Newmont Ahafo North Gold Mine

ICMI GOLD MINE PRE-OPERATIONL AUDIT

Summary Audit Report

SEPTEMBER 2025

PUBLIC

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TYPE OF DOCUMENT (VERSION) PUBLIC

PROJECT NO. 41107710

DATE: SEPTEMBER 2025

WSP

The Pavilion, 1st Floor
Cnr Portswood and Beach Road, Waterfront
Cape Town, 8001
South Africa

Phone: +27 21 481 8700

WSP.com

QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Summary Audit Report	Updated Summary Audit Report		
Date	June 2025	September 2025		
Prepared by	Marié Schlechter	Marié Schlechter		
Signature	-	Digitally signed by marie.schlechter@wsp.com Location: Cape Town Date: 2025.09.11 08:34:58 +02'00'		
Checked by	Ashlea Strong	Ashlea Strong		
Signature	-	p.p. Digitally signed by Jacqui.Fincham@wsp.com DN: cn=Jacqui.Fincham@wsp.com Date: 2025.09.12 08:26:03 +02'00'		
Authorised by	Ashlea Strong	Ashlea Strong		
Signature	-	p.p. Digitally signed by Jacqui.Fincham@wsp.com DN: cn=Jacqui.Fincham@wsp.com Date: 2025.09.12 08:26:19 +02'00'		
Project number	41107710	41107710		
Report number	02	02		
File reference	\\corp.pbwan.net\za\Central_Data\Projects\41100xxx\41107710 - NEWMONT AHAFO NORTH ICMI\41 EPA\01-Reports\02-Final			

CONTENTS

1 SUMMARY AUDIT REPORT FOR GOLD MINING OPERATIONS

Name of Cyanide User Facility:	Ahafo North Gold Mine
Name of Cyanide User Facility Owner:	Newmont Corporation
Name of Cyanide User Facility Operator:	Newmont Ghana Gold Limited
Name of Responsible Manager:	Mr Charles Bissue General Manager
Address:	Newmont Ghana Gold Ltd 8th Floor, Standard Chartered Bank (SCB) Head Office Building 87 Independence Avenue Liberation Road, Accra PMB, Airport Post Office, Accra Ghana Box
Country:	Ghana
Telephone:	+233 257995621
Email:	Charles.bissue@newmont.com

2 LOCATION DETAIL AND DESCRIPTION OF OPERATION

Newmont Ahafo North mine is located approximately 30 kilometers (km) north of Newmont's existing Ahafo South operations in the Ahafo Region of Ghana.

The Ahafo North Project will include mining development for six open pits (Subenso South, Subenso North, Terchire West, Yamfo North, Yamfo South and Susuan pits) and the construction and commissioning of a 3.7 million tonne per annum processing plant with an average gold production rate of 260,000 ounces per year (oz/yr). The plant's design throughput rate is 463 dry ton per hour (tph) at 91.3% availability and an average gold recovery of 91%.

The process plant flowsheet begins from the comminution circuits and ends at the Tailings Storage Facility (TSF). Below are the various circuits the ore passes through to obtain the final gold bullion. The comminution circuits (i.e. crushing and grinding/classification circuit), leaching and adsorption circuit, elution circuits, electrowinning and gold room, Counter Current Decantation (CCD) circuit and TSF.

The crushing circuit begins from the primary Run-of-Mine (ROM) bin and ends at the live/final stockpile at the processing plant. Major equipment utilized during crushing includes a Grizzly (fixed and vibratory), single toggle jaw crusher, conveyor belts and apron feeders. A reclaim area dust scrubber will be provided to collect the dust generated at the crushing plant. The crusher is designed to have a 74% availability and a feed rate of 567dry t/h.

Notable among the equipment used in the grinding circuit are high aspect Semi-Autogenous Grinding (SAG) mill, hydrocyclones, declined vibrating single deck screen, short head coarse cone crusher, trommel screen, overflow ball mill, trash screens. The grinding circuit is designed to produce P80 of 53microns for leaching.

Gold leaching and adsorption onto carbon happens at the carbon-in-leach (CIL) circuit utilizing a cyanide solution prepared via the cyanide sparging plant. Solid sodium cyanide, supplied in briquette form within Isotainers, will be sparged into dedicated storage tanks to produce the cyanide solution required for both CIL and elution processes. CIL circuit will comprise of six (6) CIL tanks, each with an operating volume of 2,537 m^3.

Ahafo north elution circuit is planned to perform one strip a day,6 strips a week. Gold in solution will be recovered by electrowinning onto stainless steel cathodes and smelted into gold bullion. Cyanide in solution will be recovered to minimize the cyanide content in the final tails stream (<50ppm Weak Acid Dissociable (WAD) cyanide (CN)) by washing using the CCD method with either decant return or raw water. Tails from the CIL circuit will be deposited at the TSF.

The Ahafo North Gold Mine is currently in the construction phase. Commercial production for the project is expected in the second half of 2025.

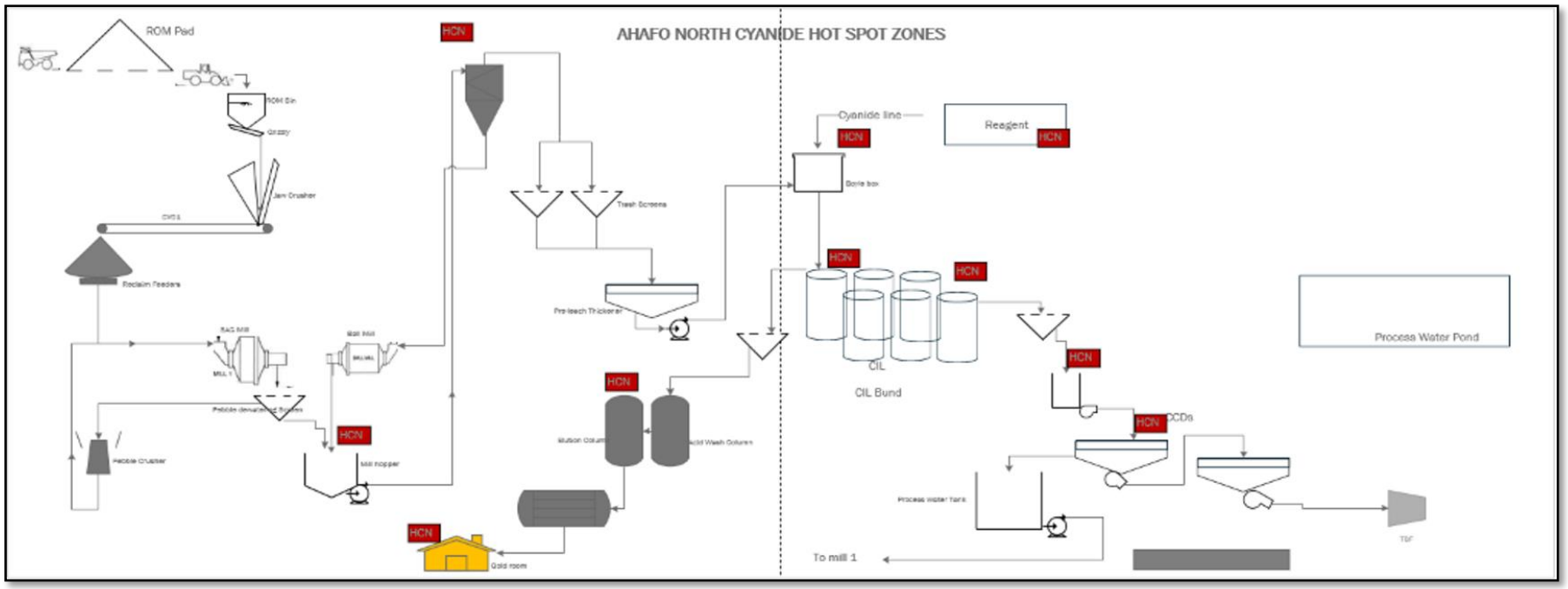

Figure 1: Simplified Process Plant Flowchart with CN Hotspots

3 SUMMARY AUDIT REPORT

3.1 AUDITOR FINDINGS

Ahafo North Gold Mine is:

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

The International Cyanide Management Code

3.1.1. Compliance Statement

This operation has demonstrated full compliance with the International Cyanide Management Institute Mining Operations Verification Protocol for the International Cyanide Management Code.

3.2 AUDITOR INFORMATION

Audit Company: WSP Group Africa (Pty) Ltd

Audit Team Leader: Marié Schlechter (Lead Auditor and Mine Technical Specialist)

Email: marie.schlechter@wsp.com

Name and signature of other auditors:

Name	Position	Signature	Date
Marié Schlechter	Lead Auditor and Technical Specialist		03/06/2025
Benjamin Asiedu	Auditor Trainee		03/06/2025

3.3 DATE OF AUDIT

The pre-operational audit was undertaken between 17 and 20 March 2025.

3.4 AUDITOR ATTESTATION

I attest that I meet the criteria for knowledge, experience and conflict of interest for International Cyanide Management Code (ICMC or Code) Verification Audit Team Leader and Mine Technical Specialist, established by the International Cyanide Management Institute.

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 ICMC Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

PRINCIPLE 1 – PRODUCTION

Encourage Responsible Cyanide Manufacturing by Purchasing from Manufacturers that Operate in a Safe and Environmentally 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.

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 1.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.1; to 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.

The cyanide to be purchased by the gold mine intends to be manufactured at a facility certified as being in compliance with the Code.

Newmont Ghana Gold Limited, including Ahafo South and Ahafo North Gold Mines, has a contract with Samsung C&T Deutschland for the supply of sodium cyanide.

The contract states that the supplier must comply with the provisions of the International Cyanide Management Code for the Manufacture, Transport and Use of the Cyanide of the Production of Gold (the Cyanide Management Code), to the extent those provisions are relevant to the Supplier's manufacturing, handling and storage and transport to the Site of the Product.

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.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 2.1**

☐ not in compliance with

Summarise the basis for this Finding/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.

Newmont Ghana Gold Limited, including Ahafo South and Ahafo North Gold Mines, has a contract with Samsung C&T Deutschland for the supply of sodium cyanide.

The contract states that the supplier must comply with the provisions of the International Cyanide Management Code for the Manufacture, Transport and Use of the Cyanide of the Production of Gold (the Cyanide Management Code), to the extent those provisions are relevant to the Supplier's manufacturing, handling and storage and transport to the Site of the Product.

In addition, the Supplier shall ensure, that for the term of this Agreement, the Affiliates of the Supplier responsible for supply related services from the point of manufacture to the point of delivery complies with the provisions of the Cyanide Management Code, and maintain Cyanide Management Code certification.

Vehrad Transport and Haulage will be used to transport the sodium cyanide from the Port of Tema to the Ahafo North Mine site. Vehrad Transport and Haulage is included in the Samsung West Africa Supply Chain (certified 9 August 2024). Vehrad Transport and Haulage was re-certified on 5 September 2024.

PRINCIPLE 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

Summarise the basis for this Finding/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.

Facilities intended for unloading, storing and mixing cyanide have been designed, by Lycopodium Minerals Pty Ltd, and are being constructed in accordance with sound and accepted engineering practices for these facilities.

The cyanide unloading and storage areas were still under construction at the time of the on-site assessment.

It was confirmed during the site assessment that the cyanide unloading and storage facilities will be located inside the high-security fence of the processing plant, away from people and surface water.

The Isotainer delivering the cyanide to the processing plant will park on a concrete ramp that has a bund on the one side and humps on the entry and exit ends. The concrete ramp is sloped towards the cyanide storage area and any spillage will flow into the cyanide / caustic bund. The bund will be fitted with a spillage pump that can pump spillage to Leach Feed Distribution Box.

Both the cyanide storage and sparge tanks will be fitted with level indicator transmitters that will in real time transmit the levels of the tanks to the Distributed Control System (DCS) that will be visible in the control room.

The testing and maintenance of the level indicators will be included in the mine's planned maintenance system.

The cyanide storage and sparge tanks are located on a surface that can prevent seepage to the subsurface. It was confirmed that the cyanide storage and sparge tanks are located on solid concrete bases coated with three layers of PERMACOAT 300 and 400 to prevent spills and leaks to the subsurface.

It was further confirmed that a damp proof membrane, overlain by a concrete floor, was installed below the concrete bases.

Secondary containment for the cyanide storage and sparge tanks are constructed of materials that provide a competent barrier to leakage. The tanks are located in a concrete bund.

Solid sodium cyanide will be received in an Isotainer and sparging will be conducted onsite. The cyanide storage and sparge tanks are located outside in an open air environment and have ventilation pipes at the top to prevent build-up of hydrogen cyanide (HCN) gas.

The cyanide unloading, sparging and storage tanks will be located in the high security, fenced area of the processing plant.

The cyanide will be stored separately from incompatible materials. The cyanide tanks and caustic tank shares a bund.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 3.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with 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.

Solid cyanide will be received in Isotainers and sparging will be conducted onsite. The Isotainer will return to the Vehrad facility in Tema.

The *Cyanide Sparge* Standard Task Procedure (STP) states that the operator must thoroughly wash all flexible hoses and hose the general unloading area as well as the Personal Protective Equipment (PPE) used during the sparging event.

The STP further provides the requirements for the operation of the valves, hoses and couplings during a sparging event. The STP also requires the regular checking of these equipment to ensure that it is not damaged. If any deficiencies are noted, the supervisor will be contacted, and the deficiencies will be corrected in accordance with the planned maintenance system.

The *Cyanide Sparge* STP describes the steps to take in the event of spillage during sparging and transfer of liquid cyanide from Isotainers.

The PPE required during cyanide sparging and transfer is listed in the *Cyanide Sparge* STP.

The *Act as a Buddy – The "Buddy" System* STP details the responsibility and tasks of the extra individual that will observe from a safe distance.

It is stated in the contract with Samsung C&T Deutschland GMBH for the supply and delivery of sodium cyanide that the cyanide supplier shall include a carmoisine dye in the Isotainer during delivery

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 preventive maintenance procedures.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.1**

☐ not in compliance with

Summarise the basis for this Finding/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 preventive maintenance procedures.

Ahafo North Gold Mine has developed written management and operating plans and procedures for cyanide facilities, including unloading, sparging, storage, CIL, elution, CCD, mills, process water ponds and tailings storage facility.

The cyanide facilities (i.e., facilities with concentrations of WAD cyanide greater than or equal to 0.5 mg/L) identified at Ahafo North Gold Mine include the following:

- Cyanide offloading area
- Cyanide sparging and storage tanks
- Grinding circuit (mills)
- Elution section
- CIL section
- CCD section
- TSF
- Process water pond
- Event pond

The operation has developed plans and procedures that identify the assumptions and parameters on which the facility design is based and any applicable regulatory requirements (e.g., freeboard required for safe pond and impoundment operation; the cyanide concentrations in tailings on which the facility's wildlife protection measures are based) as necessary to prevent or control cyanide releases and exposures consistent with applicable requirements.

The following procedures and manuals were reviewed identifying the assumptions and parameters on which the facility designs are based:

- The *Cyanide Management Plan* states that Ahafo North Gold Mine has determined that the optimal pH for process solutions is 10.5 to prevent the evolution of HCN gas.

- The *Tailings Management Plan* states that samples will be taken three times each shift to monitor the Free and Weak Acid Dissociable (WAD) cyanide content of the tailings slurry to ensure the compliance of <50 ppm WAD cyanide levels in the slurry send to the TSF.
- The *Tailings Management Plan* states the following design storm events for process solution ponds and impoundments:
  - 1:10 years – 148 mm in 24hrs
  - 1:25 years – 177 mm in 24hrs
  - 1:100 years – 220 mm in 24 hrs.
- The *Cyanide Management Plan* states that the TSF is designed to contain a 1:10 000 year 24-hour storm event plus a freeboard of 1,200mm (1.2m) prior to the emergency spillway being activated. While the management of the TSF is designated as zero discharge, there is an emergency spillway incorporated in the design to control and direct overtopping which would flow into sediment control structure (SCS) 1.
- The *Tailings Management Plan* states that the emergency spill way is designed at the freeboard level to discharge required flows resulting from the 10 000-year annual recurrence interval (ARI) storm event and includes an additional 1-meter freeboard.
- The Event Pond Standard Operating Procedure states that the Event Pond should be operated below 20% to maintain capacity for spill events. A high-low-level alarm will sound when the level reaches 20% and thereafter at 28%, 35% and 41%.

The operation has developed 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 water management, inspections and preventative maintenance activities.

The *TSF Management Plan* and *Event Pond Standard Operating Procedure* have been developed and details how these water facilities must be managed to retain the design storage capacities.

Ahafo North Gold Mine intends to conduct operational inspections and have developed the following operational inspection checklists:

- Cyanide offloading checklist that will be used before a sparging and offloading event.
- Daily reagent area checklist (2 shifts per day) which includes the cyanide sparge and storage tanks.
- Daily pre-leach and CIL daily checklist.
- Daily elution checklist.
- Daily CCD and Event pond checklist.
- Gold room checklist.
- Daily grinding area checklist.
- Daily, weekly, monthly, quarterly TSF and Impacted Water Pond (IWP) checklist.
- Weekly process plant ponds inspection (Process pond, Raw Water tank, Event pond).

Ahafo North Gold Mine is in the process of implementing the SAP Planned Maintenance System.

The Planned Maintenance Team is currently reviewing the Standard Operating Procedures to include the checklists in the planned maintenance system. The experience from the operations at Newmont's Ahafo South Gold Mine (sister site) is used during the current process to set up the system. The implementation is done in two phases. The first phase is to review the checklist

requirements whereafter, during the second phase, the requirements are loaded in the SAP system. This is being done on a systematic basis for all equipment.

Once operational, job cards will be raised for scheduled equipment and infrastructure inspections. If deviations are observed, a subsequent job card will be raised for the required maintenance actions.

The operation has a procedure to identify when changes to the site's processes or operating practices may increase the potential for the release of cyanide and to incorporate the necessary release prevention measures.

Ahafo North Gold Mine has developed a Change Management Procedure. The purpose of the procedure is to identify, evaluate, and control risks associated with new and/or changes to programs, processes, facilities, equipment, and/or materials prior to the implementation of these changes in order to mitigate potential impacts to the operation, personnel, the community and the environment.

Newmont has implemented a Change Management Software System used by their operations. The Change Management Owner populates the information pertaining to the proposed change and the system routes the information to the responsible persons for sign off, including the Health and Safety and Environmental Departments.

The operation has developed cyanide management contingency procedures for situations where there is an upset in the facility's water balance, when inspections and monitoring identify a deviation form design or standard operating procedures, and/or when a temporary closure or cessation of the operation may be necessary.

Ahafo North Gold Mine has developed the following procedures and committed to implement the following practices for contingencies and non-standard operating conditions, including upset in water balance, corrective action, and either planned or emergency shutdowns, both long and short-term:

- The *Tailings Management Plan* describes the measures to ensure that the Ahafo North Tailings Storage Facility is operated safely, in accordance with the design and local legal requirements. The plan requires the daily monitoring and maintenance of the TSF Decant Pond level to prevent an upset in the operational water balance that could present a risk of exceeding the design containment capacity.
- The *TSF Emergency Response Plan* (ERP) has been developed to ensure effective response to an emergency event that could result in the release of tailings and/or water from the site. ERP presents the general procedures to be followed during major storm events or when other emergency situations occur that could potentially endanger the operation of the dam and create downstream impacts.
- The *Process Plant Emergency Management Plan* describes response actions in the event of a major power failure and other emergencies events that could result in a tailings release or overtopping of ponds.
- The Event pond level will be visible on the DCS in real time. The pond will have level alarms installed to prevent possible overtopping.
- In addition, the SAP system will record the corrective actions and corrective maintenance that will be undertaken when inspections or monitoring identifies a problem.
- The *Process Plant Shutdown Protocol* establishes activities to assess, mitigate or control potential health, safety and environmental hazards when planning maintenance or operational activities around either a scheduled or an unscheduled process plant shutdown.

The Protocol makes provision for both when short term and longer-term temporary closure or cessation of the operations may be necessary by requiring regular inspection of all plant areas by assigned operations personnel to continue throughout the duration of the shutdown.

- The draft *Plant Controlled Start-Up* procedure is designed for the safe, efficient and smooth start-up of process plant operations. The procedure details the steps to take to correctly start the SAG & Ball mills and other operating equipment after a short- or longer-term shut-down.

Ahafo North Gold Mine intends to inspect the following at the unloading, storage, mixing and process areas:

- The cyanide sparge and storage tanks and the CIL tanks will be inspected 3 yearly (non-destructive testing) for signs of corrosion and leakage in addition to the visual inspections that will be conducted daily.
- Secondary containments, including drains and available capacity, will be inspected as part of the daily inspections.
- The TSF underdrainage system, TSF groundwater management system and the process pond liners will be inspected as part of the daily TSF inspection and the weekly process water pond inspection, respectively. The Process water pond is HDPE lined, 1mm thick and double layered with two leak detection pumps. The Event Pond is similarly lined and has one leak detection pump. Automatic alarms, reporting on the DCS that is visible in the Control Room, has been installed on the Process Water Leak Detection Pumps.
- The inspection of pipelines, pumps and valves are included in each of the operational areas' daily inspection checklists as well as in the planned maintenance system inspections (various frequencies).
- Daily, weekly, monthly, quarterly inspections will be performed as part of the operational inspections and planned maintenance system to ensure ponds and impoundments are operated in accordance with the design documents and parameters. As per the requirements of the Environmental Impact Statement for the TSF and Water Infrastructure, the surface water diversion channel will be inspected visually on a monthly basis.

From the documentation observed, the operation will inspect the cyanide facilities on established frequencies sufficient to ensure and document that they are functioning within design parameters.

It was observed that the inspection checklists identify the specific items to be observed and include the prompts to include the date of the inspection, the name of the inspector, and any observed deficiencies. Records will be retained as part of the planned maintenance system and operational inspection management system.

Electricity is supplied to the Ahafo North Gold Mine via the national grid. Two Genset (2MW each) have been installed to provide emergency power resources to the operations. The emergency power will power the CIL tanks (agitation), safety shower pumps and thickeners.

The auditors observed the 2025 Business Plan Capex sheet indicating that a diesel pump will be procured for emergency situations at the TSF.

The auditors were informed that during a power failure, the reagent strength cyanide valves will close to prevent unintentional release and exposure.

Inspections will be performed on the Genset, as included in the planned maintenance system.

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	

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.2; To introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

Ahafo North Gold Mine has conducted test work to determine appropriate cyanide addition rates when operation commences.

A series of test work was conducted by the Newmont Mining Corporation Metallurgical Services in Colorado USA during the design of the Ahafo North Gold Mine Project. The cyanide addition rate was determined according to Stage Gate Metallurgical test work that was performed by the Newmont Mining Corporation Metallurgical Services. The test work analysed representative ore samples of areas to be mined and processed in the first three years.

Various trade-off studies and modelling / simulation exercises were completed in Stage 3 to confirm the final process flow sheet and maximum mill feed grade to consider in the mine plan.

The test work program entailed:

- The standard suite (to determine minerals of value and deleterious elements) of chemical heads analyses to be performed on all samples.
- Mineralogical analysis of all samples.
- Comminution characterization test work on all samples.
- Variability leaching to be performed on all samples.

Cyanide dosing will be done in the Leach Feed Box and cyanide addition will be controlled with a TAC 1000.

The cyanide control strategy is based upon a series of test work and the recommendations from the Chief Metallurgist, who will consider discharge cyanide concentration as the first priority in setting the cyanide additional rate. To assist with cyanide control, the Ahafo North leach circuit will be equipped with a dual stream TAC 1000 Cyanide online analyser on tanks 1 or 2 and 6. The TAC 1000 will analyse the concentration of sodium cyanide in the tank and control the addition rate to tank 1 or 2 through automatic valve control. In addition to the online analyser, manual samples will be taken and titrated for free cyanide from CIL Tanks 1 or 2 and 6 every 2 hours.

Weekly bottle roll test on samples from the CIL feed will be conducted at the onsite metallurgical laboratory to compare the cyanide control with the extraction results.

Ahafo North Gold Mine has developed procedures that will inform the program to evaluate cyanide use and the adjusting the addition ratio to minimise its use.

Quarterly metallurgical test work will be conducted by the Newmont Mining Corporation Metallurgical Services to optimise cyanide dosage in the processing plant.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.3; To implement a comprehensive water management program to protect against unintentional releases.

Ahafo North Gold Mine has a comprehensive and probabilistic water balance model that is being developed by Piteau Associates South Africa using the GoldSim software platform.

The water balance considers the following in a reasonable manner and as appropriate for the facility and the environment:

- The model considers the estimated rates at which tailings will be deposited onto the TSF.
- The water balance model uses a stochastic precipitation generator that can be used to simulate any return period required. The model further has a manual over-ride to pick a day(s) and magnitudes of an event to simulate. Therefore, the model can be used to manually simulate a 1-in-100 year 1-day duration event, or a 1-in-50 year 3-day duration event, etc.
- The water balance report notes that all the uncertainty within the Ahafo North Gold Mine water balance relates to meteorological inputs. Daily precipitation is, therefore, stochastically sampled from distributions that have been developed using observed data from the rain gauges at site and comparison with Ahafo South Gold Mine data. Precipitation is then generated using the WGEN (Weather Generator) (United States Department of Agriculture (USDA), 1984) methodology.

  Historical precipitation data were provided for three rain gauges at Ahafo North Gold Mine, these being at:

  - Yamfo
  - Afirisipa
  - Terchire.

- Unit runoff and soil moisture balance algorithms for the defined land use types within the model domain are used to calculate runoff, infiltration and evapotranspiration.

  The Ahafo North Gold Mine surface water catchment areas have been defined in the water balance model to be dynamic, i.e. changing over time reflecting the mine plan. For example, the TSF footprint area expands with the construction of each phase and, consequently, the SCS 2 catchment area reduces.

  Land use categories area defined for each catchment within the model to simulate the hydrological response rainfall. For example, the runoff generated from a hardstanding area will be greater than from waster material.

- The model includes many constant value inputs such as tailings hydraulic conductivity, an open water evaporation factor and pump capacities.

- The simulation of power failures has been built into the model. Simulations can be run with or without power failures, at any frequency.
- The maximum volume of water entrained within the tailings mass is calculated accounting for the dry consolidated tailings density, tonnes of tailings solids in storage and associated specific gravity.

The model does not consider the effects of potential freezing and thawing conditions as Ghana is in the tropics. The model also does not consider discharge to surface water as the Ahafo North Gold Mine will be a zero-discharge operation.

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

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

Routine monitoring and inspection of solution levels will be conducted at the TSF Decant pond, Process Water pond, Raw Water tank and Event pond. Plant and TSF operators will be responsible for conducting daily checklists which require water/solutions level checks in these areas.

Rainfall is collected at the three rainfall gauges at the Ahafo North Gold Mine site.

The daily rainfall data collected is populated into the monthly spreadsheet which is provided to the consultant Piteau for use during the water balance refinement.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Ahafo North Gold Mine is currently still in the construction phase. The *Cyanide Management Plan* states that the TSF will be fenced to restrict wildlife and livestock from gaining access to the area.

The Ahafo North Gold Mine requirement is to maintain open waters below 50 mg/l WAD cyanide. The *Tailings Management Plan* states that samples will be taken three times each shift to monitor the WAD cyanide content of the tailings slurry to ensure the compliance of <50 ppm WAD cyanide levels to the TSF.

The Process Water pond will be sampled twice a day (per shift) and will be analysed for, inter alia, WAD cyanide.

The Event pond is designed to receive excess spillage from the plant area and automated sump pumps will be installed to maintain maximum storage capacity in the pond. The operating philosophy is that spill solution will not remain in the pond for long periods of time and is not considered a threat to birds or wildlife.

Ahafo North Gold Mine will not have heap leach facilities.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.5**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.5; to implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

The Ahafo North Gold Mine will be a zero-discharge facility and will therefore not have a direct discharge to surface water.

Ahafo North Gold Mine have commenced, prior to construction, with surface water monitoring downstream of the site to establish a baseline and will continue monitoring during the construction phase. Surface water monitoring was initially conducted quarterly and changed to monthly when construction commenced in 2022. Surface water quality monitoring results observed from 2007 to date were all below the detection limit of 0.005 mg/l for WAD, free and total cyanide.

Ahafo North Gold Mine is still in the construction phase and has not yet received a cyanide delivery to site.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.6**

☐ not in compliance with

Summarise the basis for this Finding/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 is implementing specific water management and other measures to manage seepage to protect the beneficial use of groundwater beneath and immediately down-gradient of the operation. Groundwater is abstracted for domestic use by the nearby communities.

The TSF is designed as a fully lined impoundment to include the basin and the interior face of the embankments. An underdrainage collection system is designated over the low permeability material and geomembrane to assist with drainage and dewatering of the tailings. The fluid liberated from the tailings slurry will be returned and stored within the supernatant pond.

Additionally, a groundwater drainage system will remove water beneath the TSF basin liner, and any water collected will be discharged downstream of the TSF embankment. This water will be sampled, tested and if necessary, stored within the supernatant pond.

The tailings delivery pipeline between the process areas and the TSF is above ground and provided with secondary containment by way of a high-density polyethylene (HDPE) geo-membrane lined trench.

The Event pond and Process Water pond will be double lined and will include a leakage detection system. The Event pond will have a leak detection pump and a groundwater pump system.

The cyanide storage and process tanks at the processing plant will be located in concrete bunds to prevent seepage and groundwater contamination.

Groundwater monitoring commenced in 2010 and was initially conducted quarterly. Before construction in 2022, the sampling frequency was increased to monthly.

Groundwater quality monitoring results, for boreholes located downgradient of the operation, observed from 2002 to date, were all below the detection limit of 0.005 mg/l for WAD, free and total cyanide.

The numerical standard for free cyanide in groundwater for drinking water is 0.07 mg/l, as detailed in *Ghana Standards Authority, Ghana Standard GS175:2017 - Water Quality Specification for Drinking Water*.

Ahafo North Gold Mine will be an opencast mining operation and therefore will not use mill tailings as underground backfill.

Ahafo North Gold Mine is still in the construction phase and has not yet received a cyanide delivery to site.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.7**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.7; to provide spill prevention or containment measures for process tanks and pipelines.

Spill prevention is provided for the cyanide offloading area, cyanide sparge and storage tanks, grinding circuit, elution, CIL and CCD sections. The cyanide offloading area consists of a concrete area with bund and humps on three sides. Spillage from an Isotainer will drain to the cyanide storage bund adjoined to the fourth side of the unloading area. The cyanide sparge and storage tanks are positioned inside the cyanide storage bund that is concrete lined. The sump will be fitted with a sump pump that will pump the spillage to the process.

The mills, CIL, CCD and elution areas will have concrete bunds, all fitted with sump pumps that will pump back to the process.

It was confirmed that the cyanide storage and sparge tanks are located on solid concrete bases coated with three layers of PERMACOAT 300 and 400 to prevent spills and leaks to the subsurface.

The CIL tanks (6) are each constructed on a concrete ring beam with oil impregnated centre layer. An HDPE membrane has been installed between the ring beam and the base of the tank to prevent seepage from the tank base.

Secondary containment for cyanide storage, mixing and process tanks will be sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event.

Procedures have been developed and will be implemented to prevent discharge to the environment or any cyanide solution or cyanide-contaminated water that will collect in the secondary containment area.

It was verified that all bund areas will be equipped with sump pumps, returning solutions / spillages to process tanks. These pumps will be manually operated and will be inspected daily during each shift (2 shifts per day).

The Event pond will function as a spill control pond, collecting all spills exceeding sump capacity from the process plant via concrete lined channels. The Event pond will have a capacity of 5 291m^3, designed to contain any spillage from the plant, pipe racks and the tailings line containment trench. It will be equipped with two submersible pumps. The two pumps will be automatically activated before the High-Low level (20%) in the pond is reached. The Event pond will be operated at a minimum level and the requirement will be to pump out the material as quickly as possible in order to have room for an emergency event.

All process solution tanks at Ahafo North Gold Mine have been designed with secondary containment.

It is stated in the *Cyanide Management Plan* that all cyanide, process solution and slurry lines will be contained within secondary containment including pipe-in-pipe (reagent strength cyanide), HDPE lined trenches and/or concrete bunding. Flange covers will also be used to minimise the impact from any spray that may occur. The auditors observed the ongoing construction of these containment measures.

The TSF decant and slurry lines will cross the Ankwansua stream. The auditors observed that the pipelines will cross the stream on a concrete culvert within a HDPE lined trench. A spill event pond (HDPE lined) has been constructed in close proximity to the stream crossing. The purpose of the spill event pond is to contain any spillage from this section of pipeline to prevent it from running into the stream.

All cyanide and process tanks are being constructed of mild steel, the reagent strength pipeline will be constructed from stainless steel, the process pipelines from mild steel and the TSF pipelines from HDPE. The materials of construction of the plant are specified within the design documentation.

Standard of Practice 4.8: **Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.8**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in Full Compliance with Standard of Practice 4.8; to implement quality control/quality assurance (QC/QA) procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Quality assurance and quality control programs are being implemented during the construction of all cyanide facilities.

Lycopodium, the main contractor for the construction of the Ahafo North Gold Mine infrastructure, is responsible for the implementation and management of quality assurance and quality control programs by all contractors.

The QA/QC programme being implemented by Lycopodium will continue to include appropriate testing to address the suitability of materials and adequacy of soil compaction for earthworks for the tank foundations and TSF and pond liners. It will further include testing and inspection of welding, concrete and cyanide and process tanks.

Ahafo North Gold Mine commits to keep all QA/QC records for the cyanide facilities currently being constructed.

Ahafo North Gold Mine commits that appropriately qualified persons will perform the QA/QC inspections and reviews during the construction of the cyanide facilities.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 4.9**

☐ not in compliance with

Summarise the basis for this Finding/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, and surface and groundwater quality.

The operation has developed written standard operating procedures for monitoring activities, which include the following:

- Groundwater Monitoring Procedure
- Surface Water Monitoring Procedure
- Fauna Interaction and Mortality Procedure
- Daily operational checklists requiring the checking for wildlife mortalities

The sampling and analytical protocols have been developed by the Ahafo North Environmental Team with reference to the existing procedures used at Newmont's Ahafo South Gold Mine. The procedures have been developed under the guidance of the Ahafo North Gold Mine Environmental Manager.

The *Ahafo North Project Environmental Monitoring Program Schedule*, with the groundwater and surface water monitoring maps indicates where and the frequency that samples should be taken.

The ground and surface water sampling procedures specifies how samples should be taken, sample preservation techniques, cyanide species to be analysed and quality assurance and quality control requirements.

The *Water Sample Preparation and Shipment* procedure provides consistency in preparation and shipping of samples from the environment laboratory at Ahafo North Gold Mine to external analytical laboratories for analysis. The procedure outlines the process to follow to ensure successful preparation and delivery of water samples to external laboratories for analysis, whilst protecting the samples from being tampered with or contaminated before the start of analysis, including chain-of-custody.

Sampling conditions and procedures are documented in writing on the surface water and groundwater sampling fields sheets.

Ground and surface water monitoring is conducted monthly and therefore adequate to characterise the medium being monitored and to identify changes in a timely manner.

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.**

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 5.1**
- ☐ not in compliance with

Summarise the basis for this Finding/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, livestock, and the environment.

Ahafo North Gold Mine has developed written procedures to decommission cyanide facilities at the cessation of operations. The mine has developed the following documents:

- Ahafo North Project, Reclamation and Closure Plan
- Ahafo North Mining and Processing Final Environmental Impact Statement
- Updated Final Environmental Impact Statement for the Ahafo North TSF

Ahafo North Gold Mine has developed a conceptual reclamation and closure plan that includes the measures for the decommissioning and demolition of the processing plant and associated infrastructure and the rehabilitation of the TSF.

The *Ahafo North Project Reclamation and Closure Plan* includes an implementation schedule for decommissioning activities.

It is stated in the *Ahafo North Project Reclamation and Closure Plan* that the cyanide decommissioning procedures will be reviewed and updated every three years along with the update of the Site Wide Reclamation and Closure Plan.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 5.2; to establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

Ahafo North Gold Mine has developed a preliminary estimate of the cost to fully fund third party implementation of the cyanide related decommissioning measures as identified in the site's decommissioning and closure documentation.

The decommissioning and demolition cost estimate is reviewed annually.

The Ahafo North Gold Mine environmental permit stipulates in section 5.0 *Reclamation Bond* that the entity shall post a reclamation bond as security for the decommissioning and rehabilitation of disturbed areas in line with Regulation 23 of the Environmental Assessment Regulations, 1999 (LI 1652).

The quantum of the bond to be posted for the project is specified in the environmental permit.

It is required that 20% of the bond must be paid in cash and the remaining 80% in bank guarantee.

The bond shall be posted within 6 months from the date of the permit, therefore by June 2025.

The Auditor observed communication from Newmont to the Environmental Protection Agency (EPA), requesting extension of time as they work with Ecobank on posting of the Reclamation Bond. Communication from the EPA acknowledges the request however, no specific timeframe is indicated.

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.

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 6.1**
- ☐ not in compliance with

Summarise the basis for this Finding/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.

Ahafo North Gold Mine has developed procedures describing how cyanide related tasks such as unloading, sparging, plant operations, entry into confined spaces and equipment decontamination prior to maintenance should be conducted to minimise worker exposure.

The operational procedures include the PPE required as well as pre-tasks requirements and the procedural steps to follow.

The operation solicits and actively considers worker input in developing and evaluating health and safety procedures. Ahafo North Gold Mine has adopted various platforms to communicate with employees and contractors on safety procedures and to provide them with the opportunity to give their input in developing and evaluating these procedures. The platforms include baseline risk assessments and, pre-start and safety meetings.

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

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 6.2**
- ☐ not in compliance with

Summarise the basis for this Finding/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.

Ahafo North Gold Mine has determined that the optimal pH control for process solutions will be 10.5 to prevent the evolution of HCN gas.

Ahafo North Gold Mine has identified the following areas where workers may be exposed to cyanide in excess of 10 ppm on an instantaneous basis and 4.7 ppm continuously over an 8-hour period and require the use of PPE:

- Mill hopper
- Cyclone area
- Elution
- Cyanide leach feed box (dosing)
- CIL tank 1
- CIL tank 6
- CCD feed hopper
- CCD area
- Reagent area
- Gold room

These areas have preliminary been identified. Once in operation, a survey will be undertaken to confirm.

It is stated in the *Cyanide Management Plan* that Ahafo North Gold Mine will employ personal HCN monitors for operators in high-risk areas in the processing plant.

The auditors observed the personal HCN monitoring units procured for the operations.

The *Conduct HCN Gas Survey* Standard Task Procedure states that fixed HCN gas monitors will be located at the following points:

- Reagent area
- Mills
- Cyclones
- Elution
- CIL feed box
- CIL tank 1 and 6

- CCD feed hopper
- CCD area
- Gold room

It further states that, due to operational changes, there may be a need to periodically review the location of these HCN gas monitors to determine the suitability and adequacy of the fixed monitors.

The procedure further states that personnel must be on alert at HCN gas level of 4.7 ppm and evacuate the area immediately on or before the attainment of 10 ppm.

The on-site Industrial Hygienist will be responsible for the maintenance, testing and calibration, as per the manufacturer's requirements, of the personal HCN monitors once in use.

The fixed HCN monitors will be tested and calibrated monthly by the Process Electrical and Instrumentation personnel and will be included in the planned maintenance system (job cards will be raised when calibration is due). The calibration and testing will be done as per the requirements of the manufacturer and *HCN Transmitter Checks and Calibration* Standard Task Procedure and the records will be retained for at least three years.

The *Cyanide Management Plan* states that signage will be displayed at the applicable facilities to alert personnel to the presence and/or possible presence of cyanide, access restrictions, and the requisite PPE for the area. These areas will be the cyanide offloading, sparging and storage area, grinding circuit, CIL, Elution, CCD, process water ponds and TSF, as applicable.

To support identification of pipeline contents, all pipe work in the plant will be labelled to identify the line, the contents and flow direction.

In addition to identify cyanide areas and PPE requirements, signage will also be used to restrict eating, drinking and smoking to authorised areas only.

It was confirmed in email communication between the Newmont Procurement Department and Samsung that the carmoisine dye will be added to the Isotainers at the Vehrad Repackaging Facility in Tema prior to transfer to the mine.

It was observed during the site assessment that safety showers with eye wash stations and dry powder fire extinguishers are already being installed at the areas under construction. These were observed at the cyanide storage and sparge tank area.

The requirement to check the safety showers, to ensure that they are operational and that water streams and flow are adequate, and the fire extinguishers has already been included in the daily checklists.

In addition to the daily checks, routine preventative maintenance on the showers will be completed by the process maintenance personnel, no less than quarterly.

It is stated in the *Cyanide Management Plan* that the emergency response team (ERT) will be responsible for monthly inspections and replacement of undercharged or faulty fire extinguishers.

Colour coding will be used to identify process tanks and solution pipelines. The colour codes will be done in accordance with Ghana Mining Regulations requirements. To support identification of pipelines, personnel will participate in areas specific training which identifies process solution tanks and pipelines in their work areas.

In the cyanide awareness training it is communicated that the pipelines to and from the TSF will be labelled and flow indicated.

It is stated in the *Cyanide Management Plan* that Ahafo North Gold Mine will maintain Safety Data Sheets for all chemical on site, inclusive of sodium cyanide. Hard copy documents and/or permanent stands will be maintained at the cyanide offloading and storage area. The cyanide Safety Data Sheet information will be written in the language of the workforce. The operational language for the mine and plant is English in written and verbal communication. This was confirmed through interviews. The site has not yet received a cyanide delivery.

Procedures have been developed 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 revising.

All cyanide incidents will be automatically shared via the event reporting software (Enablon). The Enablon online platform is used to capture all incidents, the details of the investigation and the corrective and preventative actions.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 6.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The emergency cabins at the processing plant will include, *inter alia*, Oxy-viva resuscitators and cyanide emergency PPE. The Oxy-viva resuscitators will be placed in the plant control room, in the gold room and at the top of the CIL.

Two-way radios are used at the processing plant and the TSF for communication.

It was confirmed during discussions with the doctor at the on-site clinic that the antidote kits will be kept at the clinic. Ahafo North Gold Mine will be using Cyanokit antidote kits.

It states in the *Cyanide Management Plan* that Ahafo North Gold Mine will regularly inspect the cyanide first aid equipment to make sure it is available if and when needed. This will include the daily checks by area operators and more formal checks by the ERT.

It is further stated that the Clinic Management Company, MediSite, is responsible for the procurement and storage of the cyanide antidote kit as required by manufacturer recommendations. The antidote kits will be kept at the on-site clinic and can be readily picked up by the paramedics on their way to an emergency call. The pharmacist will be responsible to check that the antidote kits remain within the use date as specified by the manufacturer.

Ahafo North Gold Mine has developed the *Ahafo North Emergency Management Plan* and the *Process Plant Emergency Management Plan* that both covers emergency response plans and procedures to respond to cyanide exposures.

The procedures and response plans detail the necessary responses to cyanide exposures through ingestion, inhalation and adsorption through the skin and eyes.

Ahafo North Gold Mine will have its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide.

The operation will have a 24/7 on-site clinic. The clinic will be staffed by doctors, paramedics, occupational and general nurses, laboratory technician, pharmacist and radiographer.

Ahafo North Gold Mine will employ a full-time and fully trained ERT team to effectively respond to cyanide and other incidents and emergencies at the site. In addition to the ERT, a number of process plant first responders will be trained in the plant to provide initial rescue efforts until the ERT will take over.

Due to the nature and location of the Ahafo North Gold Mine operations, the mine will have on-site capability to stabilise and treat workers exposed to cyanide at the on-site clinic. If subsequently the

patient(s) require specialist treatment after being stabilised, they will be transported to the Komfo Anokye Teaching Hospital in Kumasi.

Section 5.45 *Medical Evacuation* of the *Ahafo North Emergency Management Plan* details the process to follow in the event that a patient needs to be evacuated to advanced off-site medical facility.

Ahafo North Gold Mine will have an on-site clinic that are aware of the potential need to treat patients for cyanide exposure, as confirmed with the MediSite doctor. Ahafo North Gold Mine is committed to ensure that the medical facility will have adequate, qualified staff, equipment and expertise to respond to cyanide exposure.

It was confirmed that the clinic will be equipped with cyanide emergency PPE, cyanide antidote kits, oxygen and resuscitator.

The clinic will train the doctors, paramedic and nurses, and the ERT and the clinic will take part in mock drills to test their response to emergency situations.

If treatment is required in the longer term, the patient will be transferred to the Komfo Anokye Teaching Hospital in Kumasi. If necessary and decided by the mine management and medical team, the patient can also be medi-evacuated to an appropriate facility in Accra, as detailed in the *Ahafo North Emergency Management Plan*.

The auditors observed a letter confirming that Komfo Anokye Hospital Emergency Department can accept, manage, and treat patients who may present with cyanide poisoning. It is also acknowledged in the letter that the hospital will participate in drills.

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.

The operation is

- ☒ **in full compliance with**
- ☐ in substantial compliance with **Standard of Practice 7.1**
- ☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Ahafo North Gold Mine has developed and are finalising emergency response plans to address accidental release of cyanide and cyanide exposure incidents. These include:

- Ahafo North Emergency Management Plan
- Process Plant Emergency Management Plan
- Ahafo North TSF Emergency Response Plan

These documents outline the various credible event scenarios for the operation and the responsibilities, actions, and notifications required to ensure an effective and efficient response.

Ahafo North Gold Mine has developed emergency response plans that list the various credible events scenarios for the site, inclusive of cyanide indents. The plans account for the following events:

a) Catastrophic release of hydrogen cyanide from storage, process or regeneration facilities.

b) Transportation accidents occurring on site or in close proximity to the operation.

c) Cyanide releases during unloading and mixing.

d) Cyanide releases during fires and explosions.

e) Pipe, valve and tank ruptures.

f) Overtopping of ponds and impoundments.

g) Power outages and pump failures.

h) Uncontrolled seepage.

i) Failure of cyanide treatment, destruction or recovery systems.

j) Failure of tailings impoundments and other cyanide facilities.

Transport related emergencies outside the mine are the responsibility of the cyanide transporter, Vehrad Transport and Haulage Co. Ltd., as detailed in 2.1. Vehrad has compiled a Transport

Management Plan for the deliveries to Ahafo North Gold Mine which considers 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.

Ahafo North Gold Mine will support the cyanide supplier and transporter to respond to transport related emergencies within the mine site property and in close proximity to the mine site in accordance with the measures detailed in the *Process Plant Emergency Management Plan, Section Chemical Release – Sodium Cyanide*.

The emergency plans describe the following:

- Specific response actions (as appropriate for the anticipated emergency situations) such as clearing site personnel and potentially affected communities from the area of exposure?

  The Ahafo North Emergency Management Plan describes the actions to take to evacuate employees from the processing plant in an emergency event.

  The *TSF Emergency Management Plan* provides details on the evacuation of communities from areas that may be affected by an emergency incident.
- Use of cyanide antidotes and first aid measures for cyanide exposure?

  Ahafo North Emergency Management Plan states that antidotes will only be administered by medically trained personnel. The plan further provides the first aid measures for cyanide exposure.
- Control of releases at their source?

  The *Ahafo North Emergency Management Plan* describes the steps to take to control cyanide releases at their source.
- Containment, assessment, mitigation and future prevention of releases?

  The *Ahafo North Emergency Management Plan* describes the actions to be taken to immediately contain the release, assess the extent and impact, clean-up and mitigate the release and to investigate the incident and review the procedures / actions taken to prevent future releases.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 7.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 7.2; to involve site personnel and stakeholders in the planning process.

The operation has involved the workforce and relevant stakeholders in the cyanide emergency response planning process.

The Ahafo North emergency management plans have been developed using cross-functional teams from the Metallurgical division, Health, Safety and Environmental department and the Community Relations department.

The operation currently involves its workforce in the emergency planning process by providing the opportunity for input during the cyanide awareness induction training and safety meetings.

Due to the location and response capabilities of local agencies, the Ahafo North Gold Mine ERT will maintain responsibility for emergency activities. External stakeholders do not have a direct involvement in emergency preparedness and response planning.

The Community Relations team maintains contact with community figures and utilizes community liaison officers to share relevant information with affected peoples with regards to emergency response planning.

The operation has made potentially affected communities aware of the nature of the risks associated with accidental cyanide releases and consulted with them directly or through community representatives regarding appropriate communications and response.

Although the neighbouring communities will not have a direct role during emergency response, the Ahafo North Community Relations department ensures regular engagement with these communities and shares information on cyanide management and the risks associated with accidental cyanide releases. Communication with the neighbouring communities is facilitated through the community information centres and community liaison officers.

The auditors observed the draft memorandum of understanding (MoU) with the Ghana National Fire Service (GNFS) for joint emergency preparedness and training of Ahafo North Mine Rescue (AMR) and GNFS personnel to provide Operational and Tactical commanders with a framework to enable them to effectively respond together.

The workforce is and will in future be included in the emergency response planning process through the following:

- Induction and refresher training where they are trained on the use of the emergency response process.
- Through the Safety, Health and Environmental meetings.

- Through the testing of the emergency responses by undertaking the mock emergency drills (once operational).

As part of the MoU and joint training with the District Fire Department, any recommendations to improve or amend the ERP will be actioned as part of the ERP updated process.

It is mandatory to submit the mine's ERP to the relevant regulators, the Ghana Minerals Commission and the Ghana Environmental Protection Agency, after an update. The regulators will review the document and provide input, if applicable.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 7.3**

☐ not in compliance with

Summarise the basis for this Finding/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 Ahafo North Gold Mine Emergency Management Plans detail the following:

a) *Designate primary and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the Plan.*

The *Ahafo North Emergency Management Plan,* Section 4 *Responsibilities,* designate primary and alternate emergency response coordinators. The General Manager or his relief will assume the role of Site Response Team (SRT) Leader and has the control authority for any emergency event at the Newmont Ahafo North Gold Mine.

b) *Identify Emergency Response Teams.*
The Ahafo North ERT crew teams are identified by name on the Ahafo North ERT Crew Roster. The roster also provides the team members' contact details.

It is stated in the response plan that Ahafo North Gold Mine will maintain a competent and readily activated ERT.

c) *Require appropriate training for emergency responders.*

The *Ahafo North Emergency Management Plan* states that it is the responsibility of the Emergency Services Lead to coordinate training for all ERT members to ensure they are trained and competent to manage all emergency events or requirements.

d) *Include call-out procedures and 24-hour contact information for the coordinators and response team members.*

The Ahafo North Emergency Management Plan includes call-out procedures and 24-hour contact information. Emergencies are reported to the 24-hour security control centre (SCC). The SCC will then contact all appropriate persons in accordance with their procedures to activate an emergency response. The ERT Coordinator is the first point of contact via the SCC.

Appendix 13 *Newmont Ahafo North Project Emergency Contacts* lists the 24-hour emergency contact for the coordinators and the response team members.

e) *Specify the duties and responsibilities of the coordinators and team members.*

The *Ahafo North Emergency Management Plan* specify the duties and responsibilities of the coordinators and the various team members.

f) *List emergency response equipment, including personal protection gear, available on-site.*

Appendix 1 *Ahafo North Operations Emergency Profile and Details* of the Ahafo North Emergency Response Plan details the available emergency response equipment and personal protective gear.

g) *Include procedures to inspect emergency response equipment to ensure its availability.*

An emergency equipment register is kept by the ERT that details the required inspections and frequency to inspect emergency response equipment.

h) *Describe the role of external responders, medical facilities and communities in the emergency response procedures.*

Local agencies such as Fire and Police will be mobilised under direction of Ahafo North Gold Mine in the event of an emergency.

Appendix 13 *Newmont Ahafo North Project Emergency Contacts* includes contact details for the local police, fire station and national ambulance service.

The operation confirmed that outside entities included in the Emergency Response Plan are aware of their involvement and are included as necessary in mock drills or implementation exercises.

The auditors observed the draft memorandum of understanding (MoU) with the Ghana National Fire Service (GNFS) for joint emergency preparedness and training of Ahafo North Mine Rescue (AMR) and GNFS personnel to provide Operational and Tactical commanders with a framework to enable them to effectively respond together.

Ahafo North Gold Mine will have an on-site clinic and it was confirmed with the doctor that they are aware of the potential need to treat patients for cyanide exposure and the operation has assured that the medical facility will have adequate, qualified staff and equipment and expertise to respond to cyanide exposures. This was further confirmed during the interview that the clinic will be involved in full chain mock drills.

The auditors observed a letter confirming that Komfo Anokye Hospital Emergency Department can accept, manage, and treat patients who may present with cyanide poisoning. It is understood that Ahafo North Gold Mine will send the antidote kit with the patient. It is also acknowledged in the letter that the hospital will participate in drills.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 7.4**

☐ not in compliance with

Summarise the basis for this Finding/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 emergency management plan includes procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency.

Appendix 13 Newmont Ahafo North Project Emergency Contacts of the *Ahafo North Emergency Management Plan* and *Appendix C Emergency Response Contact List* of the *TSF Emergency Response Plan* lists the contact details for management, the Minerals Commission (MinCom), Ghana Police Services, Ghana Fire Service and medical facilities.

Appendix 10 – Rapid Response Checklist for Community Relations Advisor of the Ahafo North Emergency Management Plan provides the actions to be taken by the Community Relations Advisor to communicate with affected communities regarding cyanide related incidents and any necessary response measures.

The *Community Notification and Evacuation* procedure has been developed to provide guidelines for efficient response to an emergency situation resulting in the need to ensure the safe and effective evacuation of nearby communities as well as to interface with entities such as regulators, local police, key community stakeholders, administrative officials, local suppliers and the media.

Section 5.19 Media Relations of the *Ahafo North Emergency Response Plan* states that any and all media enquiries that relate directly to the Ahafo North Project, its business and or any associated companies, including the safety and wellbeing of people working for Ahafo North must be referred directly to the SRT Leader. The SRT Leader is responsible for ensuring that the enquiry is dealt with as per the Media Management Plan template available in the rapid response checklist.

Newmont Corporation has compiled and implement the *Safety and Sustainability Event Management Procedure* to ensure a consistent approach to classifying, reporting and investigating safety and sustainability events, determining underlying causes, and communicating lessons learned to prevent recurrences across the organisation.

It is required in terms of the procedure that the operations must share all cyanide incidents with the Newmont Enterprise Group Head. The Corporate team is responsible for reviewing all cyanide related events to determine if notification to the International Cyanide Management Institute (ICMI) is required per the “Significant Cyanide Incidents” definition as defined in the ICMI’s Definitions and Acronyms document.

It is further stated in the procedure that Newmont has committed to notify the ICMI within 24 hours of any significant cyanide incidents.

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.

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

Summarise the basis for this Finding/Deficiencies Identified:

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

The plans describe specific remediation measures as appropriate for the likely cyanide scenarios, such as:

a) Recovery or neutralization of solutions or solids?

It is stated in the Emergency Cyanide Spill Management Procedure that spillage inside a bunded or concrete area should be hosed with copious amounts of potable water from an upwind position.

The *Neutralization of CN Spills with Ferrous Sulphate* procedure covers the use of ferrous sulphate to neutralise cyanide in a cyanide-bearing solution and / slurry for use when directed by Senior Plant Management.

The procedure describes the steps to take and provides a table to determine the amount of ferrous sulphate that will be needed to neutralise the particular spill (slurry and solution). It is required that the neutralization and testing should continue until WAD cyanide is no longer detected in the soil.

It is stated in the *Emergency Cyanide Spill Management Procedure* that the ferrous sulphate will be stored in cyanide emergency spill kits in the processing plant.

b) Decontamination of soils or other contaminated media?

It is stated in the *Emergency Cyanide Spill Management Procedure* that if the spilled solution is outside of a bunded area, the spillage may be neutralised by spreading the pre-prepared ferrous sulphate solution of the required amount. Contaminated soil must be scraped up and samples taken. Continue obtaining samples and scraping up contaminated soil until WAD samples indicate no more contamination.

c) Management and/or disposal of spill clean-up debris?

It is stated in the *Emergency Cyanide Spill Management Procedure* that the contaminated soils or other contaminated media must be picked up and placed in plastic bags or containers. The contents of these must immediately be added back into the SAG mill.

d) Provision of an alternate drinking water supply?

It was confirmed to the auditor and stated in the *Ahafo North Project Mining and Processing Final Environmental Impact Statement* that Ahafo North Gold Mine will supply unaffected borehole water,

by means of drilling new boreholes if needed, to affected communities. This is applicable to any impact that the mining operations may have on community water supply, not just cyanide related.

The *Neutralization of CN Spills with Ferrous Sulphate STP* prohibits the use of Ferrous Sulphate in or near any natural surface water.

The *Environmental Emergency Sampling* procedure describes the steps to perform emergency environmental monitoring during and after hazardous substances spill event to assess the magnitude of the impact and implement the correct mitigation measures.

It requires that in the event of a cyanide spill, samples for WAD and Total cyanide analysis should be taken. It further requires field observations for wildlife mortalities and other environmental events. The procedure includes the sampling methodologies.

The sampling locations will be determined by the Environmental Department based on the location of the spill.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 7.6**

☐ not in compliance with

Summarise the basis for this Finding/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 will review and evaluate the cyanide-related elements of its emergency response plans for adequacy on a regular basis.

It is stated in the *Cyanide Management Plan* that the *Ahafo North Emergency Management Plan* is reviewed no less than every three years. The emergency management plans may also be updated if, changes occur to mine site facilities or activities, drill or incident investigations identify a gap, recommendations are received from personnel or third parties.

Mock cyanide drills will be conducted periodically as part of the *Ahafo North Emergency Response Plan* implementation and associated emergency procedures evaluation processes.

The auditors observed the emergency mock drill schedule for 2025 indicating that both a cyanide exposure and spill drill scenario has been scheduled.

Mock drills will be field based, conducted as a minimum annually and will include cyanide release and exposure scenarios, as appropriate to the operations.

Mock drills will be evaluated to determine the adequacy of the response actions and the training received by the emergency response team. The outcome will be discussed during a debriefing meeting and will be formalised in a drill report to ensure that required improvements to the mine's s response plans and training programs are formalised and communicated.

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.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 8.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The operation is committed to train all employees and contractors who may encounter cyanide, in cyanide recognition.

Cyanide Awareness training has commenced and is presented as part of the processing plant's induction training programme. The awareness training will be presented to all employees working in the processing plant and at the TSF.

All employees and contractors working at the processing plant and / or TSF will receive annual cyanide awareness refresher training.

Training records are retained electronically on the Learning Management System (LMS). Training records will be retained for the duration of employment whereafter it will be archived.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Ahafo North Gold Mine has developed a training matrix specifying the compulsory training (e.g. cyanide awareness, etc) and job specific training required per operational position.

The training matrix identifies the training and competencies required for each job description at the processing plant and TSF area.

The operation will train workers to perform their normal production tasks, including unloading, mixing, production and maintenance with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. This includes undertaking formal training in specific STPs applicable to an employee's work area.

Training will consist of a presentation and training elements on the applicable STPs for the specific sections.

The training elements necessary for the job involving cyanide management are identified in the respective training materials.

Appropriately qualified personnel will provide task training related to cyanide management activities. Peer to peer training will be provided by operators deemed competent in the area or task. This will be supported by training personnel that provide theory and practical training. The trainer is appropriately qualified in the subject matter and have the necessary training credentials.

All personnel on the plant will be trained in cyanide awareness, cyanide hazard recognition and emergency response through the initial induction programme. More detailed cyanide training will be provided for those individuals who are likely to encounter cyanide and work in specific sections.

The employees will receive the theoretic training prior to working in the area whereafter additional on the job training will be provided by the supervisors and the Process Trainer.

It is indicated in the African Training Matrix that job specific training will be refreshed every 3 years.

Ahafo North Gold Mine is committed to providing its employees with the skills and knowledge to safely and effectively complete the required tasks of their role, in a range of situations and environments to the required standard. This will be achieved by:

- On the Job Technical Training (OJTT) – after the theory training, the employee will be guided and observed by the Process Trainer to ensure the employee can commence working in the area.

- A STP will be performed on the employee by the Process Trainer to ensure the employee is competent to work in the area.
- Periodic Planned Task Observations (PTO's) will be conducted by the Supervisors to ensure that the employees continue working safely and in accordance with the training received.
- Training records are retained electronically on the Learning Management System (LMS).
- The training records include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials.

Training records will be retained for the duration of employment whereafter it will be archived.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 8.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

All cyanide unloading, mixing, production and maintenance personnel will be trained in procedures to be followed if cyanide is released by means of the mandatory Cyanide Awareness training (refer to 8.1).

Only the Processing Plant First Responders will receive cyanide decontamination and first aid training, including emergency PPE, cyanide first aid training, SCBA usage. This training will be presented by the ERT.

The trained process plant personnel will serve as first responders supported by the ERT who will take control of the incident scene upon arrival. Individual training records for this training will be maintained by the Learning and Development Department.

The auditors observed the Emergency Response Team (ERT) Training Plan detailing the training on, *inter alia,* the elements of the emergency response plans regarding cyanide first aid, spill management and the use of the necessary response equipment, that will be undertaken by the ERT in 2025.

No community members, local responders or off-site medical providers will respond to emergencies related to cyanide.

Refresher training for response to cyanide exposures and releases will be conducted annually as part of the training programme.

Records are documenting the cyanide training, including the name of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

Training records will be retained for the duration of employment whereafter it will be archived.

PRINCIPLE 9 – DIALOGUE

Engage in Public Consultation and Disclosure

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 9.1; to promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

The operation provides the opportunity for stakeholders to communicate issues of concern regarding the management of cyanide.

Ahafo North Gold Mine held the first engagement sessions with stakeholders on 26 and 27 February 2025, 4 and 5 March 2025 at the Eusbett Hotel in Sunyani.

As part of the discussions at the meeting, the Processing Plant Metallurgist presented on cyanide awareness, in the local language Twi.

The Social Performance and External Relations Department has developed a Stakeholder Engagement Plan mapping out the planned engagement sessions for 2025. The plan lists various engagement sessions with different stakeholders.

Similarly, these sessions will provide Ahafo North Gold Mine with the opportunity to engage with stakeholders on its cyanide management practices and provide an open forum for the attendees to raise concerns and ask questions.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 9.2**

☐ not in compliance with

Summarise the basis for this Finding/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 has developed written descriptions of how their activities are conducted and how cyanide is managed. These descriptions are available to communities and other stakeholders.

The cyanide awareness slides from the stakeholder engagement sessions held in February 2025 and March 2025 were made available to the participants via the Newmont Ahafo Communications Department, upon request.

Ahafo North Gold Mine has Community Relations Officers operating in the various communities. The mine has developed a cyanide management fact sheet that is available at, and distributed via, the community communications centres. The fact sheet is also posted on notice boards in the Terchire, Susuanso, Yamfo, Adrobaa and Afrisipakrom communities. The fact sheet is available in English, the common reading language in Ghana.

A cyanide awareness presentation was presented, during the stakeholder engagement sessions held in February and March 2025, in the local language Twi to accommodate the persons that could not read the English slides.

The operation will make information publicly available on confirmed cyanide releases or exposures incidents.

In the event of a major incident, the Social Performance Department will reach out to key community stakeholders such chiefs of the local communities to communicate details of such an incident.

Newmont reports on cyanide management, at all operations, publicly on in the Newmont Sustainability Report available the company website. The information in the Sustainability Report is provided at a high-level per site stating the number of incidents distinguishing between:

- Releases off site requiring response or remediation
- Adverse effects on human health
- Adverse effects to the environment
- Requiring reporting under applicable regulations
- Exceedances of applicable limits of the Cyanide Code
- Impacts to biodiversity.

For significant cyanide release from the mine site, the Community Leaders will be notified in accordance with the requirements of the Process Plant Emergency Management Plan.

Ahafo North Gold Mine has not yet received a cyanide delivery on-site.

The Pavilion, 1st Floor
Cnr Portswood and Beach Road, Waterfront
Cape Town, 8001
South Africa

wsp.com

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