



# INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

## MINING OPERATIONS SUMMARY AUDIT REPORT

PREPARED FOR THE  
INTERNATIONAL CYANIDE MANAGEMENT CODE  
CONDUCTED FOR EQUINOX GOLD CORPORATION'S  
FAZENDA BRASILEIRO MINE  
PERFORMED BY FERREIRA & CERQUEIRA LTDA.  
AUDITOR NAME: LUIZ EDUARDO FERREIRA  
FINAL REPORT DATE: OCTOBER 01, 2024

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# MINING OPERATIONS SUMMARY AUDIT REPORT

## Table of Contents

<b>Introduction</b> .....	
<b>Instructions</b> .....	
<b>Operation General Information</b> .....	
<b>Operation Location Detail and Description</b> .....	
<b>Auditor’s Finding</b> .....	
Compliance Statement .....	
Auditor Information.....	
Auditor Attestation.....	
<b>Principles and Standards of Practice</b> .....	
Principle 1   PRODUCTION AND PURCHASE .....	
Standard of Practice 1.1.....	
Principle 2   TRANSPORTATION .....	
Standard of Practice 2.1.....	
Principle 3   HANDLING AND STORAGE .....	
Standard of Practice 3.1.....	
Standard of Practice 3.2.....	
Principle 4   OPERATIONS .....	
Standard of Practice 4.1.....	
Standard of Practice 4.2.....	
Standard of Practice 4.3.....	
Standard of Practice 4.4.....	
Standard of Practice 4.5.....	
Standard of Practice 4.6.....	
Standard of Practice 4.7.....	
Standard of Practice 4.8.....	
Standard of Practice 4.9.....	
Principle 5   DECOMMISSIONING.....	
Standard of Practice 5.1.....	



# MINING OPERATIONS SUMMARY AUDIT REPORT

Standard of Practice 5.2.....

Principle 6 | WORKER SAFETY .....

Standard of Practice 6.1.....

Standard of Practice 6.2.....

Standard of Practice 6.3.....

Principle 7 | EMERGENCY RESPONSE .....

Standard of Practice 7.1.....

Standard of Practice 7.2.....

Standard of Practice 7.3.....

Standard of Practice 7.4.....

Standard of Practice 7.5.....

Standard of Practice 7.6.....

Principle 8 | TRAINING .....

Standard of Practice 8.1.....

Standard of Practice 8.2.....

Standard of Practice 8.3.....

Principle 9 | DIALOGUE AND DISCLOSURE.....

Standard of Practice 9.1.....

Standard of Practice 9.2.....



# MINING OPERATIONS SUMMARY AUDIT REPORT

The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide Code”), this document, and other documents or information sources referenced at [www.cyanidecode.org](http://www.cyanidecode.org) are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.



# MINING OPERATIONS SUMMARY AUDIT REPORT

## Introduction

This document provides the framework for the information that an auditor must include in the Summary Audit Report prepared for a Cyanide Code Certification Audit conducted for a mining operation and serves as a general template for presenting the required information.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audit is complete, it posts the Summary Audit Report on the Cyanide Code website.

## Instructions

- 1) The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in the Summary Audit Report. The Summary Audit Report is intended to provide a summary of the information included in the Detailed Audit Findings Report prepared for the certification audit; and therefore, should include only information that is presented in the Detailed Audit Findings Report.
- 2) The name of the mining operation, the Lead Auditor’s signature, and the submittal date of the final report must be included at the bottom of each page of the Summary Audit Report.
- 3) An operation that is found in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
- 4) The Summary Audit Report, the Detailed Audit Findings Report, and any necessary Corrective Action Plan with all required signatures must be submitted in electronic format to ICMI within 90 days of completion of the site inspection portion of the audit. An electronic copy of a letter from the owner or authorized representative of the audited operation granting ICMI permission to post the Summary Audit Report and Corrective Action Plan (if one is necessary) on the Cyanide Code website must also be submitted, along with both an electronic copy and a hard copy of a completed Auditor Credentials Form. The Lead Auditor’s signature on the Auditor Credentials Form must be certified by notarization or equivalent. Electronic documents should be submitted to the Institute via email at:

[audits@cyanidecode.org](mailto:audits@cyanidecode.org)

The hard copy of the notarized Auditor Credentials Form should be sent to:

**International Cyanide Management Institute**  
**1400 I Street, NW, Suite 550**  
**Washington, DC 20005, USA**



# MINING OPERATIONS SUMMARY AUDIT REPORT

- 5) The Summary Audit Report should include a description of the operation, identifying the facilities included within the scope of the audit and any new facilities or facilities that have undergone substantial changes since the previous audit (in the case of a recertification audit), and indicating key operational components such as the mine type (e.g., open pit, underground) cyanide forms used such as briquettes or liquid, cyanide packaging and method of delivery and storage, processing methods (e.g., heap leach, milling, carbon-in-leach, Merrill-Crowe), nature and purpose of ponds and impoundments, cyanide destruction circuits, and other site-specific operational features that provide context to the reader ahead of the audit findings. The description of the operation should include sufficient information to describe the scope and complexity of the operation being audited.



# MINING OPERATIONS SUMMARY AUDIT REPORT

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## Operation General Information

Name of Mine:	Fazenda Brasileiro Desenvolvimento Mineral (FBDM)_ - Mine
Name of Mine Owner:	Equinox Gold Corporation
Name of Mine Operator:	FBDM – Fazenda Mine
Name of Responsible Manager:	Alexandre Freitas – Plant Manager
Address:	Fazenda Brasileiro s/n - (zona rural), CEP 48.770-000, Teofilândia
State / Province:	Bahia
Country:	Brazil
Telephone:	+55 75 3616-5403
Fax:	+55 75 3616-5403
Email:	alexandre.freitas@equinoxgold.com

## Operation Location Detail and Description

*Provide a description of the mining operation (see Item 5 in the Instructions, above).*

The Fazenda Brasileiro Desenvolvimento Mineral (FBDM) Mine is located in the municipality of Barrocas, centered in the northeastern portion of the State of Bahia. It is approximately 223 km from the capital Salvador. Among the surrounding cities, the following stand out: Serrinha, to the south, Teofilândia, to the southeast, Araci, to the northeast. Access to the company from the city of Salvador can be done BR-324 to the city of Feira de Santana. From there, you should head north, along BR-116, passing through the cities of Santa Bárbara and Serrinha to Teofilândia. From Teofilândia, take a dirt road for 10 km, heading northwest, to the mine. Illustration through Figure 1.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

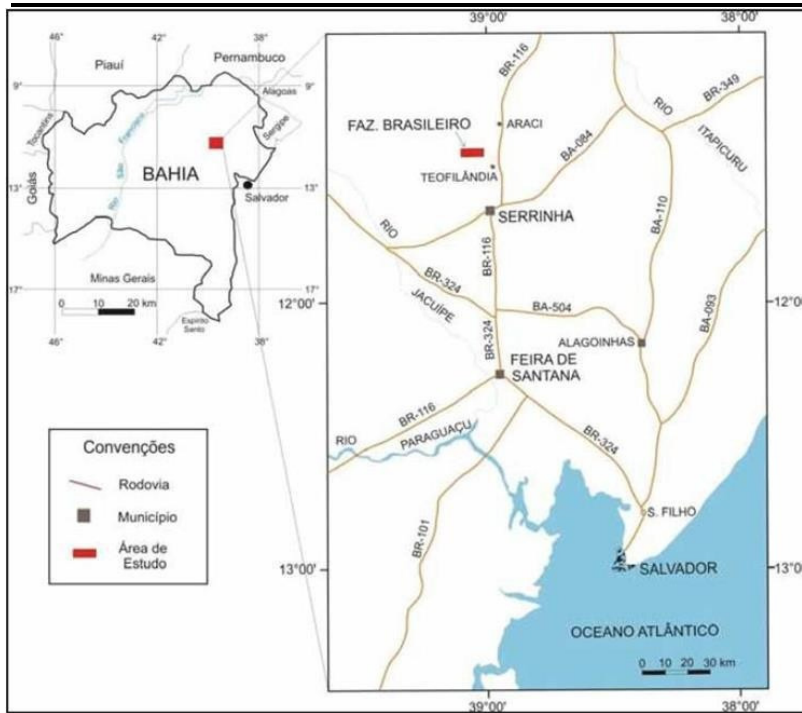



Figure 1 - FBDM Mine Location. Source: SILVA et al., 2001.

The production process of the FBDM plant goes through the following stages:

- Primary Crusher
- Secondary Crusher
- Grinding, Classification and Gravity Concentration
- Acacia
- Thickening
- Hydrometallurgy
- Desorption
- Acid Wash and Carbon Thermal Regeneration
- Smelting
- Tailings Dams
- Reagents

Below is a summary flowsheet of the process in Figure 2.

**FBDM Mine**  
Name of Operation

  
Signature of Lead Auditor

10/01/2024  
Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

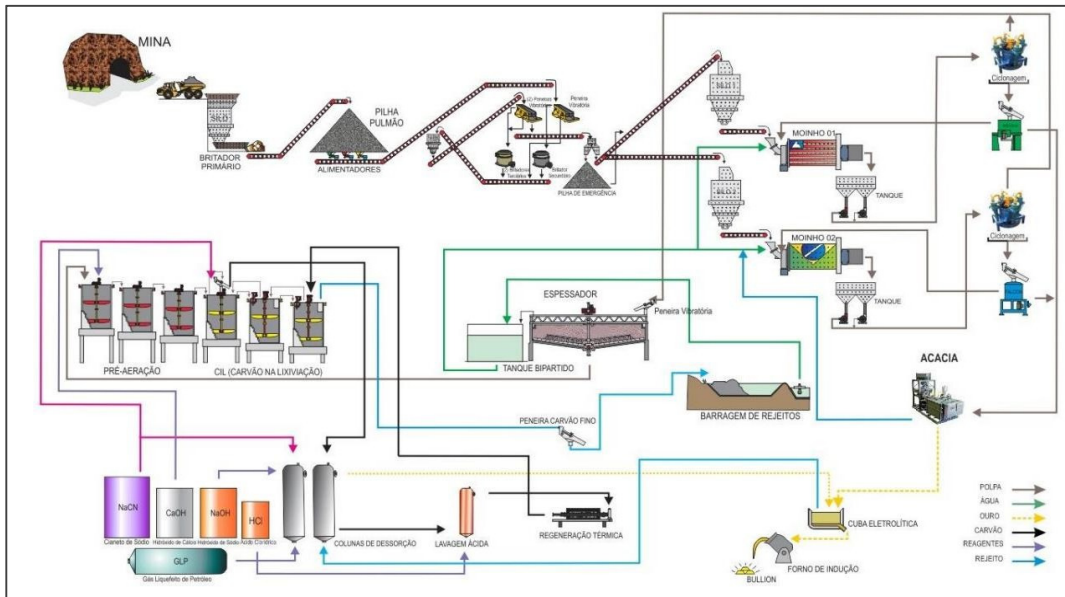


Figure 2 - Flowsheet of the plant's production process.

## 1- Primary Crusher:

The run-of-mine ("ROM") comes from around 40% of the open pit mine and 60% of the underground mine is tilted by trucks, in a hopper, equipped with fixed grid for protection with the opening of 800 mm fragments eventually retained on the grid is broken by a hydraulic impact breaker.

The fraction of the ROM is discharged in a primary double axis crusher, Metso C125 type, operating with an opening of 4 inches. The product of the primary crusher is sent through a conveyor belt to a surge pile with a total capacity of 19,000 tons.

## 2- Secondary Crusher:

The ore of the surge pile is resumed through vibrating feeders and transferred to primary screening through a conveyor belt. The primary screening is performed at dry in an inclined vibrating screen, fitted with two decks, the first having an opening of 25 mm and 10 mm the second deck. The fraction retained in both decks feeds secondary crushing.

The secondary crushing is performed in a cone crusher, Model 300 horse power (HP), from Metso, operating with opening of 19 mm. The product unloaded on a conveyor belt feeds a garner. Then it is transferred to the secondary screening through another conveyor belt and a flow divider.

The secondary screening is performed in two vibrating screens with two decks that work in parallel. The fraction retained in the secondary screening feeds tertiary crushing.

The tertiary crushing is performed with two-cone crusher that work in parallel, one model 200 HP and model 300 HP, operating at the opening of 8 mm, in closed circuit with the secondary screening.

**FBDM Mine**

Name of Operation

Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

The ore passing in 8 mm, derived from primary and secondary screening is unloaded on a conveyor belt. Subsequently, the same will follow for a flow divider, and thence into at grinding and I or pile of emergency that has storage capacity of 2000 tons.

## 3- Grinding, Classification and Gravity Concentration

With respect to concentrated, from the gravity concentrators, it must be realized that this is collected in a tank, leased in the milling building and subsequently pumped into the reactor Acacia. This step is performed manually and is the transfer of the stored concentrated in tanks TQ-523F-01, TQ-523F-02 and TQ-523F-03 gravity to concentrate receiving cone in Acacia. The transfer is making via peristaltic pump through HDPE pipe. The Operation is to control the solids concentration and the drive frequency of the pump during the transfer. Acacia intensive leaching reactor is a device that works with concentrated load in batches by recirculating the solution for 8 hours.

## 4- Acacia

This process uses a high intensity cyanidation process for achieving a recovery of gold from concentrates of extremely high gravity. The process utilizes a fluidized bed and leach conditions to improve the kinetics of dissolution of gold to the point where most of the dissolution occurs in a few hours. The process of the product is in the form of electrolytic gold cathode ready for casting by traditional means.

## 5- Thickening

The overflow of the two batteries of cyclones, from grinding is transferred to this area feeding a horizontal vibrating screen whose function is to remove splinters, plastics and similar.

The pulp passing through the screen goes to the thickener through an open trough, installed under the walkway of access to the central drive mechanism of the same. Most efficient sedimentation in the thickener is afforded using flocculants. The underflow from the thickener is he feed of the Hydrometallurgy. The overflow from the thickener is water and is recovered and recycled to the process.

## 6- Hydrometallurgy

This process step involves subjecting the ore slurry to a prior treatment of aeration for oxidation of sulfides and release of gold associated with them, followed by leaching in alkaline pH, with a dilute solution of sodium cyanide and lime milk, whose function is to control the Operation and adsorption of pH of gold dissolved in the liquid phase of a cyanuric ore slurry. The slurry transfer through this process step is affected by gravity, through a 500 mm gap between tanks and inclined gutters. Each tank has a down-comer,

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

unloading it at a depth in about 30% below the level of slurry, mini mixing thus the occurrence of short circuit in the tanks.

After the pre-airing, the ore slurry containing dissolved gold flows in counter-flow with activated carbon particles. During this transfer of carbon, the static screens of each tank prevent the activated carbon to track the flow of slurry. On that occasion, the same volume of carbon and ore slurry is transferred from each tank to the immediately prior tank by pumping countercurrent to the flow of ore slurry in the tanks, also using vertical pumps. carbon regenerated or new is added to the last tank.

The carbon loaded with gold is separated from the slurry and washed in horizontal vibrating screen and is condition in a tank for later transfer to the desorption process. The slurry returns to the first adsorption tank.

## 7- Desorption

Consists of reverse the adsorption process, extracting the metals of interest from carbon and delivering them to a solution that is subjected to an electrolysis process. Due to the need to reverse the process of adsorption, the operating conditions should be opposite to those stipulated in the adsorption process. Thus, high temperature, pH and high concentrations of cyanide favoring desorption. This step of the process, operating under batches, involves the column elution of the desorption of adsorbed gold in the carbon from the, performed in closed (IPC) circuit with the electro recovery of this gold in cathodes made of steel wool.

## 8- Acid Wash and Carbon Thermal Regeneration

The Acid Wash is a chemical treatment performed after the use of carbon in the adsorption. It is a removal of calcium and silica by leaching in a dilute acid solution. Thus, part of the base metals adsorbed on carbon (such as nickel), is also eliminate, resulting in facilitating the adsorption kinetics. Thermal Regeneration is the partial or total removal of impurities adsorbed on carbon with the gold during the Carbon-In-Leach (CIL) circuit through the burning of these impurities in a cylindrical rotary furnace. These impurities are carbonates, basic metals, clays, and organic matter.

## 9- Smelting

The slag resulting from the casting process and the crucibles are unsuitable for reuse, they are crush and returned to the milling circuit.

## 10- Tailings Dams

The slurry leaving the last CIL tank is pump to the dam number IV. The ore decants

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

fanning beaches and the crystalline solution percolates down to a point where it is re-pump back into the process. This process water is reused in milling and WAD (Weak Acid Dissociable) cyanide concentrations are less than 0.5 mg/l.

## 11- Reagents

The cyanide is received in liquid form through a truck with an isocontainer and stored in tanks and distributed to the areas of use through pumping.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Auditor's Finding

This operation is

- X in full compliance
- in substantial compliance \*(see below)
- not in compliance


with the International Cyanide Management Code.

*"This operation has not experienced any compliance issues during the previous three-year audit cycle"*

## Auditor Information


Audit Company: Ferreira & Cerqueira Ltda.  
Lead Auditor: Luiz Eduardo Ferreira  
Lead Auditor Email: luizeferreira2015@gmail.com

Names and Signatures of Other Auditors:

<b>Auditor 1:</b>	<u>Luiz Eduardo Ferreira</u>	
	<b>Name (Print/Type)</b>	<b>Signature</b>
<b>Auditor 2:</b>		
	<b>Name (Print/Type)</b>	<b>Signature</b>
<b>Auditor 3:</b>		
	<b>Name (Print/Type)</b>	<b>Signature</b>

**Dates of Audit:** September 11-15, 2023 (on site), December 04-06, 2023 (off site)

FBDM Mine  
Name of Operation

  
Signature of Lead Auditor

10/01/2024  
Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Auditor Attestation

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

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

**FBDM Mine**

\_\_\_\_\_  
Name of Facility


  
\_\_\_\_\_  
Signature of Lead Auditor

**10/01/2024**

\_\_\_\_\_  
Date

**FBDM Mine**

\_\_\_\_\_  
Name of Operation

  
\_\_\_\_\_  
Signature of Lead Auditor

**10/01/2024**

\_\_\_\_\_  
Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Principles and Standards of Practice

### Principle 1 | PRODUCTION AND PURCHASE

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

#### Standard of Practice 1.1

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

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

#### *Summarize the basis for this Finding/Deficiencies Identified:*

Yes. Evidenced that FBDM has been purchasing cyanide produced by Proquigel Química S.A, which is a Brazilian company that has two facilities located at Camaçari and Candeias cities both at the State of Bahia, Brazil, which produce solid and liquid cyanide. The auditor compared the operation's purchase agreement and chain of custody documentation with the listing of certified cyanide production facilities on the Cyanide Code website to confirm that the cyanide was, in fact, produced by a certified operation and concluded that Proquigel (Camaçari Operation and Candeias Operation) are certified as being in compliance with the Code (see <https://cyanidecode.org/sig-directory-type/proquigel-quimica-s-a-brazil/>). Besides, reviewing the above mentioned (a.m.) web site, it was noted that Proquigel's certifications (Candeias and Camaçari operations) have not been disrupted. Noted that contracts between on one hand, as seller Proquigel, and, on the other hand, as buyer, FBDM for the article NACN states that all sodium cyanide provided by Proquigel must be produced in a facility having a current certification under the International Cyanide Management Code. Evidenced that since last audit FBDM only bought liquid cyanide. Sampled examples were Purchase orders valid from September 01, 2019 until December 31, 2025.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Principle 2 | TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1

*Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.*

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

*Summarize the basis for this Finding/Deficiencies Identified:*

Yes. FBDM maintains the chain of custody records identifying all transporters and supply chains responsible transporting cyanide from the producer to the operation. FBDM only purchases liquid form of cyanide. No solid cyanide is transported. Cyanide cargo is transported from Proquigel (Camaçari and Candeias plants both at Bahia State, Brazil) directly to FBDM by road in accordance with Brazilian legislation such as Resolução from National Land Transportation Agency (ANTT) 5947/21, Registered Brazilian Standard (NBR) 15481/2021, NBR 16173/2021, NBR 15481/2021, NBR 15701/2020 and Labor Regulatory Standard (NR) 16. There is no interim storage. FBDM maintains chain custody records in accordance with Brazilian laws such as Electronic Invoice Auxiliary Document (DANFE), Electronic Bill of Lading Auxiliary Document (DACTE), Electronic Invoice (Nfe) and (CTe) - Electronic Bill Of Lading. DANFE and NFe are issued by the seller and DACTE and CTe are issued by the transporter. DANFE is the graphic representation of the NFe and DACTE is the simplified representation of CTe. Chain of custody records were reviewed.. The contract between FBDM as buyer and Proquigel defines that Proquigel shall use only use transporters that are certified as being in full compliance with the Code. The auditor compared chain of custody records with the listing of certified cyanide transporters on the Cyanide Code website to confirm that a certified transporter has transported the cyanide. Evidenced through pertinent records that cyanide was transported from Proquigel to FBDM by Confins Transportes Ltda.(Confins) and Transportadora Moscato Transporte Rodoviário Ltda. (Moscato) which are certified as being in compliance with the Code (see <https://cyanidecode.org/sig-directory- type/confins-transportes-ltda-brazil/> and <https://cyanidecode.org/sig-directory- type/transportadora-moscato-transporte-rodoviario-ltda-brazil/>). Besides, reviewing the a.m. web site, it was noted that both transporters certification has not been disrupted

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

## Principle 3 | HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

### Standard of Practice 3.1

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

The operation is  X in full compliance with  
 in substantial compliance with Standard of Practice 3.1  
 not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

Yes. Evidenced that FBDM designed and constructed facilities for unloading and storing cyanide in accordance with cyanide producers' guidelines and Brazilian engineering requirements. Several design documentations such as drawings and data sheet specification were reviewed and showed that the facilities were designed and constructed as stated. Evidenced that the design and manufacture of subsidiary systems are in accordance with the relevant codes and standards from regulatory agencies and institutes such as: Brazilian Association of Technical Standards (ABNT); American National Standards Institute (ANSI); American Society of Mechanical Engineers (ASME) such as ASME B31.3 Process Piping (2034-01-4000-SPE-P-0001); ASME B31.11 Slurry Conveying Piping System; ASME B1.20.1 Pipe Threads, General Purpose, Inch; ASME B16.1 Gray Iron Flanges and Flanged Fittings; Malleable iron threaded connections ASME B16.3, classes 150 and 300; ASME B16.5 Pipe Flanges and Flanged Fittings; Factory Made Forged Butt Welding Fittings ASME B16.9; ASME B16.11 Forged, Socket Welding and Threaded Connections; ASME B16.47 Large Diameter Steel Flanges, Nominal Pipe Size (NPS) 26 to NPS 60; ASME B16.48 Steel Line Shades; ASME B36.19M Stainless Steel Pipe; ASME B46.1 Surface Texture (Roughness, Waviness, and Surface Configuration); British Standard Institute (BSI); (ASTM) American Society for Testing and Materials; American Welding Society (AWA); International Organization for Standardization (ISO); Standardization of valve and fitting manufacturers; Pipe Manufacturing Institute (PFI); Underwriters Laboratories in Brazil (UL-BR); Canadian Standard Association (CSA). Mixing area is not applicable since FBDM does not use solid cyanide. The cyanide storage tanks are located outside in an open-air environment. During the field audit evidenced that unloading and storage areas for liquid cyanide are located away from other people of the plant. The access to the process plant is controlled. All doors are locked. The unloading, storage and preparation areas are far from surface waters. During the unloading, only authorized operators are allowed to circulate in these areas.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

During the field audit, it was evidenced that liquid cyanide is unloaded on a concrete area as well as that the unloading area was designed and constructed to contain, recover or allow remediation of any leakage from the tanker truck or isotainer system. It was evidenced, during the field audit, that FBDM has systems in place to prevent overfilling of cyanide storage tanks such as automatic level indicators, high-level alarms, shutdown valves and pumps. Evidenced that FBDM defined and documented procedures establishing methodology for testing, maintaining and calibrating equipment, instruments and systems (previously identified as critical) in order to ensure that they are available for the normal operations and this way preventing overfilling of cyanide storage tanks. Evidenced that as well as of identified critical equipment in case of occurrence an incident involving cyanide release in this area in which the product is recovered by using environmental kits. Evidenced that FBDM has been testing, maintaining and calibrating them (where applicable) in accordance Brazilian regulations laws as well as FBDM's Maintenance Plan and FBDM' Calibration Plan. Evidenced, during the field audit that overflow protection equipment and instrumentation are properly functioning. For additional information, please see Principle 4. During field audit it was not evidenced that overfilling of cyanide have been occurred. It was not evidenced occurrence of incident reports. Interviewed personnel provided evidences of adequate management of actions that effectively have been performed as well as are aware of this matter. Reviewing pertinent documentation records such as drawings, construction and Quality Assurance/Quality Control (QA/QC) records, it was evidenced that cyanide storage tanks are located on a concrete area prevent seepage to the subsurface. During field audit, it was evidenced storage areas are in good condition. Reviewing pertinent documentation records such as design and construction and QA/QC records it was evidenced that secondary containments for cyanide storage were constructed of reinforced concrete which provides a competent barrier to leakage as required by internal documented procedures.. During the field audit, it was evidenced that secondary containments for cyanide storage are in good conditions free of cracks and other breeches that compromise their ability to effectively contain releases Evidenced that FBDM defined, documented, implemented and maintains an Inspection Plan for Secondary Containments for Cyanide Storage. Evidenced duly implemented. • Evidenced that Spill containment systems: storage areas for fuels and dangerous products are protected by containment basins and standardized in accordance with standard NBR 17505 -: Field audit provided evidenced that the involved areas are in good conditions. During field audit it was evidenced that cyanide is stored: with adequate ventilation to prevent the build-up of hydrogen cyanide gas, separately from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products with berms, bunds, walls or other appropriate barriers that will prevent mixing.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard of Practice 3.2

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

The operation is  X in full compliance with  
 in substantial compliance with Standard of Practice 3.2  
 not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

FBDM only uses liquid cyanide. Evidenced that FBDM defined, documented, implemented and maintains PO-EQX-FBDM-PLA-004 - Chemical Products Unloading and Preparation Operation and PO-EQX-FBDM-PLA-015 - Cyanide Neutralization and Decontamination of Parts, Equipment and Personnel Protective Equipment (PPE) Contaminated with Cyanide which define methodology for preventing exposures and releases during cyanide unloading activities such as operation and maintenance of all hoses, valves and couplings for liquid cyanide. Reviewing inspections records it was evidenced that hoses, valves and couplings have been inspected in accordance Brazilian legislation. During field audit was evidenced that a.m. procedures are duly implemented. Evidenced that all involved personnel were trained as previously required. For additional informations, please see Principles 4 and 8. Field Interviewed personnel showed to be aware of this matter. It is defined that in the case of occurrence an incident involving liquid cyanide release in this area, for instance any spills of cyanide during transfer of liquid cyanide from tanker trucks and isotainer the product is easily recovered by using environmental kits. It was not evidenced incident reports in the last three years. Evidenced that internal documented procedure PO-EQX-FBDM-PLA- 004 - Chemical Products Unloading and Preparation Operation establishes methodology to prevent exposures and releases during cyanide unloading requiring the appropriate use of PPE and having a second individual observe from a safe area, or observe remotely by video. It is clearly defined the PPEs to be used as well as the needing the prior inspection of them. During the field audit, it was evidenced that operators performing unloading of liquid cyanide using the appropriated PPE as stated as well as they issued pre work records as required such as: Sampled examples were: (Polyvinylchloride) (PVC) boots; protective goggles; helmet with jugular; panoramic mask with gas filter; shell-type noise damper; Long-length PVC gloves, cowhide glove; nitrile rubber glove; tyvek or tychem coverall, radio communication, Pocket Preliminary Analysis Task (APT) and Work Permit (PT) reports. Reviewing PPE inspection records it was not that they have been inspected before the use as previously stated. Besides, during the field audit it was evidenced a second FBDM's individual operator observing the activity being performed from a safe area. During field audit was evidenced that a.m. procedure is duly implemented. After unloading FBDM cleans cyanide residue from hose connections and seals on tank trucks and/or isocontainers after unloading events and before returning empty containers to the supplier.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

This activity is followed according to the procedure PO-EQX-FBDM-PLA-004 - Chemical Products Unloading and Preparation Operation, which describes the steps for carrying out the activity with the support of the procedure PO-EQX-FBDM-PLA-015 - Cyanide Neutralization and Decontamination of Parts, Equipment and PPE Contaminated with Cyanide.

Reviewing training records evidenced that all involved personnel were duly trained. FBDM does not use empty cyanide containers. FBDM does not use cyanide drums plastic bags and liners.

The addition of a dye to high concentration liquid cyanide supplied by Proquigel and received at the mine is made at Proquigel facility before delivery to the FBDM site. The liquid cyanide received in FBDM is has the dye Carmoisine for quick visual assistance in identifying the product, as required by the Cyanide Management Code program of the International Cyanide Management Institute. The use of this dye by Proquigel is registered in the (Sodium Cyanide Product Manual -POR-ENG-ESP, Ver:2) and upon arrival at FBDM mining the product must be operated according to the procedure (PO-EQX-FBDM-PLA-004 - Unloading and Preparation Operation of Chemical Products) ensuring that the colorant is added. Since the addition of the dye is mandatory, it has never been evident that the dye was not used.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Principle 4 | OPERATIONS

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

### Standard of Practice 4.1

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

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

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM defined, documented, established, implemented and maintains several documented procedures included unloading, and storage facilities, process plants, , tailings impoundments, FBDM does not have heap leaching. Sampled examples were PO-EQX-FBDM-PLA-001 - Operation of Dam and Containment Basin; PO-EQX-FBDM-PLA-002 – Leaching Operation; PO-EQX-FBDM-PLA-004 - Chemical Products Unloading and Preparation Operation; PO-EQX-FBDM-PLA-010 - Grinding Preparation and Gravimetry; PO-EQX-FBDM-PLA-015 - Cyanide Neutralization and Decontamination of Parts, equipment and PPE contaminated with cyanide; RE-EQX-FBDM-SSMAC-001 - Internal Waste Movement; PO-EQX-FBDM-PLA-025 - Definition of Equipment Criticality and Management Strategies; Asset Maintenance; PO-EQX-FBDM-PLA-026 - Calibration, Measurement and Test Management; RE-EQX-FBDM-MAN-073 - Asset Criticality Rating - Equinox Gold; RE-EQX-FBDM-PLA-007 - Release of Equipment for Maintenance; Inspection Route: 303 - Cyanide transfer pipe; Inspection Guide: 299 - Well pump - emergency; RE-EQX-FBDM-PLA-002 - Daily Tailings Dam Inspection Report; RE-EQX-FBDM-PLA-013 - Diesel Pump Check List; PG-EQX-FBDM-SSMA-035 - Material Handling and Storage; PO-EQX-FBDM-PLA-012 - Sampling Operation; PO-EQX-FBDM-SSMAC-038 – Management On Change; RE-EQX-FBDM-PLA-034 - Inspection of Containment Basins During the field audit evidenced that FBDM has been implemented the necessary operational controls for operating FBDM’s cyanide facilities related to its environmental aspects and impacts and hazards and risks to occupational health and safety. FBDM identified those tasks that, if not performed properly, have the potential to cause cyanide exposures or releases and defined measures to mitigate and control them. Reviewing inspection records it was evidenced the effective implementation of operational documented procedures as stated. The operation has a plan called ‘Water Balance’ for water management involving captured water, reused water and stored water to maintain projected storage capacities. Evidenced that FBDM defined, documented, implemented and maintains internal procedures which identify and account for the assumptions and

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

parameters on which the facility design was based and any applicable regulatory requirements. These documents apply to unit operations such as: Cyanide reception, Cyanide Storage,; Crushing, Milling; Clarification; Thickening; Intensive Leaching (CIL): Filtration; Acid Wash; Elution; Carbon Regeneration; Electrolysis; Fusion. Evidenced That FBDM's procedures clearly identify the assumptions and parameters on which the facility design was based and specify operating requirements to prevent cyanide releases. The Variable Control Operation provides guidance by filling out the forms in the a.am. operational control areas as well as identifying deviations in the measured variables regarding performance indicators and carrying out continuous monitoring and correction are APT, PT, Pre Use Check list, Operational Inspection records; Maintenance Inspection Records. Evidenced that documented procedures clearly define parameters such as the design and required freeboard for the dam, the concentration of cyanide discharged to and allowed in surface water, the concentration of Weak Acid Dissociable (WAD) cyanide in open water as well as the designed storm events for process solution. Tailings dam were reviewed and showed that they are in accordance International and Brazilian regulations. The mine has operational contingency procedures and plans such as 'Mine Closure Plan rev 2022' and 'Environmental Monitoring Plan' that take into account how cyanide will be safely managed during long-term shutdowns or cessation of operations. These documents are included in site cyanide management including locations with possible presence of cyanide with ongoing facility inspections and required maintenance, water monitoring activities or possibly draining process solution tanks and piping, draining process washing and neutralization tanks. Reviewing FBDM's documentation it was evidenced that they incorporate and reference the assumptions and parameters on which design was based. During field, audit and reviewing FBDM's documented procedures and records assessed provided evidences that procedures were in place, they include design parameters and that are effective to prevent cyanide releases and exposures consistent with applicable requirements. FBDM defined, documented and maintains procedures that describe the standard practices necessary for the safe and environmentally sound operation including the specific measures needed for compliance with the Code, such as water management, inspections and preventive maintenance activities. It was evidenced that the procedure PO-EQX-FBDM-PLA-025- Definition of Criticality of Equipment and Management Strategies Asset Maintenance, which aims to establish the criticality of the Processing Plant's assets through criteria developed and applicable for the areas of Operation, Dam, Maintenance (Mechanical and Electrical), Instrumentation, Safety, Health, Environment and Community. With Based on the criticality class of the assets, the maintenance strategy to be implemented is indicated to the factors of: Use, Objectives, Maintenance Method, Spare Parts Policy, Policy of Investment, Security, Health, Environment and Community. The objectives of classifying assets in terms of criticality are, in addition to indicating the degree of importance of each asset within the production process, safety and environment, subsidizing the preparation of the Maintenance Plan, assist in the selection of maintenance methods, prioritize analysis of investment failures and complications. The definition of criticality must be carried out by a multidisciplinary team composed of professionals the following areas: • Maintenance (Mechanical and Electrical); • Instrumentation; • Operation; • Dam; • Security; • Health; • Environment and • Community. The determination of criticality

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

is based on the following factors: • Impact on Safety and Health (Factor A); • Impact on the Environment and Community (Factor B); • Impact on Production (Factor C); • Impact on Maintenance Cost (Factor F); • Frequency of Failures (Factor E); • Execution time (Factor D). Maintenance, calibration and inspection plans are prepared in accordance with maintenance strategies and guidance derived from the Manufacturer's Manual. All maintenance, calibration and inspection plans are addressed into the FBDM computerized system. The minimum requirements for preparing maintenance, calibration and inspection plans are: • Specific structured code; • Title referring to its content; • Tasks to be performed, in logical sequence; Specialties; • Expected times; • Materials and quantities; • Tools and instruments; • PPE to be used; • Frequency; • Technical control parameters and their tolerance ranges; • Minimum-security requirements, as well as Human Resources Qualification required. Note: Records of Maintenance (Preventive, Predictive, and Corrective), Calibration and Inspection are maintained for at least 3 years. Reviewing FBDM's documentation noted that defined, documented and implemented Maintenance Service Order (OS) which is a document that has two objectives. First of all it is a document that defines all necessary informations about the maintenance to be performed such as the named Why?/ Who?/When?/ Where?/What?/How? (5W1H). The other function of OS is for recording the results obtained from the maintenance performed. Evidenced internal maintenance's procedures identifying external documents to be used as reference. FBDM established, documented, implemented and maintains internal documented procedure PO-EQX-FBDM-SSMAC-038 – Management on Change to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures, and incorporate any measures necessary to protect worker health and safety and the environment. The purpose of this procedure is to establish guidelines to ensure that permitted changes are evaluated prior to implementation and are defined, implemented and innovated as control measures to reduce to a tolerated level potential impacts or hazards to people, the environment, the quality of product and property. It applies to all areas of the unit, covering direct or contracted workers. Responsibilities and authorities are clearly defined, documented and communicated. Besides, it is defined that Form RE-EQX-FBDM-SIG-004 shall be used for recording. Management on Change. Evidenced duly implemented. It was evidenced that FBDM has a management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases, such as: an upset in the operational water balance that presents a risk of exceeding the design containment capacity; problems identified by facility monitoring or inspection; and temporary closure or cessation of operations due to situations such as work stoppages, lack of ore or other essential materials, economics, civil unrest, or legal or regulatory actions. Sampled examples were Emergency Action Plan for Mining Dam Metallurgical Plant Decommissioning; FBDM Emergency Action Plan. Evidenced that procedures consider the temporary closure or cessation of operations. Reviewing pertinent FBDM's documentation it was evidenced that FBDM have been addressed effectively planned responses to the potential issues. Evidenced that FBDM defined, documented, established, implemented and maintains methodology for inspecting the required by Principle 4.1. at unloading, storage, and process areas, as applicable to the site. Reviewing

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

inspections forms, it was evidenced that they direct the inspector to evaluate specific items. Reviewing FBDM's documentation, it was evidenced that OS clearly define the named 5W1H for inspection activities. Sampled examples were Cyanide Solutions Storage Tanks Inspection; Cyanide Solutions Pumps, Valves and Pipelines Inspection; Containment Basins Inspection; Leak detection and collection systems Inspection. Reviewing inspections records it was evidenced that FBDM has been inspected cyanide facilities on an established frequency, according internal documented procedures, sufficient to assure and document that they are functioning within design parameters criteria. Additionally, reviewing internal documented procedure that establishes methodology for inspection in containment basins, it was noted that it defines that monthly inspection must be carried and duly recorded. Annual technical inspections must also be carried out for the cyanide containment basins, the issuance of a conclusive report and certificates of conformity, according to the Technical Inspection Schedule for Cyanide Containment Basins. Evidenced Cyanide Containment Basins Inspections for the period from 2021 to nowadays (2023) properly implemented. Evidenced Cyanide pipeline inspection records duly maintained in accordance with Brazilian legislation Evidenced Declaration of Evidenced Stability Condition Competence: 1st/2023 Entrepreneur: FBDM Dam Name: Dam Lake 1 and 2 Associated Potential Damage: High Risk category: Low Municipality/UF: Barrocas/Bahia Last inspection data: 07/03/2023 Declaration for monitoring and verification purposes with the National Mining Agency (ANM), which carries out Regular Dam Safety Inspection within the structure specified according to the Regular Dam Safety Inspection report, prepared on 03/29/2023, and attesting to stability in accordance with Law No. 12,334, of September 20, 2010 and current ANM Resolutions. During the audit, the auditor reviewed FBDM's internal documented procedures which clearly define methodology for cyanide facilities inspections incorporating the through the named 5W1H and defining the pertinent established frequencies to be followed, reviewed several inspection records of cyanide facilities and, as already mentioned, during the field audit, the auditor performed its own inspection on FBDM's facilities in which proved that cyanide facilities are in good order. In accordance with my professional judgment, I conclude that inspection and monitoring programs currently in place by FBDM as well as the established frequencies are adequate to ensure and document that they are functioning within design parameters that cyanide facilities ensure and document that cyanide facilities are functioning within design parameters. As already mentioned, OS and others internal documented procedures identify specific items to be observed. Reviewing inspection records it was evidenced that they include date of the inspection, the name of the inspector, and any observed deficiencies as well as the nature and date of corrective actions ( when applicable) documented, and are records retained. Evidenced that FBDM defined, documented, implemented and maintains preventive maintenance programs and activities to ensure that equipment and devices function as necessary for safe cyanide management. It is defined and documented that shall be determinate for each equipment and devices its criticality classified based on parameters such as: Occupational Hazards and Risks to workers; Significant Environmental Aspects and Impacts; Applicable Legal Requirements; Demands; to the Maintenance indicator called Mean Time Between Failures (MTBF); to the Maintenance indicator called to the Maintenance indicator called Mean Time To Repair

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

(MTTR). As already mentioned, Reviewing FBDM's documentation noted that defined, documented and implemented Maintenance Service Order (OS). Evidenced documented procedures duly implemented by FBDM related to maintenance management. Sampled examples were PO-EQX-FBDM-PLA-025 - Definition of Equipment Criticality and Management Strategies; Asset Maintenance; ANNEX 1 - RE-EQX-FBDM-MAN-073 - Asset Criticality Classification; ANNEX 2 - PO-EQX-FBDM-PLA-026 - Calibration, Measurement and Test Management; RE-EQX-FBDM-MAN-073 - Asset Criticality Rating - Equinox Gold. • PO-EQX-FBDM-PLA-026 - Calibration, Measurement and Test Management; Norsok Z-0003 – Criticality Analysis for Maintenance Purposes; RE-EQX-FBDM-PLA-007 - Release of Equipment for Maintenance; Sensitive Inspection Plan, Lubrication Plan, Preventive Maintenance Plan and Predictive Maintenance Plan. The auditor reviewed the above mentioned maintenance plans and concluded that they are consistent with aiming of protect occupational health and safety of workers as well as protecting environmental media. Reviewing maintenance records it was evidenced that FBDM has been performing and recording maintenance results in accordance with previously planned in the respective Plans (Sensitive Inspection, Lubrication, Preventive Maintenance and Predictive Maintenance). Interviewing maintenance personnel, it was noted that they clearly know how performing and maintenance activity, the specific items to be verified, and the respective acceptance criteria as well as what they have to do if anomalies are detected. During field audit, the auditor verified the cyanide facilities are in good conditions. Based on all the a.m. factors it was evidenced that FBDM has been adequately performing preventive maintenance activities as stated. Evidenced during field audit, that FBDM has necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. Reviewing FBDM's Inspection Plan as well as FBDM's Preventive Maintenance Plan that generators are included in the above-mentioned Plans with monthly frequency. Reviewing inspection records and preventive maintenance records it was evidenced that FBDM has been inspecting and performing preventive maintenance of its generators as stated. All ponds that contain process solution are inspected on a daily basis through using specific check list (RE-EQX-FBDM-PLA-002 - Daily Tailings Dam Inspection Report) and monitored by 6 wells surrounding the sample collection sites and chemical analysis in addition to collecting samples from the pond lake bed and drain. Samples are collected weekly at points Lago IV and Dick de Fundo and recorded and monitored in the (NaCN Control Reports) and data from the 6 wells are recorded and monitored in the (Environmental Assurance Technical Report - RTGA) and monitored by wells surrounding the sites with sample collection and chemical analysis. All routine inspections cover the physical integrity of all surface water diversions necessary to maintain the unit's water balance.

## Standard of Practice 4.2

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

X in full compliance with

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

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

*Summarize the basis for this Finding/Deficiencies Identified:*

Yes. The operation has the practice of collecting samples using an online analyzer and collecting manual samples for titration and control of the Cyanide dosage automatically and in real time. The practice covered in the procedure (PO-EQX-FBDM-PLA-002 - Leaching and CIL Operation) is the collection of samples to be analyzed online (TACC3001) in tanks TQ532F03, TQ532F09 and TQ532F10 every 20 min and collections of manual samples throughout the other tanks every shift for comparison with the results of the online analyzer and/or when the analyzer is undergoing preventive and isolated maintenance. The TACC3001 controls cyanide through the FCV532F001, FCV532F201A and FCV532F201B control valves, dosing only the amount necessary to leach the mineral. The amount required for dosage control is determined through leaching diagnostic tests (Report - LIX Tests) which determined the ideal amount of cyanide to be used in the circuit, depending on the gold content and the type of ore.

## Standard of Practice 4.3

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

X 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/Deficiencies Identified:*

Yes, evidenced that FBDM defined, documented, implemented and maintains internal documented procedure Water Balance Control which defines guidelines and methodology for a FBDM's comprehensive, probabilistic water balance management model in such way that it identifies and quantifies the uses, sources and consumptions of water in a standardized and traceable way, reducing potential impacts of disturbances in the operational balance. This procedure applies to the operation, processes of the metallurgical plant, dam and environmental, safety and occupational health areas. Noted that responsibilities and authorities related to water management are defined, documented and communicated. reviewing the RE-EQX-FBDM – Water Balance, it was evidenced that the water balance considers the following in a reasonable and appropriate manner for the facilities and the environment considering: the rates at which tailings are deposited in tailings storage facilities, a projected duration of the storm and a storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be avoided during the operational life of the installation; The quality of existing precipitation and evaporation data in representing actual site conditions; The amount of precipitation

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

entering a pond or impoundment resulting from surface run- on from any up gradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground; ; Solution losses in addition to evaporation, such as the capacity of decant, drainage, allowable seepage to the subsurface, and allowable discharges to surface water; the effects of potential power outages or pump and other equipment and others aspects of facility design that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility. Reviewing water management records. The auditor evidenced that they include results of all analyzed parameters in the RE-EQX-FBDM – Water Balance. Evidenced duly implemented. as already mentioned evidenced that the water balance considers the rates at which solutions and the rates at which tailings are deposited into tailings storage facilities. The water balance considers all inputs and outputs that are measured such as pumping new water, pumping reused water, pumping non-rejected water through flow meters and considers rainwater and evaporation through rain gauges and evaporimeters. All this information makes up the water balance model, allowing predictability and being updated every six months through the bathymetric study of the lakes. Delving deeper into the balance in the downstream valley of the FBDM structures, currently for the rainy day scenario, a rain with TR ( Recurrence time) of 100 years occurring permanently along the entire propagation section as evidenced in (PAEBM - Emergency action plan for dams mining - Tailings Disposal System). FBDM does not have neither discharge in surface areas. The water balance storm model predicts a decamillennial storm. The (PAEBM - Emergency action plan for mining dams - Tailings Disposal System) provides that in the valley downstream of the FBDM structures, for the Rainy Day Scenario, a rain with a TR of 100 years occurring permanently is considered. throughout the propagation section. In this way, before the rupture, a flood was simulated in the downstream thalweg, referring to the Pau a Pique River, in order to create more realistic antecedent conditions and in favor of safety, preventing overtopping from occurring. Reviewing several records of RE-EQX- FBDM – Water Balance it was evidenced that they are duly implemented. The water balance considers a design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility. Reviewing several records of RE-EQX-FBDM – Water Balance it was evidenced that they are duly implemented. Besides, he water balance considers the quality of existing precipitation and evaporation data in representing actual site conditions data obtained from FBDM's instruments are compared to Brazilian reference Meteorology Brazilian Institute (INMET).. the water balance considers the amount of precipitation entering a pond or impoundment resulting from surface run- on from any up gradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground. Reviewing several records of RE-EQX-FBDM – Water Balance it was evidenced that they are duly implemented. There is no potential of freezing. The water balance considers the effects of potential power outages or pump and other equipment failures on the drain down from the emergency removal of water from a facility. Reviewing several records of RE-EQX-FBDM – Water Balance it was evidenced that they are duly implemented. Reviewing several records of RE-EQX-FBDM – Water Balance it was evidenced that they are duly implemented. The water balance considers other aspects of facility design that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility. Evidenced the ponds and

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

impoundments designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations. There are inspections in place to ensure the control of all parameters. The results were reviewed and showed to be in accordance Brazilian regulation laws. FBDM implements operating procedures that incorporate inspection and monitoring activities to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment; Inspection and monitoring records as well as check list dam safety, geotechnical inspection dams were reviewed and demonstrated that the results are in accordance with Brazilian regulation laws. The dam's current instrumentation includes INA's (Water Level Indicators), Casagrande and Vibrant Rope piezometers, Surface Landmarks and Flow Meters. Monitoring wells are also located around the dam and in other locations on site, to monitor the water quality. FBDM measures the precipitation and compare the results to design assumptions. Records "reviewed showed be implemented as stated.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard of Practice 4.4

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

- The operation is  X in full compliance with Standard of Practice 4.4  
 in substantial compliance with  
 not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM defined, documented, implemented and maintains internal procedure PO-EQX-FBDM-SSMA-001 - Environmental Monitoring Plan which aims to establish a methodology for monitoring the quality of surface and underground waters and liquid effluents generated, water potability, monitor air quality as well as monitor noise levels in the FBDM environment and in strategic adjacent points, soil characterization and comparing the results obtained with the standards established by the respective applicable legislation. Samples for WAD cyanide determination are collected daily at the plant outlet before pumping to the tailings dam and weekly in the supernatant pond at the tailings dam.

Evidenced that there is no register of wildlife mortality caused by cyanide intoxication. Evidenced that FBDM defined, documented, implemented and maintains internal documented procedure PO-EQX-FBDM-SSMA-001 - Environmental Monitoring Plan that includes monitoring of surface water, groundwater and effluents, water potability, air quality, noise and soil characterization. Evidenced that above-mentioned documentation clearly define the localizations points for monitoring surface waters quality, groundwater and effluents. It is clearly defined the methodology for monitoring of cyanide in the waters contained in the tailings dam, the forms of cyanide that are analyzed and defines the monitoring points of industrial effluents that are collected in the dam. Reviewing WAD cyanide records it was evidenced that all sampled records showed WAD cyanide concentration less than 50 mg/l in open water

The auditor reviewed WAD cyanide monitoring for open waters records and concluded that FBDM does not present open water with WAD cyanide exceeding 50mg/l. Despite that, noted FBDM has been implemented special measure (fencing) as well as metal blocking siding, walls in concrete structures in the access to administrative areas (central entrance), fences in the environmental complex and in the metallurgical plant, in addition to barbed wire fence throughout the other areas as measures used to restrict access to wild animals and cattle in all open waters of the development. FBDM demonstrated during the audit that the cyanide concentration in open water in Tailings Storage Facilities, and ponds does not exceed 50 mg/l. The samples mentioned refer to those collected for WAD cyanide determination and not for wildlife mortality. FBDM does not have heap leaching.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard of Practice 4.5

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

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

*Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM defined, documented, implemented and maintains internal procedure PO-EQX-FBDM-SSMA-001 - Environmental Monitoring Plan that aims to establish a methodology for monitoring the quality of water surface, underground water, effluents,; water potability; air quality; environmental noise, and soil characterization. Evidenced that it includes informations such as A) methodology including Quality Assurance / Quality Control (QA/QC) data and protocols; B) Applicable legislation; C) Parameters to be analyzed for instance cyanide WAD, total and free; D) Sampling for instance points, localization, methodology, collection system, preservation, material resources; E) Responsibilities and Authorities for instance FBDM Area Team, Contracted personnel, F) Recording and reviewing monitoring results. Evidenced that surface water monitoring is in accordance with the Resolution of the Brazilian Environmental Council (CONAMA) 357/2005 as well as required by the Institute of Environment and Water Resources (INEMA) from Bahia State. FBDM does not have direct discharge into surface waters. The monitoring points of surface waters are identified as PM01, PM27, PM43, PM46, PM51, PM64, PM67 and PM68. The auditor reviewed sampled surface water monitoring results of the last three years and concluded that the concentration of WAD cyanide in surface waters has been less than 0.5 mg/l. Evidenced that FBDM does not have any direct discharge of solutions containing cyanide to surface water. The auditor reviewed sampled surface water monitoring results of the last three years and concluded that direct discharges to surface water did not cause the concentration of free cyanide in the receiving water to exceed 0.022 mg/l downstream of any established mixing zone. Evidenced that FBDM does not have any direct discharge of solutions containing cyanide to surface water. FBDM defined, documented, implemented and maintains internal documented procedure PO-EQX-FBDM-SSMA-001 - Environmental Monitoring Plan Plan that includes monitoring of surface water. Reviewing pertinent monitoring surface water records, it was evidenced that FBDM has been monitoring for cyanide in surface water and that results demonstrate there are no indirect discharges to surface water. FBDM does not have any record of indirect discharge to surface water. There is no record of indirect discharge to surface water.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard of Practice 4.6

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

- The operation is  X in full compliance with Standard of Practice 4.6  
 in substantial compliance with  
 not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM defined, documented, implemented and maintains internal documented procedure Water Balance Control in order to implement water management system in such way for managing seepage control systems to protect the beneficial use(s) of groundwater beneath and/or immediately down gradient of the operation. Reviewing pertinent records it was evidenced that internal documented procedure Water Balance Control is duly implemented. The cyanide areas are constructed with reinforced concrete floors with containment berms that provide containment against seepage. All cyanide solution pipelines are located within the containment areas and there are no cyanide buried pipelines. Collection drains and sumps are used to capture precipitation and any spillage and direct it to the process. The cyanide solution tanks are in areas provided of an impermeable barrier. The facilities are inspected and maintained to ensure the integrity these containment systems and prevent potential seepage. Evidenced that the secondary containments are covered by a HDPE, and all pipelines are within areas with secondary containment. Evidenced Containment Basins Inspections duly implemented. The tailings dam is completely covered by a synthetic geomembrane and operates daily following the procedure (PO-EQX-FBDM-PLA-001 - Operation of the Tailings Disposal System) where all lakes containing process solution are operational with monitoring of check list (RE-EQX-FBDM-PLA-002 - Daily Tailings Dam Inspection Report) and monitored by 6 wells surrounding the sites with sample collection and chemical analysis in addition to collecting samples from the lake bed and drain. Bed samples are collected weekly at points Lago IV and Dick de Fundo and recorded and monitored in the (NaCN Control Reports) and data from the 6 wells are recorded and monitored in the (Environmental Assurance Technical Report - RTGA). The deposition of waste in the lake that contains process solution (Lake IV) is done following the procedure (PO-EQX-FBDM-PLA-001 - Operation of the Waste Disposal System) through a tap pumping system that is moved as needed. During the field audit, the auditor evidenced that the involved areas are in good conditions. Evidenced that FBDM defined, documented, implemented and maintains internal procedure PO-EQX-FBDM-SSMA-001 - Environmental Monitoring Plan that aims to establish a methodology for monitoring the quality of water surface, underground water, effluents,; water potability; air quality; environmental noise, and soil characterization. Evidenced that it includes informations such as A) methodology

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

including Quality Assurance / Quality Control (QA/QC) data and protocols; B) Applicable legislation; C) Parameters to be analyzed for instance cyanide WAD, total and free; D) Sampling for instance points, localization, methodology, collection system, preservation, material resources; E) Responsibilities and Authorities for instance FBDM Area Team, Contracted personnel, F) Recording and reviewing monitoring results. Evidenced that groundwater monitoring is in accordance with the Resolution of the Brazilian Environmental Council (CONAMA) 396 of August 7, 2009 as well as required by the Institute of Environment and Water Resources (INEMA) from Bahia State. The auditor reviewed sampled under ground water monitoring results of the last three years and concluded that both free cyanide as well as total cyanide are below levels that are protective of identified beneficial uses of the groundwater. FBDM does not use mill tailings as underground backfill. there is no record of seepage from the operation that has caused cyanide concentrations of ground water to rise above levels protective of beneficial use.

## Standard of Practice 4.7

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

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

## *Summarize the basis for this Finding/Deficiencies Identified:*

FBDM has been implemented spill prevention and containment measures provided for all cyanide unloading, storage, and process solution tanks. As already mentioned FBDM only uses liquid cyanide. During the field audit it was evidenced that all the cyanide concentrated solution and process solution tanks and vessels with 0.5 mg/l or greater WAD cyanide concentrations are provided with spill prevention and containment measures, such as secondary containment and impermeable varnish. Besides, FBDM has been implemented and maintains an inspection system of containment basins duly implemented. The frequency used for this inspection was analyzed and are appropriated. Besides, reviewing pertinent record (RE- EQX - FBDM - PLA - 034 - Inspection of Containment Basins) used for this inspection, it was noted that it contains all requirements related to Code's Standard Practice of 4.7. Results recorded in the checklist demonstrated that secondary containments are as stated. During field audit, the auditor evidenced that that the above-mentioned areas are in excellent conditions. Reviewing design documentations including design drawings, data on tanks and vessels, containment's available volume calculations accounting for the volume occupied by the tanks as well as observations from the field audit it was evidenced that all cyanide storage, and process tanks and vessels with 0.5 mg/l or greater (WAD) weak acid dissociable contain secondary containment sized to hold a volume greater than that of the largest tank within the containment in accordance with Brazilian regulations and by Code's Standard Practice of 4.7 as well as any piping draining back to the tank, and with additional capacity for the design storm event. Besides, during field audit, it was verified through visual

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

observation that there are no materials stored within the above-mentioned containments that compromise the necessary defined capacity. FBDM has been defined, documented, Implemented and maintains internal documented procedures to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. Reviewing designed documents was evidenced that the system to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water has been designed with sumps and dedicated pumps and piping to return all such water to the production process. Reviewing operational documented procedures it was noted that it establishes all necessary steps to avoid discharge of cyanide solution into the environment in cases of spillage as clearly defines that no water collected in containment shall be discharged to the environment since all water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not. FBDM does not have process tanks without secondary containment. Besides, all cyanide tanks are installed on concrete impermeable barrier between the tank bottom and the ground During the field audit evidenced that all cyanide process solution pipelines are provided with spill prevention to collect leaks and prevent releases to the environment. During the field audit evidenced none areas where cyanide pipelines present a risk to surface water and requiring special risks. All pipelines are within controlled areas, by secondary containments. FBDM defined, documented, implemented and maintains several documentation such as Isometric Drawing, As Buit Drawing, Flow sheet, Data Sheet, Project Memory, Engineering Manual, Materials Technical Specification including pipes, valves, fittings, flanges and other components. and other documents necessary for the execution of the project. The design and manufacture of subsidiary systems will be in accordance with the relevant codes and standards from regulatory agencies and institutes such as: (ABNT) Brazilian Association of Technical Standards; (ANSI) American National Standards Institute; (ASME) American Society of Mechanical Engineers; ASME B31.3 Process Piping (2034-01-4000-SPE-P- 0001); Reviewing design documentation and during field audit evidenced that all cyanide tanks are made of carbon steel ASTM A-36 and pipelines are made of carbon steel ASTM 53B and ANSI B36.10 or HDPE being constructed of materials compatible with cyanide and high pH conditions. All cyanide process solution pipes, including waste pipes, are operated periodically and have secondary containments and are positioned on impermeable floors allowing leak containment and action in accordance with the 'Cyanide Emergency Response Plan - PAE Cyanide' procedure. ' . . Secondary containments are made up of waterproof reinforced concrete floors and channels in regions where the waste pipelines are closest to the plant and geomembrane in regions where there is no concrete.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard Practice 4.8

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

- X 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/Deficiencies Identified:*

1. The entire construction of the tailings dam was based on Brazilian legislation and standards from the ANM (National Mining Agency) and the International Cyanide Code, following daily monitoring by the company's own engineering team and contracted service to issue the ATO (Technical Monitoring of Work). During the construction process and assessment of conformity to the executive project, several quality control tests were carried out, such as a soil characterization report by the company Infratech analyzing the Liquidity Limit, Plasticity Limit, Granulometric Analysis, Compaction and Characterization Test, Index of California support, Density and mass specifically following standards NBR 7180, NBR 6459, NBR 7181, NBR 6457, NBR 9895, etc. The results were presented in the report TESTING OF PHYSICAL LIMITS IN A SOIL SAMPLE and as treatments when necessary registered in the ACT. All material used for heightening was carried out with a granulometric test in accordance with ABNT NBR 7181 - Soil: Granulometric Analysis (Sieving) and in situ density analysis using the Sand Bottle Method DNER ME 092. Each construction layer was tested using the compacted soil impermeability test and compacted layer density testing and registered. A geomembrane used for soil waterproofing was purchased and installed according to minimum thickness ASTM D 5199 and tested in the field for tensile strength at flow, deformation at flow, tensile strength at break and deformation at break according to ASTM D 6693, tear resistance according to ASTM D 1004 and punching resistance according to ASTM D 4833. In addition to these, weld tightness tests and Spark test were carried out. Evidenced that FBDM operation implemented quality assurance and quality control (QA/QC) programs during construction of the tailings impoundment and related ancillary facilities and update each protocol question Evidenced that FBDM conducted quality control and quality assurance programs for new and existing cyanide facilities and modifications to existing facilities, including cyanide unloading, storage, and other cyanide facilities in accordance with is defined in the Code's *Definitions and Acronyms* Evidenced documentation for QA/QC management system which includes several requirements including detailed design requirements; technical specifications; legal requirements; materials quality specifications; testing and certification; visual inspections and testing of construction work; inspection of offsite fabrication work;) - Engineering, Procurement and Construction contractors; documents, drawings and records control system, commissioning consultancy; review of material specifications (steel quality specifications and tests, inspections/testing of rebar and concrete for foundations, weld inspections and tests of steel works, and paint bonding tests for tanks and piping. FBDM has as quality control and quality assurance programs addressed the suitability of materials and adequacy of soil compaction for

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used, and for construction of cyanide storage and process tanks. Specialized contractors were hired to carry out quality control for controlling the implementation of the activities required by Cyanide Code.. Reviewing pertinent documents and records it was evidenced that FBDM has been maintained quality control and quality assurance records for cyanide facilities. Quality control and quality assurance documentation define a systematic for inspection of facilities records as defined by orders that are automatically generated by FBDM system. Evidenced that records demonstrate that FBDM has been retained quality control and quality assurance records in accordance with the orders generated by Datasul system. Evidenced that appropriately qualified personnel reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved. Verified that engineering personnel involved with the above-mentioned activity is appropriately qualified person based on their education, training, expertise and experience. FBDM has available quality control and quality assurance documentation. The entire construction of the tailings dam was based on Brazilian legislation and standards and the International Cyanide Code, following daily monitoring by the in-house and contracted engineering team according to documents made available to the auditor. Evidenced that FBDM operation implemented quality assurance and quality control (QA/QC) programs during construction of the tailings impoundment and related ancillary facilities and update such as an appropriately qualified person reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved quality control and quality assurance programs addressed the suitability of materials and adequacy of soil compaction for earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used in ponds and for construction of cyanide storage and process tanks, quality control and quality assurance records been retained for cyanide facilities, and an appropriately qualified person reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved As already mentioned the entire construction of the tailings dam was based on Brazilian legislation and standards and the International Cyanide Code, following daily monitoring by the in-house and contracted engineering team according to documents made available to the auditor.


## Standard of Practice 4.9

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

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

*Summarize the basis for this Finding/Deficiencies Identified:*

**FBDM Mine**  
Name of Operation

  
Signature of Lead Auditor

10/01/2024  
Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

Evidenced that FBDM defined, documented, implemented and maintains internal documented procedure Wild Life Management Rescue and Scaring away Plan issued by Lima Zootecnia on behalf of FBDM. The Fauna Rescue Program is an environmental document that includes all anthropic discipline strategies allow for the protection and destination of faunal biota, whether direct or indirect by impacts resulting from event of incidents involving cyanide, within FBDM's premises or in cases of specific occurrences in the various areas of direct and indirect influence of FBDM. The actions of protection and management designed through chasing away, objectively protecting the fauna. In addition to wildlife protection, the strategies carried out in the Wildlife Rescue Program Fauna recommended in mitigating ecological impacts, as well as biodiversity of the location to be affected. the Plan defines that during wildlife self-rescue activities in areas affected by cyanide leaks, the use of HCN meters and PPE suitable for working with chemical products (goggles, boots, overalls, etc.); the responsible veterinarian can treat Rescued animals that, by chance, present abnormal patterns of activity or even simple injuries, in the field. When they present serious injuries, it must be forwarded to Wild Animal Screening Center (CETAS) or partner institution for clinical care and rehabilitation until its appropriate destination is defined. Animals started in the enterprise's CETAS must receive care specific foods such as feeding, treatment and ambiance of specific foods by species, with the monitoring and responsibility of a qualified professional or the care and application of veterinary procedures in wildlife, from fauna rescue, their characteristics will be taken into account anatomical and physiological, as well as the risks offered to employees involved in the activities, containment techniques, their numerous zoonoses and anthroozoonosis, normal physiological values and especially the sensitivity of animal faced with stress. For transporting and releasing, it is defined that: a) All animals must be transported in protected vehicles with adequate ventilation and must be contained in containers suitable for the fauna group; b) The environment chosen for the release of the animals must contain characteristics consistent with the animal's habits, such as environments suitable for herbivores, carnivores, edentulous animals and so on for all groups of animals that, by chance, apply to the Environmental Declaratory Act (ADA).; c) The most appropriate time for releasing the animal must be considered, according to its habit, so that it can adapt as quickly as possible to the new environment. Evidenced that FBDM established, defined, documented, implemented and maintains internal written standard procedures for monitoring plans or procedures for wildlife and water quality in order *to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality, such as PO-EQX-FBDM-SSMA* which clearly define methodology for monitoring the quality of surface water, groundwater, liquid effluents, potability, air quality, noise and soil characterization and for monitoring of fauna and flora . Evidenced that they clearly define applicable legal requirements, sampling techniques, sampling points, parameters to be monitored, frequency of analysis, analytical

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

procedures, necessary resources (human and material), and preliminary technical analysis of analytical results and dissemination of results. FBDM defined that only uses (ISO) – International Organization for Standardization (NBR) – Norma Brasileira Registered 17025 certified laboratories to perform environmental analysis. Evidenced that FBDM established, documented and implemented and maintains PO-EQX-FBDM- SSMA-001 Environmental Monitoring Plan that clearly defines methodology for sampling activities . FBDM defined, documented, implemented and maintains internal documented procedure PO-EQX-FBDM-LAB-004 - Determination of WAD, Total and Free Cyanide Concentration in solid and liquid samples where Weak Acid Dissociable (WAD) Cyanide: - Those cyanide species liberated at moderate pH (pH 4.5) such as aqueous HCN and CN<sup>-</sup> , the majority of Cu, Cd, Ni, Zn, Ag complexes and other metal cyanide complexes having similar low dissociation constants; Total Cyanide: A measurement of cyanide concentration that includes all free cyanide, all WAD cyanide complexes and all strong metal cyanides including ferro-cyanide Fe(CN)<sub>6</sub><sup>-4</sup> , ferri-cyanide Fe(CN)<sub>6</sub><sup>-3</sup>, and portions of hexacyano cobaltate Co(CN)<sub>6</sub><sup>-3</sup> and those of gold and platinum. Only the related or derived compounds cyanate (CNO<sup>-</sup>) and thiocyanate (SCN<sup>-</sup>) are excluded from the definition of total cyanide and Free Cyanide: The uncomplexed cyanide ion (CN<sup>-</sup>) and gaseous or aqueous hydrogen cyanide (HCN). Reviewing above-mentioned procedure PO-EQX-FBDM-LAB-004 it was evidenced that it includes Principle of the Method; Equipment and Instruments; Glassware and Accessories; Reagents; Actions to Control Environmental Aspects; Evidenced that all sampling and analytical protocols have been developed by FBDM's chemicals lab in accordance with (AWWA) - Standards Methods for the Examination of Water and Wastewater, of the National Guide for the Collection and Preservation of Samples of the ( ANA) National Water Agency and the ( CETESB) – São Paulo State Environmental Company, and of the Associação Brasileira de Normas Técnicas (ABNT) Norma Brasileira Registrada (NBR) such as NBR 9897/87 - Sampling planning of liquid effluents and receiving bodies; NBR 9898/87 - Preservation and sampling techniques for liquid effluents and receptors; NBR 13895 - Construction of monitoring wells and monitoring of groundwater. Evidenced that FBDM's analytical protocols have been developed by an appropriately qualified person as defined in Code's *Definitions and Acronyms*. Evidenced that sampling conditions (weather, livestock/wildlife activity, anthropogenic influences) and procedures documented by FBDM in accordance with PO-EQX-FBDM-SSMA-001- Environmental Monitoring Plan, Biodiversity Monitoring Plan. It is defined that monitoring results reports shall include recording all sampling conditions that may affect the analysis. Reviewing pertinent records it was verified that FBDM actually records sampling conditions. Evidenced duly implemented as stated. FBDM has been conducted the monitoring at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. The monitoring frequencies are defined by the INEMA Bahia State as well as Federal Brazilian legislation. My professional judgment to evaluate the adequacy of FBDM's monitoring frequencies I conclude that the defined monitoring frequencies are adequate to characterize the medium being monitored and to identify changes in a

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

timely manner based on amount of existing data, the stability of the parameters being monitored, and for groundwater, the depth to groundwater.

## Principle 5 | DECOMMISSIONING

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

### Standard of Practice 5.1

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

The operation is  X in full compliance with  
 in substantial compliance with Standard of Practice 5.1  
 not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

FBDM defined, documented, implemented and maintains documented procedures for decommissioning cyanide facilities at the cessation of operations named as FBDM's Mine Closure Plan (PFM) issued by Mineral Engenharia e Meio Ambiente on behalf of FBDM and dated on March 2022. The auditor reviewing – FBDM's PFM evidenced that it is in accordance with Brazilian legislation such as ANM Resolution 68 dated on April 30, 202, Registered Brazilian Standard (NBR) 13030 and Mining Regulatory Standard (NRM) 19, 20 and 21. The areas covered by the decommissioning plan are – Civil and industrial installations; – Open pit and waste rock piles and soil piles; – Underground mine; – Tailings dams; – Anthropogenic areas and access roads. FBDM industrial facilities are designed to feature large structures in concrete in its foundations (footings, baldrams and slabs); and heavy metallic structures (beams, columns and trusses), designed to support large equipment. An area of treatment and concentration of ores is a region that demands greater attention, as it contains heavy equipment, at high heights and in some cases with contamination. Next are designated as FBDM's main industrial facilities, object of the decommissioning: – Primary crushing; – Riveting and sieving Grinding; – Gravimetric Concentrator / Acacia; – Thickening; – Leaching/Adsorption; – Desorption/Electroposition; – Acid washing and regeneration; – Well (underground mine); – Belt conveyors; – Central Workshop; – Warehouse. Civil installations within the FBDM complex are mostly land-based, built in masonry, featuring some constructions in concrete and metal structures. Of particular note are administrative buildings, storage sheds and water tanks. These buildings, as they are in use, are in good condition. When to stop given the decommissioning, it is possible that some of these facilities will be

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

maintained, to that are used depending on the future determined use of the complex. The following are highlights the main Civil Installations in the complex: Guardhouses; – Medical post; Ordinance; – Seedling nursery; – Water castle; – Cafeteria; – Leisure area; – Testimony warehouse; – Scale house; – Point room; Security building / Medical service / Environment; – Laboratories; – Control room; – Deposits; – Changing rooms; – Administrative building / Geology / Mine. It was evidenced that item XIII of the PFM presents the professionals and respective class records of the team that Participated in the preparation of the Mine Closure Plan. PMF includes an implementation schedule for decommissioning activities. Reviewing FBDM's PMF the auditor evidenced that it defines the relevant schedules in several items. Sampled examples of schedules were: A) PMF Item VIII.7.6 in Table VIII.7-6 displays the Physical Schedule for implementing and maintaining Revegetation of the Areas covered by this Degraded Areas Recovery Plan (PRAD). Evidenced that this physical schedule of the revegetation process, considers the planting stages such as: stage 1 - green plots, stage 2 - blue plots, stage 2 - red plots and stage 3 - yellow plots; B) PMF item VIII.8.1 defines methodology for the Air Quality Monitoring Program Schedule. Activities related to the post-closing phase involve the execution of several actions generating atmospheric emissions, making it necessary to adopt measures to control and minimize pollution. During the demobilization activities of the project, emissions will be generated atmospheric emissions from burning fossil fuels (such as diesel and gasoline) by machines and equipment used in works. Suspension of material is also planned particulate matter due to earth movement and due to the traffic of vehicles and machines on roads unpaved (dust). The control measures suggested minimizing or avoiding the generation of dust and gases cover.

Furthermore, it was evidenced the existence of a general schedule for macro activities such as: Engineering studies; Closing and recovery of pits; Recovery of waste rock deposits; Recovery of dams; Dismantling and demolition; Recovery of the Underground Mine; Revegetation and Environmental monitoring. clearly define a schedule for carrying out its proposed activities; this schedule show the order in which the planned activities will be conducted. . it was evidenced that FBDM updates its plans with sufficient frequency to reflect changes in the operation as they affect decommissioning, as well as changes in planned decommissioning techniques and measures. It is defined that, due to the dynamic nature of mining activity, this conceptual closure plan must be reviewed or updated throughout the useful life of the mine, preferably every five years, in order to refine and confirm the closure actions that by chance were carried out during this period (recovery actions concomitant with the operation), as well as reevaluating the other initial proposals for the closure/demobilization of the structures, considering the update scenario compared to that initially proposed for future use. . Therefore, it is possible to periodically update this conceptual closure plan, which must always consider the substantial changes that may occur in the project during its operations or in the conditions and aspects related to business stakeholders. In the revisions or updates to the plan must be incorporated into developments in knowledge about the area of the mine and its socio-environmental context, as well as applicable scientific and technological innovations, existing, from

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

the moment of its conception. It is clear that the main steps of Mine Closure Planning are presented in accordance with ICMM (International Council on Mining and Metals Guidance Manual 2019).

## Standard of Practice 5.2

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

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

*Summarize the basis for this Finding/Deficiencies Identified:*

.FBDM developed an estimate of the cost to fully fund third-party implementation of the cyanide-related decommissioning measures as identified in its site decommissioning or closure plan Item X of the PFM presents the costs of the FBDM's decommissioning costs.

Evidenced that Item X of FBDM's PFM presents the costs of Engineering Studies and Design for demobilization of the unit. The costs for recovering open pits refer to the filling activity of them with sterile material stored in the piles and deposition of organic soil (layer 0.3m). The detail of the revegetation cost is presented in a specific item, presented. For the purpose of estimating decommissioning costs for civil and industrial installations, around demolitions and removal of FBDM structures and buildings, a detailed estimates. This estimate was based on plans made available by FBDM, remnants from the time the original project was implemented. The quantities of weight of metal structures and equipment, slab areas, built areas, perimeters of walls, etc. The Cost of revegetation of degraded areas shows the revegetation costs, per hectare, through direct sowing, during five years of follow-up. Consideration was also given to carrying out enrichment planting in Preservation Areas Permanent and Legal Reserve. Table X.3.3-2 shows revegetation costs per hectare, during five years of follow-up. PFM at Table X.3.3-2 shows – Revegetation costs for enrichment – Permanent Preservation and Reserve Areas Legal. For the execution of the Surface and Groundwater Resources Monitoring Program, the points that encompass the current monitoring network of the FBDM. Regarding the periodicity of collections and analyses, a quarterly regime is planned for the first 5 (five) years after closure, in order to cover the entire hydrological cycle PFM X.8.1-1 presents the costs of collecting and analyzing surface water samples and underground, considering the parameters currently evaluated in the campaigns carried out by FBDM. Evidenced that FBDM' Mine Closing Plan defines that asset demobilization cost estimates are updated and reviewed annually, considering the evolution of operations and possible changes in projected project information of proven and probable

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

reserves as well as and when revisions to the decommissioning plan are made that effect cyanide-related decommissioning activities. Evidenced duly implemented. Sampled examples were Consolidated Cost Estimate Closure of the FBDM Mine – 2022; Consolidated Cost Estimate Closure of the FBDM Mine – 2021; Consolidated Cost Estimate Closing the FBDM Mine – 2020. It was evidenced t that FBDM's Mine Closure Plan presents the approximate distribution by phase of mine closure, as well as the distribution by structure to be deactivated and, the estimated Physical – Financial Schedule for the process of decommissioning FBDM Mine. Provision for environmental recovery its main objective is the formation of long-term values, for financial use in the future, when the asset's use ends. Cost estimates fully include third-party implementation of cyanide-related decommissioning measures, such as equipment decontamination; removal of residual cyanide reagents; neutralization of process solutions; and installation of permitted measures for the control or management of surface or groundwater, such as pumping and treatment systems that would operate during the facility closure period. The provisions taken by FBDM refer to the closure of the mine, with the completion of mining activities and the deactivation of assets linked to the mine. .FBDM confirms an obligation to demobilize assets in the year in which it is estimated that this will occur. FBDM considers accounting estimates related to the recovery of degraded areas and the costs of closing a mine as a critical accounting practice, as they involve significant amounts of provision and because they are estimates that involve several aspects, such as interest rates, inflation and useful life of the asset, considering the current combustion stage and projected combustion data for each mine. Financial audits have been carried out in accordance Brazilian and International auditing standards by a third independent of FBDM, in accordance with the relevant ethical principle set out and in the Accountant's Code of Professional Ethics and in the Federal Accounting Council, complying with other ethical responsibilities, in accordance with the standards. Cost estimates fully include third-party implementation of cyanide-related decommissioning measures, such as equipment decontamination; removal of residual cyanide reagents; neutralization of process solutions; and installation of permitted measures for the control or management of surface or groundwater, such as pumping and treatment systems that would operate during the facility closure period. As presented in the document Financial Statement Fazenda Brasileiro Desenvolvimento Mineral Ltda and in the Independent Auditors' Report on the Financial Statements issued by KPMG, it is concluded that “the financial statements referred to above present emphasis, in all relevant aspects, on the asset and financial position of the Treasury Brasileiro Desenvolvimento Mineral Ltda.” Cost estimates fully include what is stated in the PFM (Mine Closure Plan - Fazenda Brasileiro Desenvolvimento Mineral) with the implementation by third parties of decommissioning measures related to cyanide, such as decontamination of equipment; removal of residual cyanide reagents; neutralization of process solutions; and installation of permitted measures for the control or management of surface or groundwater, such as pumping and treatment systems that would operate during the facility closure period. The Brazillian Federal Constitution, the main Brazilian legal regulation defines the by the principle that the polluter pays for the environmental change and that is is responsible for correcting and mitigating the environmental condition when the project is found. The ANM (National Mining Agency) together with the Brazilian Constitution does not clearly define the estimated costs for decommissioning activities linked to cyanide, however, it defines the polluter pays principle where

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

the person responsible for the environmental change is responsible for correcting and mitigating the condition environment when the project is found. Therefore, it is understood that sleeping pill cyanide is included in this regulation and, as Fazenda Brasileiro Desenvolvimento Mineral Ltda. (FBDM) uses sodium cyanide, FBDM has the PFM (Mine Closure Plan - Fazenda Brasileiro Desenvolvimento Mineral) detailing the commissioning steps and an estimate of the resources required for this, including cyanide. The financial auditor who carried out the financial assessment of the self-insurance or self-guarantee mechanism presented a declared declaration that the operation or its controlling company has sufficient financial strength to comply with the decommissioning obligations. The audited financial projections for December, 2020, December 31, 2021 and December 31, 2022 were provided as objective evidence. At pages 3 to 5 of the Financial Statement Fazenda Brasileiro Desenvolvimento Mineral Ltda, the independent financial auditor (KPMG) presented the Independent Auditors' Report on the Financial Statements, concluding that he assessed that he carried out the financial assessment of the self-insurance or self-guarantee mechanism, presented a declared statement that the operation or its controlling company has sufficient financial strength to comply with the decommissioning obligation, including all actions involving cyanide. KPMG mentions in the report that "the financial statements mentioned above present improved, in all relevant aspects, the equity and financial position of Fazenda Brasileiro Desenvolvimento Mineral Ltda."

## 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  X in full compliance with  
 in substantial compliance with Standard of Practice 6.1  
 not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM defined, established, documented, implemented and maintains internal documented procedures that clearly defines methodology for describing how cyanide-related tasks such as unloading, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimize worker exposure. Sampled examples were: PO-EQX-FBDM-PLA-015 - Cyanide Neutralization and Decontamination of Equipment, PPE and Parts Contaminated with Cyanide; PO-EQX-FBDM-PLA-004 - Unloading and preparing chemical products; RE- EQX-FBDM-SSMA-082 - Check List Chemical discharge; PO-EQX-FBDM-PLA-012 - Sampling Operation; PO-EQX-FBDM-PLA-002 - Leach Operation; PO-EQX-FBDM-PLA- 001 - Dam and containment Basins Operation; RE-EQX-FBDM-PLA-002 – Daily Tailings Dam Inspection Report; RE-

**FBDM Mine**  
Name of Operation

  
Signature of Lead Auditor

10/01/2024  
Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

EQX-FBDM-PLA-013 – Diesel Pump Check List; RE- EQX- PLA-007 - Release of Equipment for Maintenance; RE-EQX-SSMAC-011 - Internal Waste Movement; PG-EQX-FBDM – SSMAC -081 – Cyanide Operations; PO-EQX-FBDM-LAB- 017 - Laboratory waste disposal. ; Reviewing above-mentioned procedures it was clearly evidenced that they not only focused on operations but they also describe cyanide-related safe work practices. Process control records provided evidences that FBDM has been performed its activities in such manner that it is minimized worker exposure.. During the field audit and interviewing field personnel, it was evidenced that they showed to be aware about how they shall conduct their activities in such manner that they minimize their cyanide exposure. FBDM established, documented, implemented and maintains internal documented procedures, which clearly define the use of PPE- Personal Protective Equipment and address pre-work inspections. Reviewing FBDM's documentation it was noted that all the documented operational procedures have a specific item which clearly identifies the required personnel protective equipment (PPE) as well as the respective pre-work inspections. Sampled examples were: PO-EQX-FBDM-PLA-015 - Cyanide Neutralization and Decontamination of Equipment, PPE and Parts Contaminated with Cyanide; PO-EQX-FBDM-PLA-004 - Unloading and preparing chemical products; RE-EQX-FBDM-SSMA-082 - Check List Chemical discharge; PO-EQX-FBDM-PLA-012 - Sampling Operation; PO-EQX-FBDM-PLA-002 - Leach Operation; PO-EQX-FBDM-PLA-001 - Dam and containment Basins Operation; RE-EQX-FBDM-PLA-002 – Daily Tailings Dam Inspection Report; RE-EQX-FBDM-PLA-013 – Diesel Pump Check List; RE- EQX-PLA-007 - Release of Equipment for Maintenance; RE-EQX-SSMAC-011 - Internal Waste Movement; PG-EQX-FBDM – SSMAC -081 – Cyanide Operations; PO-EQX-FBDM-LAB-017 - Laboratory waste disposal. FBDM defined and documented that before performing all activities shall be implemented and maintained records of using significant tolls for identifying potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them such as: Pocket Task Preliminary Analysis (PEACE) and Preliminary Risk Analysis of the Task (APRT). Reviewing PEACE and APRT records during the field audit it was evidenced pre work inspections have been duly implemented and recorded. Furthermore, during field audits, it was evidenced that workers cyanide involved carry out their day-to-day activities, using the necessities PPE. FBDM has been solicited as well as considered worker input in developing and evaluating health and safety procedures. Observed that FBDM established implemented and maintains procedures to review proposed process and operational changes and modifications for their potential impacts on worker health and safety, by several ways such as formal safety meetings, informal pre-work safety sessions for instance during the named Daily Safety Dialogue (DDS), which is carried out daily before work begins the suggestion boxes and incorporate the necessary worker protection measures, that were developed by the work force (operators & supervisors) and approved by the responsible manager. All operators and supervisors have been trained in the pertinent operational procedures and, at least, annually (as refreshment), the work forces review the risk profile, the operational procedures and, when necessary, these ones are updated. Planned job observations are also part of the operation management system. Interviewed operators and supervisors personnel

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

reported FBDM's management personnel to give suggestions and comments in order to improve health and safety procedures have solicited them. Evidenced duly implemented.

## Standard of Practice 6.2

*Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.*

The operation is  X in full compliance with  
 in substantial compliance with Standard of Practice 6.2  
 not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

FBDM defined, documented, established, implemented and maintains Internal documented procedure PO-EQX-FBDM -FBDM-PLA-002 - Leach which aims to standardize and detail the step-by-step and criteria for the leach operation. as well as guide users of the operational standard regarding health, safety and environmental risks, providing mitigating measures inherent to each activity of this operation. Reviewing PO-EQX-FBDM -FBDM-PLA-002 it was evidenced that it mentions in item 6.1 that the leaching operating range with a minimum pH value of 9.55. It clearly defines that the pulp from the thickening stage feeds tanks where oxygen is injected to oxidize the sulfides present in the ore. After this step, lime is added to increase the pH of the pulp to a value greater than or equal to 9.55 in order to avoid the formation of hydrocyanic gas (HCN). In the subsequent stage of the process (leaching), sodium cyanide is added. to leach the gold present in the ore and the same adsorbed on activated carbon (CIL). During the field audit and reviewing pertinent process records it was evidenced that the pH have been effectively controlled and monitored (through calibrated pH meter) in the operation. Alarm systems are in place. The pH is controlled through the online addition of soda solution using a calibrated flow meter. Interviewed field and control room operator and supervisors showed to be aware of this matter. . Interviewed field and control room operator and supervisors showed to be aware of these matters. FBDM has been identified areas and activities where workers may be exposed to hydrogen cyanide gas or cyanide dust in excess of 10 parts per million (ppm) (11 mg/m<sup>3</sup>) on an instantaneous basis and 4.7 ppm (5 mg/m<sup>3</sup>) continuously over an 8-hour period, as cyanide, and require use of appropriate personal protective equipment in these areas or when performing these activities. FBDM defined, documented and clearly communicated to all employees and contractors that it does not allow the employees and contractors to be exposed to cyanide

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

concentrations. The storage, distribution and dosage areas are monitored by fixed HCN gas meter. In case of a chemical reaction unleashing the formation of HCN exist several resources such as autonomous respirators, mobile and fixed HCN detectors.

Reviewing pertinent records evidence that the parameters have been maintained as stated (below exposition limits). In the event of alarm situation, the operators are ordered to leave the area, only returning when allowed by the supervision, after technical checking. It is defined and documented the necessary PPE to be used. During the field audit it was evidenced that FBDM uses monitoring devices in process areas and for activities involving management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas or cyanide dust exceeding 10 ppm on an instantaneous basis or 4.7 ppm continuously over an 8-hour period, as cyanide. The fixed and portable hydrogen cyanide monitors have set alarm level at 4,5 ppm. FBDM's defined, documented, established, implemented and maintains methodology for maintenance, testing and calibrating hydrogen cyanide monitoring equipment (fixed and personnel HCN gas detector) as well as retaining related records for at least three years. Reviewing pertinent documentation, it was noted that a.m. procedure is in accordance with manufacturer instructions. Evidenced calibration and maintenance records of HCN detectors duly established and retained. FBDM defined and documented that warning signs shall be where cyanide is used advising workers that cyanide is present, of any necessary personal protective equipment that must be worn, and that smoking, open flames and eating and drinking are not allowed. Evidenced during the field audit that the signage is effective, covering the presence of cyanide, that eating, drinking and smoking is not allowed and also open flames are prohibited as well as the needed PPE in all cyanide areas are indicated The operation places cyanide warning signs on storage tanks, distribution tank, pipelines, dam. During the field audit evidenced duly established and maintained. Evidenced that Purchase orders valid from September 01, 2019 until December 31, 2025 for 35% sodium cyanide solution signed between FBDM (buyer) and Proquigel (seller) that , establishes "According to current guideline, published on the ICMI website for the International Cyanide Code, which indicates the need to add dye to cyanide solutions with a concentration above 15% and that, in this case, the dyeing of the solution must occur before the delivery of the product at the destination, Proquigel is responsible for such procedure and thus delivering to FBDM a 35% sodium cyanide solution already with the dye added. Additionally, FBDM defined and documented a cyanide solution receipt inspection system, which defines the Demand for filling out a record for liquid cyanide reception inspection in which there is a specific item for checking if the color of the cyanide solution is reddish. Evidenced duly implemented as stated. Reviewing training records it was noted that operators have been trained in the a.m. procedure. Additionally, interviewed personnel showed to be aware of this matter and the reason to do this addition. During the field cyanide it was evidenced duly implemented During the field audit, it was evidenced that FBDM has showers, low-pressure eyewash

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

stations and dry powder or non-acidic sodium bi- carbonate fire extinguishers located at strategic locations throughout the operation and are they maintained, inspected and tested on a regular basis. Evidenced that fire extinguishers have been inspected and tested in accordance with Brazilian legislation such as NBR 19692:2016. Records assessed demonstrated it is duly implemented. During field audit, it was evidenced that storage, and process tanks and piping containing cyanide solution have been identified to alert workers of their contents, as well as the direction of cyanide flow in pipes designated. FBDM labels the tailings delivery and return pipelines to alert workers of cyanide, including the direction of flow. The waste pipelines, are labeled too. Evidenced that FBDM defined, documented, implemented and maintains an emergency program inside the plant where all cyanide related information is available in Portuguese. It contains information on health, safety, environment, chemistry and physics related to cyanide such as Chemical Product Safety Data Sheet (FISPQ) issued by Proquigel (cyanide producer) revision 11 dated on April 12, 2022 In compliance with NBR 14725:2014 for liquid cyanide. Evidenced that FBDM defined internal documented procedure PO-EQX-FBDM-SSMAC-41 - Operating procedure related to situations with Cyanide. As reported by FBDM this procedure was developed based on the FBDM's Emergency Action Plan (PAE) and Mining Dam Emergency Action Plan (PAEBM) regarding potential operational risks mapped by the company within the scope of application and relevant to Cyanide. This project results from an interpretation of the FBDM's operational risks with the best crisis prevention and management practices in compliance with the requirements of the International Cyanide Code. It is defined that actions to combat and control emergencies will have priority over other activities of FBDM while the situation continues emergency. The combat and control of emergencies in a cooperative manner are carried out full-time and with exclusive dedication. Any related accident to cyanide, which is harmful to the environment, must be immediately communicated to municipal authorities, municipal environmental control bodies and state (INEMA), Civil Defense and communities in the area of influence of the enterprise. Besides ,FBDM defined internal documented procedure PG – EQX-FBDM-SSMAC – 006 - Accident classification and analysis to investigate and evaluate cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety, and to respond to cyanide exposures. During field audit, through analyzing actual physical conditions of FBDM's plan, reviewing several records and interviewing operational, maintenance, engineering and process personnel it was not evidenced that had been occurred cyanide related accident. Interviewed several personnel all of them reported that no cyanide- related incidents or lost time / near-miss incidents occurred in the last three years.

## Standard of Practice 6.3

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

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

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

## *Summarize the basis for this Finding/Deficiencies Identified:*

During the field audit it was evidenced that FBDM has a Health Care Center fully equipped with emergency shower, potable water, ambulances, resuscitator, oxygen, antidote kits, ambulances, telephone, cell phone, radio channel, specific care center and e-mail. During the field audit evidenced an alarm system readily available for use at cyanide unloading, storage, locations and elsewhere in the plant. The antidote used is hydroxocobalamin. *Evidenced that FBDM defined, documented, established, implemented and maintains methodology for inspect its first aid equipment regularly to ensure that they are available when needed, and that materials such as cyanide antidotes stored and tested as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed.* Reviewing FBDM's Health Area documentation it was noted they clearly define the 5W1H related to first aid equipment inspection It is defined that for Visual Inspection through checking whether the packaging is intact, with no signs of damage, moisture or tampering and confirming that all items on the checklist are present, with validity data, conservation status, as recommended in the inspection forms located as mentioned above as well as for Organization through verifying whether items are organized so they are easy to access in an emergency. Evidenced that routine inspections of first aidequipment include the oxygen kits. Evidenced that FBDM defined, established and maintains documented internal procedures that define methodology for use, handling, storage, preservation, inspection and preventive and corrective maintenance of the Automatic External Defibrillator (AED). Reviewing the a.m. procedure, the auditor verified that it is in accordance with the respective User Manual Life 400 Futura Defibrillator. (supplied by CMOS Drake MAN00001\_03 [www.cmosdrake.com.br](http://www.cmosdrake.com.br)) and is in accordance with the following International Electrotechnical Commission (IEC) and ISO Standards: It was evidenced that FBDM defined, established, documented, implemented and maintains PG-EQX-FBDM-PLA-001 - Cyanide emergency response plan which aims establishing methodology to be observed and followed in eventual emergency situations, with sodium cyanide, preserving worker health and safety as well the environmental media restoring operational normality in order to eliminate/minimize possible damages which applies to all areas of FBDM that work directly or indirectly, as well as in internal and external emergencies with Sodium Cyanide.. Responsibilities and authorities are clearly defined and documented.. Sampled examples were 1, General Manager - Comply with and ensure the implementation of this procedure; 2. PAE General Coordinator - Immediately communicate to the FBDM General Manager any and all emergency occurrences involving Sodium Cyanide; Promote the effectiveness of the dissemination of this PAE in FBDM; Define additional procedures that must be adopted in cases of emergency; Coordinator of the investigation of the accident involving Sodium Cyanide; Promote, together with the HSE (Health, Safety and Environmental), evacuation simulations of emergency areas using Sodium Cyanide; 3. Leach Area Manager - Participate in the preparation and updating of the PAE, Participate together with the specific committee in the investigation of accident. 4. Human Resource Manager - Contact the

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

Environmental Agencies, Fire Department, Civil Defense, Police and Hospitals related to the accident site, Contact the Environmental Agencies, Fire Department, Civil Defense, Police and Hospitals related to the accident site, Activate the company's insurance; Respect safety signs, especially the prohibition of smoking, drinking and eating in risky places; Report any irregularities in fire-fighting equipment (extinguishers, hydrants and their accessories) to the occupational safety area. 5. Hospitals in the region previously evaluated and qualified: Participate in training promoted by the FBDM medical team; Ensure an isolated bed to care for victims contaminated by cyanide and apply an antidote (Cyanokit) to victims contaminated by sodium cyanide. 6. Police (Civil, Military, State, Federal, Road) - Ensure order and safety of rescuers, competent bodies and the population involved at the scene of external accidents in their respective areas of activity; 7. Environmental Bodies - Assess the conditions of the accident and identify environmental impacts; 8. Fire Department - Provide first aid to the victim; Carry out the rescue and take the victims to hospitals in the region; Against leakage; Fight fire if necessary. The following instructions must be considered by FBDM, Proquigel and transport companies in any type of accident, be it collision with vehicles, people, properties (public or private), tipping and/or rupture of sodium cyanide packaging: • For internal accidents and External where communication and external support is necessary, comply with PG-EQX- FBDM-SSMA-039 Crisis Management; • Serve as an advisor to the Highway Police, Fire Department and Civil Defense, providing the necessary information about the nature of the product; • Check that the area has been protected, so that there is no human traffic in dangerous areas; • In cases of surface water contamination, hydrogen peroxide, sodium hypochlorite and ferrous sulfate should not be used; • You must request more help if necessary (winches, backhoes, other trucks, etc.); • The FBDM Administrative and Financial Management must be kept informed; • If there are deaths as a result of the incident, strangers should be avoided approaching the location of the event and the location should be changed until the police arrive; • When there are deaths or injuries, the driver may be detained by the police. In this case, you must request custody of the truck and its cargo and wait for the arrival Proquigel's lawyer and the transport company to make your statement. Note: • This plan will be reviewed every 12 months, when an accident occurs, or when the emergency simulation highlights the need for review. Reviewing PG-EQX-FBDM-PLA-01 evidenced that it includes several emergency scenarios, examples sampled were: Catastrophic leak of hydrogen cyanide from storage or processing facilities; Accidents during transport; Leaks during unloading or mixing; Leaks during fires and explosions; Toy with pipes, valves and tanks; Overflow of reservoirs and dams; Power interruptions and pump failures; Uncontrolled infiltrations; Failure of tailings dams,, and other cyanide facilities. Evidenced that for each scenarios there are procedures clearly defining the 5W and 1H ( why, who, when, where, what and how ) to do. During field audit it was evidenced that FBDM has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide. It has an emergency facility, fully equipped with antidote, first aids drugs and materials, oxygen, resuscitator, as well as the existence of adequate human resources to provide first aid and medical assistance to workers exposed to cyanide. Evidenced that FBDM's Health Care is located in the Plant with Installation in containers composed of infirmary beds, dressing room, archive room, storage of materials and medicines, occupational administrative room, reception and medical office. The first aid kit contain: • 5L portable oxygen, • Attachable oxygen catheter, • High concentration mask with reservoir, • Ambu Resuscitator Full Manual Adult Resuscitator • Difphoterin (LPMD Individual eye wash, 500ml), • Diphoterin 500ml (Spray, 200 ml), as well as hydroxicobalamine It defines the Occupational medicine's role in emergency situations such as: • Advise the teams

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

involved in the emergency as well as provide medical care to victims; • Go to the Hospitals or Clinics where accident victims were sent in order to monitor their hospitalization and the evolution of the victims' condition, until they are discharged; • Provide guidance to clinics/hospitals on special care, in particular, on chemical products; • Monitor and register victims who were admitted to hospital establishments, informing the Field Coordinator of their number and status; • After the emergency, make a protected record of the incident with details relating to the victims and hospital medical care. • Communicate with family members of workers who are victims of emergency accidents. Evidenced FBDM defined an internal documented procedure for the use of diphotenin including handling, storage, preservation, inspection and the adequate way of using. Reviewing, in the Resources Human Area, qualification records it was noted that all Health Care Area Members are duly qualified as required by Brazilian legislation. Sampled examples were: MD Occupational Doctor, Occupational Nurse and Nursing Technicians. It was evidenced that PG-EQX-FBDM-SSMAC- 002 – PAE PAE in item 6.13 clearly establishes methodology for land transporting from site to hospital. As already mentioned FBDM has two ambulances. Besides, if necessary FBDM can use Emergency Mobile Care Service (SAMU) ambulances. According to the need and degree of urgency, the responsible doctor will direct the victim to reference hospitals. FBDM informed local medical facilities of the potential need to treat patients for cyanide exposure. Evidenced duly implemented. e of a formalized arrangement between FBDM and a.m hospitals in which they are aware of the potential needs that may be asked to treat a victim of cyanide poisoning. Evidenced that FBDM's Health Area received training provided by Dr. Alexandre Rodrigues (operation expert Medicine Doctor (MD) in chemical intoxication) I and Medicine Doctor of Proquigel I (cyanide producer) about treatment due to all types contamination with cyanide. Additionally evidenced that Dr. Yadir Viana (FBDM's Medicine Doctor) provided training for the pertinent technical personnel of involved hospitals such as Hospital Barrocas, Hospital Jorge Valente; Hospital São Rafael; Hospital Aliança; Hospital Geral do Estado; Hospital Geral de Camaçari; Hospital Roberto Santos; Hospital Municipal de Serrinha; Hospital Ferreira Filho. Besides, FBDM's Health Team performed technical visits at. hospitals and attested they have adequate and qualified staff, equipment and expertise to provide treatment for cyanide exposure. Additionally, it was evidenced that a.m.procedure defines the step-by-step procedure for providing first aid for each case of possible occurrence. Examples sampled were: Person poisoned with cyanide; Rescue procedure; Symptoms of HCN poisoning and treatment flowchart according to symptoms. a) In case of inhalation: • Conscious victim, • Unconscious victim, b) In case of ingestion: • Conscious victim, • Unconscious victim, c) In case of contact with the skin; Person poisoned with cyanide during a chemical analysis activity on cyanide solutions: Cyanide poisoning. In case of inhalation: • Conscious victim • Unconscious victim • Non-respiratory victim; If swallowed: • Conscious victim • Unconscious victim; Besides, it is documented how to do oxygen therapy (with naso-pharyngeal cateter and oxygen mask with ambu). Evidenced that Treatment flowchart, according to the symptoms, defines for each degree of intoxication the treatment that shall be done and the pertinent responsibility. Sampled examples were: A) For mild intoxication, the symptoms: Absence of symptoms or mild symptoms: headache, weakness, change in smell and taste, shortness of breath. In this case, the treatment should be: 1- Remove the injured person to a ventilated area; 2- Apply 100% oxygen 15 l per minute; 3- Drive to the nearest Medical Service or Hospital. Responsible: Brigade member, nursing technician, occupational Doctor. B) For Moderate intoxication. Symptoms: headache, vomiting, and

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

cardiac air toxicity. In this case the treatment shall be: 1- Remove the injured person to a ventilated area; 2- Apply 100% oxygen 15 l per minute; 3- Drive to the nearest Medical Service or Hospital. Responsibility for items 1, 2 and 3 lies with the Brigade member, nursing technician, occupational Doctor while item 4 belongs to the nursing technician, occupational Doctor. C) For severe intoxication Symptoms: In addition to the previous symptoms, delirium, convulsions and intense shortness of breath may occur. In this case the treatment shall be: 1- Remove the injured person to an airy place; 2- Apply 100% oxygen 15 L per minute; 3- Drive to the nearest Medical Service or Hospital. . The responsibilities of items 1, 2 and 3 are Brigade member , nursing technician, occupational Doctor while those of items 4 and 5 are Nursing technician, occupational Doctor. For very severe poisoning Symptoms: Loss of consciousness and respiratory and/or cardiorespiratory arrest. In this case the treatment shall be: 1- Remove the injured person to a well-ventilated place; 2- Apply 100% oxygen 15 l per minute; 3- Drive to the nearest Medical Service or Hospital. The duties of items 1, 2 and 3 are Brigade member, nursing technician, occupational Doctor while those of item 4 5 are nursing technician, occupational Doctor. 1- If has Cardiac Arrest, perform resuscitation maneuvers;2- Drive to the nearest Medical Service or Hospital; Responsibility for stages 1 and 2 are brigade member , nursing technician, occupational Doctor while in stage 3 the responsibility is nursing technician, occupational Doctor. Interviewed pertinent personnel showed to be aware of this matter.

## Principle 7 | EMERGENCY RESPONSE

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

### Standard of Practice 7.1


*Prepare detailed emergency response plans for potential cyanide releases.*

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

*Summarize the basis for this Finding/Deficiencies Identified:*

Yes. Evidenced that FBDM defined, documented, implemented and maintains several document for Emergency Response Plans to address potential accidental releases of cyanide and cyanide exposure incidents such as: PG-EQX-FBDM-SSMAC-039 - Crisis

**FBDM Mine**  
Name of Operation

  
Signature of Lead Auditor

10/01/2024  
Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

Management; PG-EQX-FDM-FBDM-003 - General Plan for Emergency Control (PAE); PG-EQX-FDM-PLA - 001; Cyanide Emergency Response Plan for Emergency Control (PAEC) and - Emergency Action Plan for Mining Dam (PAEBM) for FBDM Tailings Disposal System. Noted that the a.m. emergency plans are in accordance with Brazilian regulations such as • Federal Law 12,334 of September 20, 2010, • Law 14,066 of September 30, 2020, • Resolution No. 95 of February 7, 2022, Resolution No. 130 of February 24, 2023 and ANM Resolution No. 95/2022, • State Environmental Council (CEPRAM) Resolution No. 3,183/03, • Decree No. 16,302 of August 27, 2015, • Ordinance from the Minister's Office (GM) Ordinance no. 3,214, of June 8, 1978, • ABNT NBR 15219:2005, • ABNT NBR 14276:2006, • MEU-EQX-SSMAC-001 Emergency Plan Manual.. Evidenced that PG- EQX-FDM-PLA - 001- PAEC describe specifically the response for all cyanide related emergencies (requirements item 6.2.9.1 to 6.2.9.9. Reviewing the above-mentioned documented procedures PG-EQX-FDM-PLA - 001- PAEC - as well as Mining Dam Emergency Action Plan (PAEBM) it was evidenced that they are specific for FBDM's site. Their scope is all areas of FBDM that work directly and indirectly, as well as in internal and external emergencies with cyanide. Evidenced that for each scenario mentioned at 6.2.9.1 to 6.2.9.9 it is clearly the step by step that shall be implemented describing what to do, why to do it, how to do it, who should do it, where to do it, when to do it (the so-called 5W 1H). Responsibilities and authorities are defined and documented such as Sodium Cyanide Emergency Team is made up of Brigades, Brigade leader, Brigade coordinator, Emergency Response Team, Emergency driver, Occupational nursing technician, Occupational nurse and Medicine Doctor. Noted that all involved personnel have their activities before, during and after emergencies clearly documented. During the field audit they were interviewed and showed to be aware of. The Protective Personnel Equipment (PPE) to be used are defined. Sampled examples were Tychem jumpsuit; Latex Gloves; Mask with filter against HCN gas; Portable Gas Detector (Sampling and continuous monitoring of exposed employees). Interviewed personnel reported that PPE must be put on first before any action, especially approaching and checking for leaks as stated. It was evidenced that the emergency scenarios contemplated in the PAE and PAEBM are consistent with the risk analysis, which is based on surveys of environmental aspects and impacts as well as hazards and risks to occupational safety and health and considering significant impacts to its workers, community and environment. Evidenced that planning for response to transportation-related emergencies has been considering, transportation route(s), physical and chemical form of the cyanide, method of transport (e.g., rail, truck), the condition of the road or railway, and the design of the transport vehicle (e.g., single or double walled, top or bottom unloading, by Confins as well as Moscato As already mentioned,, Confins as well as Moscato are ICMI certified. (Please see Principles 1 and 2 for additional information). Evidenced that FBDM defined transportation accidents occurring on site or in close proximity to the operation through PAEC item 6.2.9.2. Reviewing this procedure noted that it covers cyanide transportation and operations at FBDM. Evidenced that there is sharing of documentation, training and effective communications day by day of transport conditions, route conditions among FBDM,

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

Proquigel and Confins as well as Moscato. FBDM defined, documented, established and maintains internal documented procedure FBDM's PAE that establishes at item # 6.14 methodology for evacuation of employees and contractors from the FBDM site for emergency reasons. It is defined to proceed with the partial or total abandonment of the area, when necessary, according to pre-established communication, removing the occupants from the risk areas, structure or risk area for local safety, at a safe distance from the accident site, remaining until the final definition of the emergency. The person most responsible for the emergency (general coordinator or brigade chief/leader) determines the beginning of the abandonment, and must prioritize the affected areas, the upper floors to these, the nearby sectors and the highest risk locations. Whenever the emergency communication system (siren/radio) is activated, in cases where the Emergency Coordination or chief/leader determines, the area must be evaded, and the instructions described below must be followed: Evasion covers all employees, partners and visitors, except those directly involved in controlling the emergency, even then, after ensuring their protection. .14.3.2. Evasion actions: people must go to the PE – Safe Meeting Points, (surface) and survival cells and underground chamber. Note: In the event of an accident, all employees (regardless of the area) must go to the meeting point in the internal area – PE 01. Besides, PAEBM item 10 - Description of the general functioning of the alert system for the downstream community establishes that FBDM maintains the Control and Operations Center (CCO) by monitoring, in real time, the conditions of its dams. Evidenced that FBDM defined, documented, established and maintains internal documented procedure FBDM's PAE which defines at item # 16.2 the flowchart of medical care protocol in case of cyanide emergency situation, at item 17 establishes the removal and emergency logistics and at item 22 the contingency actions in emergency scenarios. Additionally, it defines at item 8 first aid procedures. Reviewing the above mentioned noted that it is specific for FBDM' operations. Besides, evidenced that FBDM's Action Plan for Safety and Environmental (PASE) include step by step for first aid measures for cyanide emergencies situations such as: Person poisoned with cyanide; Rescue procedure; Symptoms of HCN poisoning and treatment flowchart according to symptoms: for Degrees (mild, moderate, severe and very serious); Symptoms (headache, weakness, change in smell and taste, shortness of breath; Headache, vomiting and airborne cardiac toxicity; delirium, convulsions and severe shortness of breath and loss of consciousness and respiratory and/or cardiorespiratory arrest); and Treatment (Apply 100% oxygen 15 L per minute; Drive to the nearest Medical Service or Hospital. PAE also defines what to do in case of: Inhalation; Ingestion; Contact with the skin; Person poisoned with cyanide during chemical analysis activity on cyanide solutions. The use of oxygen therapy is clearly defined. The protocol for using Diphoterine (or which is a product used for the emergency treatment of chemical injuries to the skin and eyes caused by corrosive or irritating substances, containing Instructions for the correct use of Diphoterine washing solution, chemical decontaminant for first aid in Anticipated cases with chemicals that are corrosive or irritating to eyes and skin are clearly predicted and

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

documented. Interviewed pertinent personnel showed to be aware of demonstrating that that personnel know the specific actions they are expected to take in response to the emergency. The antidote used By FBDM is hydroxocobalamin. FBDM defined, documented, implemented and maintains several procedures in order to assure a control of releases at their source. During the field audit it was evidenced the very good conditions of the FBDM' site. Please for additional information, see Principle 4. Interviewed personnel showed to be aware of this matter. FBDM did not have cyanide releases but in case of occurrence, there are specific documented procedures and personnel duly qualified to implement the necessary actions for containment, assessment, mitigation and future prevention of releases. As already mentioned, during the field audit it was evidenced the very good conditions of the FBDM' site. Interviewed personnel showed to be aware of this matter. FBDM does not have treatment, destruction or recovery systems. The use of cyanide in the leaching process is controlled online and by routine sampling at pre-defined points, ensuring that cyanide is consumed in the circuit and that there is no need for a treatment system to reduce the amount of cyanide discarded. in the dam met the maximum allowed by the International Cyanide Code.

## Standard of Practice 7.2

*Involve site personnel and stakeholders in the planning process.*

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

*Summarize the basis for this Finding/Deficiencies Identified:*

Interviewing personnel of several areas and reviewing meeting records it was evidenced that FBDM has been involved the operation involved its workforce such as areas of: process, engineering, production, maintenance, social responsibility, environmental, health and safety occupational safety, dam and design personnel as well as external stakeholders, including potentially affected communities, in the cyanide emergency response planning process. Evidenced health authorities (public and private hospitals and clinics) were duly involved in FBDM's cyanide emergency. FBDM has been made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions. For additional information, see Principle 9. FBDM has been identified external entities having emergency response roles, and involved those entities in the cyanide emergency

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

response planning process. Evidenced that FBDM engages in consultation (where applicable) and communication with stakeholders to keep PAEBM and PAE currents. Sampled examples were: Proquigel (the cyanide producer), Confins and Moscato (the cyanide transportation companies), and Ambipar (for accident prevention, response to emergencies disinfection of environments, waste management and recovery and waste collection), FBDM engages security and health authorities, emergency response suppliers, and community representatives. FBDM invites specific stakeholders to participate mock emergency drills. Another implemented control is to perform periodic meetings with stakeholders, communities in order to discuss and updated (if necessary) the emergency response plan. Evidenced duly implemented.

## Standard of Practice 7.3

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

The operation is  X n full compliance with  
 in substantial compliance with Standard of Practice 7.3  
 not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

It was evidenced that FBDM's PAE defined and documented primary and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the Plan. In this way, reviewing FBDM's PAE, the auditor verified the appointment of Deibson David do Carmo as Primary PAE Coordinator and Renato Araujo Silva as Alternate PAE Coordinator. Besides, it was evidenced that FBDM's PAEBM defined and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the Plan. In this way, reviewing FBDM's PAEBM, the auditor verified the appointment of Alexandre Ferreira Freitas as Primary PAEBM Coordinator and Juliana dos Santos Alves as Alternate PAEBM Coordinator. Interviewing pertinent personnel showed to be aware of this matter. It was evidenced that FBDM's PAEBM has been identified and documented Emergency Response Teams related to PAEBM. Evidenced that FBDM defined, documented, implemented, and maintains internal documented procedure FBDM's PAEBM that defines at item 14 the description of training and dissemination programs for those involved and potentially affected communities, with periodic exercises. It is evident that FBDM, in compliance with Resolution ANM 95, carries out the internal and external training, at the frequency defined in mentioned Resolution. as follows: .External: Trainings: • Orientation Seminar – Seminar with the participation of city halls, civil defense organizations, the dam safety team, other employees of the project, the population included in the Self Rescue Zone (ZAS) and, if formally requested by civil defense, the population obtained in the

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

Secondary Security Zone (ZSS). The content of this presentation must comprise the exposure of the flood map involving internal and external participants on the discussion of evacuation procedures, not covering an actual test.; Internal training: • Internal Expository Exercises - Expository presentations in training rooms, where the procedures described in the PAEBM are explained. • Internal Notification Flow Exercise – Prolonged exercise by the entrepreneur with the aim of testing the internal notification procedures presented in the PAEBM; • Hypothetical Internal Simulated Exercise - Hypothetical and playful tests of PAEBM's effectiveness and operability, in a training room, with time situations close to the predicted real time. The entrepreneur's response time in the event of an emergency must be evaluated; • Practical Simulated Exercise - Comprises field exercises simulating an emergency situation involving the activation and mobilization of international emergency operation centers, personnel and available resources, including internal evacuation procedures. Evidenced that PAE and PAEBM include call-out procedures and 24- hour contact information for coordinators and response team members. Evidenced that both PAE and PAEBM include not only internal personnel 24-hour contact information but also with external agents in emergency. Evidenced that FBDM's PAEBM item 3 clearly specifies duties and responsibilities of the coordinators and team members. Sampled examples were: Item 3.1. Legal Representative of the Entrepreneur: • Declare the beginning of the emergency situation and carry out the actions described in the PAEBM; • Execute the actions provided for in the notification flowchart; • Alert the potentially affected population in the Self-Rescue Zone (ZAS); Maintain contacts at institutional level with the public body responsible for Civil Defense and, if necessary, with other public bodies and service companies; • Coordinate the closure of the emergency situation and the completion of the Emergency Closure Declaration Form, when it is completed; • Provide the preparation of the emergency event closure report, in accordance with ANM Resolution no. 95/2022, with the knowledge of the legal person responsible for the dam and the Municipal Governments; • Coordinator of official communication with the company's partners (shareholders); Item 3.2. PAEBM Coordinator - • Assess, together with the Geotechnical Team, the severity of the identified emergency situation; • Declare the beginning of the emergency situation and contact the Legal Representative, internal and external agents, according to the notifications provided for in the notification flowchart; • Notify the state, municipal and national Civil Defenses, the City Hall(ies) and the ANM, in case of an emergency situation; • Communicate an emergency within the company; • Monitor the progress of actions taken in response to the emergency situation and check whether the necessary procedures were followed; • Trigger internal evasion and in the Self- Rescue Zone (ZAS), when necessary; • In case of classification at Emergency Levels 2 or 3, authorize the Control Room to activate the Alert System. It should be noted that evasion outside the self-rescue area is the responsibility of the public body with the function of emergency response compliance; • Authorize blocking of roads and vehicle exits from the dam area; • Maintain contact with the Emergency Management Committee, informing and being informed about the evolution of the occurrence at any level of emergency; • Ensure the availability of the necessary resources to deal with

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

the adverse situation, including those to provide first aid to those potentially affected in the Self-Rescue Zone; • Intervene, when necessary, in the measures taken to control and eliminate/mitigate the emergency; • Report any emergency situation error to the Legal Representative.; Item 3.3. Geotechnical Team - • identify and act in emergency situations; • Travel immediately to the location where the incident/accident was identified; • Subsidiary information of a technical nature to define the Emergency Level of the event, together with the PAEBM Coordinator; • Contact the technical person responsible for the project and work, and/or external consultant; • Once triggered, due to the occurrence of an emergency situation, maintain contact with the PAEBM Coordinator; • Propose actions to mitigate identified flaws and/or minimize possible damages; • Execute, upon guidance from the PAEBM Coordinator, immediately the response actions related to the emergency situation; • Monitor and record the repair actions allowed to mitigate/eliminate a risk event, together with the PAEBM Coordinator and the teams involved, the latter, when necessary; • Request resources necessary to respond to an emergency situation from the PAEBM Coordinator, managing the use of such resources; • If necessary, and upon communication to the PAEBM Coordinator, call employees and/or machines that do not work in the operational unit to remedy/control the identified emergency situation; • Develop easy repair actions for emergency control, according to procedures specified in the Operation Manual and Emergency Sheets. • Participate in the investigation and analysis of the accident; • Contribute relevant information to the preparation of the Emergency Event Closure Report; Item 3.4. Plant Maintenance Team - • provide equipment to deal with the emergency situation to the PAEBM Coordinator; • Supplier of human resources and assistants in the manufacture of parts/equipment to assist in emergencies; Item 3,5 - Operation Team and Operational Control Center – CCO Operation: • Once an emergency situation is triggered, join the technical team involved in executing the plan's actions and keep the coordinator updated on all actions carried out. Among these actions, the possible intervention in the flow of the SDR (Waste Disposal System) pumping system, changes in the tailings traction line, operation of support equipment and stoppage of tailings disposal stand out; • Perform corrective maintenance services defined by the Geotechnical Technical team and/or specialized technical consultancy; • Command the execution of corrective actions defined by the geotechnical technical team, in the field and/or support a specialized company hired to perform services; • Ensure that all resources (equipment, materials and labor) are available in the operational area of the project and are available to the PAEBM coordinator; • Provide information on actions taken during the emergency to support the preparation of the emergency event closure report; Operational Control Center – CCO - • Monitor video monitoring, instrumentation software and alert system, with their periodic and relevant functional tests; • Once activated, in an emergency situation, remaining ready to respond to the commands of the PAEBM Coordinator; • Intensify remote monitoring of the structure using current technologies. In the event of an eventual rupture, monitor the movement of the material via video monitoring and maintain monitoring of the remaining material; • Keep a record of notifications made; • Establish efficient communication with the PAEBM Coordinator and keep him

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

updated on all actions carried out; • provide information on actions carried out during the emergency, to support the preparation of the emergency event closure report; • Activate the siren system in the Self-Rescue Zone, upon request from the PAEBM Coordinator or in the event of an imminent rupture observed by the video monitoring system; • Report to the operational geotechnician, for evaluation and decision-making, any deviations in instrumentation and/or deviations identified through video monitoring that generate uncertainty regarding the safety of the structure; • Provide information on actions taken during the emergency to support the preparation of the emergency event closure report; 3.6. Environment Team - • Move immediately to the emergency location; • identify socio-environmental risks in the municipality and other areas possibly affected by the emergency situation, as well as promote socio-environmental protection and monitoring actions in the affected areas; • Provide assessment of damage to flora and fauna, from their recovery and rehabilitation; • Assess the socio-environmental impacts that have occurred and propose measures to repair them and to avoid and/or minimize new impacts; • Request resources necessary to respond to emergency situations from the PAEBM Coordinator, managing the use of such resources. • Execute, upon guidance from the PAEBM Coordinator, immediately the response actions related to the emergency; • Notify the Environmental Agency of the emergency situation; • Collaborate in the preparation of reports, mainly in the report to be sent to the environmental agency; • Pass information to the PAEBM Coordinator; • Participate in the investigation and analysis of the accident; Item 3.7. Occupational Health and Safety Team - • Move immediately to the emergency location; • Promote and/or support the isolation of risk areas; • Provide adequate personal protective equipment (PPE's) and collective protection equipment (EPC's); • Monitor and enforce compliance, by the teams involved with the emergency situation, in accordance with safety rules; • Request resources necessary to respond to emergency situations from the PAEBM Coordinator, managing the use of such resources. • Execute, upon guidance from the PAEBM Coordinator, immediately the response actions related to the emergency situation; • Pass information to the PAEBM Coordinator; • Participate in the investigation and analysis of the accident; Item 3.8. Emergency and Rescue Team - • Move immediately to the emergency location; • Coordinate with direct action teams and the PAEBM Coordinator to assist in measures to combat, control and extinguish the emergency; • Coordinate with public bodies operating at the location of the emergency in auxiliary actions to combat, control and extinguish it; • Assist in isolating and signaling the emergency area and other demands of the public body with Civil Defense and Fire Department functions. • Execute, upon guidance from the PAEBM Coordinator, immediately the response actions related to the emergency; • Participate in the investigation and analysis of the accident; • Request resources necessary to respond to emergencies from the PAEBM Coordinator, managing the use of such resources; Item 3.9. Supply, Support, Logistics and Business Security Team - • Prove the financial resources for carrying out preventive services; • In the event of an accident, provide all logistical support and work teams. • If an emergency is declared, the group must make all resources available for field

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

operations and maintenance; Item 3.10. Mine/Geology Operation and Maintenance Team - • supplier of equipment to deal with emergencies to the PAEBM Coordinator; Item 3.11. Legal Advice - • Auxiliary Legal Representative and PAEBM Coordinator in the officialization of the emergency within the company and external bodies, including public bodies that act during the mitigation of the emergency situation and also regulatory and supervisory bodies in the mining sector; • Advise Legal Representative on legal matters related to the event and on the legal and vulnerability aspects of Equinox Gold related to emergency situations; • Legal Representative Advisor and PAEBM Coordinator in relationships with community representatives and external agents involved; • Centralize the collection and respond to external notifications and legal reports; • Contribute to the preparation of documents to be sent to regulatory and supervisory bodies in the mining sector; • Maintain a legal team prepared to meet demands related to emergency scenarios, as defined in the specific technical procedures; • Collaborate in preparing reports on the incident/accident.; Item 3.12. Communication consultancy - • Evaluate and guide the company (in its entirety) in aspects of institutional communication; • Maintain a qualified communications team, as well as adequate means of communication, to • respond to emergencies; • Promote and/or grant to communication bodies, depending on the occurrence, interviews and press conferences related to emergencies that have occurred; • Meet and direct external communication demands, being advised by the PAEBM Coordinator and the Legal Department; • Contribute to the preparation of reports on the incident/accident; • Ensure that there are FBDM representatives with the role of official spokesperson, duly trained and qualified to deal with external communications. Item 3.13. Social Responsibility Advisory - • Advise the Legal Representative, as well as the PAEBM Coordinator, in formalizing the occurrence with federal, state and municipal institutions, including public bodies that will act during an emergency situation; • Assist the Legal Representative, as well as the PAEBM Coordinator, under institutional aspects with the various bodies involved in the occurrence, through prior and periodic relationships, in relation to topics associated with dam safety; • Serve as a centralist for all demands from federal, state and municipal institutions regarding additional information about the occurrence; • Contribute to the preparation of reports on the incident/accident. Interviewed personnel showed to be aware of this matter. Evidenced that PAE and PAEBM list emergency response equipment, including personal protection gear, available on- site.: PAEBM item 8.2 defines emergency response equipment.

Evidenced that FBDM's PAE defined methodologies for periodic inspections of emergency response equipment. Periodic inspections are carried out objectively which aims detect possible failures in the system, ensuring the performance of emergency tools/structures, when necessary. Evidenced that a.m. Plan includes a flowchart that clearly indicates the step-by- step inspection procedures using the tool 5W1H. Informations about items to be inspected, how to perform the inspections, the frequencies of each inspection and the acceptance criteria are clearly defined. Evidenced that inspectors has been

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

qualified in accordance with qualification criteria previously defined and documented. Reviewing training records it was evidenced that inspectors have been trained in pertinent FBDM's inspection procedures. Evidenced that FBDM defined and documented several internal documented procedures related to inspection and testing emergency response equipment to ensure its availability , Sampled examples were: RE-EQX-FBDM -SSMA - 019 - Automatic External Defibrillator (AED) checklist; RE-EQX-FBDM -SSMA -017 - Emergency shower inspection checklist; RE-EQX-FBDM -SSMAC-114 – Emergency Communication Extension Test; RE-EQX-FBDM-SSMAC-005 - Check list of emergency brigade items (Check list of emergency brigade items (safety cone, broom, safety boots, neoprene gloves, wide vision goggles, autonomous mask, panoramic mask with combined filter, demarcation tape to isolate the area, 2-inch adhesive tape, Tyvek coverall, helmet, shovel, hoe, toolbox, flashlights and batteries, rescue tripod, approach set, first aid kit, first aid kit, envelope stretcher. Evidenced duly implemented. Reviewing PAE, PAEBM and Crisis Plan it was evidenced that all of them clearly define the responsibilities and authorities for external responders, medical facilities and communities. As already mentioned FBDM during the preparation and revision of a.m.-documented plans involves all interested parties. After formalization of FBDM's Emergency Plan, a controlled copy of FBDM's Emergency Plan is provided to each external stakeholder including environmental, security and health authorities, public authorities, emergency response suppliers, community representatives and medical facilities, the cyanide producer and the cyanide transporter. This system is carried out at each review of the plan in such a way that they are perfectly knowledgeable and aware of how they should act in the event of cyanide emergencies. Reviewing meeting records evidenced another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. Evidenced that the emergency response plans were reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers, community representatives. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. ANM; INEMA, Firefighting Department; Civil Defense; Communities (Canto and Fazenda Brasileiro)), Teofilândia Municipal Hospital,

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard of Practice 7.4

*Develop procedures for internal and external emergency notification and reporting.*

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

*Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that PAEBM, PAE as well as Crisis Plan clearly include procedures and contact information for notifying management, regulatory agencies, external response providers and medical facilities of the cyanide emergency. During the field audit, it was evidenced the existence of an available list containing the above- mentioned informations. Reviewing this List. It was noted that it contains the necessary contact information and that is updated. which includes for instance the following phone numbers: PAEBM members, PAE members, Brigade Emergency Members, Crisis Plan members leaders, managers, general manager, public authorities, hospitals, cyanide supplier ( Proquigel), cyanide transporter ( Confins and Moscato ) regulatory agencies ( INEMA , and Regional Police Work (DRT), National Center for Risk and Disaster Management (CENAD). Evidenced that the emergency response plans have been reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers( Ambipar) , community representatives. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan). The emergency communication loop is clearly defined, tested and implemented as required. Besides, reviewing the mentioned Plans it was evidenced that for external responders, the Plan it is clearly provided contact information for those responders with designated responsibilities to implement the Plan. Evidenced that FBDM's PAEBM, FBDM's PAE as well as FBDM's Crisis Plan include procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, and for communication with the media. During the field audit, it was evidenced the existence of an available list containing the above-mentioned informations. Reviewing this List it was noted that it contains the necessary contact information related to the communities of Canto and Fazenda Brasileiro. Evidenced that FBDM defined, documented internal documented procedure that establishes methodology for for notifying ICMI of any significant cyanide incidents, **as defined** in ICMI's *Definitions and Acronyms* document. . Reviewing the a.m. procedure verified that it requires that Significant incident with cyanide whose consequences are serious in terms of the environment, occupational safety, health or which affect directly interested parties, it is necessary to communicated to ICMI - International Cyanide Management Institute. For this determination, "Significant incident with cyanide" is considered; any of the following confirmed events: a) Human exposure requiring action by a response team to emergencies, such as decontamination or treatment. b) An unauthorized release or discharge that enters surface waters natural, on or off

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

site; c) An unauthorized release that occurs off-site or migrates off-site local; d) An on-site release that requires action by an emergency response team emergencies; e) A transport incident requiring an emergency response due to release of cyanide into the environment; f) A multiple wildlife kill event in which it is known or believes that cyanide is the cause of death; It is g) Theft of cyanide. Communication with the Institute must be made through the following communication channel: 1400 I Street, NW, Suite 550 Washington, DC 20005, USA Telephone: +1-202-495-4020 Email: [info@cyanidecode.org](mailto:info@cyanidecode.org). It is worth noting that if there is any doubt about whether or not the incident is significant, it should be

1) communicated to ICMI. Initial notification is requested within 24 hours of its occurrence and must include the details and nature of the incident, and the name and contact information of a company representative to respond to transfers of information additional. Other relevant information, such as root cause, health, safety and environmental impacts, and any mitigation or remediation, must be provided within seven days of the incident. Reviewing pertinent records as well as during the field audit, interviewing personnel of various levels and areas it was not evidenced that have occurred significant cyanide incidents. The internal documented procedure that FBDM implements to notify ICMI of any significant cyanide incidents is identified as PG-EQX-FBDM-SSMAC-042.

## Standard of Practice 7.5

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

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

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that PAE and PAEBM Emergencies Plans describe recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media, management and/or disposal of spill clean-up debris as well as provision of an alternate drinking water supply. FBDM does not have a sodium metabisulfite cyanide destruction FBDM's operational procedures define, and document methodology that clearly establishes that all water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not. PAE and PAEBM clearly state that use of sodium hypochlorite and ferrous sulphate for cyanide neutralization is strictly prohibited where there has been a release into a natural surface water body due to the toxic nature of those chemicals to aquatic life. PAE and PAEBM determine that FBDM ensures to supply mineral water and other sources of potable water for domestic consumption or similar, Reviewing PAEBM it was noted that it defines specific measures, in coordination with Public Administrations, for the rescue of victims, people and animals, to mitigate environmental impacts, to guarantee the supply of drinking water and for the rescue and safeguards of cultural heritage. Internal documented procedure

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

PO-EQX-FBDM-ADM-012 - Receipt of Dangerous Products defines how hydrogen peroxide should be stored in a restricted, isolated location, protected from rain and sun, identified with signage and information signs equipped with soil waterproofing and containment basin. A soil sample is collected and sent to the laboratory for cyanide analysis according to procedure PO-EQX-FBDM-LAB-004 - Determination of Free, Total and Wad Cyanides in Solid and Liquid Samples for preparation of the solution addressed according to procedure PG-EQX- FBDM-PLA-001 - Emergency Response Plan - Sodium Cyanide. In order to meet this PAEBM it was observed that FBDM updated, in January 2023, the socioeconomic registration of the population located in the Self-Rescue Zone (ZAS) and revalidated escape routes and meeting points through a practical simulation carried out in February 2023, with the participation of the company, public entities and the community. In addition, FBDM carried out a survey of interference in the flood zone, considering the items provided for in Article 6 of ANM Resolution No. 95/2022, namely: • Mobility infrastructures; • Urban equipment; • Equipment with potential for contamination; • Infrastructures of cultural interest; • Destroyed and speleological sites; • Conservation units; • Traditional indigenous or quilombola communities; • Water collection stations for urban supply. The items listed above are presented in item 13.2 of this document. It is important to highlight that the Interference study with the ZAS found that there are no urban equipment, equipment with potential for contamination, infrastructure of cultural interest, archaeological and speleological sites and traditional or quilombola communities in a potentially flooded area. • There is no water distribution network in the ZAS and supply is carried out using water trucks. However, it is believed that due to the impossibility of vehicle traffic in the potentially flooded area, emergency contracting for the supply of drinking water in the ZAS is necessary, with the main responsibility of the FBDM Contracts Team Evidenced that PAE defines methodology for control measures for spills or leaks including: a) Personal precautions for non-emergency services personnel: such as: Do not smoke, Do not touch damaged containers or any spilled material without wearing appropriate clothing, Avoid exposure to the product; Use PPE as described in the PA and b) For Emergency service personnel such as Use complete PPE with self-breathing protective equipment (EPR) self-contained breathing equipment, Tychem overalls, Neoprene, butyl rubber or polyethylene type protective gloves and 7-league waterproof boots with composite toe cap. The material used must be waterproof. In case of large leaks, where exposure is high, it is recommended to use a respiratory protection mask with a filter against vapors and mists. Isolation of leakage from ignition sources; Evacuate an area within a radius of at least 50 meters. Keep unauthorized people away from the area; Stop the leak if it can be done without risk. Environmental precautions: Prevent the product from being spilled into waterways and sewage systems. Evidenced that ( Environmental Monitoring Plan(PMA) defines methods and materials to contain cleaning such as: Do not allow water to enter containers; Use natural barriers or spill containment. Collect spilled product and place in appropriate containers. Adsorb the remaining product with dry sand, earth, vermiculite, or any other inert material. Place adsorbed material in protected, removable containers for local safety. For final destination, proceed as stated. FBDM PAE addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methodologies, parameters and, where practical, possible sampling locations. Prohibitions: The use of chemical products in the treatment of cyanide leaks in surface waters, such as: sodium

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

hypochlorite, ferrous sulfate and hydrogen peroxide, is not permitted. For the Scenario - Catastrophic emissions of hydrogenated cyanide gases. If any catastrophic emission of hydrogen cyanide gas is detected by cyanide detectors carried by operators in the area or through suspected symptoms observed in people, an immediate evacuation of people from the area must be carried out at distances of no less than 200 meters, isolating the access points with zebra tape. To resolve emissions: Correct the pH in tanks, eliminate contact of acidic solutions or water with sodium cyanide. For the Scenario Accidents during transport: Check that there are no injuries. If there is one, request that they be attended to immediately or sent to the nearest hospital. Request: • Police/Firefighter to keep the area clear of people and vehicles. • Isolation of the area below the Policies of the nature of the product in case of mixing with water or acidic substances. • Ask the Police to prevent vehicle traffic and people from entering the danger area. In case of rainy weather or threat of rain, if the product spills on the ground or pavement, it is necessary to place a truck cover or another tarpaulin over the spilled load. • Cover with sand or earth and prevent water from canals, plantations or watercourses from being close to the area contaminated with sodium cyanide. • If the product comes into contact with water, small amounts of hydrocyanic gas may be blocked. Therefore, work with your back against the wind. • Once contained, as many cyanide briquettes as possible must be placed, using waterproof gloves and “non- metallic” shovels or brushes, storing them in plastic bags until they are properly disposed of. • If the product reaches slopes, contaminated land and/or soil must be removed and deposited in a suitable location. As the contaminated soil is to be removed, samples of the material must be provided and sent to the laboratory for cyanide determination. After these measures and verifying that there is no presence of contamination, stop the removal and arrange for the site to be filled with uncontaminated soil to restore the area. • All material contaminated with sodium cyanide must be discarded at the Dam • At the end of the emergency action, all contaminated PPE and EPC can be decontaminated using the emergency shower, where the water flow will be directed to the Reagents Area Containment Basins and in the case of unused PPE, after decontamination, it must be discarded in the hazardous waste container. Contain sound cyanide that reaches the ground, preventing it from reaching rivers, water, canals, and plantations by making physical barriers with earth or sand. All contaminated material must be disposed of, including or only after the contained spill using waterproof gloves and shovels, storing them in plastic containers or drums. Identify the extent of possible contamination caused by leakage into waterways near the site. Monitor the watercourses following the methodology/parameters practiced at FBDM during and after removal, until you ensure that there is no presence of cyanide in the water. For the Scenario - Emissions during unloading and mixing of sodium cyanide. Standard cyanide unloading and preparation practices were developed through risk analysis of tasks in order to ensure safety measures capable of neutralizing any risk of emission from this product. However, if any failure in the system allows cyanide to be sent during these activities, the emergency procedures will be the same as those reported in the items on “Accidents during transport” and “Person poisoned with cyanide”. Scenario - Emissions during fires and explosions. a) On days without rain, isolate an area as far as possible within a radius of at least 100 meters. If it is necessary to isolate the area in all convenient areas within a radius of 200 meters, trying to evacuate people up to a distance of 1500 meters downwind. b) Keep all emergency support people with the wind at their backs, away

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

from low areas. (Check the windsock). c) If the fire is a small occurrence, only use chemical powder to control it – never use water, foam or carbon dioxide (CO<sub>2</sub>). In the event of a large fire, it will leave radiation until it is possible to control it with the use of chemical powder. Provide emergency responders with thermally protective clothing and self-contained breathing. d) Once the fire extinguisher is used and authorization for the immediate aftermath has been given, attendants must start wearing PVC or similar clothing that offers total protection, providing autonomous breathing. The readjustment operation can be carried out in two ways: using chemical powder, as well as pouring virgin heat on the area, to avoid humidity and inhibit hydrocyanic gas and, in this way, control the possibility of remaining outbreaks. e) Until work begins to collect any spilled material, cover the affected area with PVC tarpaulin, in order to avoid the aerial dispersion of cyanide dust and contact with water. f) Do not use water to wash the floor before all leaked material has been collected. When the collection operation is complete, wash with plenty of water. g) Prevent the product from contaminating rivers or other sources, using sand or earth for containment and neutralization through the addition of hydrogen peroxide or ferrous chloride. In cases where contamination has occurred, immediately inform the police, public water supply bodies and rural properties in the affected watercourse. Cover the affected area to avoid aerial dispersion of cyanide and contact with water. Cover the affected area with PVC tarpaulin. Collect the product that was released in the accident, including earth or other materials contaminated with cyanide. Neutralize the affected area using hydrogen peroxide. For Scenario - Uncontrollable leaks of solution in the metallurgical plant, ruptures of tanks, valves and pipes. Tank rupture: The metallurgical plant's tanks are all located within containment basins capable of containing leaks during possible periods of hydraulic in balance in the circuit, where they can be returned to the original tanks. • If these spills are sufficient to overflow these containments, the entire solution flow will be directed to the unit's containment basin through the rainwater channels distributed throughout the plant, after neutralization with hydrogen peroxide, an abundant sample for WAD cyanide analysis (result <0, 20 mg/l) directed to the dam. • If the solution cyanides on slopes, the contaminated vegetation and/or soil must be removed. As the contaminated soil is removed, every 10cm in depth, samples of the material must be taken and sent to the laboratory to determine the cyanide until it is certified that there is no further contamination. After these measures and verifying that there is no presence of contamination, stop the removal and arrange for the site to be filled with uncontaminated soil to restore the area. At the end of emergency action, all contaminated PPE and Collective Protection Equipment (EPC) must be decontaminated using the emergency shower. Rupture of valves and pipes. • It must be stopped immediately at the source of the solution flow. A protective drum must be placed to contain the protection and avoid soil contamination. • If the flow of solution reaches the streets and storm drains, proceed as in the case of a tank rupture. Remove the product that may have reached areas without waterproofing. Remove the soil and land, pack, and neutralize them in suitable containers, which will later be sent to the waste lake. Analyze the soil to ensure its correct neutralization Monitor the soil following the methodology/parameters practiced at FBDM during and after removal, until you ensure that there is no presence of cyanide in the soil. Scenario - Lack of electricity and stoppage of the pumping system. If there is a power outage, immediately cut off the pulp flow for leaching and pumping. The tanks have sufficient volume to accumulate the pulp in flow after the supply is cut off. If electricity takes a while to return, a reduction in the pH in the CIL tanks may occur

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

due to the lack of addition of milk of lime that is pumped. The areas must be monitored using the HCN detector as well as the pH of the tanks, which must be corrected with the addition of lime milk. Monitor the pH of the tanks. Correct the pH Add powdered lime. Monitor the formation of hydrocyanic gas using a portable HCN meter. Check the water level in the containment basin Visual inspection on site. If necessary, turn on the pumps. Activate the panel. Monitor the level of the containment basin. For the Scenario - Uncontrolled infiltrations. The metallurgical plant's tanks are all located within containment basins capable of containing leaks during possible periods of hydraulic imbalance in the circuit, where they can be returned to the original tanks. In the case of seepage that is not collected in the containments and perhaps reaches the ground, then the contaminated vegetation and/or soil must be removed and deposited in bags for disposal. As the contaminated soil is removed, every 10cm deep, samples of the material must be taken and sent to the laboratory for cyanide determination until make sure there is no more contamination. After these measures and verifying that there is no presence of contamination, stop the removal and arrange for the site to be filled with uncontaminated soil to restore the area. Visual inspection on site against leakage Close the supply valve or plug it. Neutralize the affected area Apply hydrogen peroxide. Absorbent spilled material Apply blanket or sand/earth covering the affected area with PVC tarpaulin covering the affected area. Collect contaminated soil by digging the contaminated area and placing it in drums or bags for disposal. Discard contaminated disposal direct drums to tailings dam accompanied by cyanide FISPQ. Wash affected area with plenty of water. For the Scenario - Person poisoned with cyanide: During the process of chemical analysis of cyanide solutions or samples from emergencies, if there is cyanide poisoning, the witness must check before entering the cyanide preparation site, audible and visual alarms from the gas detector. The portable HCN detector will alarm at 4.5 ppm. If the detector is alarmed, proceed as follows: Against leaks Close the supply valve or cover it. Neutralize the affected Area. Report the incident immediately to the emergency team saying the word EMERGENCY three times on band 01 of the radio. Employee who witnesses an emergency. Radio assess the situation and remove the victim to the health unit Team of rescuers carry out the victim's decontamination procedure and then lower the victim through the hoist that will be attached to the safety belt along with a backup rope to ensure descent to the ground floor. Team of rescuers and emergency driver Anchor straps, semi-static rope, decontamination showers and oxygen bullet, Assess the victim of poisoning Carry out primary assessment Occupational Medicine Oximeter, sphygmomanometer and multiparameter monitor. Forwarding to the reference hospital will be scheduled in the Intensive Care Unit (ICU) ambulance, together with a nurse on duty Occupational Medicine ICU Ambulance. Collect another sample three hours after increasing the dosage and report the result. If the WAD cyanide concentration remains above the permitted limit, the circuit must be stopped, and only after new analyzes within the safe limit should the operation be restarted. If the spills are sufficient to overflow the existing containments, the entire flow of solution will be directed to the containment basin and directed to the tailings dam. Isolate the area of the tank(s) with high cyanide content Installing signage, zebra strips and ropes. Inform department management contacting the Metallurgy Manager Coordinate the entire emergency process, defining priority actions Obtaining information about the overflow and the actions already taken. Leaked material returning to the process or directing to the tailings dam. During the audit, the occurrence of an event that justified the demand to implement the actions

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

of the procedures mentioned in this item was not evidenced. Evidenced that PAE and PAEBM clearly defines that is prohibited the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

Besides, during the field audit, it was evidenced that FBDM's emergency brigade does not have these kinds of chemicals in their emergency response kit. Besides, it was evidenced that Ambipar has a copy of the FBDM's procedure prohibiting use of these chemicals in surface waters, as well as it includes this prohibition in its own procedures. During the field audit interviewed personnel showed to be aware of this matter. It was evidenced that FBDM's PAE, PAEBM and PMA address the potential needs for environmental monitoring to identify the extent of and effects of cyanide release including sampling methodologies, parameters as well as where practical, possible sampling location. Please for additional information see Principles 4. Related to sampling methodologies, parameters where practical, possible sampling locations. Reviewing a.m. plans it was noted that they clearly defines all kind of informations about sampling such as the sampling locations, sampling frequency, sampling quantity, sample preservation, and cyanide reference values in order to identify the extent and effects of cyanide release. All equipment used must be calibrated against standards nationally or internationally recognized such as National Institute of Standards and Technology (NIST), Brazilian Institute of Metrology, Quality and Technology (INMETRO). Please for additional information, see Principle 4. . FBDM does not have a cyanide treatment/destruction system. Procedure PG-EQX-FBDM-PLA-001 - Emergency Response Plan - Sodium Cyanide defines that contaminated material must be collected and sent to the tailings dam. In accordance with internal documented procedure PO-EQX-FBDM-ADM-012 - Receiving Dangerous Products, FBDM has a suitable location with storage of hydrogen peroxide to be used when necessary according to procedure PG-EQX-FBDM-PLA-001 - Plan of Emergency Response - Sodium Cyanide whenever there is no risk of contamination in aquatic systems. FBDM does not have a cyanide treatment/destruction system. As defined in procedure PG-EQX-FBDM-PLA-001 - Emergency Response Plan - Sodium Cyanide contaminated materials must be collected and sent to a tailings dam that is impermeable due to the geomembrane coating and not to the Detox circuit. FBDM does not have a detox system because the cyanide remaining in the pulp that goes to the dam is lower than the maximum allowed by the cyanide code according to the evidences that were collected during the recertification audit.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard of Practice 7.6

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

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

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM defined, documented, implemented and maintains methodology in order to review and evaluate the cyanide related elements of its Emergency Response Plan for adequacy on a regular basis since it is defined that FBDM's PAE and FBDM's PAEBM are at least annually reviewed, evaluated and updated when necessary. Besides, it is defined that after all mock emergency drills as well as after real emergencies PAE and PAEBM shall be reviewed, evaluated and updated when necessary. Evidenced duly implemented. Evidenced that FBDM has been conducting mock emergency drills periodically as previously planned. Evidenced that FBDM's PAE item 6.9 defines a Tri Annual Mock Emergency Drill Plan. Evidenced duly implemented. Sampled examples were 2022 Mock Emergency Drill Plan, 2023 Mock Emergency Drill Plan and 2024 Mock Emergency Drill Plan. Evidenced they include all the scenarios listed at 6.2.9.1 to 6.2.9.10. Evidenced that the Mock Emergency Drill Plan is in accordance with Brazilian Regulation Laws and ICMI requirements. Evidenced that FBDM has been performed mock emergency drill as stated. Besides it was evidenced that FBDM has been performed mock emergency drills related to PAEBM in accordance with ANM requirements. Evidenced that FBDM have been conducting cyanide field emergency drills at least annually and besides include all the items discussed in the [\*Guidance for Use of the Mining Operations Verification Protocol\*](#), such as whether field drills address cyanide exposure scenarios in addition to release scenarios appropriate for the operation, and involve on-site and external personnel that may be expected to respond to cyanide incidents. Evidenced duly implemented. Sampled examples were Mock Emergency drills dated on December 06, 2022, February 22, 2023, May 24, 2023 and September 06, 2023. Evidenced that FBDM has been evaluating after each emergency drill, the drill results. They are reviewed and discussed among the participants and when necessary, the opportunities of improvement raise-up during the drill are considered as corrective or preventive actions and managed adequately. Reports related to the drills and their reviewed were found in place. Evidenced that the records of the simulated reported in item 7.6 were duly evaluated and the pertinent actions to be done were defined, documented and implemented. Sampled examples were Mock Emergency drills dated on December 06, 2022, February 22, 2023, May 24, 2023 and September 06, 2023. There have been no actual cyanide-related incidents during this ICMC (International Cyanide Management Code) recertification period that required implementation of emergency response procedures.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Principle 8 | TRAINING

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

### Standard of Practice 8.1

*Train workers to understand the hazards associated with cyanide use.*

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

#### *Summarize the basis for this Finding/Deficiencies Identified:*

Yes. Evidenced that FBDM has been trained all personnel who may encounter cyanide in cyanide hazard recognition. Evidenced that FBDM established, documented, implemented and maintains procedure PG-EQX-FBDM-ADM-001 Training Management that defines methodology for planning, performing, recording and evaluating effectiveness of training for all personnel who may encounter cyanide in cyanide hazard recognition the cyanide materials present at the operation, the health effects of cyanide, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure. Reviewing training material, it was evidenced that they contain all items described above. It was noted that FBDM has been used his own materials and materials supplied by Proquigel (cyanide producer). Besides, it is defined that annually the Human Resources Area must identify the Training Needs for the following year.. During the field audit, the auditor interviewed personnel direct or indirectly involved with the Cyanide Code Principles and all interviewed personnel showed to be aware about the hazards associated with cyanide use. Evidenced that FBDM's internal documented procedure PG-EQX-FBDM-ADM-001 Training Management establishes that cyanide recognition refresher training shall be performed at least yearly for all FBDM's workers and contractors who may encounter cyanide. During the audit, the auditor reviewed several training records and comparing the pertinent dates concluded that FBDM has been provided refresher training about cyanide hazard recognition as stated. Evidenced duly implemented. Internal documented procedure PAE-EQX-FBDM-SSMAC - Emergency Brigade Periodic Training Schedule establishes the pertinent schedule for refreshing training for Emergency Brigade. Evidenced that cyanide-training records have been retained as stated. Evidenced that FBDM internal documented procedure PG-EQX-FBDM-ADM-001 – Training Management establishes that all trainings shall be recorded. For internal trainings it is used Training Attendance List as training recording. Reviewing FBDM is training records it was demonstrated that personnel received both initial and

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

refresher training in cyanide hazard recognition. The trainings have been performed in accordance with FBDM's 2023 Training Plan. Reviewing pertinent records noted that it is duly implemented.

## Standard of Practice 8.2

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

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

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM has been trained workers to perform their normal production tasks, including unloading, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Evidenced that internal documented procedure PG-EQX-FBDM-ADM-001 Training Management – Training Management establishes methodology for Identification of Training Needs as well as for recording. Reviewing the it clearly defines for each employee and contractor the required training including for example legal trainings, training in internal documented operational procedures, in PAE, in PAEBM which means the necessary trainings to perform their normal production tasks, including unloading, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Reviewing training materials as well as during the field audit interviewing pertinent personnel it was duly implemented. Sampled examples of training records related to internal documented procedures were: PO-EQX-FBDM-PLA-001 - Operation of Dam and Containment Basin; PO-EQX-FBDM-PLA-002 – Leaching Operation; PO-EQX-FBDM-PLA-004 - Chemical Products Unloading and Preparation Operation; PO-EQX-FBDM-PLA-010 - Grinding Preparation and Gravimetry; PO-EQX-FBDM-PLA-015 - Cyanide Neutralization and Decontamination of Parts, equipment and PPE contaminated with cyanide; RE-EQX-FBDM-SSMAC-001 - Internal Waste Movement; PO-EQX-FBDM-PLA-025 - Definition of Equipment Criticality and Management Strategies; Asset Maintenance; PO-EQX-FBDM-PLA-026 - Calibration, Measurement and Test Management; RE-EQX-FBDM-PLA-007 - Release of Equipment for Maintenance; Inspection Route: 303 - Cyanide transfer pipe; Inspection Guide: 299 - Well pump emergency; RE-EQX-FBDM-PLA-002 – Daily Tailings Dam Inspection Report; RE-EQX-FBDM-PLA-013, Training in PO-EQX-FBDM-PLA-001- Operation of the waste disposal system; Training in PO-EQX-FBDM-PLA-002- Leaching operation (CIL); Training in PO-EQX-FBDM-PLA-003- Operation of desorption and furnace

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

regeneration; Training in PO-EQX-FBDM-PLA-004- Chemical product unloading and preparation operation; Training in PO-EQX-FBDM-PLA-004- Chemical product unloading and preparation operation Training in PO-EQX-FBDM-PLA-011- Control room operation: Training in PO-EQX-FBDM-PLA-015 – Cyanide neutralization and decontamination of parts.; Training in PO-EQX-FBDM-PLA-012 - Sampling Operation.; Training in PO-EQX-FBDM-PLA-020 - Operation of the Intensive Leach (Acacia) and training in PG-EQX-FBDM-ADM-001 Training Management; Attendance list, As required by FBDM's internal documented procedure PG-EQX-FBDM-ADM-001 Training Management – Training Management it was evidenced that FBDM's training program clearly identifies the specific cyanide management elements that each employee must be trained in to properly perform the required tasks. Training needs clearly identify for each worker the necessary training in the respective operational procedures. Employees and contractors are trained during the admission period (introductory) and in refresher training held annually. In the general training matrix, there are tabs with the positions and the specific technical training, in which it is possible to see that for all positions the cyanide training is mandatory. During the field audit reviewing training records and interviewing pertinent personnel it was evidenced duly implemented. As already mentioned it was evidenced that FBDM has been provided initial and refresher training in response to cyanide exposures and releases for appropriate personnel; made designated response personnel familiar with implementation of the Emergency Response Plan; and required designated. Evidenced that task training related to cyanide management activities have been provided by an appropriately qualified person. Evidenced that FBDM's internal documented procedure PG-EQX-FBDM-ADM-001- Training Management establishes that training personnel should be familiar with the practices and procedures for which the training is given and experienced in effective communication techniques as required by the document Definitions and Acronyms for The International Cyanide Management Code dated on June 2021. Furthermore, the aforementioned procedure defines the criteria to demonstrate the adequate qualification of training personnel so that they are considered qualified. Evidenced that internal documented procedure PG-EQX-FBDM-ADM-001- Training Management establishes that all employees shall be trained prior to work with cyanide. Reviewing training records and through interviews during field audit evidenced that employees have been trained prior to working with cyanide are aware of performing their tasks including where cyanide can be present. There is refresher training on cyanide management provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner in accordance with internal documented procedure PG-EQX-FBDM-ADM-001- Training Management establishes that refresher training on cyanide management shall be performed at least yearly. Evidenced duly implemented. FBDM's internal documented procedure PG-EQX-FBDM-ADM-001- Training Management establishes methodology for evaluating the effectiveness of cyanide training by testing and observation. Besides it defines that the result of effectiveness evaluation shall be recorded at the Form

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

Training Effectiveness Assessment Record. Evidenced records of evaluation of the effectiveness of cyanide training by testing. Evidenced duly implemented. FBDM's internal documented procedure PG-EQX-FBDM-ADM-001- Training Management establishes that training records shall be retained throughout an individual's employment documenting the training they receive as well shall include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials. During the field audit the auditor reviewed training records as well as interviewed related personnel with the trainings performed. It was noted that workers have received initial task training; the task training addressed the critical elements of safe performance of tasks; qualified personnel provided the training; personnel were trained prior to working with cyanide in an unsupervised manner; and that FBDM evaluated the effectiveness of task training. Sampled examples were: Training provided to local fire brigades have been trained and qualified in accordance with Brazilian legislation such as Regulatory Standard (NR) 23 - Fire protection of the Ministry of Labor and Employment; Technical Instruction (IT) 17/2016 of the Military Fire Department of the State of Bahia - Fire brigade; Law No. 12,929/13 – which provides for Fire and Panic Safety and Provides Other Measures; Decree No. 16,302/15 - regulates Law No. 12,929, of December 27, 2013, which provides on Fire and Panic Safety and Provides Other Measures; NBR 14023 - Registration of Leisure Activities; NBR 14276 – Fire Brigade - Requirements; NBR 14277 – Facilities and Equipment for Firefighting Training - Requirements; NBR 14608 - Professional Civil Firefighter; NBR 15219 - Fire Emergency Plan - Requirements. Reviewing assessed training records it was evidenced that they include the names of the employees trained, the trainer name, the date of training, the topics covered by the training , and if the employee demonstrated an understanding of the training materials

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard of Practice 8.3

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

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

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that all cyanide unloading, mixing, production and maintenance personnel have been trained in the procedures to be followed if cyanide is released, including decontamination and first aid procedures as required by internal documented procedure PG-EQX-FBDM-ADM-001 – Training Management. Evidenced that plant operators and maintenance employees have collaborated to elaborate the pertinent operational procedures as well as the procedures related to emergencies involving cyanide and when applicable PAE and PAEBM. Records of training were reviewed and noted that the operation and maintenance personnel have been trained in the pertinent internal documented procedures which clearly define the actions to be followed if cyanide is released (all have been trained in the operation's response procedures as required). During the field audit interviewing field personnel as well as reviewing FBDM's training records, FBDM's 2021 Training Plan, FBDM's 2022 Training Plan FBDM's 2023 Training Plan; FBDM's Quality, Environmental, Safety and Occupational Health Policy, PAE, PAEBM, Training procedures, Operational Procedures it was clearly evidenced how FBDM has been structured its response program is structured as well as that personnel involved in unloading and storing cyanide, cyanidation processes, and maintenance of cyanide facilities have received training regarding roles in response to cyanide releases and exposures it was noted that it is implemented as stated by The Code. Besides noted that field personnel are aware of such procedures. Reviewing pertinent training records as well as interviewing Emergency Response Coordinators and members of the Emergency Response Team it was evidenced that Emergency Response Coordinators and members of the Emergency Response Team have been trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment as well as interviewed personnel showed to be aware of this matter. Evidenced that FBDM clearly identify training needs for Emergency Response Team. Evidenced duly implemented. Sampled example was: Fire Brigade Training Course Program: Brigade candidate candidates must attend a course with a minimum workload of 16 hours, covering theoretical and practical aspects, focusing mainly on the risks inherent to the occupation group. Interviewed personnel showed to be aware of this matter. Evidenced that internal documented procedures PG-EQX-FBDM-ADM-001 – Training Management establishes that FBDM shall made external responders, to the extent

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

10/01/2024

Date



# MINING OPERATIONS SUMMARY AUDIT REPORT

that they are designated with specific duties or responsibilities in the Emergency Response Plan, such as local fire brigades and emergency medical services familiar with those elements of the Emergency Response Plan related to cyanide. Evidenced that have been retained appropriate records related to notes of meetings and/or correspondence with external responders. Reviewing pertinent records, it was evidenced that it is duly implemented. Sampled examples were: Note of meetings with: ANM; INEMA; DRT, Firefighting Department; Civil Defense; SAMU; Communities (Canto and Fazenda Brasileiro) Municipal Hospital, Road Police. Evidenced that local fire brigades have been trained and qualified in accordance with Brazilian legislation such as Regulatory Standard (NR) 23 - Fire protection of the Ministry of Labor and Employment; Technical Instruction (IT) 17/2016 of the Military Fire Department of the State of Bahia - Fire brigade; Law No. 12,929/13 – which provides for Fire and Panic Safety and Provides Other Measures; Decree No. 16,302/15 - regulates Law No. 12,929, of December 27, 2013, which provides on Fire and Panic Safety and Provides Other Measures; NBR 14023 – Registration of Leisure Activities; NBR 14276 – Fire Brigade - Requirements; NBR 14277 – Facilities and Equipment for Firefighting Training - Requirements; NBR 14608 – Professional Civil Firefighter; NBR 15219 – Fire Emergency Plan – Requirements. Evidenced that internal documented procedures PG-EQX-FBDM-ADM-001 – Training Management establishes that FBDM shall provide to all employees with designated roles or responsibilities in the event of a cyanide exposure or release refresher training for response to cyanide exposures and releases regularly conducted. During the audit through reviewing refresher training records of related to employees with designated roles or responsibilities in the event of a cyanide exposure and releases it was noted that FBDM have been conducted refresher training annually as stated. Evidenced that internal documented procedures PG-EQX-FBDM-ADM-001 – Training Management establishes that FBDM shall retain training records documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Principle 9 | DIALOGUE AND DISCLOSURE

Engage in public consultation and disclosure.

### Standard of Practice 9.1

*Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.*

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

*Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM defined, documented, implemented and maintains internal documented procedure PG-EQX-FBDM-SSMAC-060 that establishes methodology for providing stakeholders with information on its cyanide management practices and engage with them regarding their concerns. There are two communities related to FBDM which are identified as Canto Community and Fazenda Brasileiro Community. Reviewing t PG-EQX-FBDM-SSMAC-060 it was evidenced that FBDM has several communications mechanisms such as Meetings; Speeches; Banners; Booklet; Posters; Podcast Sounds; Whats App Groups and “Open Door” Policy. Based on its “Open Doors” Policy, during the audit it was evidenced that FBDM has a query response system, with designated staff available to answer interested parties' inquiries, a program of visits at FBDM Plant with the aim of allowing interested parties to learn about how cyanide is managed in a way that preserves the integrity of workers, the community and the environment, as well as clarifying doubts about cyanide management itself as well as providing a telephone and email address that interested parties can use to ask questions of site personnel about the operation's cyanide management practices at FBDM. During the audit noted that all mentioned actions have been duly implemented Evidenced the creation and communication of a booklet with informations about cyanide written in a simple way and with a layout playful, which prioritizes graphic images that are easy to assimilate.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

## Standard of Practice 9.2

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

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

### *Summarize the basis for this Finding/Deficiencies Identified:*

Evidenced that FBDM have been established, documented implemented and maintains written descriptions, in Portuguese language, how their activities are conducted, how cyanide is managed as well as how these written descriptions are available to communities and other stakeholders. Reviewing the material that was has been used it was evidenced that the information materials such as brochures, newsletters, What Sapp's, Booklet, internal and external meetings, local government offices, on websites etc (please for additional information see 9.1). Evidenced that FBDM established, documented, implemented and maintains internal documented procedure Crisis Plan which was developed based on FBDM's operational risks within the scope of application and relevant to Cyanide. Evidenced that above documented procedures defines the creation of the crisis committee what is made up of permanent members and floating members and areas that become part of the committee according to the type of crisis. Part of Committee has executive functions, and consultative functions. According to nature crisis, roles can and should be updated. In the Crisis Committee of FBDM the areas of the company integrate to act together, there is no hierarchical prevalence - except for the functions of General Manager responsible for final validation of actions and communications to the public. The responsibilities and authorities of Crisis Committee participants are clearly defined and documented. All Interested parties are duly communicated about FBDM's Crisis Plan. Including the communities. There is no significant percentage of illiterate people in Teofilândia. Anyway, during visits of FBDM public relationship representatives to communities. Informations like cyanide management and hazards have been given by speeches and booklets with photos are provided. Yes. Although no incidents involving cyanide have occurred since last audit evidenced that, through its public relations process and stakeholders engagement policies and procedures, have specific communication channels to provide information, as required, related to cyanide related incidents.

The information reported to the noted regulatory agencies, regarding confirmed cyanide release and exposure incidents, are made available to the public by those agencies.

- a) Cyanide exposure resulting in hospitalization or fatality - In the event of such incident, the operation shall communicate the Regional Labor Office of Bahia State (DRT ) Bahia

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

- b) Cyanide releases off the mine site requiring response or remediation -In the event of such incident, the operation shall communicate with Institute of the Environment and Water Resources (INEMA), Civil Defense and involved communities.
- c) Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment - In the event of such incident, the operation shall communicate with INEMA, Civil Defense, DRT Bahia and involved communities.
- d) Cyanide releases on or off the mine site, requiring reporting under applicable regulations - In the event of such incident, the operation shall communicate with INEMA and DRT Bahia
- e) Releases cause applicable limits for cyanide to be exceeded - In the event of such incident; the operation shall communicate with INEMA and DRT Bahia

This operation has not experienced any compliance issues during the previous three-year audit cycle”

There have been no incidents in any of these categories occurring during the recertification period. No incidents of off-site releases, exposure or other reportable incidents relating to cyanide have occurred during the recertification period.

During the audit it was evidenced that FBDM maintains a Safety, Health, Environment and Quality (SHEQ) management system. This system ensures an adequate cyanide management in accordance with the Cyanide Code principles. During the previous three years certification cycle, FBDM did not experience any significant cyanide related incidents nor any compliance problems related to cyanide management. Being usual in all audit process, through sampling, opportunities of improvement (corrective and preventive) may exist and were not identified in this opportunity.

Please for additional information see ICMI [Guidance for Use of the Mining Operations Verification Protocol](#) (Page 16 of 89) regarding the Compliance Statement.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date

# MINING OPERATIONS SUMMARY AUDIT REPORT

Audit team conclusions:

Based on the sampled evidences, the physical conditions of the site (installations), in the interviewed personnel and in the reviewed documentation, the audit team concluded that the cyanide management system is FULLY implemented and maintained in accordance with the ICMI protocol for gold mining operation.

**FBDM Mine**

Name of Operation



Signature of Lead Auditor

**10/01/2024**

Date