Agnew Gold Mining Company

International Cyanide Management Code Summary Audit Report

GBS Consulting

27 October 2022

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Audit Details

Operation:	Agnew Gold Mine (AGM)
Name of Mine Owner:	Gold Fields Australia Pty Ltd
Mine Operator:	Agnew Gold Mining Company Pty Ltd
Responsible Person:	Tristan Freemantle, Processing and Engineering Manager
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Audit Period Commencement:	3 February 2020

Description of Operation

The Agnew Gold Mining Company Pty Ltd (AGM) site is located in the Eastern Gold Fields region of Western Australia, approximately 630 km north-east of Perth and 23km west of Leinster. The general climate of the Agnew region is described as arid. The mine, a wholly owned subsidiary of Gold Fields Australia which was acquired in 2001.

The processing plant has an annual throughput capacity of approximately 1.2Mtpa. It consists of a three-stage crushing circuit, two stage in-series ball milling circuit with two Knelson gravity concentrators, an in-line leach reactor and gravity electrowinning circuit. The carbon in pulp (CIP) circuit consists of air agitated Pachuca tanks, followed by a pressure Zadra elution circuit with carbon generation.

The tailings storage facilities (TSF) consist of TSF 2, an above ground paddock impoundment of approximately 53ha and with approximately 20.6Mt of deposition. TSF 2 is no longer an active tailings dam and is now being reclaimed to provide material for underground paste fill. TSF 3 is an in-pit facility utilising the Redeemer Pit approximately 6km south of the Agnew plant. TSF 3 was commissioned in 2004 and is only intermittently used since the commissioning of TSF 4 in 2017. TSF 4 is the second in-pit facility utilising the Songvang Pit and is located approximately 15km south of the Agnew plant. Supernatant water from TSF 3 and TSF 4 is returned to the processing plant via a series of TSF ponds and associated pumping equipment.

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Auditor's Finding

This operation is

☑ in full compliance

☐ in substantial compliance

☐ not in compliance

with the International Cyanide Management Code (Code).

This operation has experienced compliance issues during the three-year audit cycle which are discussed in this report under the following Standard(s) of Practice 4.4.

Auditor Information

Audit Company:	GBS Consulting Pty Ltd
Primary contact:	Greg Smith
Email:	gregorsmith@internode.on.net
Date(s) of Audit:	Remote Interviews from 30 May – 3 June 2022 inclusive
	Site Visit: 17 – 19 June 2022 inclusive

Lead Auditor: Gregory Smith

27/10/22

Signature of Lead Auditor | Date

Technical Auditor: Celeste Ellice

27/10/22

Signature of Technical Auditor | Date

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

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

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Principle 1 | PRODUCTION AND PURCHASE

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

Standard of Practice 1.1

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

AGM 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.

All cyanide purchased by Agnew Gold Mine Company (AGM) during the audit period was manufactured at a facility certified as being in compliance with the International Cyanide Management Code (Code).

AGM purchased all sodium cyanide solutions from Australian Gold Reagents Pty Ltd (AGR) which was manufactured at the Kwinana sodium cyanide production plant during the whole of the audit period.

The Sodium Cyanide Solution Supply Agreement states that AGR is a signatory to the Code for the production and transport of cyanide and must comply with current version of the Code. AGRs Kwinana Facility was recertified in full compliance with the Code on 3 August 2017 and again on 22 September 2020.

Cyanide is supplied to AGM under the Sodium Cyanide Solution Supply Agreement between AGR and AGM and the agreement completion date is 31 March 2024.

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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
- ☐ not in compliance with

Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

AGM 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.

The Sodium Cyanide Solution Supply Agreement between AGR and AGM states that AGR is responsible for the transportation of Sodium Cyanide and the unloading of the Sodium Cyanide Solution at the Delivery Point.

AGR supplies sodium cyanide solution to AGM via their West Australian supply chain which was re-certified under the Code on 15 November 2019. Qube Bulk are listed as a transporter under AGRs West Australian supply chain and were the only transporter used for all deliveries to AGM in the audit period. Qube Bulk was re-certified under the Code on 3 February 2022.

AGM has retained chain of custody records and other documentation identifying all transporters and supply chains responsible for transporting cyanide from the producer to the operation. Cyanide delivery dockets identify that the transport contractor/carrier was Qube Bulk Pty Ltd.

The Cyanide Supply Contract between AGR and AGM requires that AGR must at all times comply with the then current ICMI Code for the production and transport of cyanide. This requirement includes responsibility for safety, security, release prevention, training and emergency response during transport of cyanide.

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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:

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

Sodium cyanide solution is stored in AGR designed, self-bunded wrap tanks which have vents at the top of each tank to prevent the build-up of HCN gas. Vent gases discharge into water seal pots.

AGM cyanide unloading and storing facilities have not changed since the previous audit and have been in place since 2013. These facilities were designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules and other sound and accepted engineering practices. The cyanide unloading and storing cyanide facilities were installed by the cyanide producer AGR and the facilities were designed and constructed to AGRs specifications. The Manufacturer's Data Report was provided to AGM by AGR upon completion of the works and contains all required sign-off and QA/QC documentation confirming that the facilities were built to design. This has been retained on-site by AGM.

AGM only uses liquid sodium cyanide for processing, and no solid cyanide is present at the operations. Cyanide mixing facilities do not therefore exist on site.

AGMs cyanide unloading facilities and storage facilities consist of an isotainer unloading bay sufficient for a single isotainer to be accessed from an unloading tower immediately above it. The unloading bay consists of a bunded concrete pad which is designed and constructed to contain, recover, or allow remediation of any spillage from the tanker truck, isotainer system or piping. The unloading pad drains to a sump pump which can be pumped to a sump in the cyanide tank

storage area and to then to the mill.

All secondary containments for AGM cyanide storage tanks are constructed of concrete that provides a competent barrier to leakage.

The cyanide unloading and storage facilities are located within a secure fenced off area, with locked gates, away from offices and workshops. There are no nearby surface waters.

Two self-bunded 70kl unloading and storage 'wrap' tanks are located on concrete plinths adjacent to the unloading tower in a securely fenced area within the AGM processing plant. Sodium cyanide solution is stored in a separate area away from incompatible materials at an appropriate distance to prevent mixing. The tanks are double-skinned with an alarmed probe between the skins to detect and alert personnel to any liquid seepage from the storage cell into the space between the skins. A dip stick is used to manually check for evidence of leakage. The alarm is connected to the Supervisory control and data acquisition (SCADA) mill control system and alerts mill operators in the mill control room. The cyanide tank level indication instrumentation is subject to 12-month preventative maintenance inspection.

An air-conditioned observer's hut is located nearby for storage of delivery documentation and PPE.

Systems are in place to prevent overfilling of cyanide storage tanks, and the systems are tested and maintained on a routine basis. The cyanide storage tanks, and cyanide process tank have a level sensor with a low alarm at 10% and high alarm at 95%. The tank level on the cyanide unloading and cyanide process tanks and high/low level alarms are visible on the SCADA in the control room.

The Delivery and Unloading of Sodium Cyanide Procedure identifies that the safe fill level for the cyanide tanks is 95% and that the cyanide storage tanks must be under 65% full for delivery of one isotainer of liquid sodium cyanide or under 35% full for the delivery of two isotainers. It is the responsibility of the unloading observer who is an AGM employee to double check that the tanks contain the capacity to receive the delivery. Cyanide delivery dockets require the recording of cyanide tank levels before and after delivery.

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 ☐ not in compliance with	Standard of Practice 3.2

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Summarize the basis for this Finding/Deficiencies Identified:

AGM is in FULL COMPLIANCE with Standard of Practice 3.2: Operate unloading and storage facilities using inspections, preventive maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

AGM receives and uses only liquid sodium cyanide, and no cyanide mixing facilities exist on site.

Cyanide solutions are delivered solely in isotainers which are not handled or stacked on site during the unloading process. The isotainers are removed from site following cyanide unloading. No other cyanide containers are handled by any other means during cyanide unloading.

Red carmosine dye is added to all sodium cyanide solutions by AGR prior to delivery to aid in the detection of uncontained cyanide solutions.

AGM follows a Delivery and Unloading of Sodium Cyanide Procedure to prevent exposures and releases during cyanide unloading. The Cyanide Unloading Checklist details the personal protective equipment and safety equipment required before commencing unloading. The tanker driver undertaking the unloading is required to wear appropriate personal protective equipment, face-shield goggles, chemical resistant boots, and gloves in addition to standard mine site PPE requirements of safety boots, long pants and shirts and a hard hat.

An AGM plant operator is required to act as observer during cyanide unloading operations and is required to wear standard PPE, have an HCN monitor and a handheld radio and have additional PPE of chemical resistant gloves, goggles, face shield and cyanide mask with respirator in date within easy reach.

The observer is not allowed to be on the unloading pad during operations and is required to remain next to the Emergency stop air isolation button during the unloading.

The operation of all hoses, valves, and couplings for unloading liquid cyanide is described in the Delivery and Unloading of Sodium Cyanide Procedure. The procedure requires the tanker driver to wash down the hose nozzles, couplings, any spills and drips on the isotainer and trailer; and wash down the unloading area prior to the tanker leaving site.

The cyanide unloading facilities including all hoses, valves and couplings used for unloading liquid cyanide, and the cyanide storage area are inspected on a monthly basis. If any equipment requires maintenance, repairs or replacements or there are any other non-compliances then actions are raised in INX InControl Software (INX) and work requests raised in Asset Management Software (AMT).

Principle 4 | OPERATIONS

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

Standard of Practice 4.1

Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

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

Summarize the basis for this Finding/Deficiencies Identified:

AGM is in FULL 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.

AGM have developed written management and operating plans and procedures for cyanide facilities that contain solutions of greater than 0.5 mg/L weak acid dissociable (WAD) cyanide, including the following areas: unloading and storage facilities, grinding and milling, leaching and carbon in pulp (CIP), elution, in-line reactor, cyanide destruction, tailings pipelines and pumps and tailings impoundments. No cyanide mixing facilities or active heap leach operations exist at AGM.

AGM uses a Cyanide Management Plan which guides cyanide management and use. Procedures and Work Instructions describe how specific cyanide related tasks are undertaken such as cyanide unloading; monitoring of cyanide gas; entry into confined spaces; spill management; flushing cyanide pumps and lines; and equipment decontamination prior to maintenance. Additional plans and procedures cover associated activities such as preventative maintenance, change-management, job hazard analysis, permitting, isolations and inspections.

A Controlled Documents on-line environment is used to manage documentation and ensure only the current versions of plans, procedures, manuals, task instructions, area inspections and regulations related to mineral processing are accessible. Documents are available using the AGM intranet. All Manuals, Procedures and Work Instructions are reviewed every two years with notifications automatically sent from Controlled Documents to the document owner prior to expiry of the two-year period to alert that a document is due for review. Procedures are also reviewed or created in response to changes or additions to process facilities.

Key documentation such as the Tailings Storage Facility Operations Manual identifies the

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assumptions and parameters on which cyanide facility design was based to prevent or control cyanide releases and exposures consistent with applicable regulatory requirements. Key assumptions and parameters include appropriate freeboard for safe operation of process pond and tailings storage facilities; maximum WAD cyanide concentrations for open waters and design storm events for process solution ponds and impoundments. AGM manages cyanide facilities to adhere to conditions of the Western Australian Department of Water and Environmental Regulation (DWER) Licences.

AGM implements a site wide inspection program which includes all cyanide facilities. The frequency of inspections at AGM is appropriate to assure and document that they are functioning within design parameters.

Daily inspections are undertaken for the tailings storage facilities, process water ponds, tailings pipeline corridor, and associated pumps and valves for leaks, condition and functionality. Planned General Inspections (PGIs) are undertaken on a monthly basis and cover all cyanide facilities including cyanide unloading and storage facilities, processing areas, tailings pipeline corridor and tailings storage facilities. Secondary containments are inspected during monthly PGIs 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. PGIs are rotated between departments according to a schedule managed in INX to ensure that inspections are not always conducted by the primary operators of the area.

Pachuca leach tanks are mounted above an extensive concrete floor within the concrete bunding surrounding the plant. Leach detection is therefore by visual assessment as the tanks are not in contact with the concrete. Process ponds do not have leak detection installed but all are double lined and inspected on a daily basis. Daily inspections cover the key design parameter, which is freeboard capacity for a storm event, and also cover condition of pumps and pipework and leakages. The process ponds are also inspected every five weeks during area inspections for leakages and condition.

A preventative maintenance program is implemented by the Maintenance Department and managed through AMT to administer inspection schedules and record routine preventative maintenance activities. The program covers tanks, secondary containments, pumps, pipelines, valves and all critical plant and infrastructure. Cyanide tanks and vessels are inspected externally for structural integrity, signs of leakage and corrosion on a risk basis. External inspections occur annually for all tanks except for the Carbon Quench Tanks and the Elution Column which are inspected externally every two years. Cyanide tanks and vessels are inspected internally on a risk basis; every three years for all tanks except for the Carbon Quench Tanks and the Elution Column which are inspected internally every four years. Internal tank inspections are generally undertaken by third party experts. Inspections of cyanide dosing pipework are carried out on a 3 monthly basis. Any deficiencies or non-compliances are logged in AMT.

Cyanide instrument inspections are conducted every year for the cyanide unloading facility and the cyanide process (storage) tanks. The cyanide unloading and storage facility is externally

inspected and audited annually by the cyanide suppliers, AGR. An annual audit of the TSF by a suitably qualified geotechnical engineer is undertaken as required by regulatory authorities to ensure the facility is operating in a safe and efficient manner.

All inspections are documented on forms and include the date, name of inspector and any observed deficiencies. All inspection records are stored electronically either as scans of hard copy documents or as electronic 'Fast Field' forms. All third-party inspection and audit reports are retained on site.

AGM implements a Change Management procedure to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures and incorporate any measures necessary to protect worker health and safety and the environment. The Change Management Procedure covers physical changes to plant, equipment, buildings, mine design and planning, technical changes to the process or software, and technical /administrative changes to specifications and standards. The procedure requires written notification to environmental and health and safety personnel and sign-off before a change can be instituted where risks to personnel and/or the environment are identified.

AGM has cyanide management contingency procedures for nonstandard 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. Management and actions to be implemented in the event of non-standard operations are provided in the Tailings Storage Facility Operations Manual; Hydrogen Cyanide Gas Procedure; TSF WAD Cyanide Procedure; Cyanide Emergency Management Plan; and AGM Emergency Management Plan.

Cyanide is managed during planned temporary plant shut downs according to the Planned Mill Shutdown Procedure, Temporary Cessation of Operations; Cyanide Contingency Plan; Thickener Flushing Tails Lines Work Instruction; Flushing Cyanide Pumps for Maintenance Work Instruction; Flushing Cyanide Pumps and Lines Work Instruction; Decontamination of Plant Equipment Using Water Work Instruction and Decontamination of Plant Equipment with High Cyanide Concentration Work Instruction.

Section 19 of the Temporary Cessation of Operations; Cyanide Contingency Plan provides the plant shutdown sequence which includes removal or management of solutions in the tanks and shutdown, flushing and isolation of the cyanide unloading and storage tanks. Appendix 1 of this plan lists environmental compliance requirements including identification of existing inspections and monitoring activities which are to continue, Appendix 2 lists Maintenance activities required, and section 21 identifies staffing resources.

Cyanide management at closure is addressed in the Processing Plant Decommissioning and Decontamination Plan (DDP) and the Mine Closure Plan.

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AGM 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. Two backup diesel generators to the main power station are used to provide emergency power. Emergency power is limited and is used to operate only nominated equipment which includes tailings lines pumps to maintain tailings flow and tailings flushing water as required.

Safety shower backup diesel pumps operate automatically in the event of a power failure. A mobile compressor is available to provide air agitation to the leach and adsorption tanks in the event of a power failure. AGM has a Grid Power Failure Procedure which is followed in the event of a site power outage. This procedure contains an initial procedure in the event of a power failure; a call out escalation sequence and relevant contacts for responders.

Backup diesel generators are inspected and tested on a weekly basis. Tests and inspections are documented electronically.

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 ☐ not in compliance with	Standard of Practice 4.2

Summarize the basis for this Finding/Deficiencies Identified:

AGM 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.

AGM has implemented a program to evaluate cyanide use in the processing plant to determine appropriate cyanide addition rates and adjust cyanide addition rates as necessary when ore types or processing practices change the cyanide requirements.

The processing characteristics of current and future ore types are determined according to a standardised metallurgical test work program for each ore which includes mineralogy, gravity recovery and direct cyanidation response, reagent consumption and cyanide speciation. Metallurgical testwork is conducted by ALS laboratories.

The AGM mill feedstock consists of several ore sources which are blended for processing. The blend is determined on a daily basis and documented in a Crusher Blend Report which is communicated to the Run of Mine (ROM) operator in a meeting at the beginning of each shift.

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The blend report identifies the mill throughput, target gold production, grade and number of buckets of each ore and the row where each ore is located on the ROM.

The Manta Cyanide Cube is used to control cyanide flow to tank LT1 based on Ball mill feed tonnes and WAD cyanide analyser results, in order to maintain target cyanide concentrations in tanks LT1 and LT3. The pH of leach solutions is measured in Leach Tanks 1 and 3. Manta cyanide cube 24-hour performance reports are produced on a daily basis to assess cyanide control performance. These reports include cyanide dose, cyanide flow, cyanide volume, average cyanide setpoints and pH for each shift and for the 24-hour period.

Cyanide addition to the elution circuit is controlled via a sequence in the SCADA. A set volume of cyanide is added to each batch of eluate as measured by a level sensor in the eluate mixing tank. Operators also perform a manual check of the cyanide concentration in each batch. Cyanide addition to the inline leach reactor is also controlled by a sequence in the SCADA. A set mass of cyanide is added to each batch as measured by a weightometer in the In-Line Reactor (ILR) solution cone. Operators also perform a manual check of the cyanide concentration in each batch. Cyanide is recycled from the ILR and added to the leach feed hopper to reduce cyanide use. This is controlled by the Manta cyanide cube.

Daily re-leach bottle roll tests are conducted on tails samples to ensure that cyanide leaching is optimised in terms of reagent consumption and gold recovery.

Cyanide control in the tailings is achieved initially by controlling the cyanide additions in LT1 through analysing free cyanide in tanks LT1 and LT3. WAD cyanide control of the final tails is achieved through addition of hydrogen peroxide to the final tails hopper. The addition rate of hydrogen peroxide is determined by an algorithm using hourly WAD cyanide readings of solutions in Adsorption Tank 6 (the final tank).

Plant operators also collect manual samples from the TSF decant and spigot each day and WAD cyanide is analysed by a laboratory Cynoprobe as a check on the effectiveness of the hydrogen peroxide dosing.

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Standard of Practice 4.3

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 4.3

Summarize the basis for this Finding/Deficiencies Identified:

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

AGM continues to implement a comprehensive, probabilistic water balance, developed by third-party hydrogeological consultants. The model has the capacity to run probabilistic simulations and also event-based simulations for defined rainfall events and operational scenarios.

The water balance encompasses the AGM Mill Operations, Tailings Storage Facilities, underground and paste plant operations and borefields. The model was last updated in August 2021 to include site changes in water circuitry, water storage and water use and to update the stochastic climate module including latest rainfall and evaporation data.

The AGM 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 within tailings are deposited into tailings storage facilities (no leach pads exist at AGM);

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;

e) The effects of freezing and thawing are not applicable to AGM 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 for emergency removal of water from a facility. No leach pads exist at AGM;

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

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AGM; and

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

Probabilistic Water Balance (PWB) model runs are undertaken on a quarterly basis and include an average case for normal operations as well as for a 1 in 100-year, 72-hour design storm event (197 mm of rainfall) and a TSF pump failure scenario. The water balance model uses daily rainfall, evaporation, and temperature data from the Leinster airport from 1900 to date which is collected and maintained by the Australian Bureau of Meteorology. This dataset is considered to be appropriate as it is Leinster is topographically similar to AGM and this is the closest weather station with historical rainfall data. The Probabilistic Water Balance uses a climatic data set which is spatially modelled to be representative of the AGM site by the Queensland Department of Environment and Science's SILO Data Drill database, based on Bureau of Meteorology observations.

Quarterly TSF surveys are undertaken including a calculation of remaining tailings and water storage capacities and these measurements are incorporated in the water balance model. Catchments of the TSFs, process water ponds and other water storages are periodically reviewed to ensure they are accurate.

The PWB includes inputs to account for solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems. These inputs are determined from a combination of quarterly surveys and flow meter readings of pipelines between TSFs, storages and the plant.

The Probabilistic Water Balance model was last updated in August 2021.

Draindown of the tailings and return water pipeline in the event of a power failure is to TSF 4 which is down gradient of the process ponds and plant.

AGM operates ponds and impoundments within the design freeboard and regulatory freeboard requirements contained within the DWER Licence. TSF 4 (the operational TSF) and TSF 3 (the backup TSF) are in-pit storage facilities and are operated to maintain a minimum of 760mm freeboard, as outlined in the Tailings Storage Facility Operations Manual. All TSF process water ponds are managed with a minimum of 300mm freeboard as outlined in the Tailings Storage Facility Operations Manual.

AGM 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.

Operating procedures require tailings facility inspections to be conducted once per 12-hour shift. The inspections are recorded on the Daily TSF and Process Water Dam (PWD) Inspection Form. The inspection includes checks of the tails and process water pipelines for leaks or damage, bunding condition and freeboard capacity on each active TSF and Process Water Pond.

Surveys of each TSF are conducted quarterly to confirm freeboard is maintained and the available

water and tailings storage capacity remaining in each TSF.

Annual TSF audits include an inspection of the freeboard of all TSF's and Process Water Ponds.

No overtopping of ponds or impoundments has occurred during the recertification period.

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:

AGM 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.

AGM has implemented a cyanide procedure to prevent open waters which contain cyanide from exceeding 50mg/L WAD cyanide. Open waters that contain cyanide include the Redeemer in-pit TSF (TSF3), the Songvang in-pit TSF (TSF4) and the TSF2, TSF3 and TSF4 process water ponds.

Tailings from the final tank in the CIP circuit discharge (Adsorption Tank 6) is managed such that the WAD cyanide concentrations at the TSF spigot are below 50 mg/L WAD cyanide. This is achieved by measuring WAD cyanide in the final tank using an online WAD 1000 analyser on an hourly basis and adding hydrogen peroxide to the tailings pump hopper prior to discharge to the operating TSF. The flow rate of hydrogen peroxide is adjusted by a control philosophy using an algorithm based on the WAD cyanide reading in Adsorption Tank 6.

All open surface waters are fenced to prevent access by terrestrial wildlife and livestock. No heap leach operations exist at AGM.

AGM can demonstrate that the cyanide concentration in open water in TSFs, leach facilities and solution ponds, including the tailings slurry spigot discharge into the TSF cells the supernatant pond for each cell, and the Process Water Pond, was maintained below 50 mg/l WAD CN on 97% of days. Since the last re-certification audit, there have been 28 days (3%, to 17 August 2022) where monitoring data at the TSF spigot has returned results for WAD cyanide of above 50 mg/L. Of these exceedances 26 results were below 55 mg/L and the remaining two were 69.80 mg/L on 5 March 2021 and 58.93 mg/L on 21 June 2020. There were no exceedances of 50 mg/L WAD cyanide in the TSF supernatant or in any of the process water ponds. The exceedances are considered to be a deficiency but are not Significant Cyanide Incidents as defined in the

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Definitions and Acronyms for the International Cyanide Management Code.

The operation has implemented several procedural changes in a timely manner to address the identified causes of the systematic WAD cyanide concentration exceedances at the spigot. The most effective and targeted actions taken in reducing WAD cyanide concentrations in the tailings were:

- Lowering the cyanide setpoint in the leach circuit as practically as possible without significant impact to production (December 2020).
- Minimise the ratio of ores with a higher copper and nickel content.
- Refining the algorithm for the hydrogen peroxide dosage philosophy to include pH and tailings flow in addition to WAD analyser readings from Adsorption tank 6 (the final tank) which was completed in July 2021. This allowed greater control and effectiveness of cyanide destruction.
- Amendment of the hydrogen peroxide dose rate to accommodate analytical error (June 2022).
- Reduction of the pH setpoint for the leach circuit from 10.0 to 9.5-9.6 and improve management of lime addition.

As of 17 August 2022, AGM have maintained WAD cyanide in tailings discharge to the TSF at below 50 mg/L for five months and 20 days since the last exceedance. The combination of the actions taken have produced a systematic response to the deficiency and this is considered sufficient to demonstrate that the underlying causes of the systematic exceedances have been addressed.

AGM monitors for wildlife and WAD cyanide concentrations in open water every 12 hours. The wildlife monitoring regime is considered adequate to record wildlife mortalities and nine wildlife fatalities were recorded during the recertification audit period. The observations are conducted by site personnel who have received specific wildlife observation training by the environment department and/or third-party experts. Wildlife observations are recorded on the TSF inspection sheet either in hard copy or in the updated electronic (Fast Fields) form. These are retained, and results are consolidated in a Wildlife Monitoring Database. Electronic copies of TSF inspections were verified for each month of the audit period either.

Wildlife monitoring has been conducted on all days throughout the audit period including the days of exceedances occurred. No wildlife mortalities have been attributed to cyanide by investigations and it is considered that no environmental impact occurred from the exceedances. All wildlife mortalities recorded during the audit period were reported as incidents in INX and investigated including with autopsy reports where appropriate. Investigations found that none of these were attributed to cyanide.

Wildlife and cyanide monitoring indicates that maintaining WAD cyanide concentrations <50 mg/L

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is effective in preventing wildlife mortalities as no cyanide-related wildlife mortalities were recorded during this audit period or in previous audit periods.

Considering the points above, the auditors conclusion is that no further actions are required to address the deficiency and it is therefore determined that AGM is in full compliance with Standard of Practice 4.4.

Standard of Practice 4.5

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

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

Summarize the basis for this Finding/Deficiencies Identified:

AGM is in FULL 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.

AGM continues to have no direct or indirect discharge to surface water from any defined cyanide facility. The operation has a negative water balance, and all available process tailings water is returned from the tailings storage facilities to the process plant for re-use.

There is no surface water down gradient of the site and there are no established mixing zones.

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:

AGM 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 ground water.

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AGM implements specific water management strategies and other measures to manage seepage and spills to protect the quality of ground water beneath and/or immediately down gradient of the operation.

There is no beneficial use of groundwater at AGM or downgradient of the AGM Lease.

All cyanide facilities within the process plant are equipped with concrete secondary containment to ensure the protection of groundwater quality. Leach and adsorption tanks are suspended above secondary concrete containments and therefore have an impermeable barrier between them and the ground. No other cyanide solution storage tanks in the plant are in direct contact with the ground and all have secondary containments which effectively manages potential seepage

Seepage and spill management for the tailings pipeline and TSFs and process ponds include a bunded tailings and return water pipeline corridor, HDPE lined process ponds, tailings deposition techniques, appropriate freeboard, and groundwater monitoring and recovery bores.

AGM monitor for WAD cyanide on a six-monthly basis in groundwater bores surrounding the TSFs and downgradient of the site. AGM's Licence conditions issued by the Government of Western Australia Department of Water and Environmental Regulation (DWER) stipulate a limit of 0.5mg/l WAD CN at 23 compliance monitoring bores. Monitoring is required to be undertaken every six months and results throughout the audit period demonstrated that concentrations of WAD cyanide in groundwater were below 0.5mg/l WAD CN at all compliance points.

Groundwater levels of bores around the TSFs are monitored on a quarterly basis. Should a significant increase in water levels be identified production bores around TSF4 are used to remove seepage/groundwater.

A third-party audit of TSFs is undertaken annually and includes a review of groundwater quality data, water recovery and management of the TSFs in general.

The tailings and return water lines contained within bunding was verified to be in adequate condition during the site inspections. Where tailings and return water pipelines are buried beneath natural drainage most are contained in secondary pipes (culverts) which direct any leakage back to the bunded corridor. Older sections of the tailings pipeline between the plant and TSF3 do not have culverts for sections of buried pipeline. The tailings and process water return pipelines are equipped with flow meters which have telemetry to monitor the flow in the pipes. Pressure gauges are installed along pipe lengths and pressure sensors are located at pump stations and report back to the control system. If flow rate differential is detected, the pipeline is automatically shutdown and an alarm is triggered in the SCADA system. The Daily TSF and PWD Inspection includes the tailings and return water pipelines and to look for leaks from the pipeline and pipe breathers.

AGM uses mill tailings reclaimed from decommissioned TSF 2 in the paste plant for backfill at the Waroonga underground mine and has evaluated the associated potential impacts to worker

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health and the beneficial uses of ground water and implemented measures as necessary to address them.

The paste plant mixture is sampled on a quarterly basis and analysed at an external laboratory for free, WAD and total cyanide species. AGM requires paste plant underground operators wear personal HCN monitors during paste operations for routine spot checks of HCN gas levels. AGM also has two fixed HCN detectors are located at the Paste Fill (Backfill) Plant. No HCN readings within the paste plant were detected during the recertification audit period.

Standard of Practice 4.7

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

AGM has implemented a range of spill prevention or containment measures for all cyanide unloading, storage and process solution tanks. No cyanide mixing tanks exist at AGM.

All cyanide unloading activities takes place on a bunded and sealed concrete pad. Any spills on the unloading pad drain to a sump in the cyanide storage compound. The Cyanide Loading Tank and Cyanide Process (Storage) Tank are both self-bunded wrap tanks constructed by the cyanide supplier AGR. Each tank is contained within an outer wrap tank capable of holding a volume greater than the internal tank. These are sitting on concrete plinths and are not in direct contact with the ground. They each have a dipstick and an alarmed probe between the skins to detect and alert personnel to any liquid seepage from the storage cell into the secondary containment between the skins. The dip stick is used to manually check for evidence of leakage. The alarm is connected to the SCADA system and alerts mill operators in the mill control room. Cyanide storage tanks area visual assessed during regular inspections for any solution dripping or flowing from the tanks or pooling in the secondary containment.

All process solution tanks containing cyanide in the gravity, leach, elution, and electrowinning circuits as well as the tailings thickener are contained within a single concrete bund which surrounds the process plant. Leach Tanks and Adsorption Tanks are of a Pachuca design and are suspended on plinths above secondary concrete containments and therefore have an impermeable barrier between them and the ground. The Elution Column is also on legs and does not rest on the concrete pad. All other cyanide solution storage tanks in the plant including those

associated with the in-line reactor (ILR), the EW mixing tank and the cyanide recycle tank are located on the concrete pad within the secondary containment bund surrounding the plant. No tanks are in direct contact with the ground. Secondary containments are inspected by operations personnel on a daily basis to check sump pumps and identify processing material to be removed and collection of discharge.

AGM commissioned a third-party engineering company to assess compliance of the bunding volume with Code requirements and it was confirmed that there is sufficient volume to contain the largest tank plus 10%, plus an allowance for a 1/10, 72-hour rainfall event and piping drain back.

Process solution pipelines within the Process Plant are located over secondary containments.

All process water storage ponds are lined with HDPE plastic which is placed on an underlying clay liner and all process ponds are operated with a freeboard of 300 mm. The Process Pond for In-Pit TSF 4 contains a 5m wide spillway which overflows back into the TSF.

Procedures are in place and are implemented to prevent discharge to the environment of any cyanide solution or cyanide contaminated water that is collected in a secondary containment area. Any spills on the unloading pad drain to a sump in the cyanide storage compound. This sump has an automatically triggered pump that returns water to the process plant. Sump pumps are installed adjacent to relevant equipment and capture and dispose of spillage in the areas in a timely manner. Clean up of cyanide or process solutions spillage external to containment occurs in accordance with the AGM Hydrocarbon and Chemical Spill Management Procedure, or the Cyanide Emergency Response Plan.

Process solution spills are logged into the INX system and investigated as appropriate to determine causes, actions and evaluate preventative measures. No reportable spillage events involving process solution occurred during the audit period.

AGM maintains spill prevention or containment measures for all cyanide process solution pipelines to collect leaks and prevent releases to the environment.

The tailings pipeline and return water pipelines are placed on the topographical surface within an earthen trench designed to contain any spills or leaks within the trench and allow removal of residual spilled material and any contaminated earth. The tailings and process water return pipelines are equipped with flow meters and pressure gauges which have telemetry to monitor the flow in the pipes. If flow rate differential is detected, this triggers an automatic shutdown of the pipeline, and an alarm is triggered in the SCADA system which is monitored by process personnel in mill control. The pipelines have isolation valves to allow for maintenance.

Tailings and return water pipelines cross ephemeral drainage lines which contain surface water for short periods of time only, typically days to weeks. The tailings pipeline is buried within pipe-in-pipe culverts for most creek crossings and vehicle crossover sections. The culverts direct solutions back to sumps within the bunded corridor. For creek crossings without culverts, the

buried sections of the tailings and return water pipelines are placed on the topographical surface, and unconsolidated material is placed on top of the pipelines. Any leaks from the buried sections of the tailings pipeline that are not pipe-in-pipe, report laterally where they can be inspected. Operators are directed to look for such leaks during the daily TSF and PWD inspections which include the tailings and return water pipelines.

No permanent or semi-permanent surface water exists at AGM or for several hundred kilometers.

Cyanide unloading and storage facilities, process tanks and pipelines are all constructed of materials compatible with cyanide and high pH conditions. Process tanks and thickeners are constructed of mild steel, typically lined with abrasion and corrosion resistant synthetic poly coatings. The Eluate solution tank is constructed of HDPE.

Most of the processing plant slurry pipelines, including the tailings and return water pipelines are constructed of HDPE which is compatible with cyanide and high pH conditions. Cyanide solution piping is constructed in both mild steel and HDPE. Pumps and fittings are constructed of both mild steel or HDPE, which is suitable for storage and delivery of cyanide solution.

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
- ☐ not in compliance with

Standard of Practice 4.8

Summarize the basis for this Finding/Deficiencies Identified:

AGM 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.

The AGM plant was constructed over 30 years ago. The previous audit identifies that a review of QA/QC documentation gaps was commissioned by AGM and completed in May 2019 in accordance with section 4.8 of the International Cyanide Management Code Auditors Guidance. This review provided a list of recommendations to address documentation gaps. The recommendations were actioned and managed through INX In Control software, and all have been completed including the revised Piping and Instrumentation Diagrams (P&ID's). It was verified that appropriately qualified persons undertook the QA/QC review of the cyanide facilities.

Quality control and quality assurance (QA/QC) programs have been implemented during

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construction of all new cyanide facilities and modifications to existing facilities, including cyanide unloading, storage, and other cyanide facilities. No cyanide mixing facilities exist at the AGM.

No new cyanide facilities were constructed and no modifications to existing cyanide facilities occurred during this audit period. QA and QC programs were implemented for facilities constructed and modified during the previous audit period including the construction of the cyanide unloading and storage facility and construction of the new in-pit TSF4 facility including associated pipework and cyanide water return dams. Documentation was audited and found to be compliant during the previous audit.

All QA/QC documentation for construction of cyanide facilities has been retained and is available on site. This was confirmed and verified during this audit.

Standard of Practice 4.9

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

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

Summarize the basis for this Finding/Deficiencies Identified:

AGM 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.

AGM has developed, maintain and implement written standard procedures for all wildlife, surface and ground water quality monitoring activities. Which include the Ground and Surface Water Management Procedure; Environmental Monitoring Work Instruction; Wildlife Monitoring Procedure, TSF WAD Cyanide Procedure and Sampling and WAD CN Measurement Work Instruction. Forms have been developed for each monitoring activity either as hard copies, or electronic based 'fast field' forms.

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.

Sampling and analytical protocols have been developed by an appropriately qualified person. All personnel who have developed procedures have a minimum qualification of a Bachelor degree in Environment Management. Sign-off of procedures is by appropriately qualified Superintendents

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and Managers all of whom have a minimum qualification of a Bachelor degree.

Sampling conditions, livestock/wildlife activity, cloud cover, wind, precipitation, and temperature are recorded on wildlife and water monitoring field sheets and recorded within the monitoring database.

Monitoring is conducted at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. The TSF supernatant and spigot are samples on a 12-hourly basis and wildlife monitoring is also conducted on a 12 hourly basis. Groundwater quality monitoring for WAD cyanide and metals is undertaken on a six-monthly basis as determined by the WA DWER Licence conditions. Groundwater levels and field readings of pH, EC, TDS, and Temperature are monitored on a quarterly basis depending on the bore. Surface water quality at process water ponds is conducted quarterly. WAD cyanide at the last tank in the CIP circuit is monitored continuously by the WAD analyser which produces hourly reading.

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Principle 5 | DECOMMISSIONING

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

Standard of Practice 5.1

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 5.1

Summarize the basis for this Finding/Deficiencies Identified:

AGM 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, livestock, and the environment.

AGM has developed written procedures to decommission cyanide facilities at the cessation of operations with the Decontamination and Decommissioning Plan and the Mine Closure Plan. The Decontamination and Decommissioning Plan addresses decontamination and decommissioning of cyanide-containing infrastructure at the processing plant, and infrastructure associated with the transfer of tailings to the TSF and return of water from the TSF to the processing plant (eg. pipelines, valves, and pumps).

The Decontamination and Decommissioning Plan includes a detailed implementation schedule that starts 24 months prior to closure and continues 24 months post closure. This includes steps associated with safety (ie safe cyanide handling training), pre-decommissioning (ie. Reducing stocks of cyanide), processing plant clean-up, monitoring and review (ie water quality monitoring). The plan is reviewed at least every two years.

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Standard of Practice 5.2

Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 5.2

Summarize the basis for this Finding/Deficiencies Identified:

AGM is in FULL COMPLIANCE with Standard of Practice 5.2: Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

AGM has developed an estimate of the cost to fully fund third-party implementation of the cyanide-related decommissioning measures as identified in its Decommissioning and Decontamination Plan, as part of the overall Closure Cost Estimates which are produced in accordance with the Mine Closure Plan. The cost estimate is reviewed and updated on an annual basis.

AGM participate in the financial mechanism required by the Western Australian Government mine regulator (Department of Mines, Industry Regulation and Safety). An annual levy is paid to the Mine Rehabilitation Fund (MRF). The levy is calculated based on the annual Closure Cost Estimate.

The Gold Fields Closure Cost Estimates are developed for unplanned closure as well as scheduled closure and are assured annually as part of Gold Fields annual statutory financial assurance process.

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Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Standard of Practice 6.1

Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

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

Summarize the basis for this Finding/Deficiencies Identified:

AGM 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.

AGM has developed procedures describing how cyanide related tasks should be conducted to minimise worker exposure. There are written procedures with detailed instructions outlining steps taken to complete a task safely, including instructions for cyanide unloading, plant operations, equipment decontamination and confined space entry. AGM does not undertake mixing activities.

There are also procedures to identify hazards prior to the commencement of a task, and procedures to complete inductions and training in these procedures prior to being able to complete any tasks associated with cyanide.

The procedures require the use of personal protective equipment, this includes the use of HCN gas detectors in designated areas. Where relevant, the procedures include the use of inspection checklists prior to the commencement of a task. The Take-5 Process encourages pre-work inspections to identify hazards, assess the risk, and control the risk for any task carried out.

AGM solicits and actively considers worker input in developing and evaluating health and safety procedures through daily ToolBox meetings, and weekly safety meetings, and through incident investigations, and Job Hazard Analyses completed by workers and supervisors together.

Incident or hazard investigations evaluate the relevant safety procedures associated with the incident which may prompt a review of the procedure.

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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:

AGM 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.

The working pH for the AGM mill is 9.5-9.6 to prevent the evolution of hydrogen cyanide gas. The pH targets are set within the SCADA. The pH is monitored via the pH probes in the plant. A pH probe in Leach Tank 1 provides the pH signal /reading to SCADA which in turn will automatically adjust the pulse rate of the air actuated vale for lime addition to either increase or decrease. The pH is verified during operator sampling rounds and deviations in the pH are investigated. Alarms are inbuilt in the SCADA to notify the Control Room Operator of any adverse deviations in the pH setpoint.

AGM has identified that all areas of the processing plant have the potential for workers to be exposed to hydrogen cyanide gas exceeding 10 ppm on an instantaneous basis or 4.7 ppm continuously over an 8-hour period. Alarms are triggered when a short-term exposure or time weighted average (TWA) of cyanide concentrations exceeds 4.7ppm. Another alarm is triggered if the short-term exposure limit exceeds 10ppm. In response to an alarm workers are to stop work and leave the affected area immediately; notify other personnel in the area; barricade the area to prevent exposure to other personnel; report to the supervisor; and ensure the event is entered into INX.

Personal HCN gas monitors are mandatory requirement and must be worn for entry to all cyanide areas of the processing plant. These areas include the grinding and gravity bund, CIP and elution bund, gold room, Cyanide Storage Facility, Paste Plant, Tails Storage Facilities and return water ponds.

Static HCN monitoring devices are located in process areas identified as high risk the following locations: Leach Feed Hopper, Acid Wash/ Loaded Carbon Screen, WAD Analyser Hut at top of Adsorption Tanks, Final Tails Screen, Mixer at the Paste Plant. An audible alarm will sound when the concentration level is detected to be above 4.7ppm. HCN monitoring instrumentation is calibrated and maintained in accordance with manufactures' specifications, and records are

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retained for at least three years.

Warning signs are placed at appropriate locations where cyanide is used at entrances to the plant, cyanide unloading facility and tailings storage facilities, including signs that prohibit smoking, eating, drinking, open flames, use of personal HCN monitors and use of suitable PPE.

The cyanide suppliers (AGR) have confirmed that a red colourant dye is added to all cyanide solutions prior to delivery to ensure they are easily distinguishable.

Safety showers and low-pressure eyewash stations are located strategically at locations throughout the processing plant, and are tested and inspected at least monthly, and maintained as required. Dry powder fire extinguishers are located strategically throughout the processing area and are maintained, inspected and tested on a quarterly basis.

Cyanide storage and unloading tanks are clearly labelled with content warning labels. Cyanide pipelines including the tailings pipeline and return water pipeline are labelled in a violet colour with white writing to indicate the contents and flow directions.

Safety Data Sheets (SDS) are printed and located in locations where cyanide is managed. First Aid information and Cyanide Safety information is located in locations where cyanide is managed, including the Unloading Bay. SDS, first aid procedures and cyanide safety information are written in English, which is the language of the workforce.

In the event of cyanide exposure incidents, AGM's incident investigation process looks at people, environment, equipment, and procedures to determine the contributing factors. Preventative and corrective actions are identified. Cyanide related incidents which involved worker safety in the period have been reported and investigated which have resulted in amendments to procedures.

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:

AGM 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.

AGM maintains InHalo (medical) oxygen, a resuscitator, a duress alarm system, and radio at the cyanide unloading and storage area, and at several other strategically located locations elsewhere

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in the plant. The cyanide antidote kit, and a fixed supply of medical oxygen is stored in the nearby site first aid medical centre.

The First Aid Equipment in the Medical Centre has weekly, fortnightly, and monthly compliance checks of all equipment and supplies such as medical oxygen and cyanide antidote kits to ensure they will be effective when needed.

AGM has developed the site wide Emergency Management Plan (EMP) that provides over-arching guidance to emergency management, and the specific Cyanide Emergency Management Plan (CEMP). The CEMP considers cyanide specific emergencies with Plausible Scenario Pre-incident Plans to address potential cyanide exposures. The plan outlines the First Aid response for cyanide exposure and contains first aid measures including steps to take for suspected cyanide poisoning cases in a flow chart, with off-site emergency contact information and patient transport procedures. This includes the use of cyanide antidotes.

AGM has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide. The Emu Medical Centre is located near the Processing Plant. There is a suitably qualified Paramedic (on 24-hour call) to provide first aid or medical assistance to workers exposed to cyanide.

AGM has its own fully equipped Ambulance and trained Paramedics and has a written procedure in section 6.1 of the CEMP for ambulance transfer of workers with suspected cyanide exposure which includes wearing a personal cyanide monitor and having a respirator on hand for the paramedic should they need it.

Memorandums of Understanding (MOU) have been made with local medical facilities (Leinster Medical Centre, Leonora Hospital, Kalgoorlie Health Campus) which acknowledge that they have adequate, qualified staff, equipment, and expertise to respond to a cyanide exposure patient.

AGM has a formal arrangement with Health Watch Clinics for medical assistance including administering the cyanide antidote.

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Principle 7 | EMERGENCY RESPONSE

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

Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

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

AGM has developed the site wide Emergency Management Plan (EMP) that provides over-arching guidance to emergency management, and the specific Cyanide Emergency Management Plan (CEMP). The CEMP sits under the EMP and considers cyanide specific emergencies with Plausible Scenario Pre-incident Plans to address potential accidental releases of cyanide and cyanide exposures.

The CEMP considers the following potential cyanide failure scenarios appropriate for its site-specific environmental and operating circumstances: Cyanide Hazardous Chemical Response; Catastrophic Release of HCN Gas > 50ppm; Release During Transportation Delivery or Unloading; Releases During Fires and Explosions; Liquid Spills outside of Bunded Areas; Catastrophic Release from Storage, Dosing Tanks or Processing Facilities; Failure of Tailings and Impoundments or Process Water Discharge Pipes; Uncontained Release of Process Water for scenarios.

Planning for response to transportation-related emergencies is handled by the supplier (AGR) for most of the transportation route. Emergency management procedures are detailed in AGR management plans for road transport incidents associated with transporting the liquid cyanide in isotainers to AGM. The AGR Transport Management Plan for Sodium Cyanide Product provides information on transportation routes, physical and chemical form of the cyanide, method of transport, condition of road and railway and the design of the transport vehicle. AGM has developed and implemented a cyanide transport incident response pre incident plan for scenarios that may occur once trucks are onsite.

The EMP and CEMP describe specific emergency response actions appropriate for the anticipated emergency situations including clearing site personnel from the area of exposure, and the use of

first aid measures for cyanide exposure. The use of cyanide antidotes is addressed in the CEMP but can only be administered with authorisation from qualified medics (ie HealthWatch). Potentially affected communities are not considered due to the site being remote.

The incident scenarios specifically address actions to control releases at their source and mitigate the extent of spillages with methods to provide containment.

All emergency response events are required to have formal operational debriefings to identify deficiencies in the plan and implementation of actions to prevent future releases.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

The operation is	☑ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 7.2

Summarize the basis for this Finding/Deficiencies Identified:

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

AGM involves the workforce in the cyanide emergency response planning process in a number of other ways including through weekly area safety (toolbox) meetings, daily pre-start meetings which discuss safety and environment, monthly site governance meetings, plant inductions; training in core procedures including cyanide hazard awareness and participation in drill and evacuation exercises, including through the debrief sessions following the mock drills.

There nearest external community is Leinster township which is 25 km away and it is considered that Leinster is too far away to be affected by an on-site cyanide emergency.

AGM has Memorandums of Understanding (MOU) with Leinster Medical Centre, Leonora Hospital, Kalgoorlie Health Campus and formal arrangements with HealthWatch for treating patients who have been exposed to cyanide. AGM also has Emergency Response mutual aid agreements with Vivien Gold Mine, Northern Star Resources and Bellevue Gold Mine. They are involved with the planning process to the extent that they have agreed that they can provide additional resources (equipment and personnel) in the event of an emergency. AGM has a MOU with the Department of Fire and Emergency Services (DFES) to provide mutual support in planning and responding to emergency incidents. The agreement includes participation in training exercises as required. Upon the response of any DFES resources to any of AGM land or premises, the ERT and DFES personnel shall operate under the incident management structure agreed upon by both

parties.

AGM is a member of the Local Emergency Management Committee (LEMC) which includes Leinster Police, Leinster Medical Centre and local mining operations. The LEMC is the forum used to communicate emergency planning, resourcing, contact details, any incidents that have occurred and receives feedback from external stakeholders.

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:

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

AGM's Emergency Management Plan designates the responsibilities for each member of the Emergency Response Management Team, outlining explicit authority to implement the plan using the necessary resources. The Emergency Response Team Captain, in co-operation with the Emergency Services & Security Coordinator, and the On Scene Command, will be responsible for coordinating the emergency response team, equipment, and PPE to facilitate an appropriate response with an aim to control and contain the incident.

The EMP outlines the emergency management structure which includes the Emergency Management Team (the Registered Manager and members of the leadership team who are tasked with the overall control of the site during the incident), Incident Control Team, and the Emergency Response Team (trained in the required rescue techniques). Duty Cards for all of the Emergency Management Team and Incident Control Team specify the duties and responsibilities for each role in an incident.

The EMP states that the Emergency Response Team members will be trained in and competent in: First Aid (First Responder); Chemical Spill Management (HAZCHEM); Breathing Apparatus; Fire Fighting; Confined Space Rescue; and Vehicle Extrication. Team members attend weekly training exercises and participate in mock-drills.

Call-out procedures and 24-hour contact information are included in the plan, and an up-to-date contact list is updated weekly for all emergency responders.

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The CEMP lists the required emergency response equipment, including personal protection gear that is appropriate for each plausible cyanide incident scenario Pre Incident Plan (PIP's), and these items are all available onsite or in the emergency vehicles.

The ESO Compliance Schedule includes the routine testing frequency for equipment such as Ambulance, Fire Trailer, HAZMAT Trailer, and Breathing Apparatus inspections and tests.

The role of external responders and medical facilities is described in the CEMP, including within the Pre-Incident Plans. Memorandum of Understandings with the medical facilities (Leinster Medical Centre, Leonora Hospital, Kalgoorlie Health Campus), and Mutual Aid Agreements with DFES and with other mine ER Teams, confirm that the outside entities are aware of their involvement in the CEMP.

Members of the Vivien Gold Mine Emergency Response Team have been involved with training and mock drills. The LEMC provides a quarterly forum which allows AGM to keep the outside entities up to date with any changes to their involvement in the CEMP.

AGM has confirmed that DFES has agreed to be available for annual mock drills, as per the Mutual Aid Agreement in place demonstrate that the external entities are aware of their involvement.

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

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

Summarize the basis for this Finding/Deficiencies Identified:

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

AGM's Emergency Management Plan includes procedures and contact information for notifying management, external response providers including Department of Fire and Emergency Services, Royal Flying Doctor Service, Leinster Medical Centre, Kalgoorlie Health Campus, mutual aid partners, and regulatory agencies.

AGM is located remote from any communities so incidents occurring on-site would not affect or require communications with those communities. The Duty Cards designate responsibilities for external contact, which includes communication with the Media and the development of a community and stakeholder plan if appropriate. Contact information with community stakeholders is contained in the Stakeholder Management Plan.

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The Cyanide Emergency Management Plan includes the requirements for notifying ICMI of any significant cyanide incidents. No significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document have occurred in the audit period.

Standard of Practice 7.5

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 7.5

Summarize the basis for this Finding/Deficiencies Identified:

AGM 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 AGM Cyanide Emergency Management Plan (CEMP)) and the Hydrocarbon and Chemical Spill Management Procedure describe remediation measures appropriate to the cyanide release scenarios in the PIP's. This includes the recovery of cyanide containing liquid solutions and recovery of cyanide containing solids. The CEMP also describes the process to neutralise cyanide contaminated soils and cyanide solutions. This includes the method of application of ferrous sulphate to achieve the neutralisation; storage location of the ferrous sulphate; and the management and/or disposal of spill clean-up debris. Soil within the spill zone is tested for presence of NaCN with a cyanide test kit or electronic monitor, and if NaCN is present in accordance with the Environment Monitoring Work Instruction. The removal of soil is to continue until the concentration falls below 10ppm. Contaminated soil is removed to the bioremediation pad for treatment. The procedure for decontamination of equipment following a clean-up is also described in the CEMP.

The CEMP addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release and refers to sampling methodologies in site environmental procedures. The monitoring procedures describe how to take soil and water samples, sample preparation and dispatch are described in the Environment Monitoring Work Instruction. The number of samples to be taken would be determined through consultation with the AGM Environment Department based on the location and nature of the spill.

The CEMP states that sodium hypochlorite and ferrous sulfate must never be used to treat cyanide that has been released into natural surface waters or dry drainages.

There are no drinking water supplies that could come into contact with cyanide at the site and

provision of alternative water supplies is therefore not applicable.

Standard of Practice 7.6

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

AGM reviews and evaluates the Emergency Management Plan and Cyanide Emergency Management Plan for adequacy on an annual basis, and when otherwise required following incidents.

AGM schedules and conducts mock drills involving cyanide at least once a year which involve the Emergency Services Officer, the Emergency Response Team (ERT) and other on-site personnel who would be expected to respond to cyanide emergencies. External personnel may be involved in mock drills as required. Four mock drills involving cyanide have been conducted in the audit period, these included administering First Aid, manual isolation of a source, and retrieving of a casualty. External personnel were not required to provide support for the emergency scenarios been tested.

There are provisions in place to evaluate and revise the emergency response plans as required, including following any mock drills or an actual cyanide related emergency.

Formal operational debriefs are conducted following all emergency response events to identify deficiencies in the plan and correct and communicate these to the appropriate personnel.

Following a mock scenario, a debrief is carried out which identifies areas for improvement. These are generally ways to better implement the actual plan, such as improved communication with the ERT team, getting additional radio devices, more training for use of the Duty Cards. Minutes of the debrief meeting are documented and recorded in INX including any actions raised during the debrief meeting. Actions identified are closed out in a timely manner.

No cyanide related emergency has yet occurred and as such no changes to the CEMP were made as a result of a cyanide related emergency in the audit period.

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Principle 8 | TRAINING

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

Standard of Practice 8.1

Train workers to understand the hazards associated with cyanide use.

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

Summarize the basis for this Finding/Deficiencies Identified:

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

All personnel who may encounter cyanide in cyanide hazard recognition are trained in cyanide hazard recognition.

AGM Processing Department Personnel (including maintenance team), and emergency response team members must complete the AGR Cyanide Awareness Training. The Cyanide Awareness training includes information on liquid sodium cyanide, the health effects of cyanide, symptoms of cyanide exposure and procedures to follow in the event of exposure. They are also required to complete the AGM Processing Induction which includes where cyanide is present on site, mandatory HCN Monitor areas, HCN gas detectors, procedure if monitors alarm at 10ppm, and duress alarm locations.

All short term contractors who undertake any work at the AGM Processing Plant are trained in cyanide hazard recognition by initially completing the Short-Term Workers Induction which includes basic cyanide hazard awareness. All visitors who enter cyanide areas must be escorted by inducted personnel at all times and are not allowed to undertake work.

The AGR Cyanide Awareness Training must be refreshed annually. The Processing Induction is refreshed every two years.

AGM maintains records of all training and induction records of permanent employees in the Learning Management (LMS), and contractors in Velpic. This includes when refresher training is due to be completed.

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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:

AGM 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.

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

All Processing Department Personnel must complete the Primary Core Program prior to entering the processing plant. In addition to the Processing induction and the AGR Cyanide Awareness, training in the following is required: Hydrogen Cyanide Gas Procedure, CN Incident response, Hydrogen Cyanide Respirator Mask Awareness, Emergency Response Inhalo (Medical Oxygen) Training, SOLO HCN monitor training, Hydrogen Peroxide Awareness.

The training elements necessary for each job involving cyanide management identified in training materials. Each trainee will be assigned a "Buddy" for the infield training and ensure that they are being trained in accordance with Task Instructions/Work Instructions in their training plan issued by their supervisor's. The trainee will not be authorised to carry out any Work Instructions unsupervised until they have been deemed competent. The training Matrix shows 100% completion of the Core Entry Program modules, and the Buddy System. Other area specific training is task specific and not all workers are trained in all tasks.

An appropriately qualified or competent person provides task training related to cyanide management activities. Trainers have certification for Training and Assessment skills.

All Competencies, Procedures and Work Instruction based training is scheduled to be refreshed every two or three years (depending on the course content). A review of the training records show that all training is up to date.

The effectiveness of cyanide training is evaluated by testing and observation and documented. Final Practical Assessment is carried out to verify the trainee's ability to adhere to safe work practices and reporting of hazards and follow work instructions. Training courses also include theory questions (written tests) at the end of training.

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LMS is used to electronically document and store all AGM training records (of permanent employees). The name, date, course completed, and trainer is recorded. The system allows for searches of training completion per person, or training course. All training documentation is uploaded to LMS (including signed forms, copies of certificates, completed theory assessments).

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	Standard of Practice 8.3
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

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

All Processing Department Personnel (including Maintenance) must complete Spill Response Training, CN Incident Response Training (ie first aid response and decontamination of a cyanide exposure) and HCN Emergency Response Inhalo (Medical Oxygen) Training which addresses the administration of oxygen as the first response to cyanide exposure. The training Matrix shows 100% completion of these training modules.

Emergency Response Coordinators and members of the Emergency Response Team are trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment

AGM maintains a training matrix for Emergency Response Team members which includes training in hazardous materials and cyanide incidents. The Emergency Response Team members undergo weekly training sessions which includes regular use of Oxygen Resuscitators and some cyanide related scenarios. Mock Drills are undertaken for scenarios which cover both worker exposures and environmental releases.

Due to the remote location of AGM, Emergency Response actions are primarily carried out by the operation. However, Department of Fire and Emergency Services (DFES) have a MOU with AGM to provide mutual support in responding to emergency incidents.

Medical entities with MOU's for treating patients who may have suffered from cyanide exposure (Leinster Medical Centre, Leonora Hospital, Kalgoorlie Health Campus), and formal arrangements with HealthWatch for providing medical advice.

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Spill Response Training, CN Incident Response Training and HCN Emergency Response Inhalo (Medical Oxygen) Training is required to be completed every two years. The Training matrix shows 100% of Processing, Mill and ER Team are up to date with training of this module. Mock cyanide emergency drills covering both worker exposures and environmental releases are periodically conducted for training purposes.

All training records of AGM Processing Department are documented and maintained in the LMS. Training records include the names of the employee and trainer, date of training, topics covered, and the assessment completed to confirm understanding of training content. Emergency Response Team training records are managed by the Emergency Coordinator.

Principle 9 | DIALOGUE AND DISCLOSURE

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 ☐ not in compliance with	Standard of Practice 9.1

Summarize the basis for this Finding/Deficiencies Identified:

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

AGM has provided stakeholders with information on its cyanide management practices.

AGM engage with their stakeholders in a variety of ways, including community meetings. The Stakeholder Management Plan identifies all stakeholders, and guides how stakeholder interactions are managed.

AGM has regular meetings with the Tjiwarl Aboriginal Corporation, which includes providing information about the operation and management practices of environmental issues during operation and at closure.

AGM has a Community Complaint and Grievance Procedure.

The Gold Fields website contains a “Contact Us” page, which contains a tab for the Regional Offices. Phone numbers and email address is listed for the Perth Gold Fields office.

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Standard of Practice 9.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

AGM has developed a Cyanide Awareness Poster which explains what cyanide is, what the risks are, and how it is used. This poster is available to stakeholders and has been shared with stakeholders at a recent meeting.

There is no significant illiteracy in the local population in the region surrounding the operation. Stakeholder engagement is generally delivered verbally, such as by phone call and meetings.

AGM have publicly available information about their operation in the form of annual reports. Reporting of any cyanide release or exposure incidents would be included in these reports. There have been no cyanide release or exposure incidents in the audit period.

An incident resulting in hospitalization or fatality would be considered a Serious Injury under the Mines Safety and Inspection Act 1994 (s.76) and Regulations governed by the Department of Mines, Industry Regulation and Safety (DMIRS). As per the AGM Incident Reporting and Investigation Guideline it would be reported to DMIRS.

The Department of Mines, Industry Regulation and Safety (DMIRS) Annual Environment Reports are visible on the DMIRS website to the public, and if a cyanide related incident occurred in the reporting period it would be included in the “Site Activity Summary” section.

DWER Annual Audit Compliance Reports are downloadable from the DWER Licences and Works Approvals web page, accessible to the public. Any non-compliance to the licence conditions is included in Appendix 1 of each report, and this includes WADCN concentrations of the tailings decant pond, and any discharge of cyanide containing substances to the environment.

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