

SAN ANDRES MINE  
CORRECTIVE ACTION PLAN

**CORRECTIVE ACTION PLAN FOR:  
SAN ANDRES MINE**

**Introduction**

One of the components of the International Cyanide Management Institute (ICMI) is the development of a Corrective Action Plan (CAP) for those parts of the audit findings that have been found to be in substantial compliance and require focused responses to take the site to full compliance.

ICMI requirements indicate that Corrective Action Plans and notification, therefore, must be completed within 12 months of posting of the Plan on the ICMI website.

The sections below detail the corrective actions, agreed by the San Andres Mine and the Lead Auditor, necessary to bring San Andres in to full compliance, as indicated in the Detailed Audit Report and Summary Audit Report.

**Corrective Action Plan**

**Standard of Practice 4.3:** Implement a comprehensive water management program to protect against unintentional releases.

**4.3(4) Are ponds and impoundments designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations?**

**Deficiency**

The Standard of Practice was found to be substantially compliant for San Andres.

San Andres has a positive water balance, with an average annual precipitation of 1500 mm. The operation uses an Excel spreadsheet to manage the water balance, which does not have probabilistic capabilities to take into account the uncertainty and variability in the prediction of precipitation patterns. To prevent overtopping of ponds due to low probability, high volume rainfall events, the model uses meteorological data collected at site to determine water treatment requirements as well as water needed for the process during the dry season. Solution ponds levels are monitored daily during the rainy season to ensure there is enough pond capacity in case of high volume rainfall events. This

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Aura Minerals Inc  
San Andres Mine

  
Signature of Lead Auditor

Jan 22<sup>nd</sup> , 2021

  
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information is entered in the water balance on a daily basis during the rainy season and once a week during the dry season.

The mine retained an external water balance professional to review their current water balance model and provide a level of certainty that water balance practices can prevent overtopping of the ponds during the operational life of the facility. The report provided by the external water balance professional concluded that currently there is not enough capacity in the ponds to contain a 3-yr/24-hour precipitation events and that the heap leach facilities and ponds need to be upgraded to be able to manage and contain large precipitation events. San Andres indicated that the preferred alternative is to install raincoats on the leach pad to reduce the amount of precipitation entering the system, and that these improvements could take up to 6 months to be completed. A CAP is required to fully address this deficiency and achieve full ICMI certification.

**Corrective Action**

Obtain evidence that San Andres has implemented improvements to the facilities and operation of the water balance to prevent overtopping of the ponds and satisfy the requirements of the ICMI Code. This evidence will include pictures and drawings of the new installed raincoats in the leach pad, as well as water balance calculations including the new covered areas. As indicated by San Andres, this corrective action should be closed by October 1<sup>st</sup>, 2021.

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