ICMC CYANIDE CODE SUMMARY AUDIT REPORT
RECERTIFICATION AUDIT

Pinos Altos Mine, Chihuahua, Mexico
Agnico-Eagle México, S.A. de C.V., subsidiary of Agnico Eagle Mines Ltd.

Submitted to
International Cyanide Management Institute (ICMI)
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Washington, DC 20005
United States of America

Submitted by
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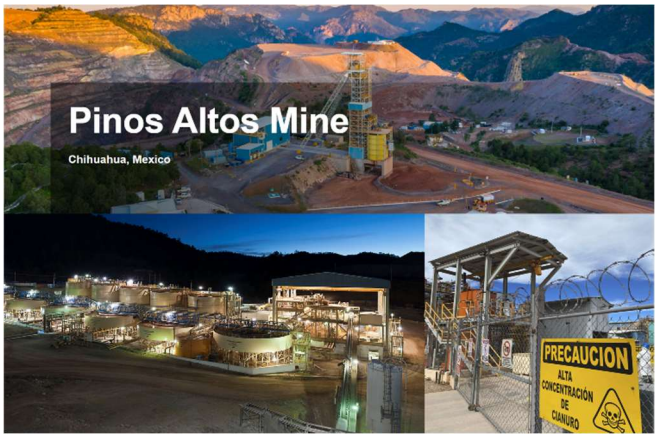

Chihuahua, Mexico, Aug 12, 2025

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Operation General Information

Name of Mine:	Pinos Altos Mine
Name of Mine Owner:	Agnico Eagle Mexico
Name of Mine Operator:	Agnico Eagle Mexico
Name of Responsible Manager:	Marco Antonio Perea Gallegos General Manager, Pinos Altos Mine
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State / Province:	Chihuahua
Country:	Mexico
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Operation Location Detail Description

Pinos Altos Mining, owned by Agnico-Eagle México, S.A. de C.V. (AEM), a subsidiary of Agnico Eagle Mines Ltd. is in the state of Chihuahua, Mexico. The project is located within the municipality of Ocampo, to the west of the state of Chihuahua, approximately 220 kilometers from the city of Chihuahua. See figure 1.

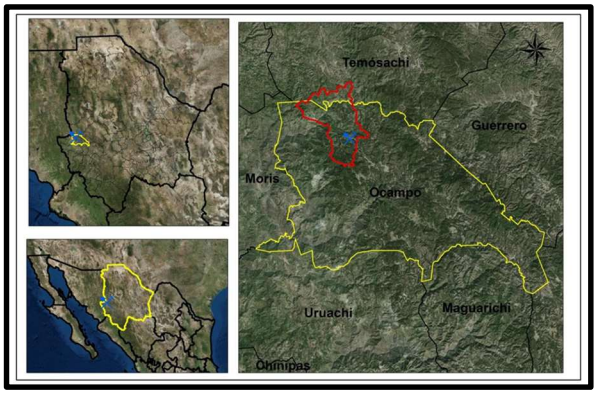

Figure 1, Pinos Altos Mine Location

Pinos Altos utilizes both open-pit and underground mining techniques to extract about 6 million tons of ore and waste material annually. The extracted ore is processed in a plant with a capacity of 6,000 tons per day, see figure 2.

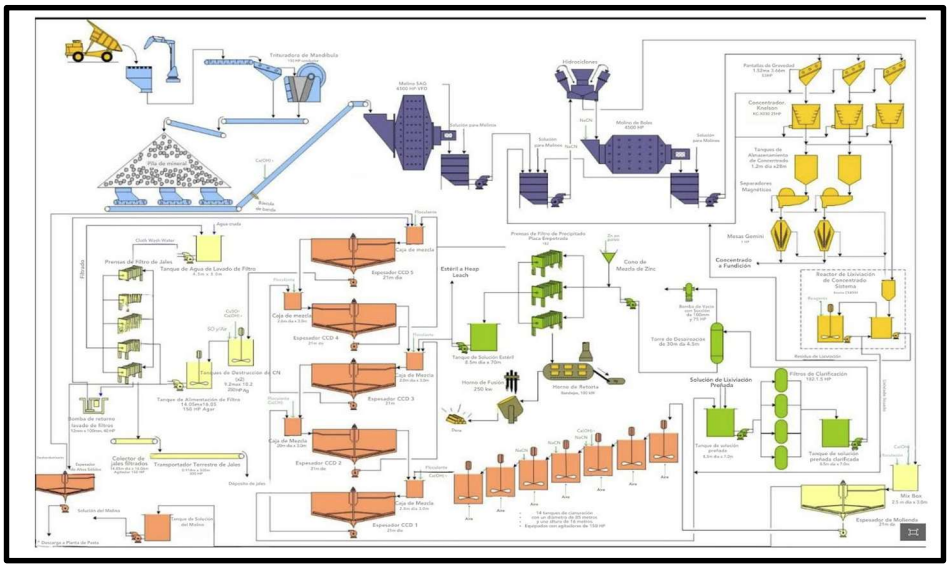

Figure 2, Pinos Altos Process Plant

Open-pit mining yields lower grade ore: Various open-pit methods are employed at Pinos Altos, using shovels and trucks for extraction. The ore is sent to the processing plant, see figure 2, instead of using Heap Leach Facility (HLF), see figure 3, which was not utilized during the recertification period.

Underground mining yields higher grade ore: The sub-level stopping method with paste backfill is employed for underground mining, extracting ore from the Santo Niño, Cerro Colorado, Oberon de Weber, and San Eligio deposits. This ore is transported to the surface via a ramp system and processed in the plant.

The Process Plant, see figure 2, involves crushing, grinding, gravity concentration, and agitated leaching, followed by counter-current decantation (CCD). The tailings produced from this process are detoxified using an INCO treatment with sodium metabisulfite, then filtered. Depending on the mine's needs, the filtered tailings can be deposited using a combination of the next two methods:
1) As a dry stack in the Oberon de Weber Tailings Storage Facility (TSF).
2) Or mixed with cement at the Paste Plant for use as underground backfill.

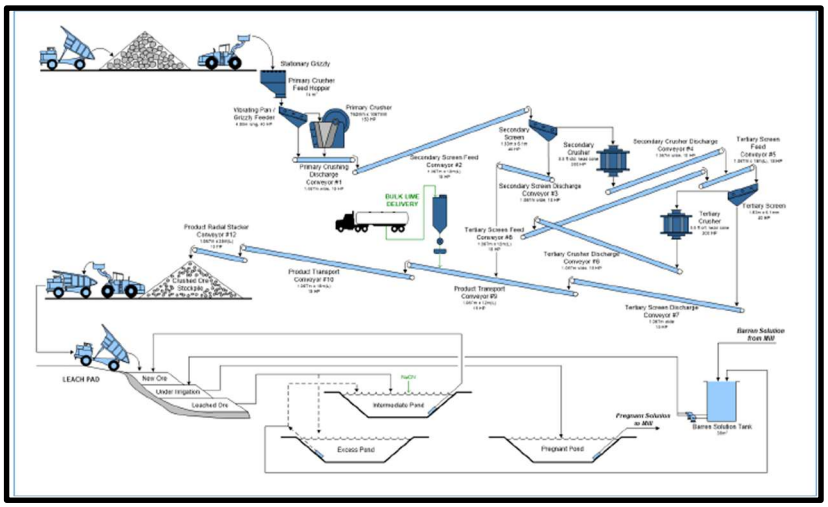

Figure 3, Heap Leach Facility (HLF), not used in this period audit

There were no new cyanide facilities for this audit cycle; however, the removal of piping and pumps from the Heap Leach Facility mixing installation took place since this process has not been used during this audit period. Nonetheless, the HLF ponds and emergency ponds remain available in case of any emergency.

Cyanide Facilities for this cycle audit includes:

A. Process Plant. Consisting of:
- Cyanide warehouse,
- Plant cyanide mixing area (including the cyanide mixing tank and the cyanide storage tank),

- Milling and grinding area,
- Leaching area (seven leach tanks)
- Thickener area (six CCD thickeners and one grinding thickener tank),
- Acacia reactor area including the Sioux heater
- Merrill Crowe plant (including a barren solution tank, a clarified pregnant solution tanks, zinc cone, deaeration tower, clarifiers, and precipitate filter presses)
- Detox area (an INCO cyanide destruct circuit with two detox tanks)
- High solids thickener is a paste thickener to remove clays prior to filtration
- Filtration plant, including the filter pond

B. Flotation plant to recover silver associated with sulfides from the tailings of the lixiviation leaching process.
C. HLF consisting of:
    - HLF Phases 1, 2, 3, and 4: During this audit cycle, cyanide irrigation at the HLF has not been performed.
    - Pregnant pond, intermediate pond and emergency pond. These ponds are only used for water management and for emergencies.
    - HLF cyanide mixing tank and barren tank: The cyanide mixing area has not been used in this audit cycle.
D. Dry Stack TSF, with deposition until February 2016 but continuing seepage and runoff from the tailings to the sedimentation pond.
E. Associated pipelines, pumps, valves, and appurtenances
F. Surface water diversions associated with the above facilities

Excluded Facilities:

There are two excluded cyanide facilities for this audit cycle because analytical data has shown that the Weak Acid Dissociable (WAD) cyanide concentrations have been less than 0.5 mg/l during this recertification period:

- Paste plant for making backfill from filtered tailings for the underground workings
- Oberon de Weber TSF with filtered tailings deposition in a former open pit

Nonetheless, it was deemed necessary to reference these excluded facilities in this comprehensive audit report, as a significant amount of evidence, such as inspections and maintenance, is interconnected between cyanide and non-cyanide facilities. Consequently, this report addresses both included and excluded facilities in a similar manner, while keeping in mind that certain facilities have been explicitly excluded.

Additionally, Pinos Altos receives solid cyanide briquettes in wooden boxes exclusively from an ICMI-certified producer. The cyanide has been transported to Pinos Altos through a producer Supply Chain. Pinos Altos has a cyanide warehouse for the storage of solid cyanide in wooden boxes, as well as a mixing and storage area at the process plant.

Auditor's Finding

	☒ **in full compliance with**	**the International**
The operation is	☐ in substantial compliance with	**Cyanide Management**
	☐ not in compliance with	**Code**

"This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle."

Audit Company:	GR Auditing
Lead Auditor and Technical Auditor:	Gabriel Rodriguez
Lead Auditor Email:	gabriellrdz@gmail.com
Dates of Audit:	February 25-28, 2025

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 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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Name of Mine	Signature of Lead Auditor	Date

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Principles and Standards of Practice

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.

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

Summarize the basis for this Finding:

The operation is in full compliance with 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.

During this recertification period Pinos Altos has only purchased solid sodium cyanide in briquettes from CyPlus-Idesa, S.A.P.I. de C.V. manufacturing plant located at Coatzacoalcos, Mexico and temporarily stored cyanide at the Cyplus Obregon Transloading Terminal and Warehouse in Obregon City. The CyPlus-Idesa, S.A.P.I. de C.V. manufacturing plant and the Cyplus Obregon Transloading Terminal and Warehouse were recertified under the code on Sep 26, 2023, and Nov 29, 2022. Respectively.

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.

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

Summarize the basis for this Finding:

The operation 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.

Pinos Altos has a letter from Cyplus-Idesa identifying the elements of the supply chain. The CyPlus Idesa cyanide supply chain elements included truck transportation from Coatzacoalcos plant to Obregon City, Mexico, and then truck transport to the mine. Three trucking companies conform this Cyplus-Idesa Mexican Supply Chain: Excellence Freights, Transportes Degam, and Autotransportes Nieto.

The CyPlus-Idesa Mexican Supply Chain was re-audited in 2022 by an ICMI approved auditor and found to be in full compliance with the Cyanide Code.

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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:

The operation is in full compliance with Standard of Practice 3.1; design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

Pinos Altos has a cyanide warehouse for the storage of solid cyanide in wooden boxes, as well as a mixing and storage area at the process plant. Pinos Altos exclusively receives solid cyanide in wooden boxes. During this audit cycle, the cyanide storage and mixing facilities at Pinos Altos have met compliance.

The unloading, mixing, and storage areas for solid cyanide are located away from populated areas and surface waters. These facilities are secured within fenced, gated, and locked zones to prevent unauthorized access.

Pinos Altos has stored solid cyanide in the walled and roofed warehouse at the process plant with a raised concrete floor to minimize the potential for contact with water and to prevent seepage or leakage into the subsurface.

The warehouse is equipped with grated concrete channels and a sump that directs to the preparation area. It also features vent openings and a continuous fan operation to ensure proper ventilation. Personnel entering the cyanide warehouse are required to use a handheld HCN monitor. The warehouse is exclusively dedicated to cyanide storage, eliminating the risk of contact with incompatible materials such as acids, strong oxidizers, explosives, as well as food, animal feeds, and tobacco products.

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The cyanide warehouse at the Process Plant is situated away from populated areas and surface water. This location has remained unchanged since the previous recertification audit in 2022. The nearest surface water source, an ephemeral creek, is approximately 1 km north of the Process Plant and the Heap Leach Facility (HLF). The closest community, La Bateria de Rodriguez, is located about 6.6 km to the west of Pinos Altos, well beyond the mine's perimeter fence.

The cyanide warehouse is securely locked, and both the mixing and storage areas are enclosed within fenced and locked perimeters. Unauthorized access to these areas is strictly prohibited, and there are no operational zones that place workers in close proximity to these facilities. Consequently, the potential for releases into surface water or human exposure is minimal.

Pinos Altos stores high-strength cyanide solution in two outdoor tanks at the process plant preparation area, which are equipped with adequate ventilation and situated on solid concrete bases with concrete secondary containment that effectively prevents leakage. Additionally, the cyanide preparation area has been isolated from incompatible materials.

Pinos Altos has also established a system to prevent overfilling of the cyanide storage tanks and has ensured the maintenance of these devices throughout the recertification period. The high-strength cyanide storage includes the preparation tank and the addition tank at the process plant. Level sensors have been installed in both tanks, with visual and audible alarms, as well as connections to the respective control room or panel. Furthermore, Pinos Altos has provided quarterly maintenance records for the level sensors throughout the recertification period to confirm their upkeep.

The preparation tank, addition tank, and barren tank are all mounted on reinforced concrete bases. In addition, the other tanks containing cyanide solutions are also installed on similar bases. Pinos Altos has constructed the secondary containment for the cyanide storage and mixing tanks using materials that effectively prevent leakage. The preparation and addition tanks at the process plant, along with the preparation and barren tanks at the HLF, are made of reinforced concrete. The secondary containment system directs any solution to a sump, where it is returned to the addition tank.

Standard of Practice 3.2

Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 3.2

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☐ not in compliance with

Summarize the basis for this Finding:

The operation is in full compliance with Standard of Practice 3.2; operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

Pinos Altos has established procedures to prevent the reuse of empty cyanide containers. These protocols require that the containers be thoroughly rinsed and disposed of at an authorized facility.

To ensure accountability, the cyanide boxes are tracked by serial numbers. Empty bags are rinsed three times and then temporarily stored alongside the empty wooden boxes in the cyanide warehouse until they are picked up by an authorized trucking company for disposal. The auditor reviewed the logbook inventory and examples of completed manifests for the disposal of empty boxes and plastic bags to confirm compliance throughout the recertification period.

Pinos Altos has implemented procedures that address the operation of valves, prompt cleanup of spills, and careful handling of cyanide containers with a forklift to prevent rupturing or puncturing during unloading and transfer from the cyanide warehouse to the preparation area.

Procedure PIA-OPP-OP-141, Transfer and Mixing of Sodium Cyanide, “Traslado y mezcla de cianuro de sodio”, describes the operation of valves and tanks for mixing and distributing cyanide. The auditor interviewed one of the mixing operators to verify understanding of this procedure.

In addition, procedure PIA-OPP-OP-142, Cyanide Equipment Inspection for Corrective Maintenance, outlines the routine inspections performed on mixing equipment as part of the maintenance plan. It is important to note that ISO tanks are not received; therefore, hoses are not utilized for their connection.

These procedures also stipulate that cyanide containers be stacked no more than two high within the cyanide warehouse, which the auditor confirmed during the inspection. Additionally, the procedures outline required personal protective equipment and mandate that an observer be present during cyanide mixing.

Lastly, the procedures call for the addition of colorant during mixing. A cyanide mixing event was observed at the process plant to verify the implementation of these procedures

Principle 4 | OPERATIONS

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

Standard of Practice 4.1

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

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

Summarize the basis for this Finding:

The operation 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.

Pinos Altos has established management systems for the operation of its facilities, including those handling cyanide. These systems encompass the Mining Association of Canada´s (MAC) Towards Sustainable Mining(TSM), the Agnico Eagle corporate Risk Mangement and Monitoring System (RMMS), which aligns with the ISO 14001 Environmental Management System and the Occupational Health and Safety Assessment Series (OHSAS) 18001 Health and Safety Management System. Additionally, they participate in the Clean Industry program (Industria Limpia), a Mexican government initiative, the AEM Management System for Responsible Mining, and the Socially Responsible Company (ESR, “Empresa Socialmente Responsable”) Socially Responsible Company certification.

Pinos Altos has developed plans and procedures that describe the design criteria and applicable regulatory requirements to prevent or control cyanide releases and exposures. Freeboard has been defined in various procedures as 0.5 m. Groundwater and surface water standards for cyanide have been referenced to a Mexican regulation. A procedure defines the concentration goal of 10 mg/L cyanide after detoxification, if necessary, for solutions in the HLF emergency pond. Additionally, the GoldSim water balance model identifies the design storm for a 100-year, 24-hour period as 180 mm.

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Pinos Altos has created a comprehensive set of standard operating procedures for the safe and environmentally responsible operation of their cyanide facilities. These procedures outline the risks associated with each task and provide clear descriptions of safe work practices. Each procedure specifies task-specific measures, personal protective equipment (PPE) requirements, and the individuals responsible for verifying that the procedures for each cyanide task are implemented.

Additionally, Pinos Altos has established a procedure to assess proposed changes to production processes, operating practices, or cyanide facilities. This review evaluates the potential implications for releases and safety, as well as determining necessary mitigation measures. During the recertification period, Pinos Altos provided two examples of changes related to the cyanide facilities that were approved and signed by the Safety and Health and Environmental Departments.

Pinos Altos has established contingency procedures to address issues related to water balance, deviations from standard operating procedures, and temporary shutdowns. These procedures outline the actions to take when water level in the ponds surpass freeboard limits, and in the case of the HLF Emergency Pond, neutralization measures if overtopping is imminent. Specific contingency plans have been created for potential failure scenarios concerning the HLF, Dry Stack TSF, and Oberon de Weber TSF. The conceptual closure plan also covers the temporary shutdown or cessation of cyanide facilities.

Pinos Altos has developed written procedures to decommission cyanide facilities during long-term shutdowns or cessation of operations. The January 2024 Conceptual Closure Plan includes the decommissioning of cyanide facilities during long-term shutdowns or cessation of operations.

Furthermore, the following documents provide guidance on the safe handling of cyanide during long-term shutdowns or cessation of operations:PIA-ER-EP-37, Contingency Response Plan

- AEM-HSE, Crisis Management Plan
- PIA-ENV-OP Surface and Groundwater Sampling Procedure
- Daily walk monitoring
- Daily checklist for sodium cyanide handling equipment inspections for corrective maintenance.

Pinos Altos has established and executed inspection programs for their cyanide facilities. These inspections encompass various components, including tanks, pumps, valves, secondary containment areas, pipelines, ponds, leak detection and collection systems at the HLF and ponds, TSFS, as well as monitoring for wildlife presence and mortality, and surface water diversion channels. The integrity of tanks is assessed through an annual ultrasonic thickness measurement program. Inspections are documented using forms and checklists that record the date, inspector's name, and provide areas for comments on necessary corrective actions. The maintenance department ensures that all corrective actions are monitored until their completion. The inspection forms have identified specific items to be observed and their expected condition. The forms also included the date of the inspection, the name of the inspector, and any observed

deficiencies, if any. In addition, the inspection forms have cells for comments regarding corrective actions.

Pinos Altos conducts inspections of their cyanide facilities at appropriate intervals to ensure they operate within design parameters. The inspection frequencies are daily, weekly, or monthly depending on the facility, as well as per event (in the case of pre-work inspections for cyanide mixing and unloading). (e.g. surface water diversions at the HLF and its ponds have been inspected daily on FO-0P-CN-01-043 and -044. Surface water diversions at the Dry Stack TSF and Oberon de Weber TSF have been inspected weekly to monthly on their respective weekly and monthly inspection forms). Records of these inspections have been maintained throughout the recertification period.

Pinos Altos has established a maintenance program to guarantee that all equipment and devices operate effectively. They utilize a software system to oversee both preventive (scheduled) and corrective (unscheduled) maintenance activities. As proof of completed maintenance, Pinos Altos supplied a spreadsheet detailing corrective actions for a randomly chosen area, along with preventive maintenance records for randomly selected equipment. Additionally, they provided inspection and maintenance records, including calibration details, for level sensors and pH meters throughout the recertification period.

Finally, Pinos Altos operates eight generators, each with a capacity of 1,850 kilowatts, to ensure the mine can function when the primary government supplier cannot meet demand, thereby preventing releases and exposures. They have provided documentation including annual lubrication schedules, biannual operational inspection and testing reports.

Standard of Practice 4.2

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 4.2
	☐ not in compliance with	

Summarize the basis for this Finding:

The operation 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.

Pinos Altos has established a program aimed at minimizing cyanide usage in its milling area and flotation plant, which are the two main circuits at the mine. Optimization studies for these areas confirmed a reduced cyanide addition rate of 750-850 ppm free cyanide (down from the previous audit rate of 1,100 ppm) for the milling process, while at the flotation plant the cyanide addition rate was 9,000 ppm.

Pinos Altos has established both manual and automatic control strategies for managing cyanide addition. They routinely adjust cyanide levels in the milling area and flotation plant to maintain target addition rates, based on samples collected every two hours, as recorded in control tables and daily reports. Additionally, a Cyanoprobe device has been installed in the detox circuit to automate control and limit cyanide from entering the filtration circuit. Time series graphs indicate that WAD cyanide concentrations in filtered tailings remained below 0.5 mg/l during the entire recertification period.

Standard of Practice 4.3

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 4.3
	☐ not in compliance with	

Summarize the basis for this Finding:

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

Pinos Altos has developed two water balance models. The first is a comprehensive, probabilistic GoldSim model designed for the life of the mine. The second is a comprehensive Excel-based operational model that operates on a daily time-step. Both models are thorough, incorporating all relevant cyanide facilities. The GoldSim model is probabilistic in that key input and output parameters are represented by distributions instead than single values.

Pinos Altos has developed a GoldSim model that considers the appropriate input parameters for the facilities and the environment. The model assigned reasonable values for precipitation, evaporation and moisture content of ore, representative climate data, draindown from the pad in

case of a power outage or pump failure, and seepage from the TSFs. Model simulations also evaluated scenarios involving multiple-day power outages, considering various initial pond water levels (both low and high) and extreme weather events, including a 100-year, 24-hour storm event (180 mm) and a storm double that size (360 mm). These assessments ensure a sufficient probability of preventing overtopping throughout the operational life of the facilities.

Pinos Altos has designed and operated ponds with an adequate freeboard of 0.5 m above the maximum design storage capacity. Time series graphs from the recertification period indicate that pond water levels have consistently been maintained below this freeboard level.

To implement the water balance and prevent overtopping, Pinos Altos has established a procedure that includes monitoring and inspections. A contingency plan outlines the measures to be taken during upset conditions to prevent overtopping, including the use of misters to evaporate water.

Pond water levels are monitored using pressure sensors and staff gages, with data entered daily into an Excel spreadsheet water balance. Additionally, Pinos Altos conducts daily inspections of diversion channels. Pinos Altos has conducted daily water diversions inspections at the HLF and its ponds, while the Dry Stack TSF and Oberon de Weber TSF have been inspected weekly and monthly. Local precipitation is measured and incorporated into operational practices, supported by the installation of one meteorological station, six rain gages, and two evaporation pans at the mine. The 100-year, 24-hour storm event utilized in the GoldSim model was identified as 180 mm.

Standard of Practice 4.4

Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 4.4
	☐ not in compliance with	

Summarize the basis for this Finding:

The operation 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.

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Pinos Altos has put in place measures to restrict wildlife and livestock access to all open waters where WAD cyanide levels exceed 50 mg/l. These measures have remained consistent since the previous audit and include mine perimeter fencing, pond perimeter fencing, netting over the pregnant and intermediate ponds, and conveyance of process solutions in pipelines.

Pinos Altos has shown that WAD cyanide concentrations remained below 50 mg/l in open waters without netting during the recertification period. Samples were collected at least quarterly, and often monthly, with analytical data from an external laboratory indicating concentrations of less than 0.5 mg/l in the emergency pond, filters pond, the contact water pond at the Oberon de Weber TSF, and the ramp pond for water from underground workings. Additionally, WAD cyanide concentrations were below 5 mg/l in the sedimentation pond at the Dry Stack TSF.

Pinos Altos has successfully maintained WAD cyanide concentrations at or below 50 mg/l in open water and has prevented significant wildlife mortality during the recertification period. Staff reported no mortalities, and daily inspections confirmed this statement. Notably, during this audit period, Pinos Altos did not utilize the leach process, although the ponds remain available for emergencies.

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:

The operation 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.

Pinos Altos does not have a direct discharge from its cyanide facilities to surface water, and there are no mixing zones present.

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Pinos Altos has the potential for indirect discharges to surface water in four ephemeral washes: Arroyo La Bateria, Arroyo El Durazno, Arroyo Carboneras, and Arroyo La Maquina. During the recertification period, samples collected from monitoring stations in these washes showed that free cyanide concentrations were below the minimum quantifiable level of 1.0 mg/l. Additionally, WAD cyanide concentrations at these stations were generally non-detect, with occasional measurements reaching up to 0.013 mg/l. Since free cyanide concentrations are typically lower than WAD cyanide concentrations, the auditor accepted these findings as evidence of no indirect discharges.

Pinos Altos has not detected any indirect discharges of cyanide solutions to surface waters, and as a result, the company is not engaged in any remediation efforts to prevent degradation or to restore beneficial use.

Standard of Practice 4.6

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 4.6
	☐ not in compliance with	

Summarize the basis for this Finding:

The operation is in full compliance with Standard of Practice 4.6; Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

Pinos Altos has implemented several measures to minimize the potential for seepage to groundwater. These include: (1) a geomembrane lining for the leach pad, which consists of a low permeability underliner fill topped with a geomembrane liner, (2) the pregnant, intermediate, and emergency ponds are equipped with a double liner and leak detection system, while the filters pond utilizes a single liner, (3) concrete floors have been constructed in the process plant, including cyanide warehouses and the cyanide mixing area, as well as in the flotation plant.

Both the Dry Stack TSF and Oberon de Weber TSF were designed with foundation drains to remove water that accumulates at the base of the tailings mass, directing it to the sedimentation pond and filters pond, respectively. These measures have remained unchanged since the previous audit cycle.

Pinos Altos has actively monitored cyanide levels in groundwater to ensure that beneficial uses downgradient of the cyanide facilities have not been impacted at concentrations exceeding the numerical standards set by Mexican regulations. The Environmental department has adopted a standard of 1.0 mg/l total cyanide, as specified in the Mexican environmental agency (Secretaria del Medio Ambiente y Recursos Naturales, SEMARNAT), NOM-00I-SEMARNAT-2021, which applies to agricultural use and human consumption of groundwater. Currently, no actual points of beneficial groundwater use have been identified downgradient of the cyanide facilities. To facilitate monitoring, Pinos Altos has installed seven monitoring wells in the area downgradient of the cyanide facilities.

Analytical data from quarterly samples collected by an external laboratory throughout the recertification period showed that results were generally non-detect for total cyanide, with all values remaining below the 1.0 mg/l. Pinos Altos has utilized detoxified paste tailings mixed with cement for underground backfill, and monthly measurements of hydrogen cyanide (HCN) in the underground environment consistently recorded 0.0 parts per million, indicating no risk to worker health.

Analytical results of monthly paste tailings samples from throughout the recertification period were all non-detect for WAD cyanide. Analytical results of quarterly samples of underground dewatering water from throughout the recertification period were mostly non-detect with a maximum value of total cyanide below the regulatory limit of 1.0 mg/l. Results obtained are protective of worker health and groundwater.

Moreover, analytical results from monthly paste tailings samples during the recertification period were all non-detect for WAD cyanide. Quarterly samples of underground dewatering water also predominantly yielded non-detect results, with the highest total cyanide value being below the regulatory limit of 1.0 mg/l. These findings demonstrate that the measures in place are protective of both worker health and groundwater quality.

Pinos Altos has not caused cyanide concentrations in groundwater to exceed levels that would be protective of beneficial use. As a result, the company has not needed to engage in any remedial activities to prevent further degradation or to restore beneficial use.

Standard of Practice 4.7

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

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

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Summarize the basis for this Finding:

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

Pinos Altos has implemented spill containment measures for cyanide unloading, storage, mixing, and processing. The mixing and storage tanks, as well as the cyanide solution tanks at the process plant, are installed on solid concrete bases within concrete secondary containment structures. Additionally, the floor of the containment area for the HLF cyanide mixing and barren tanks is sloped towards the adjacent pregnant pond, which provides secondary containment.

Pinos Altos has maintained properly sized secondary containment systems, which have remained unchanged since the initial and previous recertification audits. The findings from those audits continue to hold true. The containment capacities are designed to range from 110% to 782% of the largest tanks or vessels within their respective containment areas, ensuring adequate protection against potential spills or leaks.

Pinos Altos has designed the secondary containments to not discharge to the environment and therefore no written procedures are needed to prevent discharge of contained water to the environment. Sumps with automated pumps in the secondary containments return cyanide solutions to the process circuits.

Pinos Altos has designed its secondary containment systems to ensure that they do not discharge to the environment, which eliminates the need for written procedures to prevent the discharge of contained water. Additionally, sumps equipped with automated pumps are installed in secondary containments, allowing the return of cyanide solutions to the process circuits.

Pinos Altos has implemented containment measures for its cyanide solution pipelines to effectively collect leaks and prevent environmental releases. These containment systems include concrete channels, double-wall pipes, geomembrane-lined ditches, and steel trays. During the site visit, the auditor observed that these pipeline secondary containments were in good condition.

There are two specific pipeline segments that lack secondary containment because the concentrations of WAD cyanide were consistently below 0.5 mg/l during the recertification period. These segments include: (1) the pipeline transporting tailings water from the Oberon de Weber TSF decant tower sump to the filters pond, and (2) several meters of the pipeline from the high solids' thickener to the paste plant.

Pinos Altos has constructed tanks and pipelines using materials that are compatible with cyanide and high pH conditions. The cyanide tanks are made of carbon steel, while the pipelines are constructed of carbon steel, stainless steel, and HDPE. Importantly, Pinos Altos does not have cyanide-related tanks without secondary containment.

Pinos Altos has effectively managed its operations to ensure that there are no areas where cyanide pipelines pose a risk to perennial surface water. The surface water in the region is ephemeral, and there are no natural surface water bodies in the vicinity of the mine.

Standard of Practice 4.8

Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 4.8
	☐ not in compliance with	

Summarize the basis for this Finding:

The operation is in full compliance with 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 QA/QC programs for the existing cyanide facilities at Pinos Altos were evaluated and found to be fully compliant during both the initial and first recertification audits. The evaluations for the HLF Phase 4 and the Sioux heater also confirmed full compliance during the previous recertification audit in 2022.

During this audit period, no new cyanide facilities were installed, nor were there any changes made to existing facilities. Pinos Altos has maintained QA/QC documentation and records, and the auditors were provided with PDFs of the previous QA/QC reports from the initial report and the 2022 recertification audit report to verify compliance.

Standard of Practice 4.9

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

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

Summarize the basis for this Finding:

The operation is in full compliance with Standard of Practice 4.9; implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

Pinos Altos has established written standard procedures for monitoring surface water, groundwater, and wildlife. The procedure for Surface Water and Groundwater Sampling outlines the monitoring processes for these medias, while the Daily Walk procedure focuses on daily wildlife monitoring and the reporting of any mortalities. These procedures have been created by qualified personnel at Pinos Altos, each with over 10 years of experience in sampling and analysis. Additionally, the analytical laboratory procedures have been developed by an (EMA, Entidad Mexicana de Acreditacion) -accredited laboratory, ensuring high standards of compliance and accuracy in monitoring efforts.

The procedure for Surface Water and Groundwater Sampling at Pinos Altos includes comprehensive details on various aspects of the sampling process. It specifies sampling locations, sampling procedures, the cyanide species to be analyzed, as well as the types of sampling containers and preservation methods required. Additionally, the procedure outlines the chain of custody protocols, transportation instructions, and quality control measures.

The analytical laboratory, acting on behalf of Pinos Altos, is responsible for collecting the samples and preparing the chain of custody records. Field sampling sheets are utilized to document relevant information such as weather conditions, flora, fauna, and other conditions that may influence the results of the samples. This thorough approach ensures the integrity and reliability of the monitoring data.

Pinos Altos has implemented monitoring at frequencies adequate to characterize the media being monitored and to promptly identify any changes. Wildlife inspections have been completed daily. Groundwater monitoring has been monitored quarterly. Surface water has been monitored monthly to quarterly, as appropriate for ephemeral water courses.

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:

The operation 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.

The company has developed written procedures for decommissioning cyanide facilities when operations cease. The January 2024 Conceptual Closure Plan outlines the relevant cyanide facilities and the associated decommissioning activities.

Pinos Altos has developed an implementation schedule for mine closure that includes decommissioning of cyanide facilities. Table V1 in the Conceptual Closure Plan is a general schedule that shows mine closure is estimated to take three years with the decommissioning of the mayor cyanide facilities (i.e., the process plant and HLF) in the second and third years. This plan complies with the Environmental Impact Assessment (MIA, Manifiesto de Impacto Ambiental) requirements from the Mexican regulation entity, SEMARNAT.

Additionally, Pinos Altos has conducted annual reviews and updates of its Conceptual Closure Plan throughout the recertification period, incorporating any new or modified cyanide facilities as they come online. The auditor reviewed closure plans from 2012 to 2024 to confirm compliance.

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Standard of Practice 5.2

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 5.2
	☐ not in compliance with	

Summarize the basis for this Finding:

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

Pinos Altos has developed a cost estimate for the decommissioning of cyanide facilities, utilizing quotes from independent contractors as part of its annual Asset Retirement Obligation (ARO) process. This estimate covers the appropriate cyanide facilities and decommissioning activities, including the removal of residual cyanide and decontamination, as well as costs associated with electricity, labor, and materials for rinsing the Heap Leach Facility (HLF), in accordance with the closure plan and Mexican regulations.

The cost estimate is based on contractor quotes from 2024, which were used to establish unit costs and to obtain lump sum costs for specific decommissioning activities. The estimated costs for the subset of mine closure related to decommissioning cyanide facilities are approximately $8.53 million United States Dollars (USD). Pinos Altos has conducted annual reviews and updates of this closure cost estimate during the recertification period, as evidenced by the versions from 2022, 2023, and 2024.

For financial assurance, Pinos Altos has established a self-guarantee mechanism. A qualified financial company provided a statement confirming that the operation possesses sufficient financial strength to meet this obligation, as demonstrated by an acceptable financial evaluation methodology as outlined in Section 40 of the United States Code of Federal Regulations 265.143 (f). The preparer of this statement was a certified public accountant in Mexico, and the amount of the self-guarantee noted in the declaration exceeds the estimated decommissioning costs.

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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:

The operation 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.

Pinos Altos has developed and implemented procedures that describe the operation of cyanide facilities to minimize the possibility of workers exposure to cyanide. The procedures cover the areas for grinding, Merrill Crowe, leaching, thickeners, cyanide destruction, filters, and tailings and flotation, as well as the storage, discharge, mixing and handling of cyanide.

The auditor observed the implementation of Pinos Altos' procedures in the field, confirming their effective use during operations. Pinos Altos has created specific procedures that outline the requirements for personal protective equipment (PPE), training needs, risks associated with each task, and the necessity for pre-work inspections. During the audit, the auditor reviewed examples of pre-work inspection checklists specifically for cyanide offloading and preparation.

Pinos Altos actively seeks and values the participation of workers in the development and evaluation of health and safety procedures. This engagement is facilitated through various mechanisms that encourage worker input. Comments and suggestions from employees are collected and addressed via the INTELEX database, which serves as a central platform for tracking feedback and responses. The auditor reviewed records from the INTELEX database, including examples of worker comments and the corresponding supervisor responses to verify compliance.

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:

The operation is in full compliance with Standard of Practice 6.2; operate and monitor cyanide facilities to protect workers' health and safety and periodically evaluate the effectiveness of health and safety measures.

Pinos Altos has established specific pH levels to limit the evolution of hydrogen cyanide (HCN) gas during mixing and production activities. According to their procedures, a minimum pH of 10 to 11 is required for dosage, while the mixing area must maintain a minimum pH of 10.5 to 11.5. The auditor reviewed data confirming that Pinos Altos consistently maintains pH levels above these minimum prescribed values. Additionally, he observed real-time pH data in the control room to verify compliance.

Pinos Altos has conducted a thorough risk assessment to identify areas and activities where workers may be exposed to hydrogen cyanide (HCN) levels exceeding 10 ppm on an instantaneous basis and 4.7 ppm continuously over an 8-hour period. In response to these findings, the company has mandated the use of personal protective equipment (PPE) in the identified locations or during specific activities. The areas identified for potential HCN exposure include the cyanide preparation area in the process plant, leach tank 1, cyanide destruction tanks, Acacia, Merrill Crowe, flotation, and the refining area. These were identified through a risk assessment where the initial risk, the control measures, and the probability and the consequence of the risks were evaluated. To enhance safety, portable HCN meters have been provided to workers in these high-risk areas, while fixed HCN monitors are located at the cyanide preparation area in the process plant, leach tank 1, cyanide destruction tanks, Acacia, Merrill Crowe, flotation, and refining area. HCN monitors have audible alarms set at: 1) 4.7 ppm to stop the work and do activities such as venting, etc. and 2) 10 ppm for evacuation. Pinos Altos has adhered to the manufacturer's instructions for the maintenance, testing, and calibration of its HCN monitors. The operation has personnel certified by the manufacturer and has the necessary equipment to perform accurate calibrations. The auditor reviewed the calibration records from 2022 to 2024, which were found to be complete and well-documented. The records had the values with which the HCN monitors were calibrated.

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Pinos Altos has placed signs in Spanish in all work areas where cyanide is present, including the plant, Heap Leach Facility (HLF), and Dry Stack Tailings Storage Facility (TSF). These signs not only indicate the presence of cyanide but also specify prohibited activities in those areas and outline the required personal protective equipment (PPE) for workers.

Pinos Altos has dyed high-strength cyanide solution for clear identification. The operation adds red dye No. 40 to the cyanide solution during the mixing process. Workers must specify that the dye was added in the "cyanide preparation" section of the daily inspection checklist. The auditor was present at a cyanide solution preparation event and observed the addition of the colorant to the solution.

Pinos Altos has strategically installed emergency showers, eyewash stations, and dry powder or non-acidic sodium bicarbonate fire extinguishers throughout the operation to enhance worker safety. Both showers and eyewash stations are inspected and tested daily, and prior to beginning a task that has the potential for cyanide exposure. During the site visit, the auditor conducted random checks on the functionality of several showers and eyewash stations to verify that they are operational. Fire extinguishers are inspected and tested monthly. In addition, Pinos Altos has an external contractor that tests fire extinguishers monthly.

Pinos Altos has identified storage, mixing, and process tanks, as well as piping that contains cyanide to alert workers of their contents. During the site inspection, it was observed that cyanide lines were labeled with yellow-colored labels indicating the direction of flow. Additionally, the cyanide mixing and storage tanks are also properly labeled. Access to the plant area is restricted, with no one permitted to enter the processing area until they have completed the Cyanide Training Induction. Training materials specify that cyanide is present in the plant area. All plant personnel and maintenance workers receive this training.

Pinos Altos has placed Safety Data Sheets (SDS) and first aid procedures in areas where cyanide is managed. This critical information is provided in Spanish, the language of the workforce. Additionally, electronic versions of the SDS have been made accessible to staff via computers located throughout the facility using the intranet.

Pinos Altos has established a procedure for investigating and evaluating incidents, including those related to cyanide exposure incidents, to determine if the operation's programs and procedures to protect worker health and safety, and to respond to a cyanide exposure, are adequate or need revision. The procedure documents the requirements for incident reporting and investigation to determine purpose, justification, scope, responsibilities, development, research, methodology, and the basic causes of the incident. Although no cyanide-related incidents have occurred during the recertification period, the auditor reviewed two non-cyanide incident examples to verify compliance with the established procedures.

Standard of Practice 6.3

Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 6.3
	☐ not in compliance with	

Summarize the basis for this Finding:

The operation 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.

Pinos Altos had made available antidote kits, water, oxygen, resuscitators (a device that uses positive pressure to inflate the lungs of an unconscious person who is not breathing such as an artificial manual breathing unit, AMBU), radios, telephones, and alarms in the process plant, leach pad and clinic. The location of the emergency equipment was deemed to be appropriate for the operation.

Pinos Altos has ensured the availability of essential emergency equipment, including antidote kits, water, oxygen, resuscitators, radios, telephones, and alarms, strategically placed in the process plant, leach pad, and clinic. The location of this emergency equipment has been assessed and deemed appropriate for the operation, allowing for swift access in case of an emergency.

Cyanide antidote kits with oxygen tanks and amyl nitrite, Cyanokit (hydroxocobalamin), sodium nitrite, and sodium thiosulfate, are located at cyanide preparation area in the plant, Merrill Crowe circuit, laboratory, control room at the process plant and the clinic. Pinos Altos has strategically placed cyanide antidote kits, which include oxygen tanks, amyl nitrite, Cyanokit (hydroxocobalamin), sodium nitrite, and sodium thiosulfate, in key locations such as the cyanide preparation area, Merrill Crowe circuit, laboratory, control room, and clinic. Operators are equipped with two-way radios while performing their tasks. Pinos Altos has also a dedicated radio channel for paramedics as well as dedicated landline extensions. Additionally, there are push button alarms at various locations throughout the plant, including the mixing area.

First aid equipment has been inspected regularly to ensure that it is available when needed, and that materials such as cyanide antidotes are stored and tested according to manufacturer guidelines, with timely replacements to prevent expiration. Pinos Altos has kept their oxygen tanks operable with tracking records of the inspections. For the ambulances and the clinic, the brigade commander and paramedics are responsible for reviewing the first aid equipment and the emergency response equipment.

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Pinos Altos has developed and implemented emergency response plans and procedures specifically designed to address cyanide exposures. Collectively these documents address potential accidental releases of cyanide ranging from actions for the attention to spills or cyanide poisoning, to the communication and handling of the emergency with stakeholders.

Pinos Altos has its own onsite capabilities to provide first aid and medical assistance to workers who may be exposed to cyanide. The mine has an Emergency Response Team trained in first aid and hazardous materials. The clinic on site consistently has one paramedic and one doctor available for each shift, seven days a week. The clinic staff are trained in advanced medical response and are authorized to administer cyanide antidotes. The Emergency Response Team is trained in emergency first aid and would provide additional medical support when needed.

Pinos Altos has an established procedure and resources for transporting individuals affected by cyanide intoxication to hospitals in Cuauhtémoc or Chihuahua, either by land or air. During the transport, a paramedic will accompany the patient to ensure they receive continuous care. Hospitals in both Cuauhtémoc and Chihuahua have signed a memorandum that outlines their commitment to treating patients exposed to cyanide in emergency situations.

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:

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

Pinos Altos has established and implemented emergency response plans and procedures to manage potential accidental releases of cyanide and exposure incidents. The documents include:

- Contingency Response Plan, PIA-ER-EP-37, “Plan de Atención a Contingencias V-8”
- Crisis Management Plan, AEM-HSE “Plan de Gestión de Crisis”
- Cyanide Spill Control, PIA-OPP-OP-143, “Control de Derrames de Cianuro”
- Cyanide Poisoning Antidote, PIA-OPP-147, “Primeros Auxilios por intoxicación por cianuro”.
- General Evacuation Plan, PIA-SSH-0P-25, “Procedimiento General de Evacuación”
- AEM Action Plan and Emergency Response, “Plan de Atención y Respuesta a Emergencia”

The procedures at Pinos Altos consider cyanide failure scenarios that are relevant to the specific environmental and operational conditions of the site. The Environmental Risk Study, conducted as part of the Environmental Impact Study for the operation, assessed potential hydrogen cyanide (HCN) releases and determined that no communities are located within the potential impact zone. In the case of the mine workers, the PIA-ER-EP-37 Contingency Response Plan outlines the evacuation procedures and emergency response protocols in the event of a catastrophic release of hydrogen cyanide.

Releases and spills are managed according to the procedures PIA-ER-EP-37 and the fire prevention procedure.
The PIA-ER-EP-37 and the Crisis Management Plan address potential ruptures in pipes, valves, and tanks, as well as pond overflows.
Electrical outages and pump malfunctions are included in PIA-ER-EP-37.
Uncontrolled seepage is addressed in the PIA-ER-EP-37.
The failure of the cyanide destruct circuit is specifically addressed in the procedure for Detox Startup after Power Failure.
Failures related to Tailings Storage Facilities (TSF) and Heap Leach Facilities (HLF) are addressed in the operation and maintenance manuals for the Oberon Weber and Dry Stack TSFs, and the procedure for slope failures and liners tears, respectively.

The PIA-ER-EP-37 addresses transportation accidents both onsite and within 30 km of the mine. For offsite incidents. In the event of offsite incidents, the Pinos Altos brigade role is controlling the accident area until the cyanide supplier brigade arrives.

The General Evacuation Plan addresses evacuation of mine facilities and potentially affected communities. The Cyanide Poisoning Antidote addresses antidote use. The AEM Action Plan and Emergency Response, Crisis Management Plan, and PIA-ER-EP-37 collectively address control of releases at their source, as well as containment, assessment, mitigation, and future prevention of releases.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

Summarize the basis for this Finding:

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

The operation is in full compliance with Standard of Practice 7.2; involve site personnel and stakeholders in the planning process.

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Pinos Altos has involved its workforce and stakeholders in the cyanide emergency response planning process, this includes local communities, contractors, operators, and agencies. Pinos Altos has communicated the risks associated with cyanide through annual training sessions for local communities. These sessions focus on the emergency response plans and procedures.

Pinos Altos has made potentially affected communities aware of the nature of the risks associated with accidental cyanide releases. The company has consulted with these communities directly or through representatives regarding appropriate communications and responses. The site has conducted mutual assistance meetings with external responders from the Ocampo municipality, focusing on emergency procedures and involving discussions with city hall leaders. Additionally, Pinos Altos has held meetings with community leaders in Basaseachi during the recertification period to discuss the use of cyanide in gold mining, potential risks, control measures, and community concerns.

Pinos Altos has identified external entities that play a role in the cyanide emergency planning and response process, providing them with specific responsibilities. Outside responders have received training from Pinos Altos staff on the correct use of the antidote for cyanide poisoning. Additionally, annual letters outlining their roles and responsibilities in a cyanide emergency have been sent to Hospital Angeles Cuauhtemoc and Hospital Angeles Chihuahua.

Pinos Altos has actively communicated with stakeholders to ensure that the emergency planning documents remain up to date. The operation conducts annual training for local communities on its cyanide emergency response plans and risks associated with cyanide management. Additionally, Pinos Altos provides training on the emergency response plan for cyanide poisoning to representatives of the Red Cross, firefighters, and the local hospital. Consultation with the mine workers is provided through health and safety meetings, as well as 5-minute pre-shift information meetings.

In addition, the consultation with mine workers is provided through the health and safety meetings and 5-minute pre-shift information meetings, where the emergency response and related procedures are reviewed. Their comments are taking into account.

Standard of Practice 7.3

Designate appropriate personnel and commit necessary equipment and resources for emergency response.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 7.3
	☐ not in compliance with	

Pinos Altos	_____	Aug 12, 2025
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Summarize the basis for this Finding:

The operation is in full compliance with Standard of Practice 7.3; designate appropriate personnel and commit necessary equipment and resources for emergency response.

Pinos Altos has developed emergency procedures that meet the required elements of the Code. The Crisis Management Plan outlines responsibilities and identifies key staff authorized to commit resources. The AEM Action Plan and Emergency Response procedure includes a section listing all current Emergency Response Team members, their positions within the brigade, and their specific responsibilities. It also provides a matrix detailing the required qualifications and training for emergency responders. Pinos Altos maintains certificates for the training received by the Emergency Response Team. Furthermore, the AEM Action Plan and Emergency Response includes 24-hour contact information and callout procedures for emergency coordinators and team members, as well as detailing their specific roles and responsibilities. The plan also addresses equipment resources and includes an inspection program to ensure their availability.

Pinos Altos has conducted regular inspections of the Emergency Response Equipment during the recertification period. The Red Cross, the municipality of Ocampo, Hospital Angeles Cuauhtemoc, and Hospital Angeles Chihuahua have been informed about the importance of their actions and the roles they play in cyanide-related emergencies. Furthermore, the operation has made annual contacts with the hospitals in Cuauhtémoc and Chihuahua to discuss the acceptance of patients exposed to cyanide.

Additionally, Pinos Altos Pinos Altos does not anticipate the assistance of external responders during a cyanide-related emergency because the communities are quite small and lack the necessary equipment and resources to respond effectively to a cyanide-related incident.
Even though Pinos Altos has shared the Emergency Response Plan with the State Emergency Services, Police Department, Firefighters, Environmental Agencies, and the Ministry of the Interior. The 'TELEFexternos' section of the AEM Action Plan and Emergency Response procedure includes their contact numbers for notifying them in the event of any emergency.

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

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

Pinos Altos	_____	Aug 12, 2025
Name of Mine	Signature of Lead Auditor	Date

Summarize the basis for this Finding:
The operation is in full compliance with Standard of Practice 7.4; develop procedures for internal and external emergency notification and reporting.

Pinos Altos has established procedures that provide instructions and contact information for notifying management, regulatory agencies, outside response providers, and medical facilities in the event of cyanide emergencies. This information is included in the Emergency Response Plan and the AEM Action Plan and Emergency Response.

Additionally, procedures have been developed for notifying potentially affected communities about cyanide-related incidents and response measures, as well as for communicating with the media. The Crisis Management Plan outlines the communication procedure for communities, detailing how the mine spokesperson will contact key stakeholders prior to or simultaneously with the release of the preliminary statement to the media.

The Emergency Response Plan also mandates the notification of ICMI regarding significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document, and specifies the criteria for such notifications. Notably, Pinos Altos has not had any significant cyanide incidents to report before or during this audit cycle.

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.

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

Summarize the basis for this Finding:

The operation 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 Cyanide Spill Control procedure describes specific remediation measures as appropriate for the likely cyanide release scenarios. Pinos Altos does not contemplate the neutralization of soils or other contaminated media. Recovered solutions would be redirected to the process circuit and

cyanide-impacted soil would be placed on the process plant. Pinos Altos supplies bottled water at the mine. There are no nearby communities whose water supply could be affected by a release. Therefore, the provision of an alternative water supply is not applicable.

The AEM Action Plan and Emergency Response explicitly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide for treating cyanide released into surface water.

Pinos Altos has developed procedures for environmental monitoring to assess the nature and extent of a cyanide release. The procedures for surface and groundwater sampling and controlling cyanide spills address sampling methods and cyanide species for surface water, groundwater, and soil, respectively. The endpoint for removing contaminated soil is set at 0.5 mg/kg WAD cyanide. Sampling locations are determined based on environmental considerations and the areas identified as at risk.

Standard of Practice 7.6

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

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

Summarize the basis for this Finding:

The operation is in full compliance with Standard of Practice 7.6; periodically evaluate response procedures and capabilities and revise them as needed.

Pinos Altos conducts regular reviews and evaluations of the cyanide-related components of its emergency response procedures. Each emergency response procedure or plan includes a change control section that documents any revisions made during the recertification period.

Mock drills are conducted regularly to assess the response procedures for different scenarios involving cyanide exposure and release. These drills cover various situations, including hydrogen cyanide (HCN) releases, cyanide spills, and scenarios involving worker inhalation and dermal exposure. Following each drill, a report is generated that outlines any deficiencies observed and the corrective actions that need to be taken.

The mock drills include an event timeline with the following activities: 1) incident occurrence, 2) emergency communication via radio, cellular phone, WhatsApp emergency group, or office phone, 3) personnel evacuation, 4) arrival of the response team and medical staff, 5) attention and first aid for the victim, 6) spill containment, 7) emergency control, 8) radio confirmation of emergency

termination, and 9) a debriefing session with the participating team, response team, and area staff to discuss the drill and areas for improvement. These drills tested the entire cyanide emergency response process

Drills have been held at least once a year and have been evaluated to determine the adequacy of planned actions and training of response personnel and have resulted in improvements to the operation's response plans.

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This drill reports are prepared according to the format established by the Federal Attorney for Environmental Protection (PROFEPA, Procuraduria Federal de Proteccion al Ambiente) during the National Day for Chemical Emergency Preparedness and Response, and it is communicated to PROFEPA.

For internal cyanide incidents, Pinos Altos does not anticipate the assistance of external responders because the communities are quite small and lack the necessary equipment and resources to respond effectively to a cyanide-related emergency; therefore, they were not called upon for these drills.

In addition to the field drills, the brigade has completed regular training sessions, including practical exercises in first aid and response to hazardous materials.

Pinos Altos has established the criteria for updating its emergency plans and programs. These updates are carried out annually as part of standard procedures and whenever significant corrective actions are identified following drills. Since there have been no cyanide-related incidents during the recertification period, the plans have not required updates due to actual incidents.

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.

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

Summarize the basis for this Finding:

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

Pinos Altos has implemented training for personnel and contractors in cyanide hazard recognition, regardless of their roles. The organization has a structured induction process that includes area inductions and a cyanide awareness training program. Completion of the "Important Facts About Sodium Cyanide" course is mandatory for all personnel and contractors. Cyanide related training includes subjects such as 1). Use and handling Cyanide, 2). Cyanide antidote, which addresses the health effects of cyanide and the symptoms of cyanide exposure. 3). Evacuation plan for cyanide spill, 4). Risks identification in working areas, 5). Emergency response, and 6). PPE. Each participant must complete a knowledge assessment, which is documented in the employee's training file. The training is valid for one year, and both contractors and employees are required to complete annual refresher training. A review of training records and the TRESS database confirms that cyanide training and refreshers have been conducted as mandated.

Pinos Altos employs the TRESS database to maintain training requirements and records. Additionally, hard copies of training quizzes, assessments (to evaluate understanding and competence), and other training documents are stored in each employee's personal training file

Standard of Practice 8.2

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 8.2
	☐ not in compliance with	

Pinos Altos	_____	Aug 12, 2025
Name of Mine	Signature of Lead Auditor	Date

Summarize the basis for this Finding:

The operation 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.

Pinos Altos trains workers in production tasks, focusing on minimizing health and safety risks while preventing cyanide releases. Training follows annual matrices detailing job-specific procedures, led by area supervisors who guide workers alongside experienced operators. After three months, workers are evaluated for their ability to work independently.

Cyanide management training materials outline essential elements, with presentations created by area experts. Operators receive tailored training, including site inductions, cyanide awareness, operational training procedures and task specific procedures, while the Procedure Trainer maintains a matrix for task-specific training based on cyanide-related roles and responsibilities.

Qualified trainers with over 20 years of experience deliver cyanide management training. Compliance is verified through audits of train-the-trainer certificates. Employees, including contractors, receive cyanide awareness training before commencing work, with new operators completing comprehensive cyanide and operating procedures training before being assessed for independent work.

Pinos Altos also mandates annual refresher training for employees and contractors on cyanide management, utilizing the General Introduction to Sodium Cyanide and Important Facts About Cyanide courses. Refresher training specific to cyanide-related work tasks is conducted annually to ensure ongoing competency.

Pinos Altos has retained records throughout an individual's employment documenting the training received. The records include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials. Pinos Altos has retained these records in the TRESS database. The people in charge of the training department stated that hard copies of training records are also retained by each employee.

Standard of Practice 8.3

Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 8.3
	☐ not in compliance with	

Pinos Altos	_____	Aug 12, 2025
Name of Mine	Signature of Lead Auditor	Date

Summarize the basis for this Finding:

The operation 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.

Pinos Altos has trained personnel involved in cyanide unloading, mixing, production, and maintenance on the procedures to follow in the event of a cyanide release. The required responses for such incidents are detailed in the training provided annually on the Cyanide Spill Control and Emergency Response Plan.

Process staff have also received training in decontamination procedures (decontamination of people and equipment used in the emergency) and the use of antidotes and oxygen until the Emergency Response Team arrives. Brigade leaders and members have been trained in emergency response procedures, including the use of response equipment, spill remediation and facility decontamination.

Additionally, members of the Emergency Response Team have been training in cyanide emergency response plans and procedures, along with training in hazardous materials, firefighting, and others. This training is provided both internally and by external entities specializing in Emergency Response Team training.

Pinos Altos has ensured that external responders are familiar with the elements of cyanide emergencies, and the nearest hospital is aware of its responsibilities in such situations. Although no other external entity has assigned onsite responsibility, Pinos Altos has provided training on its emergency response plan for cyanide poisoning to representatives of the Red Cross, firefighters, and local hospitals.

Annual refresher training for responding to cyanide exposures and releases has been completed by Pinos Altos. All personnel, regardless of their work area, participate in inductive and annual refresher training on responding to cyanide exposures and releases, in addition to their specific work procedures.

Training records are maintained throughout an individual's employment in the electronic TRESS system. These records include the names of the employee and the trainer, the date of training, the topics covered, and whether the employee demonstrated an understanding of the training materials.

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.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 9.1
	☐ not in compliance with	

Summarize the basis for this Finding:

The operation is in full compliance with Standard of Practice 9.1; Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns

Pinos Altos has provided stakeholders with opportunities to voice their concerns. The Community Relations staff manage interactions between the local community and Pinos Altos, documenting these interactions, which include training, meetings, and site visits.

To facilitate communication, Pinos Altos has established community offices where individuals can express their concerns. Flyers outlining the company's cyanide activities, along with site contact information, have been distributed to community members.

The "Mecanismo de Atención Comunitaria (MAC)" procedure details how stakeholders can communicate their concerns, complaints, and doubts, with WhatsApp being the most used channel.

At the corporate level, Agnico Eagle offers electronic communication options on their website, allowing English speaking stakeholders to express their concerns, doubts, and complaints. Additionally, Pinos Altos has published articles in magazines that discuss presentations and informative talks related to cyanide management, social support, and new projects.

Pinos Altos	_____	Aug 12, 2025
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Standard of Practice 9.2

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

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

Summarize the basis for this Finding:

The operation is in full compliance with Standard of Practice 9.2; Make appropriate operational and environmental information regarding cyanide available to stakeholders.
Pinos Altos has created a written description of its cyanide management practices in the form of a flyer, written in the local language, titled "Responsible Management of Cyanide in Mining," which is distributed in nearby communities.

At the corporate level, Agnico Eagle has electronic means of communication via their website where English speaking stakeholders can express their concerns, doubts, and complaints.

The company has conducted oral presentations for communities to discuss emergency response plans and cyanide risks, despite the low percentage of illiterate individuals. Pinos Altos has also established mechanisms to make information publicly available regarding cyanide releases or exposures when applicable. Pinos Altos has reported no incidents related to cyanide releases or exposures during the recertification period.

Pinos Altos has reporting procedures in its emergency response plans and procedures to follow in case of cyanide releases and/or exposures, as well as a communication procedure for general purposes.

Pinos Altos is also required by Mexican law to report releases of, and exposures to, hazardous materials, including cyanide. In case of cyanide exposures to workers, cyanide releases off the mine, and cyanide releases on or off the mine site resulting in significant adverse effects to the environment, Pinos Altos would report the details of the incident to PROFEPA and the Ministry of Labor and Social Welfare (STPS, Secretaria del Trabajo y Prevision Social), these entities would make this information available to the public.

Pinos Altos	_____	Aug 12, 2025
Name of Mine	Signature of Lead Auditor	Date