REPORT

ICMC Recertification Audit - Summary Report

La India Mine, Sonora, Mexico

Submitted to:

International Cyanide Management Institute (ICMI)
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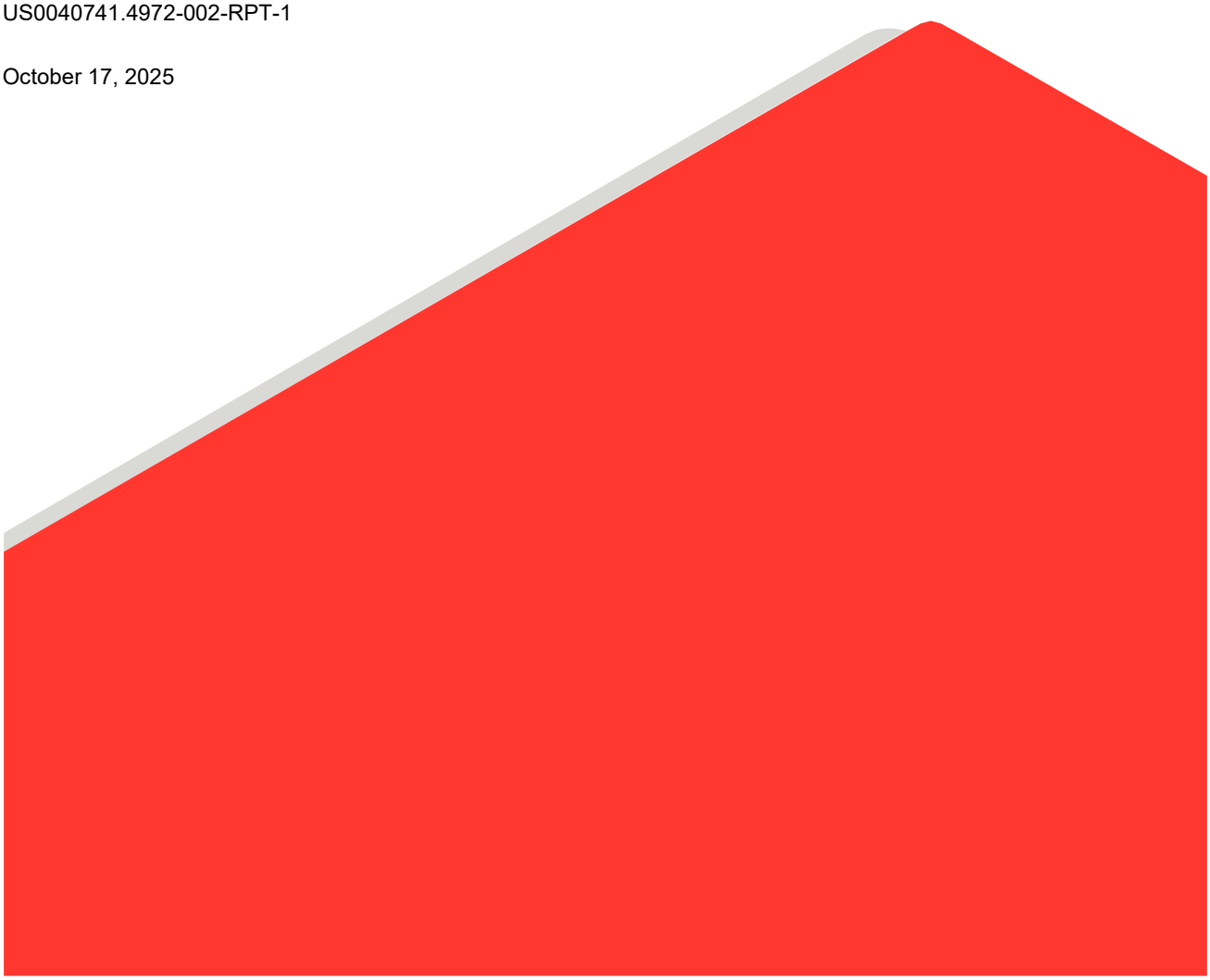

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1.0 SUMMARY AUDIT REPORT FOR GOLD AND SILVER MINING OPERATIONS

Name of Mine:	La India Mine
Name of Mine Owner	Agnico Eagle Mexico
Name of Operator:	Agnico Eagle Sonora
Name of Responsible Manager:	Mr. Marco Galindo, Mine General Manager
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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

2.1 Mine Location

La India Mine (La India) is located in in the County of Sahuaripa, State of Sonora, Mexico. It is in the mountainous region of the Sierra Madre Occidental between the villages of Tarachi and Matarachi, approximately 210 kilometers (km) to the southeast of the city of Hermosillo (Figure 1). The area around the mine is extremely rugged. The nearby communities and approximate number of residents are: Matarachi (350) and Tarachi (270).

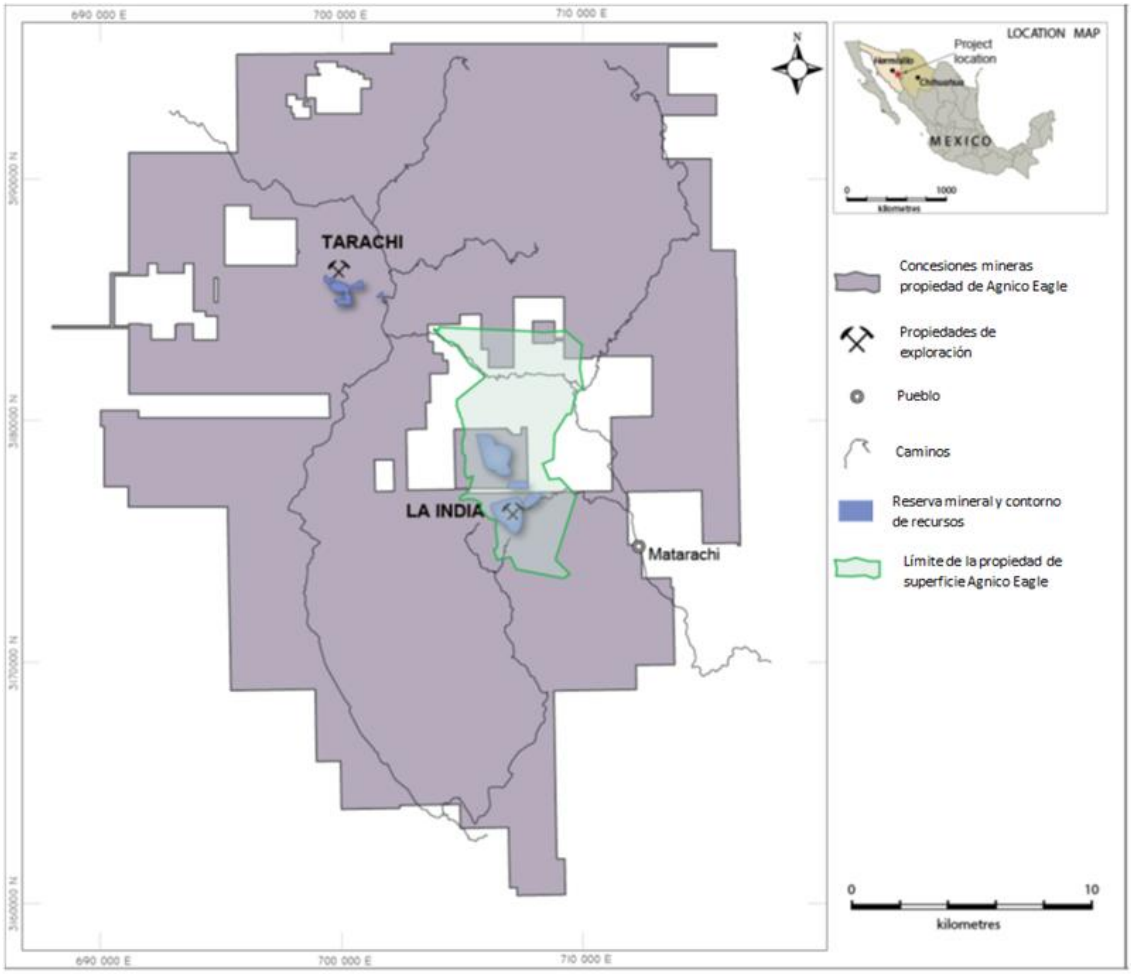

Figure 1: Regional Location Map

2.2 Background

In November 2011, Agnico Eagle Mexico (AEM) acquired the La India Project and in 22 months AEM completed the design and permitting for the mine, starting operations in September of 2013 and producing the first bar of doré in November of 2013. Commercial production was reached in February 2014 with an annual average production of 92,000 ounces of gold.

La India occupies approximately 547 hectares for open pit mining, heap leaching, processing and support facilities. The primary open pits are the North Pit, La India (Central Pit), and the Principal Pit. The mining process consists of drilling and blasting, loading, and haulage of ore and overburden to the crusher or stockpiles, respectively, depending on its grade. The ore is crushed in three phases, starting from a primary feed stockpile.

After processing through grizzlies and transporting by conveyor, the ore undergoes secondary and tertiary grinding until the desired particle size is obtained. Between 2020 and 2023, the crushed ore also passed through an agglomeration plant where cement was added to create larger particles with better permeability when placed in the Heap Leach Facility (HLF).

Heap leaching consists of irrigation with alkaline cyanide solution (barren) and recovery of gold-laden solution (pregnant). The HLF has three pad phases. Pregnant solution reports to a pregnant pond adjacent to the Adsorption, Desorption, and Recovery (ADR) plant via an intermediate transfer pond associated with the phase 3 pad. A third process pond, the excess pond, is operated for containment of solutions during extreme precipitation events or wet seasons. All three ponds are double-lined with Leak Detection and Collection Systems (LDCSs).

From the pregnant pond, the gold-laden solution reports to the column feed vessel in the ADR plant and then to two trains of the Carbon-In-Column (CIC) circuit with six columns each. Carbon passes to the carbon acid wash vessel, the carbon stripping tank, the carbon dewatering screen, and the carbon regeneration circuit added in 2018. Carbon fines are collected in a separate tank for later shipping for additional processing at an off-site location. From the carbon stripping tank, the gold-laden solution passes to the electrowinning (elution) cells and then to the refinery for production of the gold doré. The barren solution from the CIC circuit passes to the barren tank for pumping back to the HLF. Figure 2 presents a simplified process flow diagram.

La India has received solid cyanide in the form of briquettes, packaged in plastic bags inside wooden boxes. The solid cyanide has been dissolved into a 25 percent solution in a mixing area adjacent to the warehouse. The mixing area consists of two tanks: a preparation tank and a distribution tank. From the distribution tank, high-strength cyanide with red colorant has been added to the process circuit at various addition points.

La India is nearing the end of its operations, and in preparation for closure, the following milestones had been completed at the time of the site visit:

- Ore was last placed on the heap leach pad in November 2023
- Cyanide was last delivered to the site in November 2024
- The last cyanide mixing occurred on January 1, 2025, and irrigation to the pad with cyanide concluded on January 2, 2025
- The cyanide preparation and distribution tanks still contained cyanide solution, with cyanide being added only at the elution tank
- Residual pad solution was being recirculation at the HLF, and metal recovery was still ongoing
- All on-site solid cyanide boxes had been used, and the cyanide warehouse was empty

La India has contracted with Code-certified cyanide producers and transporters. La India has shipped the rinsed plastic bags and empty wooden boxes to a government-authorized disposal facility via the cyanide transporter or a government-authorized transporter.

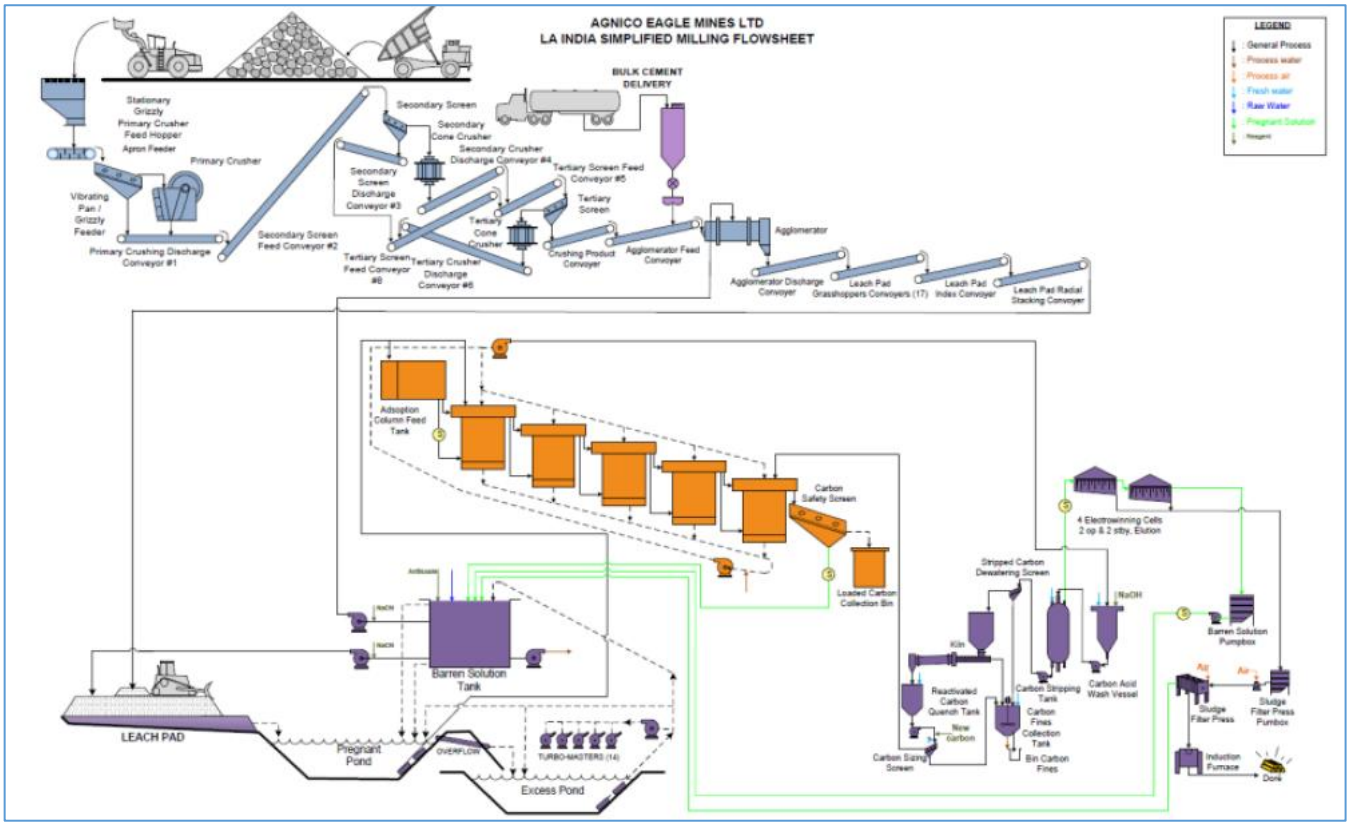

Figure 2: Simplified Process Flow Diagram

2.3 Cyanide Facilities

The cyanide facilities (as defined by the Code as any facility containing a solution with a Weak Acid Dissociable [WAD] cyanide concentration of 0.5 milligrams per liter [mg/L] or greater) during the recertification period consisted of the following:

- The cyanide warehouse
- Cyanide mixing and storage areas:
  - The cyanide preparation and distribution tasks
  - The booster tank system – this system was a new cyanide facility installed during the recertification period, but was only operated from June 2023 to March 2024
- The ADR plant including the CIC tanks, carbon washing, and stripping
- The agglomeration plant (which was operated until 2023 and is now decommissioned)
- The HLF:
  - Phases 1, 2 and 3 of the heap leach pad
  - The pregnant pond
  - The transfer pond
  - The excess pond
  - A small stormwater water collection pond in the pad area, referred as pond 5.5
- Associated pumps, piping, secondary containment and leak detection, collection, and recovery systems

Laboratories and refineries commonly use cyanide at gold mines but are not required to be evaluated under the Code. Therefore, they have been excluded from this audit.

La India was last recertified with the Code on March 17, 2022. This recertification cycle covers the period from April 2022 to the present.

La India has not had a “significant cyanide incident” subject to the notification requirements of the International Cyanide Management Institute (ICMI) (as per Section VI.A of the Code's Signatory and Certification Process document). Additionally, La India has not experienced a reportable cyanide incident during the recertification period.

3.0 SUMMARY AUDIT REPORT

Auditors Findings

La India is:	☒ **in full compliance with**	**The International Cyanide Management Code**
	☐ in substantial compliance with	
	☐ not in compliance with	

The operation has not experienced compliance problems during the three-year audit cycle.

Audit Company: WSP USA Inc.

Audit Team Leader: Ivon Aguinaga, Lead Auditor and Mining Technical Specialist

Email: ivon.aguinaga@wsp.com

Name of Other Auditors

Name, Position	Signature
Angel Aguayo - WSP Grupo Mexico, Auditor Trainee	

Dates of Audit

The recertification audit was undertaken over three days, from March 10 to 12, 2025.

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

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

La India Mine
Name of Facility

Signature of Lead Auditor

October 17, 2025
Date

PRINCIPLE 1 – PRODUCTION

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

Standard of Practice 1.1: **Purchase cyanide from 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 manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

La India has purchased cyanide manufactured by CyPlus Idesa at its production facility in Coatzacoalcos, Mexico, during the recertification period. The CyPlus Idesa production facility in Coatzacoalcos, Mexico, was initially certified in 2016 and most recently recertified in September 2023. Also, the CyPlus Idesa transloading terminal and warehouse in Obregon, Mexico, was initially certified in 2013 and most recently recertified in November 2022. The auditors verified compliance through the review of the CyPlus Idesa summary audit reports posted on the ICMI website. The auditors also reviewed a letter from CyPlus Idesa describing the cyanide supply chain from their production facilities to the mine site.

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.

La India has maintained copies of bills of lading from CyPlus Idesa as well as a letter from them describing the entire cyanide transportation supply chain from their production facility to the mine site.

The CyPlus Idesa cyanide transportation supply chain elements included:

- CyPlus Idesa production facility in Coatzacoalcos, Veracruz, Mexico
- CyPlus Idesa transloading terminal and warehouse in Obregon, Mexico
- Transportation of the cyanide boxes from the production facility to the warehouse in Obregon and then to the mine site by Transportes Degam

All parts of the transportation supply chain, which are covered under CyPlus Idesa's Mexican Cyanide Supply Chain, are certified with the Code. This chain was most recently recertified with the Code in November 2022.

The auditors reviewed a letter from CyPlus Idesa describing their cyanide supply chain as well as examples of bills of lading for the recertification period. The auditors also reviewed the CyPlus Idesa's Mexican Supply Chain summary audit reports posted on the ICMI website.

PRINCIPLE 3 – HANDLING AND STORAGE

Protect Workers and the Environment during Cyanide Handling and Storage

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

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 3.1**

☐ not in compliance with

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.

La India has received only solid cyanide as briquettes in plastic bags inside wooden boxes during the recertification period. La India has not received liquid cyanide via tanker trucks or solid cyanide via isotankers.

La India has designed and constructed facilities for unloading, storing, and mixing cyanide in accordance with cyanide producers' guidelines, applicable jurisdictional rules and sound and accepted engineering practices for these facilities. La India has one cyanide warehouse for storing solid cyanide and one mixing and storage area (consisting of two tanks: a preparation tank and a distribution tank). No physical changes in these facilities have occurred this audit cycle and the auditors observed them to be in good condition. In June 2023, a cyanide booster tank system was installed to temporarily store high-strength cyanide solution before injecting it into the irrigation pipeline toward phases 2 and 3 of the pad. The system was installed to increase the cyanide concentration to the required level for irrigating new ore. The booster tank system was decommissioned in March 2024.

At the time of the site visit, and in preparation for the end of operations, all the sodium cyanide boxes had been used, and the cyanide warehouse was empty. La India may need to purchase additional cyanide for use in the elution circuit to recover metals from the residual solution prior to the end of the operations, but no specific plan for this had been established at the time of the site visit. Also, at the time of the site visit, the cyanide preparation and distribution tanks still contained cyanide solution, with cyanide being added only at the elution tank.

La India has located the cyanide warehouse and mixing and storage area away from people and surface water bodies, and within locked, fenced, gated, guarded, and video-monitored areas to prohibit unauthorized access. This was also the case of the cyanide booster tanks system when it was in operation. At the time of the site visit, the warehouse was not locked because it was empty however, it has always been locked whenever cyanide was stored inside. There are no offices or areas where personnel congregate near the warehouse and mixing and storage area (or near the area of the booster tank). The nearest community is 6 km away in a separate hydrologic basin. Surface water in the vicinity of the mine is ephemeral, flowing only in response to precipitation.

La India has stored solid cyanide at the walled and roofed cyanide warehouse at the ADR plant with a concrete floor to minimize the potential for contact with water and to prevent seepage or leakage to the subsurface. The cyanide warehouse has two fans in the walls and two turbine ventilators in the roof to provide adequate

ventilation. There is a fixed hydrogen cyanide (HCN) gas monitor. When cyanide was stored in the warehouse, personnel entering the cyanide warehouse were required to use a handheld HCN gas monitor. The cyanide preparation and distribution tanks are located in the open air. The booster tank, when in use, was also located in the open air.

La India has implemented a method to prevent overfilling of the cyanide tanks and has maintained these devices throughout the recertification period. La India has installed level sensors in the cyanide tanks with visual and audible alarms, as well as connections to the ADR Plant control panel. La India has maintained these level sensors quarterly. The auditors visually checked the tank level and corresponding alarm levels at the ADR Plant control room. The auditors also reviewed examples of calibration records for the tank level sensors and alarms to verify compliance.

La India has stored high-strength cyanide solution in tanks located on solid concrete bases/floors and with adequate secondary containments that provide a competent barrier to leakage. The reinforced concrete secondary containment of the cyanide preparation and distribution tanks has a sump with a pump to return solution to the distribution tank. The booster tank was also built on a solid reinforced concrete foundation, which was connected via High-Density Polyethylene (HDPE) polylocks to the HDPE geomembrane of the pregnant pond. Any spills from this tank outside its concrete foundation would have drained into the pregnant pond, which provided secondary containment for this tank.

Cyanide was stored in areas separate from incompatible materials, as well as foods, animal feeds, tobacco products and all other chemicals.

Standard of Practice 3.2: **Operate unloading, storage, and mixing facilities using inspections, preventative 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**

☐ 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, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

La India has implemented procedures that prevent empty cyanide containers from be reused, that require rinsing, and that ensure their proper disposal at an authorized facility. Empty bags have been rinsed twice and then temporarily stored with the empty wooden boxes in the cyanide warehouse until they are transported by the cyanide transporter (previously contracted to Bao Ingenieria y Servicios) to an authorized disposal facility for final disposal. The auditors reviewed examples of hazardous waste shipping manifests from throughout the recertification period to verify compliance. The auditors also verified that no empty bags or wooden boxes were present in the cyanide warehouse.

La India has implemented procedures that address the operation, inspection and maintenance of the valves, pumps, and tanks for mixing and transferring cyanide to the distribution tank. In addition, the procedures address the timely cleanup of spills, and the proper handling of cyanide containers to prevent rupturing or puncturing during cyanide unloading and the transfer of the cyanide boxes from the cyanide warehouse to the mixing area.

The procedures also require that cyanide containers be stacked no more than two high within the cyanide warehouse. Procedures specify the personal protective equipment (PPE) and require that a minimum of two operators be present during the cyanide mixing. Finally, the procedures call for addition of colorant during mixing. During the site visit, the auditors were unable to observe a cyanide unloading and a cyanide mixing event to verify the implementation of the procedures as all cyanide boxes had already been used on site and no mixing was conducted. Compliance was verified through interviews with process personnel and the review of the procedures. The auditors also reviewed examples of Cyplus Idesa invoices for the purchase of the colorant as well as completed cyanide mixing checklists, which require the confirmation of the colorant addition, to verify compliance.

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 preventative maintenance procedures.**

☒ **in full compliance with**

The operation is

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

☐ not in compliance with

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 preventative maintenance procedures.

La India has developed and implemented written management and operating plans and procedures for all their cyanide facilities. The cyanide facilities (i.e., facilities with concentrations of WAD cyanide greater than or equal to 0.5 mg/L) evaluated during this audit cycle include the following.

- The cyanide warehouse
- Cyanide mixing and storage areas:
  - The cyanide preparation and distribution tasks
  - The booster tank system – this system was a new cyanide facility installed during the recertification period, but was only operated from June 2023 to March 2024
- The ADR plant including the CIC tanks, carbon washing, and stripping
- The agglomeration plant (which was operated until 2023 and is now decommissioned)
- The HLF:
  - Phases 1, 2 and 3 of the heap leach pad
  - The pregnant pond
  - The transfer pond
  - The excess pond
  - A small stormwater water collection pond in the pad area, referred as pond 5.5
- Associated pumps, piping, secondary containment and leak detection, collection, and recovery systems

Operating procedures and plans cover procedures for the safe operation of the entire cyanide management at La India. The procedures include process descriptions, operating tasks, the risks involved with each task, inspections, maintenance, PPE requirements, water management and contingency measures. The operating procedures also describe the persons responsible for verifying that the procedures for each cyanide task are implemented.

La India has developed plans and procedures that describe the design criteria and applicable regulatory requirements to prevent or control cyanide releases and exposures. These include: 50 mg/L WAD cyanide limit for open waters; freeboard of 0.6 to 1.0 m depending on the pond; regulatory standard of 0.07 mg/L total cyanide in water for human consumption; and the 100-year, 24-hour design storm of 97.1 millimeters (mm) and 161.7 mm for dry and wet weathers, respectively.

The procedures have been reviewed during this audit cycle but were only updated when changes to the cyanide facilities or the operational process have occurred. The auditors verified compliance by reviewing written procedures and by interviews with process, and safety personnel.

La India has developed a procedure to review proposed changes to production processes, operating practices, or cyanide facilities to evaluate environmental and health and safety implications, determine mitigation measures, and disseminate knowledge of the change. The procedure specifies that the areas responsible for evaluating and signing off on the change will be determined based on the nature and potential impacts of the change. These areas may include environmental, health and safety, process, maintenance, legal and engineering. La India has had only one cyanide related change during the recertification period, which was associated with the installation of the booster tank system. The auditors reviewed the management of change evaluation conducted for this system to verify the implementation of the management of change procedures.

La India has developed cyanide management procedures for non-standard operating situations that have the potential for cyanide exposures and releases. These contingency procedures cover water balance upsets, concentrations of WAD cyanide in open waters greater than 50 mg/L, and specific situations identified by monitoring and inspection (e.g., leaks, seepage, slope failure, cyanide-contaminated soil, cyanide-intoxicated wildlife, and spills).

The closure plan addresses temporary closure due to economic, political, or social situations. This plan addresses the safe management of cyanide during temporary closure. Cyanide will continue to be handled in accordance with the operational, inspection and maintenance procedures established during active operations, and in compliance with the applicable Mexican regulations. Decommissioning activities will occur in final closure and will not take place during temporary closure. Monitoring of physical stability, water and air quality will also continue following the requirements of the existing operational and environmental monitoring procedures. If decontamination is required, it will be conducted in accordance with the decontamination procedures included in Section 3.2.3 of the plan. In the event of a cyanide related emergency, the existing emergency response procedures will be implemented.

La India has inspected the cyanide facilities on an established frequency sufficient to assure and document that they are functioning within design parameters. The inspection frequencies vary from daily to weekly depending on the facility, as well as per event (in the case of pre-work inspections for cyanide mixing and unloading). La India conducts inspections of HLF, tanks, pipelines, pumps, secondary containments for physical integrity and others. The Leak Detection and Collection Systems (LCRSs) at the ponds have been inspected every three days. In addition, La India inspects the ponds for water levels and for wildlife presence and mortality. Water levels in the excess, pregnancy, and transfer ponds are measured and inspected daily. La India also provided evidence of inspection, calibration, and maintenance for level sensors and HCN meters.

La India has implemented a maintenance program to ensure that equipment and devices function as necessary for safe cyanide management. The preventive maintenance program includes the following cyanide elements: 1) fixed and portable HCN monitors (calibrated every 3 months), 2) tanks (maintained as needed), 3) pumps (monthly), 4) ultrasonic thickness testing on cyanide solution tanks (annually), 5) on-line pH meters and level sensors (every 6 months) and 6) backup generators (started up and checked regularly and full maintenance

every 250 hours of use). The auditors reviewed examples of completed maintenance records for the recertification period to verify that the preventive and corrective maintenance programs were implemented.

La India generates its own power at an on-site station with five generators of 1,800 kilowatts each – there is no connection to the national grid. La India has backup power, a generator of 2,000 kilowatts, sufficient to run the ADR plant and HLF pumps and ponds and thereby prevent unintentional releases and exposures. La India has regularly maintained the backup generator throughout the recertification period, as evidenced by a maintenance schedule and examples of completed inspection and maintenance forms.

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.

Standard of Practice 4.2 is not applicable because La India does not have a mill or generate tailings.

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.

La India has developed a water balance model using the GoldSim software that is comprehensive and probabilistic. La India has last updated this model in 2023. The model is probabilistic in that it includes average, wet, and dry year scenarios, a 100-year, 24-hour design storm for wet and dry scenarios, and a 24-hour power outage. The model is comprehensive in that it includes all the appropriate facilities and considers the appropriate input parameters for these facilities and the environment. The model assigned reasonable values for precipitation, evaporation, moisture content of ore, active and inactive areas, irrigation rates, and representative precipitation and evaporation data. The model and its updates showed that the excess pond would not overtop in the average, wet, and dry year scenarios.

La India has designed and operated the pregnant and excess ponds with adequate freeboard of 0.6 meters (m) above the maximum design storage capacity. Water levels in the pregnant and excess ponds have been inspected and surveyed daily in comparison to the maximum allowed level. La India has run monthly model evaluations to verify that conditions would not lead to overtopping and unplanned discharges. Memoranda for

these evaluations include time series graphs that show that the pond water volumes have not encroached into the design storm or freeboard levels for the pregnant and excess ponds during the recertification period.

The design freeboard for the transfer pond is 1.0 m. The transfer pond is a small, flow-through pond designed to transfer pregnant solution collected from the pad to the pregnant pond, without significant storage. Water level monitoring in the transfer pond is conducted daily and is presented in the pond checklists. Monitoring results showed that freeboard has been maintained. The auditors observed during the site visit that the water level was well below the elevation of the discharge pipes.

La India has measured precipitation on site and compares results to design assumptions and revises operating practices as necessary. La India has installed one meteorological station near the ADR plant. Precipitation data from this station was used in the 2023 water balance model update. As part of this update, the storm events considered in the model were also checked and updated.

The auditors reviewed the technical memorandum on the 2023 model update, which described the input model parameters as well as the climate data, storm events, and operational considerations used for the model. The auditors also reviewed the monthly water balance evaluation memoranda, and spreadsheets containing the climate data, pond water levels and volumes, and other operational parameters monitored and used for the monthly evaluation of the water balance model.

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.

La India has implemented measures to physically restrict access by wildlife and livestock to open waters when concentrations of WAD cyanide have been greater than 50 mg/L over the recertification period. The only process ponds with WAD cyanide concentrations greater than 50 mg/L during part of the certification period have been the pregnant pond, the transfer pond and pond 5.5. Physical restrictions installed in these ponds included netting in the transfer pond and pond 5.5, and bird discs in the pregnant pond. The pregnant pond and the transfer pond are also fenced.

By end of June 2024, the netting of the transfer pond and pond 5.5 was partially damaged. La India had the intention to repair the netting in these two ponds and had ordered materials and contracted for the work in December 2024. However, at that time, La India decided to conclude irrigation to the heap leach pad by early January 2025. Given that the WAD cyanide concentrations in these ponds had already decreased to values below 50 mg/L in November 2024 (when La India started to monitored WAD cyanide) and were expected to continue decreasing, La India decided not to repair the netting in December 2024 and instead removed it. Due to the lack of WAD cyanide analytical data, La India estimated what the WAD cyanide concentrations may have been during the period when the netting was partially damaged and before November 2024. La India estimated these concentrations in the pond from June to October 2024. This was done using the sodium cyanide concentration in the solution, multiplying it by the mass percentage corresponding to the cyanide ion, and then

adding the parts per million (ppm) corresponding to the cyanide associated with copper (since copper is the element found in the greatest quality of the solution). Results from this assessment indicate that WAD cyanide values exceeded 50 mg/L in June and the first half of July 2024. Based on this, La India may have experienced a 2- to 3-week period between the end of June and mid-July 2024 during which the netting in the transfer pond and pond 5.5 was not completely restrictive to wildlife and the WAD cyanide concentrations were above 50 mg/L.

La India has prevented wildlife mortality by either generally maintaining WAD cyanide concentrations less than 50 mg/L or physically restricting access to open waters with higher concentrations, as previously indicated. Based on weekly reports of daily wildlife inspections, as well as an interview with the environmental coordinator, La India has not experienced any wildlife mortalities during the recertification period.

La India has applied leach solution to the HLF in a manner that prevents significant ponding and limits overspray. La India has developed a written procedure for managing ponding that includes a definition of “significant” ponding. La India manages ponding by daily inspections and implementing measures according to a written procedure when significant ponding is noted. Control measures include reducing the application rate, draining the ponding area, installing netting, and ripping/perforating the surface. The auditors observed the heap leach areas under leaching and did not notice significant ponding on the HLF during the site visit.

The auditors reviewed analytical WAD cyanide data, a technical memorandum on the WAD cyanide assessment, and the purchase orders for materials to repair the netting and contracting the contractor for this work. The auditors also interviewed process and environmental personnel. Considering that La India concluded irrigation with cyanide in January 2025, that the WAD cyanide concentrations in the ponds are below 50 mg/L since at least November 2024, that no wildlife mortalities have occurred, and La India’s good faith effort to plan the repair of the netting in the transfer pond and pond 5.5, the auditors consider that La India is in full compliance with Standard of Practice 4.4.

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

☒ **in full compliance with**

The operation is

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

☐ not in compliance with

Summarize the basis for this finding:

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.

La India does not have direct or indirect discharges to surface water from the cyanide facilities, nor is there a mixing zone established by Mexican authorities. Nonetheless, La India has monitored surface water for cyanide during the recertification period. The HLF, ponds, and ADR plant are located in a valley with a single watercourse downstream with two surface water sampling stations (ASUP1 and SED-06). ASUP1 is located approximately 100 m downstream of the excess pond and SED-06 is downstream of ASUP1. The monthly monitoring results from this audit cycle indicated that the concentrations of free cyanide at these two sampling stations were less than 0.022 mg/L in general with values most of the time below the laboratory quantification limit of 0.010 mg/L. The auditors accepted these data as evidence that no indirect discharges had occurred.

Since La India has not detected any indirect discharges of cyanide solutions into surface waters, it is not engaged in remediation to prevent degradation or 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.

La India has implemented measures to protect groundwater. All phases of the HLF and pipeline secondary containment channel are constructed with a composite liner (geosynthetic clay liner, 1.5 mm HDPE geomembrane, geonet and then another 1.5 mm HDPE geomembrane). The transfer, pregnant and excess ponds are constructed with a composite liner and are equipped with LCRS. The ADR plant, cyanide warehouse, and agglomeration plant are constructed with reinforced concrete floors.

La India has monitored for cyanide in groundwater to demonstrate that beneficial uses of groundwater downgradient of the cyanide facilities have not been affected at concentrations greater the numerical standards in Mexican regulations.

La India Environmental department has adopted the lowest water standard from the Mexican federal regulation (NOM-127-SSA1-2021), which is for human consumption, although they could have adopted higher standards for other beneficial uses such as irrigation. The numerical standard for human consumption is 0.07 mg/L total cyanide.

The closest point of actual groundwater use is well (ASB1) at the mine camp located in a separate watershed and approximately two kilometres from the cyanide facilities.

A monitoring well (ASB3) is located downgradient of and adjacent to the excess pond and is therefore the closest well positioned downgradient of all cyanide facilities. La India has other wells, but they are located upgradient, cross gradient, or too far from the cyanide facilities to be relevant.

For both wells (ASB1 and ASB3), results from the recertification period were below the laboratory quantification limit of 0.005 mg/L total cyanide and also below the numerical standard for human consumption of 0.07 mg/L total cyanide.

La India has not caused cyanide concentrations of groundwater to rise above levels protective of beneficial use and therefore is not engaged in groundwater remediation.

The question regarding use of mill tailings as underground backfill is not applicable because the operation does not have a mill or underground workings.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Standard of Practice 4.7**

☐ not in compliance with

Summarize the basis for this finding:

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

La India has provided spill containment measures for all cyanide-related tanks. La India has also developed and implemented measures to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area.

All containments of the cyanide preparation and distribution tanks as well of the ADR plant were constructed with reinforced concrete floors and walls and the tanks installed on solid concrete bases (as found compliant in the 2018 and 2022 audits). The secondary containments have been designed with sumps and automated pumps that would return the solution back into the process circuit. The CIC containment within the ADR plant has an overflow point to a geomembrane-lined channel to the concrete barren tank containment, which in turn is sloped to drain to the pregnant pond. The geomembrane-lined pregnant pond, therefore, provides tertiary containment for the entire ADR Plant. The booster tank, which was also a high-strength cyanide storage tank, was built on a solid reinforced concrete foundation, that was connected via HDPE polylocks to the HDPE geomembrane of the pregnant pond. Any spills from this tank outside its concrete foundation would have drained into the pregnant pond, which provided secondary containment for this tank. The booster tank system was installed in June 2023 and decommissioned in March 2024. The auditors observed the secondary containments to be in good condition at the time of the site visit.

La India has not modified the secondary containment measures related to the tanks since the 2018 initial audit, except for the installation of a booster tank system. La India has adequately sized secondary containments for cyanide-related tanks or provided flow-through containment for additional capacity as indicated in the 2022 audit report. In the case of the booster tank and as previously discussed, the geomembrane-lined pregnant pond provided secondary containment for this tank. The volume of the booster tank was 31 m^3 and the pregnant pond volume is 544,455 m^3. The auditors reviewed a technical memorandum that includes the design considerations and design drawings to verify compliance.

La India has provided secondary containment for cyanide-related pipelines to collect and prevent releases to the environment. These secondary containment measures include a geomembrane-lined pipeline channel, a tray system for overhead pipelines, concrete secondary containment and the footprint of the geomembrane-lined pad and pregnant pond areas.

La India does not have any cyanide-related pipelines that cross surface water and require special protection beyond those already provided. There are no permanent surface water bodies in the vicinity of the pipelines.

La India has constructed tanks and pipelines of materials that are compatible with cyanide and high pH conditions.

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.

Construction quality assurance and quality control (QA/QC) programs have been implemented for all the cyanide facilities.

No changes have occurred in the cyanide facilities since the previous recertification audit except for the installation of a booster tank system in June 2023. This system was installed to temporarily store high strength cyanide solution from the cyanide distribution tank in the booster tank. This solution was then injected into the irrigation pipeline toward phases 2 and 3 of the pad. The system was installed to increase the cyanide concentration to the required level for irrigating new ore. The booster tank system was decommissioned in March 2024.

The cyanide booster tank system was designed by La India in compliance with applicable jurisdictional rules and sound and accepted engineering practices for such facilities.

QA/QC programs implemented for the booster tank system included non-destructive testing and welding inspection of the tank and pipes as well as ultrasonic testing at the tank. Inspection of the HDPE polylocks and concrete tests for the reinforced concrete pad of the tank were also conducted.

An appropriately qualified engineer from La India (with a Mexican Cedula) approved the design and QA/QC activities. The auditors reviewed a technical memorandum signed off by this appropriately qualified engineer, that includes the design considerations, design drawings and the results of the QA/QC activities conducted during the installation of this system. The technical memorandum confirms that the booster tank system was constructed per design.

Construction QA/QC documentation for the cyanide facilities in operation at the time of the 2022 recertification audit, including the adequacy of the construction program, was evaluated and found compliant during the 2018 initial certification audit and the 2022 recertification audit; those findings are not repeated for brevity.

La India has retained QC/QA records identified in the 2018 initial audit, the 2022 recertification audit and this audit for the cyanide facilities, in electronic files. QA/QC documentation is available as PDFs in La India's intranet system. The auditors checked the files to verify that electronic versions of the documents were retained.

The auditors observed the cyanide facilities to be in good condition at the time of the site visit.

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.

La India has developed written procedures for water and wildlife monitoring. La India has developed an overall environmental management program manual as well as written procedure specific to wildlife monitoring and surface water and groundwater monitoring. These procedures have been developed by qualified consultants and staff.

The written procedure for groundwater and surface water sampling describes containerization, preservation, handling, and shipping of samples for analysis of cyanide species in accordance with Mexican regulations. The procedure also contains instructions for preparing the chain of custody and for ensuring the integrity and quality of the samples. The field sampling is conducted by staff from the analytical laboratory, Analytica de Noroeste, using their standard procedures that include QA/QC procedures.

La India has documented sampling conditions and procedures via the field forms used by its analytical laboratory. The field form has documented weather, flora, fauna, and other conditions that might affect sample integrity, as well as containerization, preservation, shipping, handling, samplers names, and the date and time of sampling.

La India has conducted monitoring at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. Surface water has been monitored monthly, groundwater has been monitored monthly to quarterly, and wildlife has been monitored daily.

The auditors reviewed the monitoring procedures, aerial photographs with the surface water and groundwater sampling locations, and examples of completed chain of custody and field forms. The auditors also interviewed environmental personnel to verify compliance.

PRINCIPLE 5 – DECOMMISSIONING

Protect Communities and the Environment from Cyanide through Development and Implementation of Decommissioning Plans for Cyanide Facilities

Standard of Practice 5.1: Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, and livestock.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 5.1**

☐ not in compliance with

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, and livestock.

La India has developed a closure plan that describes the decommissioning of the cyanide facilities at the cessation of operations. This closure plan covers the HLF, ponds, ADR plant, cyanide warehouse, and pipelines, and includes proper disposal of remaining cyanide, equipment decontamination, and rinsing of the HLF and ponds. The closure plan is accompanied by an operational procedure for decontamination of cyanide-contaminated equipment with more details on the decontamination process.

La India has developed an implementation schedule for closure that includes the major decommissioning activities for the cyanide facilities. The schedule is detailed in the 2024 closure cost estimate spreadsheet.

La India has regularly reviewed and revised, as needed, its decommissioning procedures for cyanide facilities to incorporate changes in processes or facilities. Since no significant changes associated with the cyanide facilities have occurred since the 2022 audit that would require modifications to closure procedures and activities, the Mining Closure Program document was reviewed but not updated during this audit cycle. In preparation for closure, La India is currently conducting several closure studies and plans to update the closure procedures and activities in 2026 based on the results of these studies. Based on the above, the auditors consider that La India is in full compliance with Standard of Practice 5.1.

Compliance was evaluated through the review of the Mining Closure Program document and the operational procedure for decontamination of cyanide equipment as well as an interview with environmental personnel.

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

La India has developed a cost estimate for decommissioning of cyanide facilities as part of its annual Asset Retirement Obligation (ARO) process. The cost estimate covers the appropriate cyanide facilities and decommissioning activities. It also includes the rinsing and neutralization of the HLF. Costs are based on contractor quotes and third-party unit rates. The subset of the 2024 closure costs for decommissioning cyanide facilities was approximately $13.2 Million United States Dollars (M USD).

La India has reviewed and updated its closure cost estimate annually during the recertification period. The auditors reviewed estimates for 2022, 2023 and 2024 to verify compliance.

La India has established self-guarantee as the financial assurance mechanism. A qualified financial company prepared a statement that the operation has sufficient financial strength to fulfil this obligation as demonstrated by an acceptable financial evaluation methodology (i.e., Section 40 of the US Code of Federal Regulations 265.143(f)). The financial auditor was a certified public accountant in Mexico. The amount of self-guarantee noted in the declaration exceeded the subset of decommissioning costs as shown in the 2024 version of the closure cost estimate. The auditors reviewed a copy of the declaration of the external financial auditor certifying that La India has sufficient financial strength to fulfil its cyanide related decommissioning cost obligation.

PRINCIPLE 6 – WORKER SAFETY

Protect Workers' Health and Safety from Exposure to Cyanide

Standard of Practice 6.1: Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce, and control them.

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Standard of Practice 6.1**

☐ not in compliance with

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 measure as necessary to eliminate, reduce, and control them.

La India has developed and implemented a robust set of operational procedures for cyanide mixing and storage areas, the ADR plant, HLF, environmental management, safety, and maintenance. The procedures aim to minimize worker exposure during unloading, mixing, plant and pad operations, entry into confined spaces, and equipment decontamination. These procedures provide detailed descriptions of associated hazards, required PPE, and step-by-step methodologies to ensure safe task execution. Pre-work inspections are integrated into each procedure to proactively assess risks before work begins.

La India conducts pre-work inspections before cyanide unloading and mixing activities, as well as routine inspections of all cyanide handling facilities. The auditors reviewed operating procedures along with completed inspection forms and checklists to confirm their correct implementation. The auditors also reviewed the documentation and monitoring records maintained by La India, which is in compliance with Mexican Norm NOM-010-STPS-2014 that confirms the implementation of effective controls to mitigate workers exposure risks to workplace contaminants (including cyanide) and safeguard worker health. During the field inspection, the auditors observed clear signage mandating the use of PPE and confirmed that workers were wearing the appropriate PPE during the site visit.

La India promotes worker involvement in the development of procedures, demonstrating that supervisors and workers collaborate in meetings and field discussions to develop and review safety procedures. Operators formally acknowledge their agreement by signing the cover sheet of each procedure, and any modifications are subject to the same review process. The auditors reviewed signed procedures to verify this practice.

In addition to formal procedural controls, La India has implemented risk evaluation mechanisms prior to cyanide activities through structured work task forms. These assessments help identify safety concerns, reinforce adherence to best practices, and provide a basis for corrective actions. Supervisors review completed forms, follow up on identified risks, and implement necessary adjustments to enhance workplace safety. The auditors interviewed process personnel who confirmed active worker participation in the development of procedures and risk assessments, promoting a proactive and safety-oriented work environment. The auditors also reviewed examples of completed safe work task forms 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.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Standard of Practice 6.2**

☐ not in compliance with

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 worker health and safety and periodically evaluate the effectiveness of health and safety measures.

La India has established procedures to regulate pH levels and limit HCN gas evolution during cyanide mixing, storage and production activities. The ADR plant and HLF maintain a minimum pH of 10.5, while cyanide mixing is controlled within a pH range of 10.0 to 11.0. Compliance is ensured through daily pH monitoring, recorded in a control book and saved in an electronic spreadsheet. The auditors reviewed plant and pad data as well as completed cyanide mixing checklists to confirm adherence to procedural requirements.

To mitigate exposure risks, La India conducted risk assessments to identify areas and activities susceptible to HCN exposure. Based on these evaluations, fixed HCN gas monitors have been installed at the cyanide warehouse, mixing area, acid wash area, heap leach pad area (by the pond 5.5), barren tank near the rich solution pond, and the refinery. Workers exposed to cyanide-related activities are required to wear portable HCN gas monitors. The fixed HCN gas monitors are equipped with audible and visual alarms. The portable HCN gas monitors also have alarms. The alarms are set to alert at 4.7 ppm and trigger evacuation at 10 ppm. The auditors confirmed compliance by reviewing HCN fixed and portable HCN gas monitor functionality and observing workers wearing portable HCN gas monitors.

La India consistently maintains, tests, and calibrates its HCN gas monitoring equipment. The auditors reviewed calibration records for fixed and portable HCN gas monitors, verifying compliance with manufacturer specifications.

Safety signage is placed around the cyanide-related facilities, alerting workers of the presence of cyanide and prohibiting smoking, open flames, eating and drinking. Signage also includes the required PPE. In addition, tanks are marked with the word cyanide and the appropriate Globally Harmonized System of Classification and Labeling of Chemicals hazard pictogram. Pipelines carrying cyanide solution are labelled in yellow and are marked with the words “cyanide solution” and flow arrows, clearly indicating flow direction and contents. During their inspection, the auditors observed that all cyanide-related tanks and pipelines were appropriately labelled in compliance with safety and regulatory standards. A checklist for periodic signage inspection confirms that signs are kept in good condition and updated. The auditors reviewed corrective action reports confirming updates and improvements to signage placement.

To ensure clear identification of solutions with high concentrations of cyanide, La India adds colorant to the cyanide mixing tank during mixing. The “Cyanide Preparation” procedure describes the addition of colorant during mixing. The cyanide mixing checklist also includes a verification for the addition of the colorant, ensuring that the addition of the colorant is properly documented. The auditors reviewed examples of Cyplus invoices for the purchase of the colorant and completed examples of the cyanide mixing checklists to verify compliance.

La India has installed shower/eyewash stations and fire extinguishers in strategic locations throughout the process areas. La India conducts monthly inspections of the emergency shower, eyewash stations and fire

extinguishers. Annual fire extinguisher recharges are conducted by an external service provider. The auditors randomly tested selected shower/eyewash stations during the site visit to confirm they were operational and that water pressure in the eyewashes was not too high. The auditors also reviewed completed inspection records for the emergency shower/eyewash stations and fire extinguishers.

Cyanide Safety Data Sheet (SDS) and emergency response procedures are placed and accessible for workers in the cyanide warehouse, mixing area, ADR plant, and HLF. SDSs are provided in Spanish, the primary language of the workforce. Emergency response diagrams are displayed at ADR plant entrances and by the cyanide mixing and storage area.

Incident investigations follow the Incident Cause Analysis Method (ICAM) methodology, identifying root causes and corrective actions. La India indicated, through an interview with the Environmental Coordinator, that no cyanide-related incidents have occurred during the audit cycle. The auditors viewed an ICAM report on a non-cyanide-related accident to confirm implementation of investigation procedures.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **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.

La India ensures access to water, oxygen, resuscitators, antidote kits, and communication systems at cyanide-related areas. Automatic External Defibrillators (AEDs), radios, alarms, and a 24-hour all-terrain ambulance are also available as part of the site emergency response capability. The resuscitators are equipped with an oxygen tank and a mask for assisted breathing, along with an artificial manual breathing unit (AMBU). The AMBU is a hand-held device commonly used to provide positive pressure ventilation to patients who are not breathing or are breathing inadequately.

La India conducts monthly inspections of the cyanide antidote kits (Cyanokit and Nithiodote), oxygen tanks, and activated carbon monthly, while the ambulance is inspected weekly. The auditors reviewed completed inspection forms verifying compliance and had operators open oxygen tank valves to confirm they were fully charged. Additionally, the auditors checked that all antidotes were properly stored and within their expiration dates. A replacement schedule (2021–2026) ensures antidotes are ordered and available before expiration.

La India has written emergency response procedures integrated into the Emergency Response Plan, covering cyanide chemistry, exposure symptoms, and the necessary responses to cyanide exposure through ingestion, inhalation and absorption through the skin and eyes. These responses include cyanide-related first aid, and advanced medical treatment. Signage and diagrams provide clear emergency measures at key locations inside the ADR Plant and HLF.

A 24/7 on-site clinic and ambulance are staffed with trained personnel to ensure medical readiness. This includes at least one doctor and one paramedic, always on-site. In addition, the site has an emergency response brigade. The brigade meets weekly, and their training program includes emergency response for worker cyanide exposure and cyanide-related environmental incidents. Specialized equipment, including self-contained

breathing apparatus (SCBAs), chemical suits, decontamination cabins, and containment tools supports emergency preparedness of the brigade and medical staff.

The auditors visited the clinic and interviewed the on-site doctor and verified compliance with medical preparedness requirements. The ambulance was also inspected. Additionally, the auditors reviewed cyanide medical training certificates for brigade members, verifying their training and preparedness for responding to cyanide-related incidents.

In addition, emergency response procedures ensure rapid air transport to CIMA Hospital in Hermosillo via Pima Air Taxi. The procedures require that a paramedic accompanies the patient during the one-hour flight. La India has an agreement with CIMA Hospital in Hermosillo to ensure the proper treatment of patients with cyanide intoxication. As part of these arrangements, La India has provided the hospital with a cyanide antidote kit, sent a formal notification outlining the possibility of cyanide exposure cases, and facilitated the participation of hospital doctors in CyPlus Idesa medical training conducted in August 2024. This is part of a coordination plan with the nearest local medical facilities for cyanide medical response. The auditors verified compliance through the review of the hospital contract for urgent service, completed training certificates, and the air transport procedures.

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.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Standard of Practice 7.1**

☐ not in compliance with

Summarize the basis for this finding:

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

La India has developed a comprehensive Emergency Response Plan, along with additional response procedures covering all operational areas of the mine and a range of potential cyanide releases and incidents. The plan addresses site-specific scenarios, including HCN gas releases, transportation accidents, spills during unloading and mixing, fires and explosions, structural failures in tanks, valves, and pipes, pond overtopping, power outages, seepage from cyanide facilities, and slope failures at the heap leach pad.

The Emergency Response Plan also includes protocols for evacuating site personnel and nearby communities. There are four nearest communities: Tarachi, La Iglesia, Trigo de Corodepe, and Matarachi. In addition, the Emergency Response Plan includes procedures for administering cyanide first aid (including antidote use), personnel decontamination, air transport to CIMA Hospital in Hermosillo, and managing environmental incidents and cyanide spills. Since La India does not operate cyanide treatment, destruction, or recovery systems, these scenarios are not included in the plan. The auditors reviewed the plan and procedures to verify compliance with emergency preparedness standards.

Transportation emergency planning has been jointly coordinated by La India and CyPlus Idesa, the code-certified cyanide producer and transporter. La India maintains a dedicated procedure for transportation emergencies, while CyPlus Idesa has its own emergency response plan. The last version (2023), reviewed by the auditors, was developed in accordance to certification requirements under the Code.

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

☒ **in full compliance with**

The operation is

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

☐ not in compliance with

Summarize the basis for this finding:

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

La India engages its workers, stakeholders, and nearby communities in cyanide emergency planning. Most emergency response crew members are from the local communities. La India provides annual training, conducts mock drills, and collaborates with external entities for cyanide emergency preparedness. The auditors verified compliance through drill reports, training records, and signed agreements.

The Emergency Response Plan designates CIMA Hospital in Hermosillo as the primary treatment center for cyanide exposure cases. While local, state, or federal agencies do not have an on-site emergency role, they may provide offsite support depending on the incident.

La India conducts annual cyanide refresher training for all workers as well as emergency response training with local and regional authorities, prioritizing the four nearest communities: Tarachi, La Iglesia, Trigo de Corodepe, and Matarachi. La India performs annual training sessions at their public facilities which serve also to inform and have open forums about cyanide and identify any concerns. The auditors confirmed no community relies on water sources downstream of the mine cyanide facilities. Verification included aerial photographs, interviews, and records of community engagement activities. The Community Relations personnel confirmed that La India have not registered any inquiries or concerns related to cyanide in their grievance mechanism.

La India's strategic approach to strengthen medical preparedness includes the coordination with CIMA Hospital in Hermosillo, providing yearly training and supply of cyanide antidote kits. During 2024, twenty-two CIMA Hospital staff completed specialized cyanide medical training facilitated by CyPlus Idesa. La India also maintains a Mutual Aid Agreement with the Sonora Civil Protection Agency and nearby mining operations for emergency support.

To keep its Emergency Response Plan current, La India engages external entities and communities through training sessions, mock drill invitations, and maintaining updated emergency contacts. The auditors reviewed compliance through reports, training materials and the updated emergency numbers of local authorities. These findings reflect La India's strategic approach to cyanide emergency preparedness, local stakeholder engagement, and external coordination.

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

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.

La India has developed an Emergency Response Plan that includes an organization chart outlining the incident command structure, designating primary and alternate coordinators with the authority to allocate resources, as well as each member of the emergency brigade. The plan defines the duties and responsibilities of the coordinators and team members and mandates that brigade members undergo training and certification for emergency activities. A table detailing the required training is included. Additionally, the plan lists brigade members with their contact information and specifies emergency call-out procedures.

Section 5 of the Emergency Response Plan provides a detailed inventory of cyanide-related emergency response equipment at the mine site. The "Inspection of Emergency Protection and Response Equipment" procedure governs the regular inspection of emergency equipment, supported by inspection forms specifically developed for cyanide emergency equipment. The auditors reviewed completed inspection forms to verify compliance.

La India has coordinated with CIMA Hospital in Hermosillo regarding their support for medical emergencies, including cyanide intoxication victims, providing the hospital with training and a cyanide antidote kit. In addition, to enhance their preparedness and support, La India maintains a Mutual Aid Plan Agreement with the Sonora Civil Protection Agency and nearby mining projects to ensure mutual support during emergencies.

As part of its cyanide community training efforts in 2024, La India organized a chemical emergency demonstration involving rescue crew members and local authorities, aimed at increasing community awareness and preparedness. Also, at the mine facilities, La India conducted a cyanide-related drill in August 2024, engaging process personnel, brigade members, and both on-site and external doctors to further refine emergency response capabilities. External agencies, such as local fire departments and the Sonora Civil Protection Agency, were invited to participate but were unable to attend due to external circumstances. Nevertheless, the on-site doctor maintains continuous communication with these entities, coordinating community cyanide code training and broader environment, health, and safety activities, as documented in community training reports. Furthermore, most crew members are part of the local communities, enhancing the local resources for emergency response and coordination.

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

☒ **in full compliance with**

The operation is

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

☐ not in compliance with

Summarize the basis for this finding:

The operation is in full compliance with Standard of Practice 7.4; develop procedures for internal and external emergency notification and reporting.

La India has developed an Emergency Response Plan that includes procedures and contact information for notifying management, regulatory agencies, and medical facilities. Additionally, the plan outlines procedures for informing nearby communities and communicating with the media.

To comply with ICMI requirements, La India has also established a process for reporting significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. At the time of the audit, La India environmental and safety staff mentioned that no significant cyanide incidents had occurred during the recertification period. The auditors reviewed the notification process and reports of cyanide-related incidents recorded during the recertification period to verify compliance.

Standard of Practice 7.5: Incorporate and 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.

La India has developed and implemented a remediation procedure for cyanide releases, including solution and solids recovery using hand tools and heavy equipment, as well as neutralization with sodium hypochlorite. The procedure outlines solution preparation steps and establishes an endpoint for soil decontamination, after which contaminated soil is disposed of at the HLF.

While an alternate water supply is considered highly unlikely, the procedure identifies an upstream source ("noria") that could be used if needed. The auditors confirmed, through interviews with the Community Relations Supervisor and Google Earth map reviews, that nearby communities do not obtain water from the downstream watercourse of the HLF.

Both the remediation procedure and Emergency Response Plan explicitly prohibit using sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat surface water releases.

La India has established environmental monitoring procedures to assess cyanide release impacts and conduct soil sampling for cyanide analysis. Soil excavation should occur until the 0.2 mg/L total cyanide endpoint is met. Additionally, the procedures detail surface and groundwater sampling, sampling methodologies and locations, directing analysis to an accredited laboratory.

As part of its Environmental Management Plan, La India maintains a comprehensive water monitoring program, conducting regular surface and groundwater sampling in line with regulatory requirements to detect cyanide and other contaminants.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

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.

La India regularly evaluates the cyanide-related elements of its Emergency Response Plan, with revisions made as needed. Section 36 includes a revision table documenting updates from the annual review. The most recent version of the plan was updated in August 2024 and incorporated changes in the emergency team members, emergency contact lists, and cyanide medical emergency procedures in regard to the use of cyanide antidotes.

La India conducts annual mock drills to test cyanide emergency response procedures, scheduled to simulate different cyanide exposure and release scenarios. For example, the 2025 mock drill involved a cyanide solution release. This mock drill covered rescue activation, spill containment and clean-up, worker decontamination, and first aid. The 2024 mock drill involved cyanide intoxication and covered medical intervention and air transport. Each drill included evaluations and follow-up actions. The 2024 mock drill led to HAZMAT refresher training and

safety gear improvements. The auditors reviewed training records, drill reports, and evidence of corrective actions.

Section 36 of the Emergency Response Plan mandates evaluations following emergencies and mock drills to determine necessary revisions to this plan. La India confirmed that the most updated revision of the plan was updated in August 2024. No changes associated with mock drill corrective actions were identified during the audit cycle that would require the update of the Emergency Response Plan. The auditors verified compliance by reviewing the plan and associated mock drill reports.

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.

La India has trained all personnel and contractors who may encounter cyanide in cyanide safety and emergency response procedures. This training covers cyanide management and hazard recognition including the cyanide materials present across the different cyanide facilities, the health effects of cyanide and the symptoms of cyanide exposure. The training also covers first aid (including advanced medical treatment), and the Emergency Response Plan. In addition, process personnel undergo additional training in SCBAs. A general training program tracks cyanide induction and refresher course completion for employees and contractors. Training certificates of 59 workers were provided as evidence of the progress for the first two months of 2025 regarding the cyanide safety and first aid refresh training program. La India also maintains detailed training records, including employee and trainer names, training dates, topics covered, and test results, which auditors reviewed along with completed quizzes.

The auditors verified compliance through the review of PowerPoint training presentations, training matrices, and training records.

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

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.

La India provides cyanide related task training for operators handling unloading, mixing, production (ADR plant and HLF), operations and maintenance to ensure safe cyanide management and to prevent cyanide releases. Training includes procedure reviews, PowerPoint presentations, and quizzes, with operators signing procedure cover sheets to confirm their understanding. The auditors verified compliance by reviewing training materials, training records and examples of signed procedure cover sheets.

Cyanide management training elements are clearly identified for each job, incorporating PPE requirements, hazard recognition, procedural steps, and relevant forms. Training is provided using the operating procedures and reinforced with PowerPoint presentations and quizzes, which the auditors reviewed.

Task training is conducted by appropriately qualified staff, including experienced ADR plant and HLF supervisors while safety personnel trained in cyanide management by CyPlus Idesa provide the general training. The auditors confirmed compliance through interviews and training record reviews.

All new and existing personnel receive training before working with cyanide. New operators complete task training, work under supervision until ready for independent tasks, and undergo a three-month re-evaluation.

Annual refresher training ensures operators maintain safety and environmental standards. Task refresher training is covered in safety meetings, periodic procedure reviews, job safety analysis, observation cards and supervisor observations.

Training effectiveness is evaluated through testing and observation. Quizzes assess comprehension, while supervisors monitor and document worker performance. La India maintains records of cyanide training throughout an individual's employment. Training records document employee and trainer names, dates, topics, and test results.

The auditors verified compliance through a review of training records, completed quizzes and observation records as well as interviews.

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

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.

La India has trained operators expose to cyanide in first aid and emergency response including decontamination and emergency response for cyanide releases, as part of the Safe Management of Cyanide and Cyanide First Aid training program. Brigade members and emergency response coordinators receive additional, in-depth information that covers emergency response training in more specific aspects like poisoning, trauma, HAZMAT, rescue gear and PPE use, SCBAs use, vertical rescue, confined spaces, and evacuation.

Operators undergo annual refresher training, while brigade members receive refresher training monthly on rotating topics. Training records document employee and trainer names, dates, topics, and test results, which auditors reviewed alongside presentations, matrices, and completed quizzes to verify compliance.

The Emergency Response Plan outlines the role of CIMA Hospital in Hermosillo for treating cyanide intoxication cases. While local, state, or federal agencies do not have an on-site role, they may contribute offsite depending on the incident. La India maintains its Mutual Aid Agreement with the Sonora Civil Protection Agency and other nearby mining projects.

Recognizing the importance of medical preparedness, La India has actively collaborated with CIMA Hospital in

Hermosillo to ensure their knowledge and preparedness to attend medical cases related to cyanide exposure. La India has provided the hospital with a cyanide antidote kit, and in August 2024, 22 doctors completed specialized cyanide medical training facilitated by CyPlus Idesa. A mock drill was performed at the mine facilities after the August 2024 training, which simulated a sodium cyanide emergency, with the participation of external doctors, mine personnel and crew members from the community.

The auditors verified compliance by reviewing mock drill reports, hospital correspondence, training certificates, and the signed agreement with the Sonora Civil Protection Agency.

PRINCIPLE 9 – DIALOGUE

Engage in Public Consultation and Disclosure

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

☒ **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.

La India has informed stakeholders about its cyanide management practices and engaged with them on related concerns since the early stages of its operation. La India maintains an open-door policy and a grievance mechanism for local communities. This mechanism involves continuous engagement by community relations personnel with nearby communities, established communication channels via phone, a hotline, and strategically located mailboxes, as well as trained security guards to receive community concerns and notify community relations staff of any issues.

Annual training on cyanide use in mining is provided to nearby communities including Tarachi, La Iglesia, Trigo de Corodepe, and Matarachi. During these sessions, any concerns raised by community members are recorded and addressed. In 2024, safety personnel, paramedics, and the on-site doctor trained these nearby communities and Yecora community medical staff on cyanide management and first aid.

Auditors verified compliance through training materials, records, weekly community engagement reports, and interviews with community relations personnel.

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.

a India has documented its cyanide management practices and shared this information with stakeholders through a trifold pamphlet distributed in community visits, and training sessions and talks. The documentation and diffusion materials are all written in Spanish. Weekly Reports 36 and 37 detail the 2024 Code training provide to the communities of Matarachi, La Iglesia, and Yecora. Also, the Agnico Eagle 2024 Annual Information Form, posted on their website, includes cyanide related information. The auditors verified compliance by reviewing the pamphlet, corporate website, and sample weekly reports.

The Community Relations Supervisor is responsible for stakeholder engagement and oversees the annual cyanide training in local communities. The Community Relations Supervisor, the on-site doctor, and the rescue team share cyanide-related information verbally during annual training sessions in nearby communities. To achieve this task, La India schedules the training date considering the local stakeholders' availability and prepares the training materials, including presentations, a trifold pamphlet, posters, photos and diagrams, to ensure accessibility of the information to most of the residents.

With a 95% local literacy rate with Spanish as the first language, La India has developed visual support materials to increase comprehension. Weekly engagement reports document training discussions through photographs. The auditors verified compliance by reviewing training materials and reports.

At the time of the audit, La India had not experienced cyanide releases or exposures requiring reporting under Standard of Practice 9.3 during the recertification period. If such incidents were to occur, La India would disseminate the information to the public in accordance with written procedures for general communication and communication of environmental matters included in the Emergency Response Plan and the accident investigation procedures. Additionally, the public would have access to information on exposures and releases through reports submitted to governmental agencies. Exposures and environmental releases that meet the legal reporting requirement would have to be reported within 72 hours to the Mexican Secretariat of Labor and Social Welfare (STPS) for lost-time incident cases and to the Mexican Federal Attorney for Environmental Protection (PROFEPA) for environmental releases. La India confirmed no cyanide-related incidents during the audit period. The auditors verified compliance through procedure reviews, reports, and staff interviews.

Signature Page

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