Veritas Metallica

International Cyanide Management Code
Mining Operations Recertification Audit
Evolution Mining (Cowal) Pty Ltd
Cowal Gold Mine

Summary Audit Report

30 June 2025

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Operation General Information

Name of Mine:	Cowal Gold Mine (CGM)
Name of Mine Owner:	Evolution Mining (Cowal) Pty Ltd
Name of Mine Operator:	Evolution Mining (Cowal) Pty Ltd
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Audit Team Leader:	Tom Gibbons
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Date(s) of Audit:	11 – 15 November 2024 Inclusive

Operation Location Detail and Description

Evolution Mining owns and operates six gold operations. Five Operations are located in Australia and one Operation in Canada. In Australia, two Operations are located in Queensland (QLD), two in New South Wales (NSW), one in Western Australia (WA). Evolution Mining's diversified portfolio combining production and growth has made it become the second largest Australian Stock Exchange (ASX) listed gold miner. In 2015, Evolution Mining acquired 100% interest in the Cowal Project from Barrick Gold Corporation.

The Cowal Gold Mine (CGM), also known as Cowal Gold Operations (CGO), is located on the western shore of Lake Cowal, approximately 32 km northeast of West Wyalong in Mid-Western New South Wales. The mine commenced operations in 2005 and is scheduled to continue until 2042 at current estimates.

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The Processing Facility treats ore at a rate of 9 million tonnes per annum.

The main components of Cowal are:

- An open pit which, on completion of mining, would measure approximately 1.2 km by 1.0 km and 500 m deep;
- A processing plant to extract the gold from the mined ore;
- Waste rock emplacements which would contain mined rock that has no commercial quantities of gold;
- An Integrated Waste Landform (IWL), which incorporates the previous two tailing storage facilities (TSF), which would contain the slurry residue from the processing plant;
- A lake isolation system to separate the Project from Lake Cowal over the long term;
- A 132 kV electricity transmission line from Temora to the project (some 90 km in length); and
- An access road (approximately 3 km) to the Project.

The CGM process plant treats oxide and sulphide ore and consists of primary crushing, crushed ore stockpiling, grinding, pebble recycle crushing, gravity concentration, intensive cyanide leaching (batch process), flotation, ultra-fine grinding, cyanide-leaching of both ground flotation concentrate and flotation tailings, carbon adsorption, elution, electrowinning and smelting. The leach tailings are treated with Sodium Metabisulphite (SMBS) and/or Caro's Acid to attenuate cyanide to prescribed limits and then pumped to the IWL. A Tailings Backfill Plant, referred to as the Paste Plant, was constructed and commissioned during the audit period, and has been in operation since November 2023.

The process plant was designed to ensure cyanide levels in the IWL would be a maximum of 30 mg/L and, for 90% of the time, would be below 20 mg/L measured as Weak Acid Dissociable (WAD) Cyanide.

Cyanide is delivered to site dry within 22 tonne isotainers containing solid sodium cyanide briquettes. The cyanide briquettes are dissolved in water via a sparging process, with the resulting reagent cyanide solution transferred into the process plant Cyanide Storage (Day) Tank.

Consistent with most gold ore processing plants, cyanide remains the preferred lixiviant for extracting gold via leaching processes at CGM. Cyanide is used as a gold leaching reagent in both the intensive leach reactor (ILR) and the Leach circuits. Cyanide is also used in the elution circuit to remove gold adsorbed onto carbon. Minor quantities of cyanide are also used or present in the on-site laboratory and in the

Goldroom, noting that these areas are specifically excluded from the International Cyanide Management Code.

The CGM Processing Plant flowsheet is illustrated below in Figure 1.

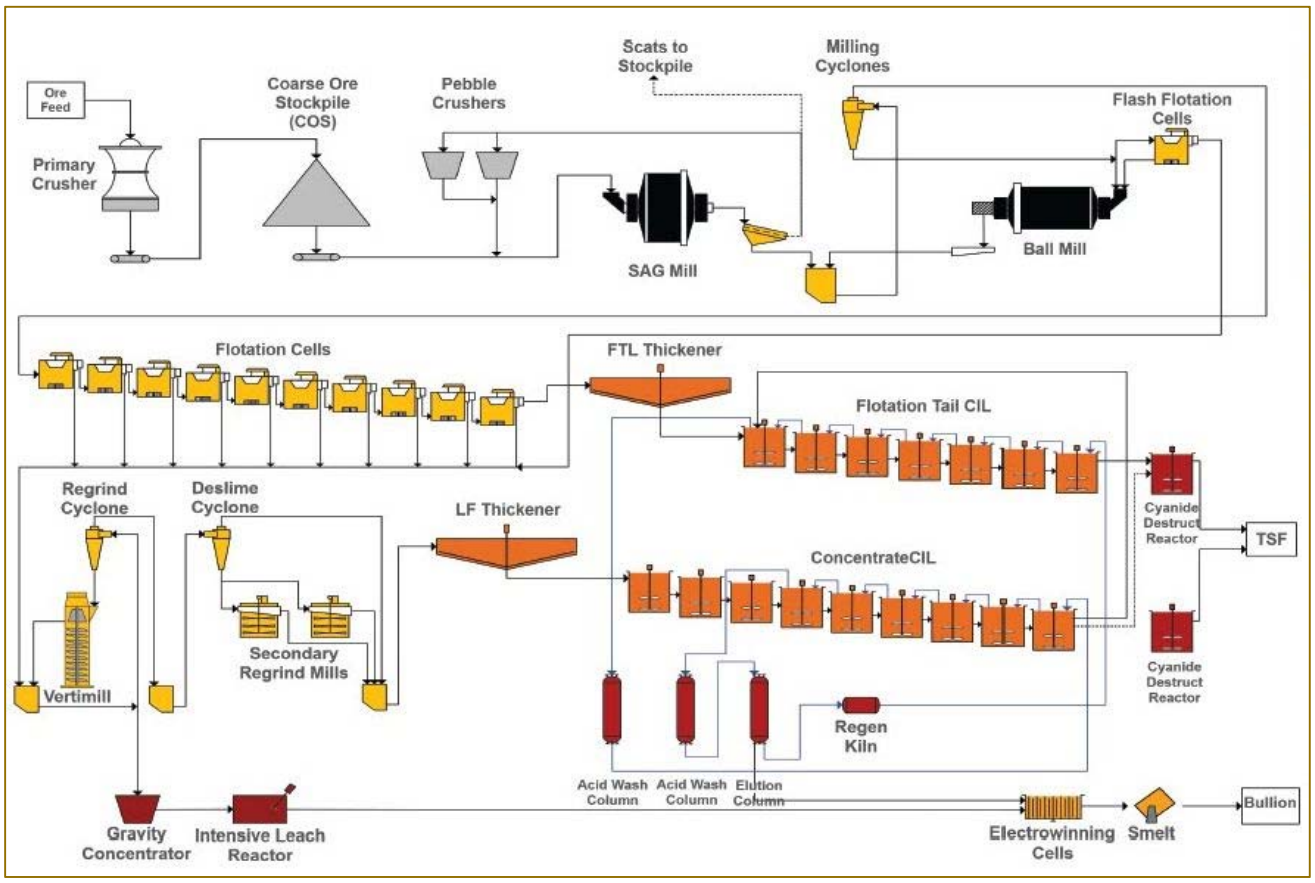

Figure 1 CGM Simplified Processing Flowsheet

Auditor's Finding

This Operation is

☐ in full compliance

☑ in substantial compliance

☐ not in compliance

with the International Cyanide Management Code.

This Operation has experienced compliance issues during the previous three-year audit cycle, as discussed in Standards of Practice 3.2, 4.1, 4.3, 4.5, 4.7, 7.1, 7.4, 7.6, and 9.2.

Auditor Information

Audit Company:	Veritas Metallica Pty Ltd
Audit Team Leader:	Tom Gibbons
Email:	Tom_G@westnet.com.au
Dates of Audit:	11 – 15 November 2024 Inclusive

Names and Signatures of Other Auditors:

Celeste Ellice 30 June 2025

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

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

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PRINCIPLE 1 - PRODUCTION:

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

Standard of Practice 1.1:

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

	☑ in full compliance with	
The Operation is	☐ in substantial compliance with	Standard of Practice 1.1
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Cowal Gold Mine (CGM) is in FULL COMPLIANCE with Standard of Practice 1.1: Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

During the audit period, all cyanide purchased by Cowal Gold Mine (CGM) for operational use was solid sodium cyanide briquettes within isotainers, manufactured at a facility certified as being in compliance with the Code.

CGM has purchased cyanide solely from Orica Australia Pty Ltd (Orica) during the audit period, with all supplied cyanide being manufactured at Orica's Yarwun Production Facility.

The Orica Yarwun Production Facility has maintained certification in full compliance with the Code during the Operation's audit period. The relevant certification dates are: 17 September 2020, and 31 October 2023.

CGM's supply contract with Orica specifies that the Supplier shall provide sodium cyanide from a production facility that has been certified as being in full compliance with the ICMC (International Cyanide Management Code).

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PRINCIPLE 2 - TRANSPORTATION:

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1:

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

The Operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice 2.1
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with 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.

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

Chain of Custody records and documentation is maintained in hardcopy and electronic format.

The records and documentation consists of Tax Invoices, Orica Delivery Notes, Goods Receipt Slips, and Electronic Inventory Records. CGM have maintained chain of custody records for cyanide supply/transportation throughout the audit period.

The records and documentation consists of Tax Invoices, Orica Delivery Notes, Dangerous Goods Transportation Notes, Goods Receipt Slips, and Electronic Inventory Records. CGM have maintained chain of custody records for cyanide supply/transportation throughout the audit period.

All identified transporters are individually certified in compliance under the Code or included in a certified supply chain.

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As noted in the most recent Orica Australia Supply Chain Recertification Audit Detailed Audit Findings Report, supply originates from the Yarwun facility in northern Queensland where the transport operation is coordinated. For cyanide supply to CGM, solid cyanide is packaged in sparge Portable Tanks, also referred to as Isotainers.

Cyanide is supplied to CGM via the Orica Australia Supply Chain. This supply chain remained certified in full compliance under the Code for the duration of the audit period. The relevant recertification dates are 20 August 2018 and 04 February 2022.

Additionally, the following identified Transporters have remained certified in full compliance under the Code during the audit period as follows:

- Lake Fox Ltd/Rocky's Own Transport Company (ROTC); relevant recertification dates 23 July 2018 and 10 May 2022; and
- Toll Global Logistics (Toll); relevant recertification dates are 09 October 2018 and 04 March 2022.

As noted on the Cyanide Code website, under the Orica Australia Supply Chain page, the certified transporter ROTC/Lake Fox was acquired by Centurion Transport in 2023 and remains certified as Centurion Transport.

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.

The Operation is
☑ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

CGM 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.

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

The unloading, storing and mixing compound was designed in consultation with CGM's cyanide supplier (Orica) and has been found in previous certification and recertification audits to be constructed in accordance with the applicable specifications and standards.

Design of the facilities has occurred in accordance with the requirements of the Australia/New Zealand Standard AS/NZS 4452:1997 The Storage and Handling of Toxic Substances, and also in accordance with the International Cyanide Management Code.

CGM advise that there have been no design or construction changes to the cyanide unloading, mixing and storage area during the audit period.

CGM unloading, storage and mixing areas for liquid and solid cyanide are located away from people and surface waters.

The location of unloading, storage and mixing facilities is unchanged from the previous certification audit, and remains strategically located away from people, surface waters, and incompatible chemicals.

The nearest surface water body is Lake Cowal. Lake Cowal is located beyond the lake protection wall, which circumscribes the open pit as a means of protection for Lake Cowal. At the nearest point, the lake protection wall is 1.0 km southeast of the cyanide unloading, mixing and storage areas. The lake isolation system serves to hydraulically isolate Lake Cowal from the unloading, mixing and storage areas.

CGM unloads liquid cyanide on a concrete surface that can minimize seepage to the subsurface, and the unloading area is designed and constructed to contain, recover or allow remediation of any leakage from the tanker truck or isotainer system.

The unloading facility has been designed and constructed such that cyanide is unloaded on a concrete surface (pad). The surface has also been designed and constructed to drain any unplanned spillage, rain or wash down activities to the secondary containment bund of the cyanide mixing and storage tanks. The unloading pad slopes gently towards the bund. The volume of this bund is sufficient to contain the full volume of a sparge mix from an isotainer.

Systems are in place to prevent overfilling of cyanide storage tanks, and the systems are tested and maintained on a routine basis.

Several systems are in place to prevent overfilling of cyanide storage tanks, including electronic level indication, high-level alarms, high level switches, and inspection, observation and unloading procedures. These systems are tested and maintained on a routine basis.

CGM has two applicable tanks; the Cyanide Mixing Tank (362-TK-362) and the Cyanide Storage Tank (362-TK-361), also referred to as the Cyanide Day Tank.

Both tanks have electronic level indicators that display at local displays at the cyanide unloading bay and also on the Distributed Control System (DCS) in the plant control room. High and High-High level alarms remain configured on each tank.

Monthly preventative maintenance checks are conducted on the cyanide mixing and storage tank level instruments to manage their reliability. Records indicated the instruments were operating effectively.

Cyanide Mixing and Storage Tanks are located on a concrete surface that can prevent seepage to the subsurface.

The cyanide storage and cyanide sparge mixing tanks are located on a concrete surface that prevents seepage to the subsurface. As-built drawings show that the mixing and storage tanks have been installed on concrete ring beams with compacted fill placed

in the annular space, topped by layers of concrete and bitumen to prevent potential leakage reaching the natural subsurface.

Secondary containments for CGM cyanide storage and mixing tanks are constructed of materials that provide a competent barrier to leakage.

The secondary containment for the Cyanide Mixing Tank (362-TK-362 and Storage/Day Tank (362-TK-361) is constructed of concrete that that provides a competent barrier to leakage.

Cyanide at CGM is stored under a roof, off the ground or with other measures to minimize the potential for contact of solid cyanide with water; with adequate ventilation to prevent the build-up of hydrogen cyanide gas; in a secure area where public access is prohibited, such as within the fenced boundary of the plant or within a separate fenced and locked area; and separately from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products with berms, bunds, walls or other appropriate barriers that will prevent mixing.

Cyanide is stored at CGM in solid form in up to six purpose-built solid cyanide sparge isotainers and in liquid form in the two cyanide mixing and storage tanks. The mixing and storage tanks are enclosed vessels installed on a competent concrete foundation that ensures they stand above any ponded water and the tank vent designs are such that water ingress cannot occur under normal weather conditions.

The solid cyanide sparge isotainers are double walled purpose-designed containers which are stored on a concrete slab to minimise the potential for contact of solid cyanide with water.

Cyanide at CGM is stored with adequate ventilation to prevent the build-up of hydrogen cyanide gas.

Cyanide is delivered in solid briquettes within sparge isotainers. Up to six sparge containers may be stored on an open concrete pad adjacent to the unloading area.

These briquettes are mixed with water via the sparging process. The cyanide is then stored in a purpose built above ground tank as a solution of approximately 30% by weight after mixing. The mixing and storage tanks are installed outdoors (in the open) and both tanks are vented to atmosphere via vent pipes that extend approximately 7.0 m above ground level. The area of the tanks is an open, naturally ventilated area, inhibiting potential accumulation of hydrogen cyanide (HCN) gas.

Cyanide is stored in a secure area where public access is prohibited, such as within the fenced boundary of the plant or within a separate fenced and locked area.

The cyanide reagent area is contained within the secured boundaries of the processing plant and has additional local fencing around the secondary containment.

Cyanide is stored separately from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products with berms, bunds, walls or other appropriate barriers that will prevent mixing.

The Cyanide Unloading, Mixing and storage area is located on the east side of the plant away from areas where acids, strong oxidisers and explosives are stored. No food products of any sort are kept within the reagent storage area or processing plant.

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

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL 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.

Standard work instructions are in place and are implemented to prevent cyanide containers being used for any purpose other than holding cyanide.

The requirement to rinse empty cyanide drums, plastic bags and liners with water three times and add the rinse water to the cyanidation process or otherwise dispose of it in an environmentally sound manner is not applicable, as CGM utilises only purpose-designed reusable double-walled metal isotainers as cyanide containers. No cyanide drums, bags or liners are used for cyanide containers.

Likewise, given CGM's Sole use of custom designed reusable isotainers for cyanide containers, crushing or disposal of cyanide containers is not applicable.

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

A procedure is in place for the operation and maintenance of all hoses, valves and couplings for mixing the cyanide into liquid form and the subsequent cleaning of them at the completion of sparging. CGM inspect and maintain hoses, valves and couplings within their Preventative Maintenance Program.

CGM has developed and implemented procedures for handling cyanide containers without rupturing or puncturing, and limited stacking of cyanide containers, via the Cyanide Unloading, Mixing and Storage Procedure and the Rotation of Cyanide Isotainers Procedure.

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CGM has developed and implemented plans or procedures for timely clean up of any spills of cyanide during mixing and transfer of liquid cyanide from tanker trucks and isotainers.

The Standard Work Instruction for Cyanide Unloading Mixing and Storage is in place and implemented to clean any cyanide residue from the outside of cyanide containers that are returned to the vendor and securely close them for shipment. The procedure requires that the discharge connections are hosed clean and that caps are fitted securely to the connection points and securely locked in place with wire cable seals after unloading. The procedure requires that the driver hose the sparge isotainer fitting and the transport trailer to ensure no cyanide residue is present, prior to the delivery truck leaving the cyanide unloading point.

CGM has developed and partially implemented plans or procedures to provide safe unloading of liquid cyanide and manual mixing of solid cyanide by requiring appropriate personal protective equipment and having a second individual observe from a safe area, or remote observation by video.

The relevant procedures are the Cyanide Unloading, Mixing and Storage Procedure and the Rotation of Cyanide Isotainers Procedure.

During a field inspection, the Auditor observed deviations from these procedures, related to correct use of personnel protective equipment, operation of drain valves, location of emergency cut-off valves, communication during cyanide spills, and Spotter duties.

The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- The deficiencies are readily correctible;
- Unloading records do not indicate a systemic problem;
- CGM have rapidly investigated and implemented corrective measures; and
- Due to other existing controls and measures within the cyanide unloading and mixing activities, the deficiencies did not result in an immediate or substantial risk to health, safety or environment.

Colourant dye continues to be added to the cyanide isotainers containing cyanide produced and delivered from the Orica Yarwun facility as stipulated in the cyanide production and transport agreement between Orica and Evolution Gold.

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PRINCIPLE 4 – OPERATIONS:

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

Standard of Practice 4.1:

Implement management and operating systems designed to protect human health and the environment utilizing 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

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL COMPLIANCE with 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.

CGM have developed written management and operating plans and procedures for cyanide facilities including, but not limited to, unloading, storage and mixing facilities, milling circuit, flotation circuit, leach plants, cyanide destruction, paste plant, and tailings impoundments. No active heap leach operations or cyanide regeneration and disposal systems exist at CGM.

Key Overarching Plans include Cyanide Management Plan (CMP); Tailings Management Plan, Surface Water, Groundwater, Meteorological and Biological Monitoring Programme; Environment Management Strategy; Water Management Plan; Emergency Preparedness and Response Management Plan; Hazardous Materials Management Plan; HCN Gas Critical Control Management Plan; Tailings Storage Facilities Dam Safety Emergency Plan; and Decontamination and Decommissioning Plan.

CGM continue to maintain plans and procedures that identify the assumptions and parameters on which the facility design was based (including but not limited to freeboard required for safe pond and impoundment operation and the cyanide concentrations in tailings on which the facility's wildlife protective measures were

based) as necessary to prevent or control cyanide releases and exposures consistent with applicable regulatory requirements.

The approval conditions for the mine establish regulatory requirements to prevent or control cyanide releases and exposures. These include a requirement that there be no discharge from the site and that regulatory limits in place for WAD CN levels at the compliance monitoring point are not exceeded. Control of freeboard levels at the TSF is managed through the TSF Operating Manuals and Procedures, with daily inspections and regular surveys against the minimum regulated freeboard requirements. Pond levels are monitored via inspections and online level detection instrumentation.

CGM continue to implement 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, including inspections and preventive maintenance activities.

These plans, procedures and work instructions describe the nominal operating conditions, systems, operating and maintenance inspections, and preventative maintenance activities.

Water management procedures for key cyanide-containing storages have been developed to retain the storage capacity of these facilities. Operational manuals have been prepared and implemented for tailings facilities and Trigger Action Response Plans have been developed to manage circumstances that are critical to the safe and stable operation of these facilities. The Cyanide Management Plan includes prescriptions for the management of freeboard in the tailings storage facilities and the concentrations of cyanide permitted to be discharged to these facilities. The operation has developed the decontamination and decommissioning plans which describe how cyanide would be managed in the event of a temporary closure or cessation of operations.

CGM implements a comprehensive Preventative Maintenance System, driven by an overarching Cyanide Code Maintenance Strategy.

CGM has a Management of Change (MOC) procedure to identify when changes in a site's processes or operating practices may increase the potential for the release of cyanide and to incorporate the necessary release prevention measures.

The MOC procedure requires environmental and safety personnel to review and sign off on proposed cyanide-related process changes and modifications, prior to implementation of the changes and modifications.

Records of Management of Change spanning the audit period were provided for a variety or processing and cyanide-related changes. However, during the audit period, a new cyanide facility was constructed and commissioned – the Paste Backfill Plant.

No Management of Change Workflow, as it relates to cyanide and the Cyanide Code, was available for this project.

The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- CGM has demonstrated good faith by executed a significant number of Management of Change workflows effectively in the audit period;
- The facility is largely compliant with applicable standards of practice;
- The cyanide concentrations at the facility are relatively low;
- The deficiency is readily correctible;
- CGM have immediately addressed identified action items; and
- Due to existing design features and controls, the deficiency did not result in an immediate or substantial risk to health, safety or environment.

CGM has cyanide management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases, such as an upset in the operational water balance that presents a risk of exceeding the design containment capacity; problems identified by facility monitoring or inspection; and temporary closure or cessation of operations.

CGM carries out inspections on the following at unloading, storage and mixing and process areas, as applicable for the site: Tanks holding cyanide solutions for their integrity and signs of corrosion and leakage; Secondary containments for their integrity, the presence of fluids and their available capacity, and to ensure that any drains are closed and, if necessary, locked, to prevent accidental releases to the environment; Leak detection and collection systems at leach pads and ponds, as required in the design documents; Pipelines, pumps and valves for deterioration and leakage; and Ponds and impoundments for the parameters identified in their design documents as critical to their containment of cyanide and solutions and maintenance of the water balance, such as available freeboard and integrity of surface water diversions.

The preventative maintenance system at CGM requires scheduled inspection activities for cyanide related work areas, equipment and facilities, including unloading, storage, mixing and process areas. Records are maintained that demonstrate that these schedule inspections are completed and that any deficiencies are identified and corrective actions undertaken. The maintenance and inspections tasks are issued with maintenance work instructions, including inspection checklists that require sign off and retention of completed work order records.

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CGM undertakes cyanide facility inspections on an established frequency to assure and document that they are functioning within design parameters.

The Cyanide Maintenance Strategy outlines the basis for inspection frequency of maintenance and inspection, the process for tracking and recording maintenance completed and the ongoing review of maintenance strategy.

Inspections are documented, and the documentation identifies specific items to be observed and includes the date of the inspection, the name of the inspector, and any observed deficiencies. The nature and date of corrective actions documented, and are records retained.

A cross-section of inspection documents, both Operational and Maintenance, were reviewed and found to be consistent with listed requirements.

CGM continue to implement and document preventative maintenance programs and activities to ensure that equipment and devices function as necessary for safe cyanide management.

The CGM preventative maintenance system maintains records that demonstrate that equipment and devices function as necessary for safe cyanide management.

This includes fixed and personal hydrogen cyanide monitors, pH probes, cyanide tank level indicators, online cyanide analysers, safety showers, and fire extinguishers.

CGM has necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. The back-up power generating equipment is maintained and tested.

Standard of Practice 4.2:

Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

The Operation is
- ☑ in full compliance with
- ☐ in substantial compliance with

Standard of Practice 4.2

- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 4.2: Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

CGM conducts a program to determine appropriate cyanide addition rates in the mill and evaluate and adjust addition rates as necessary when ore types or processing practices change cyanide requirements.

CGM continues to utilise a gold recovery model, based on statistical analysis, which includes various cyanide additional parameters to optimise cyanide addition and forecast changes due to variability in ore characteristics.

CGM conducts testwork both on site in the metallurgical laboratory and with external metallurgical laboratories to evaluate and optimise cyanide addition rates for current and future ore sources.

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Standard of Practice 4.3:

Implement a comprehensive water management program to protect against unintentional releases.

	☐ in full compliance with	
The Operation is	☑ in substantial compliance with	Standard of Practice 4.3
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL COMPLIANCE with Standard of Practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.

CGM has developed and continues to implement a comprehensive, probabilistic water balance, developed by third party hydrogeological consultants, and utilising industry standard modelling software, as reviewed in the previous recertification audit. The current model was developed in 2015, and has been updated in 2018, 2019, 2020, and 2021.

The model owner on site is the CGM TSF Superintendent.

Probabilistic modelling to date has not identified any risk of overtopping of the TSF, ponds or impoundments.

The CGM probabilistic water balance model considers the following aspects in a reasonable matter as appropriate for the facilities and environment:

a) The rates at which solutions are applied to leach pads and tailings that are deposited into tailings storage facilities (no leach pads exist at CGM);

b) A design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility;

c) The quality of existing precipitation and evaporation data in representing actual site conditions;

d) The amount of precipitation entering a pond or impoundment resulting from surface run-on from the upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground;

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e) The effects of freezing and thawing are not applicable to CGM due to its location/climate;

f) The model considers solution losses from seepage and evaporation;

g) The effects of potential power outages or pump and other equipment failures are not applicable, due to no leach pads existing at CGM, existence of power generation redundancy, and availability of portable power generators and pumps;

h) Discharge to surface water is not applicable as this does not occur at applicable facilities at CGM; and

i) Other aspects of facility design that can affect the water balance.

The existing CGM Probabilistic Water Balance Model was specifically designed by the model developer and third party technical expert to address the listed aspects in a reasonable manner as appropriate for the facilities and the environment.

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

The design rainfall event for process water ponds on site is a 1 in 1000-year 48-hour event of 216 mm. The design rainfall event for storm water ponds on site is a 1 in 100-year 48-hour event of 144 mm. The Cowal Water Management Plan, Site Water Management Plan outline the design storm events and design capacity for the mine ponds and impoundments.

For each TSF, there is a 500 mm freeboard for slurry and a 1000 mm freeboard for supernatant water, which meets the 1 in 1000-year event of 216 mm. An independent tailings consultant conducts yearly inspections, which includes TSF freeboard requirements assessment.

CGM 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.

CGM continues to implement relevant inspection and monitoring activities, including IWL inspections and Processing Area Inspections.

The results of daily and weekly inspections of ponds and IWL (tailings facilities) are analysed along with the water balance model outputs to assess compliance against the trigger action response plans developed within the tailings management plans and site water management plan. These are reviewed monthly by the CGM operational teams.

CGM measures precipitation and compares results to design assumptions, with revision of operating practices as necessary.

Measured climatic data, including precipitation, is updated quarterly into the site water balance model. The simulation outcomes of the model are used to verify the operational water management practices.

Based upon an Auditor interview with the probabilistic water balance model owner, the CGM TSF Superintendent, the model appears to have been run consistently on a quarterly basis by the CGM TSF Superintendent, but a complete record of the model runs and reports was not available. As such, records for the Probabilistic Water Balance Model Runs and Reports are incomplete.

The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- The deficiency is readily correctible;
- Evidence exists supporting the periodic running of the model where a formal report is absent; and
- Due to existing other controls and measures within the Water Storage Facilities Procedure, Tailings Management Plan, and Integrated Waste Landform plans and procedures, the deficiency did not result in an immediate or substantial risk to health, safety or environment.

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 ☐ not in compliance with	Standard of Practice 4.4

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 4.4: Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

CGM operates a cyanide destruct facility within the Main Processing Plant, and as such does not have open waters where WAD cyanide exceeds 50 mg/L.

Irrespective of attenuation of WAD cyanide concentrations, further measures have been implemented to reduce the ability of wildlife to access operational water bodies, including fencing and air cannons.

CGM can demonstrate that the cyanide concentration in open water in TSFs, leach facilities and solution ponds was maintained below 50 mg/l WAD cyanide.

CGM monitor WAD cyanide concentration in a number of open waters, including: the Integrated Waste Landform (IWL), D6 Process Water Pond; D5 Process Plant Stormwater, and the TSF Decant.

CGM continue take the samples and analyse results internally as well as send samples to external laboratories for testing. Results are also reported to the regulator. Monthly WAD cyanide results are located on the website as publicly available.

CGM also use an online WAD cyanide analysers on process streams, including on the final tails prior to discharge to the TSF and after the cyanide destruct system, to help verify and effectively attenuate WAD cyanide concentrations prior to discharge.

In addition to the Code limit of 50 mg/l WAD cyanide, CGM's Operations Development Consent Approval from the New South Wales (NSW) Environmental Protection Authority (EPA) enforces the following limits:

- 20 mg/l WAD cyanide (90th percentile averaged over 6 months); and
- 30 mg/L WAD cyanide (100th percentile – never to exceed)

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Two confirmed exceedances occurred during the audit period as follows:

- 26 May 2022 – 36ppm WAD cyanide Final Tails
- 22 Mar 2023 – 36.8ppm WAD cyanide Final Tails

Per regulatory conditions, both incidents were reported to the NSW EPA and Department of Planning and Environment (DPE). The exceedances were also reported within Cowal Gold 2022 and 2023 Operations Annual Review Statutory Reports.

The incidents were investigated in detail, with subsequent recommended remedial actions implemented.

Maintaining a WAD cyanide concentration of 50mg/l or less in open water is effective in preventing significant wildlife mortality.

The operation continues to inspect the TSF ponds twice daily for the presence of wildlife and mortality in accordance with procedures. Daily Tailings Storage Facility Inspections requires the conduct of twice daily TSF inspections.

A register of wildlife deaths at CGM continues to be maintained by the operation. A veterinarian investigates all recoverable fauna carcasses and reports are maintained regarding the cause of death for all observed wildlife mortalities at CGM where cyanide impacts may be attributed.

Cowal continues to engage third-party wildlife and toxicology experts to provide training to process operators and other site staff and the environment team is also approved by the experts to provide training to site staff. Third-party wildlife experts continues to conducts 6 monthly site visits for intensive expert wildlife observations.

No wildlife deaths attributed to cyanide occurred during the audit period.

No heap leach operations exist at CGM.

Standard of Practice 4.5:

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

	☐ in full compliance with	
The Operation is	☑ in substantial compliance with	Standard of Practice 4.5
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL COMPLIANCE with Standard of Practice 4.5: Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

CGM continues to have no direct or indirect discharge to surface water from any defined cyanide facility.

The nearest surface water body is Lake Cowal, situated immediately adjacent to the current Mining Open Pit.

The Operation is designed and operated such that all water within the site operations area (and therefore potentially contaminated) drains internally towards a range of catchment dams.

Groundwater monitoring results were reviewed during the audit period with results below limits of detection. Groundwater flow on-site is towards the pit void, as confirmed by third-party subject matter expert reports.

Physical Inspection records show no visual indication of indirect discharge.

CGM has not consistently assayed for cyanide in surface water (Lake Cowal) downgradient of the Operation during the audit period. The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- The deficiency is readily correctible;
- CGM has robust physical and civil barriers approved by regulatory authorities to prevent potential accidental direct discharge to Lake Cowal;
- Routine assaying for WAD CN has occurred in 2024; and
- The deficiency did not result in an immediate or substantial risk to health, safety or environment.

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Standard of Practice 4.6:

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

The Operation is	☑ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.6

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

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

There are currently no identified beneficial uses of groundwater beneath and/or immediately down gradient of the operation. The operation has determined that there are no beneficial users of groundwater in the area, other than the water requirements of the operation itself.

Specific studies have determined that there are two groundwater aquifers in the area, one shallow and one deeper. There is no connectivity between these two aquifers.

A groundwater monitoring bore network is located throughout the mine lease and monitoring of water for cyanide is undertaken quarterly. Groundwater monitoring results were reviewed during the audit period with results typically below limits of detection. Groundwater flow on site is towards the pit void.

CGM does not have numerical standards for cyanide in groundwater applied to their operation by the regulatory authority. The operation does have a requirement to monitor and report WAD cyanide levels at various locations but no limits have been established. Cowal has complied with their requirement to monitor and report WAD CN levels in groundwater in the Annual Review Statutory Reports for 2021, 2022, and 2023.

During the audit period, a Paste Backfill Plant was constructed and commissioned. At the time of the field audit, it had been operational from approximately 12 months. CGM conducted Hazard and Risk Assessments during the design and construction phase of the Project to evaluate potential impacts to worker health and the beneficial

uses of ground water been evaluated and have measures been implemented as necessary to address them.

The site is designed to capture all surface water runoff within the operational area, which is directed to surface water point D5. D5 is a clay lined water storage dam. The IWL has been constructed as a clay-lined facility and all three locations are engineered to a permeability of no greater than 1 x 10-9 meters per second over a thickness of 1 metre, as required by government development approvals. D6 (process water dam) is HDPE lined.

The IWL has seepage collection structures in place that capture any seepage and pump back to the IWL.

Standard of Practice 4.7:

Provide spill prevention or containment measures for process tanks and pipelines.

	☐ in full compliance with	
The Operation is	☑ in substantial compliance with	Standard of Practice 4.7
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL COMPLIANCE with Standard of Practice 4.7: Provide spill prevention or containment measures for process tanks and pipelines.

CGM continues to provide a number of measures for spill prevention or containment for all cyanide unloading, storage and process solution tanks.

The mixing, storage and process tanks have been designed and constructed such that they sit on a concrete ring beam with compacted fill in the centre and covering layers of concrete and asphalt to prevent potential leakage from migrating to the subsurface. The Flotation Tailings Leach (FTL) tanks utilise a HDPE liner to provide an impermeable layer beneath these tanks.

Secondary containments for cyanide unloading, storage, mixing and process tanks are 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.

Secondary containments for cyanide unloading, storage, mixing and process tanks are 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. The mixing and storage tanks are in a concrete bunded area, the volume of which is significantly more than 110% of the combined volume of the two storage tanks. The bunding surrounding the leach and adsorption tanks is capable of storing two of the largest leach tanks, which exceeds the volume required by the Code.

Procedures are in place and being implemented to prevent discharge to the environment of cyanide solution or cyanide- contaminated waters that are collected in the secondary containment areas.

This requirement is specified in the Responding to Spills Containing Cyanide Procedure, which deals with spill response both inside and outside of secondary containment.

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Secondary containment areas have been built with dedicated sump pumps and piping to redirect all such water back into the processing plant.

There are no Process Solution Tanks without secondary containment.

Spill prevention or containment measures are provided for all cyanide solution pipelines to collect leaks and prevent releases to the environment.

Measures include impermeable secondary containments, pipe-within-pipe secondary containment, clay-lined trenches for lower strength solution, operational and preventative maintenance inspections, and electronic and visual inspection leak detection.

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

Cyanide tanks and pipelines are constructed of materials compatible with cyanide and high pH conditions.

Materials of construction include mild steel, stainless steel, and HDPE.

During a field inspection of the Flotation Tailings Leach (FTL) circuit on 12 November 2024, a significant number of leak detection ports, also known as tell tales, were found to be blocked. It was further noted that monthly inspection sheets for this circuit did not identify that the ports were blocked.

The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- The deficiencies are readily correctible;
- CGM have rapidly investigated and implemented corrective measures; and
- Due to existing other controls and design features related to spill prevention and containment, the deficiencies did not result in an immediate or substantial risk to health, safety or environment.

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

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 4.8: Implement quality control/quality assurance (QA/QC) procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Quality control and quality assurance (QA/QC) programs have been implemented during construction of all new cyanide facilities and modifications to existing facilities, including cyanide unloading, storage and other cyanide facilities.

CGM have implemented construction quality assurance and quality control programs for all active cyanide facilities prior to the current recertification period. Records of these programs exist and were inspected during the current audit.

The two applicable cyanide facilities during the audit period are the Paste Plant and IWL Works.

Project records for both facilities confirm that detailed quality control and quality assurance programs have been implemented.

Quality control and quality assurance programs have addressed the suitability of materials and adequacy of soil compaction for earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used in ponds, and for construction of cyanide storage and process tanks. No heap leach facilities and hence no leach pads exist at CGM.

Quality Control and Quality Assurance records have been retained for cyanide facilities.

CGM store original and subsequent cyanide facility construction records, including quality control and quality assurance, in electronic format on a network drive (G: Drive).

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The original hard-copy files and reports are also stored on site in a purpose-assigned Sea Container, with ready access. This was inspected during the field audit.

Appropriately qualified personnel have reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved.

Newly constructed facilities have been reviewed by appropriately qualified and certified Mechanical and Civil Engineers, and signed completion certifications exist.

CGM has retained quality control and quality assurance records for cyanide facility construction.

Standard of Practice 4.9:

Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

The Operation is	☑ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.9

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

CGM have developed written standard procedures for monitoring activities.

CGM have developed, maintained and implemented a range of written standard procedures for monitoring activities. They exist in the form of overarching Management Plans (e.g. Cyanide Management Plan; Water Management Plan, Surface Water, Groundwater, Meteorological and Biological Monitoring Programme), and in specific task procedures (e.g. Surface Water Monitoring Procedure, Groundwater Monitoring Procedure, Daily Tailings Storage Facility Inspections SW).

Sampling and analytical protocols have been developed by an appropriately qualified person.

The sampling and analytical protocols have been developed by taking into consideration licensing requirements and Australian Standards for sampling and monitoring. The majority of the site documents were originally written by third party technical experts. Laboratory analytical protocols have been developed in accordance with American Public Health Association (APHA) methods for analysing WAD cyanide.

Site environmental staff contribute to the review and update of procedures and protocols and are appropriately qualified (i.e. Certificate IV in Laboratory Techniques, Bachelor of Environmental Science).

CGM procedures specify how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, cyanide species to be analyzed and quality assurance and quality control requirements for cyanide analyses, as verified by review of procedures and examples of chain of custody documentation.

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The Cyanide Management Plan and Surface Water, Groundwater, Meteorological and Biological Monitoring Programme detail where samples should be taken. The Environmental Sample Handling and Transport Procedure specifies the methods for sample preservation, refers to how to complete Chain of Custody forms, instructions for shipping the samples in an Cooler Box with ice, handling times and shipping methods

Sampling conditions (e.g., weather, livestock/wildlife activity, anthropogenic influences, etc.) and procedures are documented in writing. The Field Sheet Form includes fields for recording weather, last rain event, and Lake water level, and any other pertinent observations.

Monitoring is conducted at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner.

The CGM monitoring frequency has been developed based upon legislative licence conditions, expert third party advice, and operational learnings.

The Cyanide Management Plan and Surface Water, Groundwater, Meteorological and Biological Monitoring Programme detail the monitoring frequency and parameters for each monitoring location. Monitoring frequencies are as follows: Process solution streams within Plant – continuous online analysers (CN FREE); Tailings slurry – twice daily (WAD CN); Tailings decant water– twice daily (WAD CN); Wildlife at TSF – twice daily (bird count); Groundwater levels (TSF seepage bores) – monthly, Groundwater Quality – quarterly (WAD CN), Surface water internal catchment ponds – monthly.

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 and livestock.

The Operation is
☑ in full compliance with
☐ in substantial compliance with Standard of Practice 5.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 5.1: Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

CGM has developed written procedures to decommission cyanide facilities at the cessation of operations.

The Decontamination and Decommissioning Plan (DDP) addresses the processing facilities and associated infrastructure, and includes decommissioning of all cyanide facilities on site. This includes the cyanide facilities commissioned during this recertification audit period (i.e. paste plant). The DDP addresses each area of the processing plant with decontamination and decommissioning activities such as flushing, washing, rinsing, removal and monitoring for all cyanide areas.

The DDP states that all process streams containing residual cyanide will be routed through the cyanide destruction circuit, prior to discharge to the TSF. Procedures for decontamination of equipment have been written for low, medium and high cyanide concentration areas.

The DDP includes an implementation schedule for decommissioning activities.

This includes a review of occupational health and safety (OHS) procedures, and cyanide handling safety training. Each area of the plant (including tailings pipework and pumps) is listed in order of clean-up over a period of 12 months. Water Quality Monitoring tasks are included in the schedule.

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CGM reviews its decommissioning procedures for cyanide facilities during the life of the operation and revises them as needed.

The DDP is reviewed at least every 5 years or when major changes occur in the process facilities. The most recent update was carried out following the addition of the Paste Plant in August 2023.

Standard of Practice 5.2:

Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

The Operation is	☑ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 5.2

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 5.2: Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

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

An estimate of the cost of decommissioning and contamination of the processing facilities at CGM have been carried out by third party consultant ATC, and are included in the DDP. A detailed breakdown of cost estimates has been made for each section of the processing plant, and each step of the decommissioning and decontamination process, including assessment and remediation of groundwater (if required). The unit cost rates have been indexed based on Construction Index Values for June 2020 costs.

CGM continues to review and update the cost estimate at least every five years and when revisions to the plan are made that effect cyanide-related decommissioning activities.

The DDP states that the cost estimate will be updated every 5 years, including updated third-party cost rates. The costs were reviewed in 2020. Overall closure costs for the entire site are calculated as part of the Mine Closure Plan (MCP), and is estimated using the Rehabilitation Cost Estimation Tool (developed by the NSW Resources Regulator). This was most recently updated when the paste plant was commissioned, in 2023.

CGM participate in the financial mechanism required by the applicable jurisdiction to cover the estimated costs for cyanide-related decommissioning activities as identified in its decommissioning and closure strategy.

As part of the NSW regulatory framework for rehabilitation, all exploration and mining title holders are required to lodge a security deposit with the department that covers the full rehabilitation costs. This requirement ensures that the NSW Government does

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not incur financial liabilities in the event of a title holder defaulting on their rehabilitation obligations.

A Rehabilitation Cost Estimation Tool (developed by the NSW Resources Regulator) is used to assist in calculating the security deposit for a site. The Resources Regulator undertakes regular reviews of the rehabilitation cost estimate tool to ensure it remains accurate and reflective of third-party costs. CGM has lodged the required Security Deposit with the Resources Regulator.

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 or control them.

The Operation is
☑ in full compliance with
☐ in substantial compliance with Standard of Practice 6.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 6.1: Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

CGM has developed procedures describing how cyanide-related tasks such as unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimize worker exposure.

Procedures and work instructions have been developed and implemented for areas of operation that involve cyanide solutions, including the Cyanide Unloading, storage and mixing Area, Leaching Tanks, Elution Columns, Gold Room Operations, and TSF. These are stored and accessed electronically within the CGM document control system.

Procedures and work instructions have been developed for cyanide-related tasks such as cyanide unloading, plant operations, entry into confined spaces, spill management and equipment decontamination prior to maintenance. Procedures/work instructions have been reviewed and found to be of industry standard.

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

PPE requirements, Hazards, and Hydrogen Cyanide (HCN) Monitoring requirements are clearly identified in separate sections prior to the procedure steps.

Pre-work inspections are identified for each procedure, as required (e.g. Complete Take 5 risk assessment prior to commencing any new task).

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CGM solicits and actively considers worker input in developing and evaluating health and safety procedures, and when new cyanide related procedures are developed or periodically reviewed.

Safe Work Instructions and Procedures are drafted and finalised by subject matter experts and managers. The drafts are sent out to all workers in the work group who would use the procedures for review and feedback. The Job Hazard Analysis (JHA) is a documented risk management tool, used to review a task and is completed with participation from all persons who will be involved in the task. Regular safety meetings and toolbox sessions are held across the site in each department and team. This includes daily pre-start meetings, and monthly crew safety meetings.

Formal risk assessment sessions are held periodically to assess risks within the Processing plant and the risk management tools. This involves a cross-section of employees.

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
☐ not in compliance with
Standard of Practice 6.2

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with 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.

CGM has determined the appropriate pH for limiting the evolution of hydrogen cyanide gas during production activities.

The set points for optimum pH in Leach Tank 2 are between 9.8 – 10.8. Operating data indicates that pH is managed in the range 9.8 – 10. pH is controlled using lime. Online pH readings are displayed on the plant control system.

CGM has identified areas and activities where workers may be exposed to cyanide in excess of 10ppm on an instantaneous basis and 4.7ppm continuously over an 8 hour period and require use of personal protective equipment in these areas or when performing these activities. Specifically: Cyanide mixing area, CIL circuit, Gold Room, Elution Circuit, Cyanide Destruct Tank, Intensive Leach Reactor (ILR), Final Tails Hopper FTL circuit. The entrance to these areas is clearly signposted that a HCN Gas Detection Monitor must be worn.

CGM uses both fixed (static) and personal cyanide monitoring devices in processing areas and for activities involving management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas exceeding 10 ppm on an instantaneous basis or 4.7 ppm continuously over an 8-hour period.

No monitoring for cyanide dust occurs, as CGM only used liquid sodium cyanide solution within cyanide facilities. Mixing of the solid cyanide only occurs within the isotainer and therefore exposure to cyanide dust is not present.

Fixed hydrogen cyanide (HCN) gas monitors are installed in the following locations where there is potential for evolution of HCN gas: Leach Tanks 1, 2, 4, 9; Cyanide Mix & Storage Tanks; Float Cell 1; Cyanide Destruct Tank; Elution Column – Top & Bottom; Gold Room; FTL circuit (x 4); Float Tails Bund (Eastern End and Western End).

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During field inspections, fixed HCN gas monitors were observed at all the listed locations. The fixed detectors are programmed with alarms. An audible and visual alarm is activated at 4.7ppm and 10ppm, and if above 4.7ppm it will alarm at the Control Room.

Mandatory areas for wearing a personal HCN Gas Detection Monitor include most parts of the Processing Plant, specifically: Cyanide mixing area, CIL circuit, Gold Room, Elution Circuit, Cyanide Destruct Tank, ILR, Final Tails Hopper FTL circuit. Programmed into the personal HCN gas detectors are high (4.7 mg/L HCN) and high-high (10 mg/L HCN) alarm points.

During field inspections, fixed HCN gas monitors were observed at all the listed locations. The fixed detectors are programmed with alarms. An audible and visual alarm is activated at 4.7ppm and 10ppm, and if above 4.7ppm it will alarm at the Control Room. The Responding to HCN Levels above 4.7ppm Procedure outlines the procedure to take if a fixed or personal gas detection monitor alarm goes off. If the alarm corresponds to an exceedance of 4.7ppm HCN, the worker must immediately inform the Supervisor, who will assess the situation in accordance with the sequence of instructions and necessary controls listed within the procedure. A worker cannot remain in a 4.7ppm HCN area for longer than 8 hours (Threshold Limit Value). If the alarm corresponds to an exceedance of 10ppm HCN, the worker must immediately evacuate the area and inform the Supervisor, who will similarly will assess the situation in accordance with the sequence of instructions and necessary controls listed within the procedure.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained for at least three years.

The fixed HCN gas monitors are tested monthly (zero test) by the Electrical Maintenance Department as per work orders generated by the preventative maintenance system. Every six months they are calibrated as per the manufacturer guideline procedure (zero and span test).

Personal cyanide monitors are bump tested daily, and calibrated in accordance with manufacturer's requirements. Bump and Calibration records are retained for at least three years and have been verified for 2021 to 2024.

Warning signs have been placed where cyanide is used advising workers that cyanide is present, of any necessary personal protective equipment that must be worn, and that smoking, open flames and eating and drinking are not allowed. Signage was inspected and verified during auditor field inspections.

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High strength cyanide solution is dyed for clear identification. ORICA deliver cyanide to site with Carmoisine red dye tablets added to the Isotainer. Consequently, all high strength cyanide solutions on site are identifiable by this red dye.

Low pressure combination Safety shower/ eye wash stations and dry powder fire extinguishers are located at strategic locations throughout the operation and are maintained, inspected and tested on a regular basis. The safety showers are identified by green lights. Only dry chemical powder extinguishers are available within the leach and CIL tanks, gold room and cyanide storage areas. These were observed during the field inspection.

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

All pipes carrying high strength cyanide on site are coloured purple and/or labelled 'cyanide' with the direction of flow indicated. Cyanide storage tanks containing high strength (>1%) cyanide solution are labelled by signage that identifies sodium cyanide solution, UN and HAZCHEM id numbers and a phone number for ORICA specialist advice. Process tanks including CIP Tanks, and Elution Tanks are also identified as containing cyanide through signage and labelling.

Pipelines containing lower-strength process solution and slurry (e.g., the tailings delivery pipeline and other pipelines within the plant) are identified to alert workers of their contents and the direction of flow, as necessary, based on cyanide concentrations, signage, and the operation's safety and training programs.

Safety Data Sheets (SDS), first aid procedures or other informational materials on cyanide safety in English, the language of the workforce, are available in areas where cyanide is managed. The information is available in both electronic and hardcopy format.

CGM has a procedure to investigate and evaluate any 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 to be revised.

The Incident Reporting and Investigation Procedure outlines the method of investigation following an incident, including In the event of a cyanide exposure. A review of the effectiveness and adequacy of the cyanide procedures and work instructions relevant to the incident are conducted as part of the incident investigation.

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 ☐ not in compliance with	Standard of Practice 6.3

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 6.3: Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

CGM has oxygen, a resuscitator, antidote kits and a radio, telephone, alarm system for communication and emergency notification readily available for use at the cyanide unloading, storage and mixing locations and elsewhere in the plant.

A portable medical oxygen cylinder and oxygen delivery mask is stored in a weather-proof box at the cyanide unloading, storage and mixing area. Bulk oxygen bottles are stored at the medical clinic and in the Ambulance.

All personnel working in cyanide areas including the cyanide unloading area, are required to carry two-way radios. This is the primary means for raising an emergency, and for communication during an emergency.

The cyanide antidote used is CYANOKIT® (hydroxycobalamin), which is stored at the Medical Centre only, and to be administered by site paramedic under authorisation. First response equipment (PPE safety box) for managing cyanide exposure is located at the unloading and mixing area. Equipment includes: Chemical suit, Full Face Respirator, Cyanide Canister, Safety Glasses, Mono Goggles

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

Cyanide antidote kits are stored in the medical facility in a locked cabinet and is replaced on schedule to ensure that they remain within their expiry date and will be effective when needed. Completed monthly inspection checklists of First Aid Kits were viewed for a range of months throughout the audit period.

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The Site Paramedic carries out weekly, fortnightly and monthly checks on the First Aid Equipment in the Medical Centre and of the Ambulance, a range of completed checklists were reviewed. First aid equipment housed by the Emergency Response Team (ERT) is maintained, inspected and logged weekly during training or by an Emergency Services Officer (ESO). CGM has developed specific written emergency response plans or procedures to respond to cyanide exposures.

The operation has developed and implemented a site-specific Emergency Preparedness and Response Plan (EPRP) to respond to emergency incidents. First aid measures for cyanide exposure are outlined in Standard Operational Guideline 14 - Cyanide Spill, uncontrolled release, Gas plumes. Response measures include administering of oxygen, flushing eyes and skin with running water, decontamination, and handing over to medical aid.

All workers that may encounter cyanide are required to complete and be verified as competent in Cyanide Awareness Training, which has detailed information on cyanide hazards. This specifically addresses the necessary response to cyanide ingestion, inhalation and absorption through the skin and eyes.

CGM has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide.

CGM has a Medical Centre close to the Process Plant. It is a single bed facility fully equipped with consumables (including cyanide antidote and equipment, with the capability of responding to a cyanide exposure incident and a range of other emergencies. A paramedic is on 24 hour call at all times, with ancillary support from Emergency Response Team (ERT) medics who have training in advanced first aid. Persons trained to a level in Certificate IV and above hold the required training in intravenous (IV) access to administer the Cyanide antidote. Should the antidote be indicated, the provisions of use would be approved via the nominated on-call Doctor (Royal Flying Doctor Service).

CGM has developed procedures to transport workers exposed to cyanide to locally available qualified off site medical facilities.

The ambulance adjacent to the Processing Plant is equipped to transport a patient from site, and contains six hours of oxygen supply. Discussions have been held with the NSW Ambulance regarding their ability to assist in transporting a patient who has been exposed to cyanide.

CGM has informed local medical facilities of the potential need to treat patients for cyanide exposure and is confident that the medical facility has adequate, qualified staff, equipment and expertise to respond to cyanide exposures.

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A formal notification has been made to the West Wyalong Hospital regarding the potential transportation of individuals affected by cyanide exposure to the facility for assessment and treatment. This agreement has been in place and renewed periodically since 2013.

PRINCIPLE 7 – EMERGENCY RESPONSE:

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

Standard of Practice 7.1:

Prepare detailed emergency response plans for potential cyanide releases.

	☐ in full compliance with	
The Operation is	☑ in substantial compliance with	Standard of Practice 7.1
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL COMPLIANCE with Standard of Practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.

CGM has developed an Emergency Response and Management Plan (EPRP) which addresses potential accidental releases of cyanide and cyanide exposure incidents.

The Emergency Preparedness and Response Management (EPRP) provides over-arching guidance to emergency management and addresses emergency preparedness, emergency management system framework, and emergency response team activation. The Emergency Response Standard Operational Guidelines (SOG) have been developed to provide guidelines for Emergency Response personnel in a full range of emergency events, including potential releases of cyanide (specifically addressed in SOG 14).

The CGM EPRP considers the following potential cyanide failure scenarios appropriate for its site-specific environmental and operating circumstances: Cyanide releases during unloading; Cyanide related injury; Liquid cyanide spills outside of bunded areas; Cyanide releases during fires and explosions; Release of cyanide due to pipe, valve and tank ruptures; Failure of tailings and impoundments or process water discharge pipes; Overtopping of ponds and impoundments.

Emergency response procedures exist that consider power outages, pump failures, and uncontrolled seepage from the tailings storage facility.

CGM have adopted the Dynamic Risk Assessment approach – which in the rapidly changing circumstances of an operational incident is the continuous process of

identifying hazards, assessing risk, implementing actions to eliminate or control risk, monitoring the effectiveness and then reviewing the process.

Planning for response to transportation-related emergencies considers transportation route(s), physical and chemical form of the cyanide, method of transport (e.g., rail, truck), the condition of the road or railway, and the design of the transport vehicle (e.g., single or double walled, top or bottom unloading).

Sodium cyanide is transported on the local road network using the Newell Highway travelling from Forbes to West Wyalong, and then the approved Mine Access Route (from West Wyalong) to Cyanide is transported in a solid form in Isotainers designed for the safe transport of cyanide. These roads have been risk assessed and approved for transporting cyanide. Sodium cyanide is transported to CGM as a solid and contained within a bulk solids container (i.e. Isotainer), transported to CGM typically by B-Double with a maximum capacity of up to 40 tonnes per delivery or alternatively if required, by a single semi-trailer.

Cyanide transported for delivery to site is under the control and responsibility of the cyanide producer (Orica). Emergency response for off-site transportation incidents would be coordinated and conducted by and under the supplier's emergency management procedures. They are responsible for emergency response in the case of an accident or release when on route.

CGM Emergency Response Plans describe specific response actions (as appropriate for the anticipated emergency situations) such as clearing site personnel and potentially affected communities from the area of exposure, use of cyanide antidotes and first aid measures for cyanide exposure, control of releases at their source, and containment, assessment, mitigation and future prevention of releases.

The CGM emergency response plans describe specific response actions (as appropriate for the anticipated emergency situations).

Evacuation zones have been identified for all incident types, including gas plumes and fire. The Evacuation Processes are outlined, which includes the use of muster points and locating them upwind of the incident site.

The contact details of landholders in adjoining properties to the Cowal Gold Operations Mining Lease are included in EPRP and are marked on the site emergency map. Landholders would be notified of any emergency in proximity to their land.

First aid measures for cyanide exposure are outlined. Response measures include administering of oxygen, flushing eyes and skin with running water, decontamination, and handing over to medical aid. Instructions on the appropriate use of the cyanide antidote kit is kept with the Cyanokit which is stored in the First Aid Clinic. This is

administered under direction of a medical professional for using the Cyanide Antidote – it would not be administered as a First Aid Treatment.

Mitigation and monitoring of cyanide releases is considered, including sections on Spill Debris Clean-up and the use of Ferrous Sulphate. Assessment post-spill is addressed, with use of soil testing, removal of contaminated soil, and water testing. Future prevention of releases is addressed by the incident investigation in accordance with the Incident Reporting and Investigation Procedure.

CGM's Emergency Response Plan does not adequately address Transportation accidents occurring on site or in close proximity to the operation.

The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- The deficiency is readily correctible; and
- The deficiency is not an immediate or substantial risk to health, safety, or the environment.

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

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 7.2: Involve site personnel and stakeholders in the planning process.

CGM has involved its workforce and external stakeholders, including potentially affected communities, in the cyanide emergency response planning process.

CGM's workforce continue to be involved in the emergency planning process, including participation in: annual audits of the EPRP, mock drill exercises, review process for new and existing plans and procedures.

The nearest external community is West Wyalong which is 50 km from the Operation and it is considered too far away to be affected by an on-site cyanide emergency. The only potential cyanide emergency that could potentially affect the community would be from a transport related incident, which is the responsibility of the transport company.

There is a Community and Environmental Monitoring Consultative Committee (CEMCC) includes representatives of local communities and the local Shires. Aspects of emergency planning which would be relevant to the community would be included in these meetings.

The contact details of landholders in adjoining properties to the Cowal Gold Operations Mining Lease are included in EPRP and are marked on the site emergency map. Landholders would be notified of any emergency in proximity to their land.

CGM has made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions. CEMCC meetings are held quarterly and include a presentation on cyanide management at CGM. Landholders are kept informed of activities on the mine site.

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CGM has has identified external entities having emergency response roles and involved those entities in the cyanide emergency planning and response process.

A formal notification has been made to the West Wyalong Hospital regarding the potential transportation of individuals affected by cyanide exposure to the facility for assessment and treatment. Each transported individual will be accompanied with a CYANOKIT® (Hydroxocobalamin). This agreement has been in place and renewed periodically since 2013. Discussions have been held with the NSW Ambulance regarding their ability to assist in transporting a patient who has been exposed to cyanide.

CGM is a member of the Local Emergency Management Committee (LEMC) which includes the NSW Fire and Rescue, NSW Rural Fire Service, NSW Ambulance Service, NSW Police, Main Roads, and Essential Energy, NSW Police and local government.

CGM engages in consultation or communication with stakeholders to keep the Emergency Response Plan current.

The primary stakeholders are on-site personnel across site. The operation engages with on-site personnel in a range of ways to provide avenues for feedback on emergency response. Proposed changes to the emergency response or other related emergency management issues are discussed as required. After each Mock Emergency Drill a debrief session is run, feedback on how the exercise went has been used to improve and update procedures.

LEMC members are advised of cyanide operational and transport risks through formal communication of the emergency response plans and involvement with emergency planning exercises.

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 ☐ not in compliance with	Standard of Practice 7.3

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 7.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

The CGM Emergency Response Management Plan, in relation to cyanide elements of the plans, designate primary and alternative emergency response coordinators who have explicit authority to commit the resources necessary to implement the plans; identify emergency response teams, require appropriate training for emergency responders, include call-out procedures and references to 24-hour contact information for the coordinators and response team members; specify the duties and responsibilities of the coordinators and team members; list emergency response equipment, including personal protection gear, on site; include procedures to inspect emergency response equipment to ensure its availability; and describe the role of outside responders, medical facilities and communities in the emergency response procedures.

CGM have confirmed that external entities with roles and responsibilities identified in the Emergency Response Plan are aware of their involvement and are included as necessary in mock drills or implementation exercises.

A formal notification has been made to the West Wyalong Hospital regarding the potential transportation of individuals affected by cyanide exposure to the facility for assessment and treatment. Discussions have been held with the NSW Ambulance regarding their ability to assist in transporting a patient who has been exposed to cyanide.

Outside entities are familiar with CGM's Cyanide Emergency Response Plan and Emergency Management Plan via the Local Emergency Management Committee (LEMC) which includes the NSW Fire and Rescue, NSW Rural Fire Service, NSW Ambulance Service, NSW Police, Main Roads, and Essential Energy, NSW Police and local government. CGM engages with the LEMC membership through attending the

regular meetings. Members of these organisations attended the Lake Cowal Operation during the audit period for a LEMC meeting, which gave the members an opportunity to become familiar with the site, and the Operation's Emergency Procedures.

Standard of Practice 7.4:

Develop procedures for internal and external emergency notification and reporting.

	☐ in full compliance with	
The Operation is	☑ in substantial compliance with	Standard of Practice 7.4
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL COMPLIANCE with Standard of Practice 7.4: Develop procedures for internal and external emergency notification and reporting.

The CGM Emergency Response Management Plan includes procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency.

The Incident Management Team (IMT) is responsible for informing key operational stakeholders (i.e. employees, community, contractors and family). The IMT also engage the Crisis Management Team which consists of executive and senior management members at Evolution Group Office for all Level 3 incidents (e.g. an incident involving a significant hazard to the public and surrounding communities). The member of the IMT who has the Duty Card for Communications Officer is responsible for communication with all internal and external parties including outside responders and medical aid. A checklist is included on the Duty Card. Contact information for the external emergency contacts, local community and regulatory agencies are listed.

CGM Emergency Response Plans include procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, and for communication with the media.

The member of the IMT who has the Duty Card for Communications Officer is responsible for communication with all external parties (e.g. Media, Local Community). A checklist is included on the Duty Card. The contact details of landholders in adjoining properties to the Cowal Gold Operations Mining Lease are included in EPRP and are marked on the site emergency map. Landholders would be notified of any emergency in proximity to their land.

CGM have a procedure for notifying the International Cyanide Management Institute (ICMI) of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. The notification protocols for notifying ICMI of any significant

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cyanide incidents is in the Incident Reporting and Investigation Procedure. It includes the list of what is considered a significant incident, and the contact details for the ICMI. However, this procedure was not in place for the entire audit period.

No significant cyanide incidents were reported to the ICMI under this protocol during the audit period. At the end of the mock emergencies (24th Jun 2024 and 1st Jul 2024) the incidents were simulated as being reported to the ICMI under the protocol.

A cyanide incident occurred on 21 March 2023, during cyanide unloading, which was recorded and investigated by CGM, but was not reported to ICMI. The Auditor has reviewed the incident report, interviewed personnel involved with the incident, and concluded that the incident was consistent with a mild cyanide exposure.

A procedure for notifying ICMI of any significant cyanide incidents was in place for only a portion of the audit period, resulting in a potential cyanide exposure incident not being evaluated for the need to report to ICMI.

CGM have subsequently reported the incident to ICMI, and it has been clarified as a near-miss incident.

Contributing to the failure to adequately evaluate the incident for reporting was the concurrent development of the procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. Also contributing to the failure to adequately evaluate the incident for reporting was inadequate understanding of reporting requirements by CGM Supervisors and Management, as assessed in interviews and discussions during the field audit.

The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- Upon recognising the deficiency, CGM has acted in good faith by retrospectively reported the incident to the ICMI in a timely fashion;
- The deficiency is readily correctible;
- Hydrogen cyanide personal and fixed monitors were effective in raising the alarm and minimising potential exposure time;
- The maximum recorded hydrogen cyanide concentration was 15.9ppm, which whilst above the 10 ppm instantaneous limit, is not an immediate or substantial risk to health, safety, or the environment;
- The transportation of the worker to a local hospital for evaluation was done on a cautionary basis; with no resulting clinical observation of cyanide exposure; and

- In the period immediately following the incident, CGM carried out a detailed Investigation commensurate with the incident classification, and consistent with their internal standards (Incident Cause Analysis Method).

Standard of Practice 7.5:

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

The Operation is	☑ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 7.5

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with 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 CGM EPRP describes specific remediation measures as appropriate for the likely cyanide release scenarios, including recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media, and management of spill clean-up debris. The CGM spill remediation procedures identify what final (maximum) concentration will be allowed in residual soil as evidence that the cyanide release has been completely cleaned up.

Recovery of cyanide-containing liquid solutions is described. The spillage may be contained in earth bund walls. Cyanide solution can then be pumped back into a bund area of the plant or into suitable containers via a portable sludge pump. Solid material is to be placed by shovel into a bulky bag or similar, inside a plastic liner within a suitable sealed container. The process of decontamination of soils. Procedures identify the location of treatment chemicals (ferrous sulphate and lime); required equipment and resources and personal protective equipment. The process of decontaminating any equipment used for a spill, including Heavy Equipment and PPE is described. The procedure addresses the use of flushing with water, testing for residual cyanide, and using sodium hypochlorite, including safety information. Management and/or disposal of spill clean-up debris is to be addressed after consultation with the Environment Department.

Provision of alternative drinking supply is not discussed as there are no drinking water supplies that could come into contact with cyanide at the site.

The EPRP prohibits the use of chemicals such as sodium hypochlorite and ferrous sulfate to treat cyanide that has been released into surface water or that has the potential to reach surface water.

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Lake Cowal is in close proximity to the mining operation, but an up-catchment diversion system has been installed to direct clean water from the catchment outside the minesite to the lake. All water flow within the minesite is internally draining and does not leave the minesite.

The Emergency Response Management Plan addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methodologies, parameters and, where practical, possible sampling locations. Hazardous Chemical SOG.14 describes the use of a cyanide test kit to identify if all cyanide has been removed when cleaning up a spill. Step 12 of "Responding to a spill containing Cyanide SWI" requires the Environmental Department to be contacted so that the required samples are taken and monitoring of the area can be carried out to confirm there is no further contamination issues with the spill site. Monitoring procedures for surface water and groundwater describe the sampling methodologies, parameters and locations for identifying any contamination beyond the cleaned-up spill.

Standard of Practice 7.6:

Periodically evaluate response procedures and capabilities and revise them as needed.

	☐ in full compliance with	
The Operation is	☑ in substantial compliance with	Standard of Practice 7.6
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL COMPLIANCE with Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.

CGM review and evaluate the cyanide related elements of its Emergency Response Plan for adequacy on a regular basis.

The Emergency Preparedness and Response Management states that it is to be audited annually to evaluate the efficiency and effectiveness of the system and associated procedures (Sect. 19), and the document must be reviewed at least every 12 months. There have been 4 revisions since October 2020.

CGM conducts mock emergency drills periodically.

The EPRP states that GRM will conduct one full emergency exercise annually. Three mock emergency drills involving cyanide were carried out in the audit period:

Cyanide Spill/Exposure - ERT activated, search and rescue with Breathing Apparatus, stretcher retrieval of casualty, decontamination.

Cyanide Spill - Cyanide delivery truck spill, ERT activated, no casualties. Evacuation of area carried out, external emergency services contacted (Simulation), spill contained and cleaned up, ICMI notified of incident (simulation).

Cyanide Spill/Exposure - Cyanide delivery truck spill, delivery driver overcome by fumes. ERT activated, evacuation, decontamination initiated, oxygen administered. External emergency services contacted (actual) spill contained and cleaned up, ICMI notified of incident (simulation).

Over the three year audit period, three mock drills involving a response to a cyanide spill or exposure were conducted, however these were not carried out on annual basis across the 3 year period. Two of the mock drills were carried out in July 2024, two weeks apart. The first cyanide mock drill was carried out in July 2022.

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The previous audit had a finding of substantial compliance for this SOP and a Corrective Action Plan was developed by the operation to rectify the finding. This included developing the Drill Schedule for 2021-2024. The drill schedule was not followed as planned, which resulted in the lack of an annual mock cyanide emergency drill in 2023.

The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- Upon recognising the deficiency, CGM has acted in good faith by conducting two drills in 2024, thus a total of three drills within the audit period;
- The deficiency can be readily rectified; and
- The deficiency did not result in an immediate or substantial risk to health, safety or environment.

CGM has provisions in place to evaluate and revise the Emergency Response Plan, as necessary, following mock drills and following an actual cyanide related emergency requiring its implementation.

The EPRP states that a debrief meeting will be conducted following all ERT activations to discuss what happened, what went well, areas for improvement, co-ordination of the event, and to offer further counselling. Minutes of the debrief meetings are documented and recorded including any actions raised during the debrief meeting.

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

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

CGM continues to train all personnel who may encounter cyanide in cyanide hazard recognition.

All personnel who may encounter cyanide must complete cyanide awareness training, including short term contractors. This training is completed prior to entering the site. The Cyanide Awareness training is an on-line course that anyone entering the processing area is required to complete. This includes information on identifying characteristics of cyanide, symptoms of cyanide exposure, and procedures to follow in the event of exposure. The Cyanide Workers Induction enhances cyanide hazard awareness for employees who will be working with cyanide: includes how to wear and calibrate a personal HCN Monitor, procedure for responding to HCN monitor alarm at 4.7ppm, muster point, Cyanide spill response, and Cyanide decontamination.

Cyanide hazard recognition refresher training is conducted periodically at CGM.

Refresher training for Cyanide Awareness training is carried out every two years. Refresher training for Cyanide Workers training is carried out every year.

CGM retains cyanide training records.

INX is used to document training records for CGM employees. All training details are recorded in the system, with scanned or digital copies of certificates or attendance able to be attached to the training record for each employee. Records can be searched by course or employee.

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Standard of Practice 8.2:

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

The Operation is
☑ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 8.2

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 8.2: Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

CGM trains 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.

Training of new processing operators is undertaken in accordance with the Processing Operator Training Progression Procedure checklist developed by the processing trainers to ensure that all new employees have met the minimum training requirements before commencing work. Within the first week the trainees will complete the following: Reagents – Cyanide Unloading, Mixing and Storage; Responding to HCN Levels above 4.7ppm, and Responding to Spill Containing Cyanide. Operational training is carried out according to roles. Workers must complete training in a procedure before a task can be performed unsupervised. A Buddy System is implemented for all new processing personnel.

Training status for processing and maintenance personnel for each crew was reviewed by VPML auditors, and this showed that all core cyanide training was completed.

Training materials used at CGM identify the training elements necessary for each job involving cyanide management.

The Processing Operator Training Progression Procedure outlines the different processing operator roles which include Processing Operator, Leaching Operator, Floatation Operator, and Control Room Operator. There are classifications based on competency and progression must be signed off by the supervisor and Superintendent using the Processing Operations Progression Approval form.

Task training related to cyanide management activities is provided by an appropriately qualified person.

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Persons conducting training for individuals or small groups must have demonstrated current competence against the relevant suite of competency standards for the training being provided. Appointed Trainers have Certificate IV in Training and Assessment. Specialist training for ER team is provided both by experienced site personnel and expert third party trainers.

Employees at CGM continue to be trained prior to working with cyanide.

Training of new processing operators is undertaken in accordance with the Processing Operator Training Progression Procedure checklist developed by the processing trainers to ensure that all new employees have met the minimum training requirements before commencing work. Operational training is carried out according to roles via a Training Needs Analysis. CGM has established a Designated Task Register which essentially outlines the tasks that may only be performed by persons who have been assessed as competent to carry out that task. All training plans include on-the job training and assessment prior to be deemed competent.

Refresher training on cyanide management is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner.

Refresher training for Cyanide Awareness training is carried out every two years. Refresher training for Cyanide Workers training is carried out every year. Refresher training for Cyanide Code Procedures training is carried out every year.

A review of the training record extracts showed that all processing and maintenance workers currently working in the shift crews (A-D) had up to date training records for the Cyanide Code Procedures, Cyanide Workers Package, and Cyanide Awareness training.

CGM evaluates the effectiveness of cyanide training by testing, observation or other means.

CGM has developed a structured competency-based training system. With each competency assessment there are pre-requisites which must be met before an individual can be assessed as competent. Each competency assessment has been designed and put in place for the Superintendent or Coordinator to assess the knowledge of the Process Operator in the specific area. Each assessment includes a theory component.

CGM retain records throughout an individual's employment to document the training they receive. The 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.

INX is used to document training records for CGM employees. All training details are recorded in the system, with scanned or digital copies of certificates or attendance

able to be attached to the training record for each employee. Records can be searched by course or employee.

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 ☐ not in compliance with	Standard of Practice 8.3

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 8.3: Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

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

The Cyanide Awareness Training package includes the basic First Aid response to a cyanide exposure. This includes raising the alarm for medical aid, removing the patient from the source of exposure, providing oxygen, removal of contaminated clothing, and flushing the contaminated area while awaiting medical aid.

The procedures considered to be required for a response to a cyanide release are: Responding to a Spill containing Cyanide Procedure; Responding to HCN Levels above 4.7ppm Procedure; Fixed Plant Cyanide Decontamination Procedure; and Mobile Equipment Cyanide Decontamination Procedure. Training records show that 100% of the employees in the four Processing crews, and four maintenance crews have completed the core cyanide training.

Provide First Aid Course covers the basic requirement for responding to a cyanide release prior to the arrival of highly trained paramedics. At the time of the audit all processing operator and maintenance crews had over half of the crew with current First Aid training.

Emergency Response Coordinators and members of the ERT are trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment. CGM ERT members are trained in the use of necessary response equipment, such as Self-Contained Breathing Apparatus. ERT members undertake three multi-element Emergency Response Training modules courses which address relevant response procedures and equipment use.

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ERT members are trained in decontamination and first aid procedures. On-site training for administration of cyanide antidote has been carried out during the audit period. All ERT members work toward completion of Certificate III in Emergency Response and Rescue and the Certificate II Medical Service First Responder.

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

A Mutual Aid Agreement is in place with the NSW Rural Fire Service and with North Parkes Gold Mine. A formal notification has been made to the West Wyalong Hospital regarding the potential transportation of individuals affected by cyanide exposure to the facility for assessment and treatment. Discussions have been held with the NSW Ambulance regarding their ability to assist in transporting a patient who has been exposed to cyanide.

CGM is a member of the Local Emergency Management Committee (LEMC) which includes the NSW Fire and Rescue, NSW Rural Fire Service, NSW Ambulance Service, NSW Police, Main Roads, and Essential Energy, NSW Police and local government. Members of these organisations attended the Lake Cowal Operation for a LEMC which gave the members an opportunity to become familiar with the site, and the sites Emergency Procedures.

CGM regularly conducts refresher training for response to cyanide exposures and releases.

Refresher training for Cyanide Awareness training is carried out every two years. Refresher training for Cyanide Code Procedures training is carried out every year.

A review of the training record extracts showed that all processing and maintenance workers had up to date training records.

CGM ERT conduct weekly skills training in accordance with a training calendar.

CGM retains all records documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

All training details are kept by the ERT coordinator, with scanned or digital copies of certificates or attendance able to be attached to the training record for each employee.

All training records including documentation of mock drills and weekly ERT training (including HAZMAT training) are retained.

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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

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in FULL COMPLIANCE with Standard of Practice 9.1: Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

CGM continue to provide stakeholders with information on its cyanide management practices and engage with them regarding their concerns.

CGM continues to provide the opportunity for stakeholders to communicate issues of concern regarding the management of cyanide.

There is a phone number for Community Relations enquiries for CGM and it is advertised on the Evolution Mining website under “Contact Us”, there is also an online Feedback form which generates an email submission.

There is an email address dedicated to Community Relations which is publicised in the community newsletter. There is a company office in town that any member of the community can visit to obtain information or make concerns known.

There is a Community and Environmental Monitoring Consultative Committee (CEMCC) includes representatives of local communities and the local Shires. The CEMCC meetings are held quarterly and include a presentation on cyanide management at CGM.

A complaints register is maintained and is made publicly available through the Evolution Cowal website. There have been no complaints regarding cyanide management since the mechanism has been established.

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Standard of Practice 9.2:

Make appropriate operational and environmental information regarding cyanide available to stakeholders.

	☐ in full compliance with	
The Operation is	☑ in substantial compliance with	Standard of Practice 9.2
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

CGM is in SUBSTANTIAL COMPLIANCE with Standard of Practice 9.2: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

CGM has developed written descriptions of how their activities are conducted and how cyanide is managed, and these are available to communities and other stakeholders.

The Cyanide Management Plan is published on the Evolution Cowal website. The Evolution Sustainability Report 2024 has a section which outlines the company's management approach to hazardous chemicals, including cyanide. It explains that cyanide destruction systems are adopted to reduce the concentration of cyanide discharged.

There is not a significant percentage of the local population that is illiterate; the spoken and written language is English. However, information on cyanide management is provided verbally in CEMCC meetings.

There is no clearly defined method established to make cyanide exposure incidents publicly available, resulting in inadequate evaluation of a potential cyanide exposure for the need for public disclosure.

Contributing to the deficiency to adequately evaluate the incident for disclosure was inadequate understanding of Code disclosure requirements by CGM Supervisors and Management, as assessed in interviews and discussions during the field audit.

The following are the ways that a cyanide exposure resulting in hospitalisation would be reported if it occurred:

Serious safety incidents (including cyanide exposure) are reported to the NSW Resources Regulator – however these are generally not made publicly available.

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CGM is able to make information publicly available on the following confirmed cyanide release if they occur: cyanide releases off the mine site requiring response or remediation; cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment; cyanide releases on or off the mine site requiring reporting under applicable regulations; and releases that are or that cause applicable limits for cyanide to be exceeded.

The following are the ways that cyanide releases would be reported in a publicly available way if they occurred: Environmental non-compliances against the Development Consent Conditions are required to be notified to the NSW Department of Planning and Environment. Also, non-compliances or incidents against the Environmental Protection Licence are required to be notified to the EPA within seven days of the incident. Any incidents or non-compliances are included in the Annual Review report which reports on the environmental performance for the year. This report is published on the Evolution Mining website under Regulatory Compliance.

The Annual Regulatory Compliance Review Reports published on the Evolution Mining website are site-specific. As such, the information regarding confirmed cyanide release incidents that is made publicly available in the Annual Review report published on this website would separately identify any such incidents occurring at the Cowal Operation, so that stakeholders would be aware of their nature and location.

The basis of the substantial compliance finding has considered the following:

- CGM has acted in good faith by conducting an interim gap audit during the audit period;
- CGM acted in good faith in reporting the cyanide exposure near-miss incident to the NSW Resources Regulator;
- The deficiency can be readily rectified; and
- The deficiency did not result in an immediate or substantial risk to health, safety or environment.

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APPENDIX A: Important Information

Important information and limitations concerning the preparation and submission of this Audit Report both in its complete and summarised forms.

Kindly take notice of the following important qualifications and limitations in connection with the preparation and submission of this report ("Report").

1. The Report has been prepared in good faith by the signatory for and on his own behalf and as an authorised representative of Veritas Metallica Pty Ltd ("VMPL");
2. The Report is intended for the exclusive use of Evolution Mining (Cowal) Pty Ltd ("Client").
3. It is not intended to be relied upon by any party other than the Client.
4. No permission is given by the author for reliance on this Report by any third party and the author takes no responsibility for publication thereof on any media by others.
5. The Report has been prepared on the basis of instructions, information and data supplied by the Client, and on the basis of the physical conditions and location of the site at which tests (if any) were undertaken.
6. The author of the Report gives no warranty or guarantee and makes no representation, whether express or implied, with respect to the content of this Report or the completeness or accuracy thereof.
7. No reliance should be placed upon anything other than that which is expressed in this Report.
8. The author of this Report accepts no responsibility or liability for any loss or damage suffered by any party which is incurred in reliance upon the contents of this Report. In particular and without limitation, the author shall not be liable for any loss or damage or economic loss suffered by any party which arises out of any of the contents of this Report or anything which is omitted from the contents of this Report.
9. Readers of this Report are alerted to the possibility that the conditions which existed at the time of the preparation of this Report may have changed both prior to and after the preparation of this Report and in no way does this Report encompass, take account of or refer to such changed conditions.

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