coordinator and teams, the clinic, environment department, process department, maintenance department and security department. There are no external stakeholders in the vicinity of the mine site that would be capable of or required to take any action in the event of a cyanide emergency on site. Ahafo has established Community Relations programs for dialogue with external stakeholders including local communities. The primary emphasis has been on explaining how Ahafo manages cyanide to make sure that local communities are protected from any impact of cyanide. The clinic has exchanged letters with the Kumasi and Accra teaching hospitals in respect of the use of their ICUs for stabilisation of cyanide poisoning victims should the need arise.

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	

Basis for Audit Finding: The emergency response section is the primary response to all site emergencies. Key personnel associated with the Emergency Response function are the Emergency Response Coordinator, the Health Safety and Loss Prevention Manager and the Emergency Response Teams. The Clinic, Security Department and the process Department also have key roles in the cyanide related emergencies. Training for the emergency response teams includes cyanide emergency response. Emergency Response Teams work eight hour shifts and there is an emergency response team on duty 24/7. The Emergency Response Coordinator is on call out 24/7. Responsibilities for key emergency response personnel and for all employees, the Site Manager, Managers, general foremen and supervisors, the H&S Manager, and Security Department are described in the Emergency Response Plan. Emergency response equipment associated with cyanide emergencies is in the custody of either the clinic or the emergency response section. Each emergency response team carries out a check of emergency equipment with deficiencies or action items noted in an occurrence book. The checklist covering all emergency response equipment is being continually updated as additional equipment is purchased.

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

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 7.4**
	☐	not in compliance with	

Basis for Audit Finding: A mine wide call out tree has been established for notification of key personnel in the event of an emergency. The call out tree is applied by the Security Department control room which is the first point of contact for any emergency and covers both internal and external notification. A Rapid Response Plan supports the Emergency Response Plan by providing a process for notification from the mine site level to regional and corporate levels. The level of notification is determined by the severity of the emergency. A Rapid Response Coordinator and alternate have been appointed to manage the process. Rapid response personnel at the mine site cover communications control room coordination, community relations, environment, recovery, security and safety. The Rapid Response process includes external notification such as to government and other bodies.

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

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 7.5**
	☐	not in compliance with	

Basis for Audit Finding: The Emergency Response Plan and associated emergency response procedures cover the remediation of contaminated areas and disposal of contaminated material. In the event that there is a solid or liquid cyanide spill to ground the response process requires that all contaminated soils are recovered for disposal into the TSF. The Plan permits the use of ferrous sulphate or sodium hypochlorite on small spills of cyanide slurry or cyanide solution that occur to land. The Plan prohibits the use of chemicals to treat materials containing cyanide that have been released to surface water. The potential for an impact on the drinking water supply at the site has been assessed as negligible but in the unlikely event that there is an impact an alternate supply could be made available from the on site potable water treatment plant. An Environmental Advisor checklist is completed for emergencies that require assessment of the need for post clean up monitoring based on the circumstances of the incident.

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

Basis for Audit Finding: Ahafo has committed to annual review and reissue of the mine wide emergency response plan, and following any incident when it was necessary to implement the Plan. One cyanide drill has been carried out. Additional drills are planned to involve each of the four emergency response teams. Drills are documented with photographic records and a drill post mortem that identifies positive outcomes and deficiencies that require corrective action.

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

Basis for Audit Finding: Ahafo provides training to all employees with the potential to be exposed to cyanide. All employees are required to attend a site induction covering cyanide awareness, identification and exposure routes. Cyanide safety training covers: general training attended by all employees; process training attended by process plant operators and maintenance personnel; and supplier training by Orica attended by process plant and maintenance personnel. Special training is provided for personnel responsible for the sparging activity (Standard of Practice 3.2). All personnel

are required to complete an annual refresher training which contains sections on cyanide. Training records are held and controlled by the Ahafo People Development Centre.

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	

Basis for Audit Finding: Ahafo has developed and implemented operating procedures that cover activities and operations related to cyanide management (Standard of Practice 3.2). Operating procedures detail health and safety and environmental controls for all aspects of cyanide receipt, mixing, and use, including associated operations such as tailings management. Specific training modules covering a range of process operations are delivered to nominated personnel. These modules are designed to minimise the risk to employee health, promote safe practices and prevent uncontrolled releases. Training needs analysis carried out by Ahafo has led to the development of plant operating procedures which are then the basis for the specific training modules. In addition, there is an on the job training which is co-supervised by and assessed by the process supervisor and Training Department personnel. Ahafo policy is that all personnel are trained prior to working with cyanide. This policy is policed by the Training Department. All personnel are required to attend annual induction refresher training. All Process personnel are required to attend an annual training session on Cyanide Safety delivered by the cyanide supplier. Reagent operators and maintenance personnel attend additional refresher training. There is a yearly on the job refresher training covering SOP's. Evaluation is by Supervisors and Trainers. Training records are maintained in the PDC.

Standard of Practice 8.3: *Train appropriate workers and personnel to respond to worker exposures 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	

Basis for Audit Finding: The unloading and mixing of cyanide is controlled by a "Reagent Team". The team members are trained in the relevant operating procedures covering receipt and mixing of isotainers at the sparging facility. Reagent, process and maintenance personnel are trained in first aid and cyanide hazard awareness and response. Emergency response to a cyanide release is the responsibility of the Emergency Response Section. A duty team is on stand by 24/7. Emergency Team personnel have been provided with specialist training in response to cyanide emergencies and

first aid, such as the administration of oxygen and have participated in an emergency drill. Ahafo has adopted a system where the Emergency Response Teams are responsible for response, clean-up and decontamination of accidental cyanide releases. See also commentary covering Principle 7, Emergency Response. Emergency services in the local region surrounding the Ahafo mine have no equipment or training to provide any services to the mine in the event of a cyanide emergency. Provision of external medical assistance is covered in Standard of Practice 6.3. There has been one cyanide related drill that involved processing, emergency response and medical staff. Processing and emergency response training records include refresher training covering cyanide emergency response. Training records are retained for each individual and provide the date, the type of training, the source of the training (organisation and trainer), and training assessment results.

9. DIALOGUE: ***Engage in public consultation and disclosure.***

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 9.1**

☐ not in compliance with

Basis for Audit Finding: There are a number of external bodies that are involved in external communication programs established by Ahafo. These include: women's groups, youth groups, NGOs, farmers groups, civil union groups, and government – Assemblymen, the Departments of Agriculture, Health, and Environment, the Ghana EPA, and the Land Valuation Board. There are ten communities identified in the broad "zone of influence" of the mine and another ten outside the zone. Stakeholder engagement meetings are the most common form of community communication. All stakeholder meetings are minuted. Because of the number of groups and of stakeholders committee structures are used extensively. Some stakeholder meetings are scheduled but others are called to address particular issues. There is a grievance system in place that covers the lodgement and recording of grievances and action taken in response. Complaints are entered into a data base and attended to by Grievance Officers. There have been no registered community complaints about cyanide to date. Cyanide communication is almost invariably initiated by Ahafo. Public Consultation Officers have been appointed to staff information centres in various locations. Grievance officers are providing training to Environmental Officers. There was initial engagement of local communities along the transport route used by cyanide transport vehicles. Subsequently public consultation meetings have been held describing how cyanide is managed at the mine.

Standard of Practice 9.2: *Initiate dialogue describing cyanide management procedures and responsively address identified concerns.*

	☒	**in full compliance with**	
The operation is	☐	in substantial compliance with	**Standard of Practice 9.2**
	☐	not in compliance with	

Basis for Audit Finding: Interactive meetings have been held with Assemblymen with cyanide as an agenda item. A recent quarterly meeting of Assemblymen from within the defined zone of influence was attended by 24 people. A public disclosure plan covered stage 2 of the development of the site and included the use of posters showing how cyanide was to be managed. These posters have been distributed to various communities.

Standard of Practice 9.3: *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 9.3**
	☐	Not in compliance with	

Basis for Audit Finding: Posters have been prepared and used to show the community how cyanide is managed at the mine. Public Consultation Officers (PCOs) are provided with a descriptive document for reference and to assist them in responding to questions. The most common medium of communication with local communities is through face to face meetings. All PCOs have attended the site induction which covers cyanide and have also been trained to respond to likely questions about cyanide. From a global perspective information on cyanide incidents is available on the Newmont web site. Incidents are also reported in the annual Sustainability Report. An incident at the mine which did not result in any spill of cyanide solution was reported to the Ghana EPA. The incident was communicated to the local community and visits to the site were hosted so that community representatives could see what had happened and how Ahafo managed the response. Newmont also hosted a press conference in Accra to communicate the incident. Newspaper coverage of the incident was considered by Ahafo to be fair and accurate.