WASTE MANAGEMENT POLICY

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1. INTRODUCTION.

Waste is any substance or object which its producer or the person in possession of it discards or intends to discard. A wide spectrum of wastes is generated throughout the mining lifecycle. These range from inert to reactive, benign to highly toxic, organic to inorganic, and arise from the commercial, industrial and domestic activities of the company. Hazardous wastes typically require compliance with regulatory controls. The management of low hazard and non-hazardous waste tends to be based on economic considerations. This document provides a framework for the management of non-mineral waste in GNCC Capital, Inc. ("GNCC") managed sites.

2. OBJECTIVE

The objective of this document is to ensure that actual and potential impacts arising from waste generation, handling, transportation and disposal are managed in accordance with host country requirements and the Values and Business Principles of GNCC Capital, Inc.

3. ACCOUNTABILITY AND RESPONSIBILITY

Overall accountability for implementing this standard lies with the Manager in control of the site. Responsibility for its implementation can be delegated to a designated person(s) who should clearly understand their role(s) and responsibilities.

4. SCOPE

This waste management standard defines the approach **(1)** to the management of waste products at GNCC managed sites.

This standard applies to valueless waste streams which may be generated during the mining and processing of the ore or the treatment of water, for example; chemical precipitates of arsenic or sulphur.

Where GNCC has no operational responsibility but a significant equity stake, and an equivalent standard is not in place, this standard must be made available to the operator for application.

Onsite contractors and subcontractors are required to adopt this standard unless they have an alternative waste management standard, approved in writing by GNCC.

1 Including activities of waste generation, collection, segregation, storage, transport and disposal.

Exclusions:

This waste management standard does not apply to radioactive substances and mineral wastes such as tailings and waste rock.

The management of cyanide at GNCC Capital, Inc. managed sites will be according to the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold.

5. REQUIREMENTS

5.1. Legal and Other Requirements

GNCC Capital, Inc. managed sites must manage all wastes and on-site waste disposal facilities in compliance with applicable international treaties, national laws and regulations, environmental license conditions and any other binding obligations.

5.2. Classification of Waste Streams on Environmental Risk

5.2.1. A register of the different waste streams generated under normal and abnormal conditions by the site must be developed and maintained.

5.2.2. The identified waste streams must be characterized and classified either as hazardous **(2)** or non-hazardous. Those subject to regulatory controls must be clearly distinguished.

5.2.3. Secondary categorization of wastes should be done to suit the particular circumstances of the site **(3)**.

5.3. Development of Waste Management Programs

5.3.1. Sites must develop waste management programs **(4)** in the context of the legal and other obligations applicable to the different types of waste identified. Documented waste management programs must be maintained.

5.3.2. The waste management programs must be informed by the following hierarchy of waste management strategies:

2 Hazardous waste is waste that has the potential, even in low concentrations, to have a significant adverse effect on public health and the environment because of its toxicological, chemical and physical properties, or is waste classified as such by host country law.

3 For example; non-hazardous waste streams can be further classified into: recyclable/non- recyclable, ferrous & non-ferrous metals, wood, paper, cardboard, plastic, etc. Hazardous wastes can also be further classified into recyclable or non-recyclable, with further logical subcategories, such as asbestos, fluorescent tubes, electronic, hydrocarbons, PCB contaminated transformer oils, cyanide-contaminated waste, solvents, sewage, etc.

5.3.3 These programs should be integrated into the site Environmental Management System through, for example, site specific procedures.

i. **Waste avoidance** – practices which minimize the generation of waste through e.g. purchasing practices aimed at reducing volumes of packaging; ensuring waste materials are recyclable, etc.

ii. **Waste reduction** – practices which reduce waste production at source through e.g. more efficient use of physical resources or maintaining optimum levels of substances which are prone to expiring.

iii. **Waste reuse** – where objects or materials can be reused directly or after refurbishments, such as electric motors, pump components or printer cartridges.

iv. **Waste recycling** – using waste materials, such as waste heat, metal, plastic, wood and paper, as raw material inputs into other processes or industries.

v. **Waste treatment** – transforming a nuisance or hazardous waste into a form that is easier to manage, e.g. through chemical stabilization, or the chemical extraction of toxic constituents through, for example, precipitation.

vi. **Waste disposal** – the disposal of hazardous & sub-economic waste to appropriately licensed, constructed and managed waste disposal facilities.

5.4 Components of Waste Management Programs

5.4.1 Segregation, handling and storage

5.4.1.1 Measures to segregate (**5)** waste types according to their chemical and physical characteristics or disposal method must be specified in waste management programs.

5.4.1.2 The location and design specifications (**6)** of waste transfer and disposal facilities must be suited to the waste type being managed and (ensure protection of the environment and the health and safety of people.

5.4.2 Transport and disposal

5.4.2.1 The regulatory requirements relating to the transportation of hazardous & nonhazardous waste materials in host countries must be specified in the waste management programs.

5.4.2.2 Waste disposal on GNCC property, including in landfill sites, pits and via co-disposal in rock dumps, may take place only if approved by the host country Government.

5 Where feasible, segregation should be performed at source since this lowers the potential for waste mixing and contamination and usually as a consequence, the overall cost of waste handling.

Including engineered protection measures such as a firm, waterproof base; liners, protection from the ingress and egress of storm water from surrounding areas; and drainage into a containment area to prevent contaminated water from entering the environment.

5.4.2.3 Proof of safe offsite disposal of hazardous waste materials must be maintained.

5.4.2.4 Where off-site disposal is done by contractors, the contractor must provide proof of registration to conduct such business and the proof of safe disposal.

5.5 Monitoring

Where waste transfer, sorting or disposal activities present a risk of land and water becoming contaminated, suitable monitoring programs to enable corrective and preventative actions must developed and implemented.

5.6 Emergency Preparedness and Response

Sites must include appropriate responses to hazardous waste incidents in their emergency preparedness and response planning.

5.7 Reporting

5.7.1 Information (7) on hazardous and non-hazardous waste materials must be collated and reported in accordance with regulatory and GNCC corporate office reporting requirements.

5.7.2 The results of monitoring conducted to verify the integrity of environmental protection measures must be maintained.

5.8 Closure

GNCC operations must adapt and incorporate their waste management programs into the Mine Closure Plan, taking into account the reduced level of resources on site.

6. GLOSSARY

6.1 **Operation** refers to a producing mine.

6.2 **Project** refers to an exploration project or a new mine expansion.

6.3 **Site** is used when referring collectively to gold producing operations and to exploration and expansion projects.

6.4 **Mining lifecycle** encapsulates all stages of a mine project, from exploration to operation and closure.

7 Information such as that required for GRI reporting, e.g. quantities and types of wastes produced (e.g. wood, metals, hydrocarbons, etc.) and the final disposal destination (e.g. landfill).