

ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

**Jacobina Mineração e Comércio Ltda
Jacobina mine**

Bahia, Brazil

**Submitted to:
The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA**

2025 Audit Cycle



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1150 Catamount Drive
Golden, CO 80403-7795 USA
www.PatersonCooke.com

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Mining Operation: Jacobina Mine

Mine Owner: Pan American Silver

Mine Operator: Jacobina Mineração e Comercio Ltda (JMC)

Name of Responsible Manager: Marcos Mendonca de Oliveira, General Manager

Address and Contact Information:

Jacobina Mineração e Comercio Ltda,


Fazenda Itapicurú s/nº Jacobina

Bahia, Brazil

Telephone: +55 74 3621 8000

Antonio.oliveira@br.panamericansilver.com

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Location and description of the operation

The Jacobina mine location is presented in the picture below



Location and General Context

Jacobina Mineração e Comércio Ltda. (JMC) is located in the state of Bahia, approximately 330 km from the capital Salvador, in the municipality of Jacobina. The unit is part of the Pan American Silver group and is recognized as the largest gold producer in the Northeast and one of the main producers in Brazil. Its activities involve the extraction, processing and responsible management of tailings from the mineral process, with emphasis on the adoption of safety and sustainability practices in all production stages.

Structure of the Mining Complex

JMC owns an integrated mining complex, consisting of a set of interconnected underground mines, an industrial plant for the processing of gold ore and a tailings dam. These three main operations: mine, plant and dam, form the operational axis of the unit, interconnected by transport, pumping and automated control systems, ensuring efficiency and operational safety.


Underground Mining Stage

The production process begins in the underground mines, where access ramps are developed to the ore bodies. These ramps, in addition to allowing the movement of equipment and people, function as integration routes between different levels of the mine and as conduits for the ventilation system, essential for the safety of workers and for the control of gases and dust.

Galleries and Rock Blasting

From the main ramps, the development galleries are opened, horizontal tunnels that allow direct access to the ore and the mining fronts. At the end of the galleries, detonation holes are made, in which explosives are inserted according to the previously defined blasting plan. After blasting,

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the ore is dismantled, giving rise to cavities known as stopes, from which the fragmented material is removed.

Loading of Ore and Transport

The fragmented ore is loaded by LHD (Load-Haul-Dump) loaders and transported by underground articulated trucks to the ore yard, located on the surface. This is the transition point to the beneficiation stage, where the ore starts to be processed industrially.

Ore Crushing and Comminution

In the beneficiation plant, the ore goes through a crushing process in three successive stages: primary, secondary and tertiary, which aims to reduce the size of the particles.

Primary crushing

Performed by a jaw crusher, it reduces the ore to a controlled size and stores it in a lung pile, which gives autonomy to the process.

Secondary crushing

The material is taken up by conveyor belts and processed in cone crushers coupled to vibrating screens, which separate the particles of the appropriate size, recirculating only the coarse material.

Tertiary crushing:

Refining stage, where high-efficiency crushers and screens produce a material with fine and controlled granulometry, which goes to silos 01 and 02 with capacities of 1,500 tons and 2,700 tons, respectively, to feed the mills.

Hydro cyclone Grinding and Classification

From the silos, the ore is sent to the ball mills: mill 01 and mill 02, which are partially filled with steel balls, responsible for the wet grinding of the material. The addition of water transforms the ore into pulp, which is then directed to the hydro cyclones, equipment that performs particle size separation:

- Overflow (fine fraction): it goes to subsequent stages of processing. The overflow pulp receives the addition of lime, an essential reagent for pH control and leaching preparation, and sent to the thickener.
- Underflow: returns to the mill as a circulating load or is sent to gravimetric concentration.

Gravimetric concentration

At this stage, the process is based on the difference in density between the mineral particles, separating the gold concentrate from the tailings. JMC uses 3 Knelson-type concentrators, which operate with a rotating cone at high speed, intensifying separation. The resulting concentrate is rich in gold, while the tailings return to milling.

Thickener

The thickener promotes the reduction of the water content of the pulp and the reuse of up to 95% of the water in the process, in accordance with water saving and environmental sustainability practices.

Leaching and Carbon in Pulp (CIP)

The thickened pulp is sent to the agitation leaching tanks, where the controlled addition of sodium cyanide (NaCN) occurs. The slurry currently passes through seven tanks arranged in series: TK-03, TK-04, TK-05, TQ-31, TQ-32, TQ-33 and TQ-30, all equipped with mechanical agitators and air injection from the bottom. The transfer between tanks occurs by overflow, and all tanks have containment systems. From the TQ-30 tank, the pulp is pumped to the adsorption stage in activated carbon, called CIP (Carbon In Pulp). The gold-laden coal is then separated and sent to the elution process.

Elution and Rich Solution

In elution, the coal is subjected to controlled temperature and pressure, releasing the adsorbed gold and generating a solution rich in precious metals, which goes to the smelting circuit.

Intensive Cyanidation (Acacia)

Operating in parallel with the leaching and CIP process steps, the Acacia system (model CS 4000) performs intensive cyanidation, using a catalytic agent commercially called "Leach Aid". This process is applied to concentrates with higher gold content, coming from Knelson concentrators, with the objective of maximizing the recovery of the precious metal. As a result, the Acacia system generates a rich solution of high purity, which goes on to the subsequent stages of treatment and casting.

Gold Smelting & Production

The rich solutions are processed in electrolytic cells, where the gold is electrodeposited on the cathodic screens by electric potential difference. The deposited metal is then washed, melted and shaped, giving rise to gold bullions, the final product of the operation.

Tailings Management and Disposal

The tailings from the CIP constitute the final tailings of the process, being pumped through approximately 6 km of pipes to the tailings dam. In the dam, the material is classified and disposed of: part is deposited in the reservoir and part is used to raise the dam.

Tailings Dam and Operational Safety

The dam currently in operation adopts the downstream construction method, considered the safest among the raising methods. Its structure is waterproofed, ensuring geotechnical stability and environmental control. The system is continuously monitored, integrating measurement instruments, regular inspections and contingency plans in line with the best practices of responsible mining. JMC's operation does not use a cyanide destruction process to reduce cyanide concentration in tailings pulp.

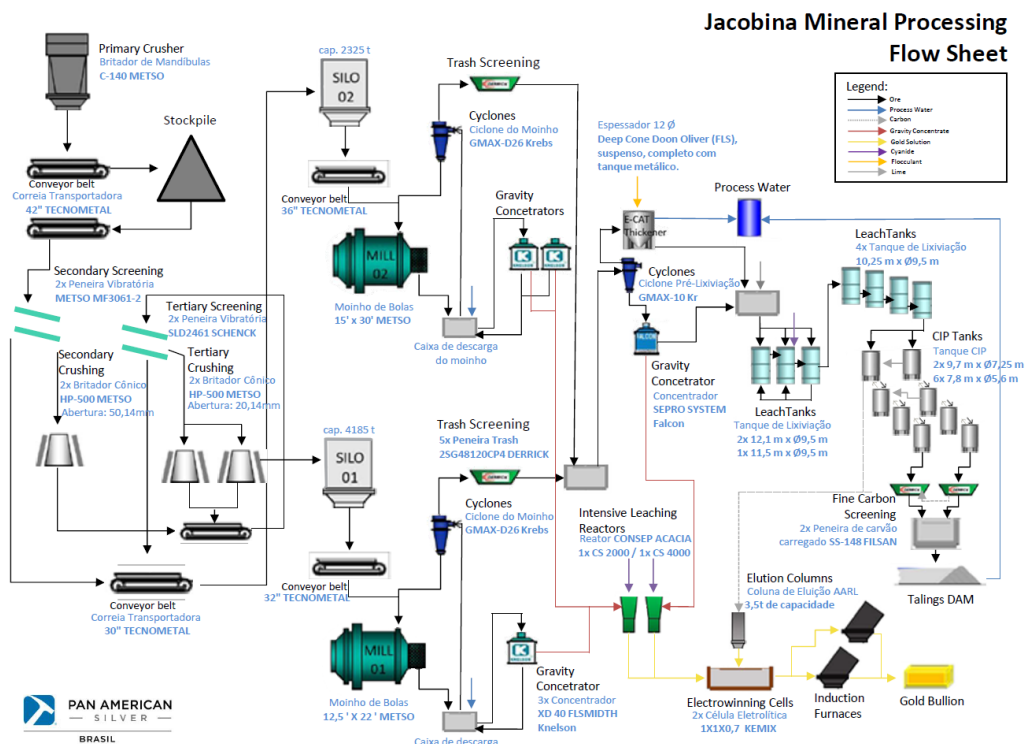
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The scope of the recertification audit at JMC comprises the process plant facilities including the leach tanks, CIP tanks, intensive cyanidation units (Acacia), carbon handling, cyanide offloading and storage tanks, and the cyanide distribution tank. The two mills are also included in the scope as reclaim water with cyanide content is added to the milling process. The scope also includes the tailings pipeline corridor, the B2 Tailings Storage Facility (TSF) and the reclaim water pond, and the seepage collection ponds. The B1 TSF has been reclaimed and is outside of the scope of this recertification audit. There are no treated cyanide water discharges to the environment at JMC.

Liquid cyanide at 35% concentration is delivered at JMC in isotanks. Cyanide is stored in two cyanide tanks before it is distributed for use in the production facilities.

The only new facilities constructed and put in operation since the previous recertification audit are the two raises of the TSF dam (Phases 5 2A and 5 2B), two CIP tanks (TQ03 and TQ04), and the Acacia unit #2.

JMC process flowsheet is presented below:



Auditor's Finding

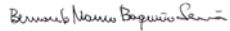
The International Cyanide Management Institute (ICMI) approved Audit Team verified that the JMC is in **SUBSTANTIAL COMPLIANCE** with ICMI Cyanide Code requirements for Gold Mining operations.

This operation was found in substantial compliance with the Cyanide Code based on the audit findings discussed in this report under the following Standards of Practice: 4.3 and 4.4.

JMC has experienced zero significant cyanide incidents during this 3-year recertification audit cycle.

This operation was determined to be in SUBSTANTIAL COMPLIANCE with the International Cyanide Management Code.

Auditor's Attestation

Audit Company:	Paterson & Cooke	
Lead Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us	
Mining Technical Auditor:	Bernardo Moreno Baqueiro Sansão E-mail: Bernardo.Rios@patersoncooke.com	
Date(s) of Audit:	October 6 th – 9 th , 2025	

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, 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 Verification Auditors.

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

Jacobina Mine

Name of Operations


Signature of Lead Auditor

Mar 25th, 2026

Date

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SUMMARY AUDIT REPORT

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: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 1.1

Discuss the basis for this Finding/Deficiencies Identified:

During the recertification period from 10 October 2022 to present, the Jacobina Mineracao Mine purchased cyanide from Proquigel Quimica. Proquigel has been the sole supplier of cyanide to Jacobina since the beginning of the plant operations as Proquigel is the only supplier in Brazil. During the recertification period, all cyanide for JMC was purchased as a 33%-35% NaCN concentration in liquid from Proquigel from the Camaçari plant, which was verified during interviews with transportation & logistics personnel. The contract and amendments extending the contract effective dates were provided to the auditors. There is no exclusivity of purchase in the contract between JMC and Proquigel. Cyanide purchased by the Jacobina mine for the recertification period was manufactured at facilities certified by the Code. Proquigel Quimica SA was first certified on 17 December 2009 and is currently certified with the last certification audit being approved 01 March 2024. Verification was done through ICMI's website.

2. TRANSPORTATION: Protect communities and the environment during cyanide transport.

Standards of Practice

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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: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 2.1

Discuss the basis for the Finding/Deficiencies Identified:


The transportation from Proquigel to JMC is done by truck and the cyanide is stored in isotainers. The transportation company is hired by Proquigel. Four different transportation companies delivered cyanide solution to Jacobina. They were Ergotrans, Confins, Concordia and Moscato. The certification of the companies was verified through ICMI's website. Proquigel provides shipping papers documenting chain of custody from the point that the trailer is filled through offload at the mine site. Review of sample paperwork for the recertification period indicates that this practice has remained consistent during the recertification. No interim storage takes place between the production facility and the storage tanks at the mine site. Bills of Lading for cyanide deliveries show that the cyanide was produced by Proquigel and transported by the transportation company straight to the Jacobina site. Safety and maintenance of the means of transportation throughout transport is the seller's responsibility, as well as task and safety training and emergency response for the seller's transporters throughout the process. Security is addressed as part of transportation company's ICMI certification. Maintenance of chain of custody records within the transportation segment was addressed by reviewing the transportation company recertification records covering the period. The records were reviewed and all companies mentioned above except Moscato were recertified. Moscato certification expired on July 22, 2024. However, Moscato didn't deliver any cyanide to the Jacobina facility after this date. This audit item is therefore considered acceptable.

The records were reviewed and all companies mentioned above except Moscato were recertified. Moscato certification expired on July 22, 2024. However, Moscato didn't deliver any cyanide to the Jacobina facility after this date. The most recent recertification dates were Confins – 02 August 2024, Concordia – 28 May 2025, Ergotrans – 17 January 2025. This audit item is therefore considered acceptable. The certification of the companies was verified through ICMI's website.

3. *HANDLING AND STORAGE*: Protect workers and the environment during cyanide handling and storage.

Standards of Practice

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

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


Discuss the basis for this Finding/Deficiencies Identified:

JMC has cyanide offloading and storage facilities that were designed and constructed in accordance with sound and accepted engineering practices. This was verified during the initial certification audit for JMC. No changes or modifications have been made since the initial audit and subsequent recertification audits. The field component of the audit confirms that the cyanide tanks area is located within the process area on concrete hardstanding maintained in good condition. There are two cyanide storage tanks (Tanks 550-TQ-01A and 550-TQ-01B), each of them with a capacity of 82 m³. The tanks are located within a containment concrete berm, which is sized to contain at least 110% volume of the tank and have a sump pump to return any rainwater or spilled cyanide back to the circuit. The cyanide tanks area is also subject to monthly inspections to detect any obvious releases or failure in containment. This area is also inspected before cyanide offload events, which usually occur twice a week. The cyanide offloading and storage facilities were designed and constructed by consulting firm GEST Engenharia e Consultoria. Design and as-built drawings for the cyanide offloading system have been retained from the initial certification audit and were available for review by the auditors.

JMC offloading and storage facilities for liquid cyanide are located inside the process area far away from people and surface waters. This facility remains substantially unchanged since the initial certification audit and subsequent recertification audits and is not located near any offices or places where workers might congregate. Appropriate warning signage is placed at the cyanide offloading and storage facility to alert operators of cyanide presence and hazards associated with it. The offloading and storage facilities have their own fenced areas and are also located within the fenced and secure areas of the process plant. There are surface waters in the vicinity of JMC operations, however, these water courses are far away from the cyanide offloading and storage area. There is a fixed HCN monitor installed at the cyanide offloading and storage area. All personnel with access to the offloading and storage facilities, including contractors, receive site specific health and safety training. All these measures minimize the potential for human exposure. The offloading platform has a drain towards the cyanide tanks secondary containment and also has traffic bumps that prevent any potential spill from leaving the area. Any release from the cyanide tanks will be contained within the secondary containment and pumped into the process circuit.

JMC cyanide offload area has a concrete pad for trucks carrying liquid cyanide. This pad is constructed with cast-in-place reinforced concrete to prevent seepage to the subsurface. It is sloped towards a drain that daylight into the secondary containment of the cyanide tanks to

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collect any potential spillage during offloading. The offload platform has traffic bumps that prevent any potential spill from leaving the area. This area is inspected monthly to detect any deficiencies, and before every cyanide offload. The field portion of the audit verified that the concrete pad was in good condition, with no significant damage, cracking or spalling evident, and with epoxy seal. In case of an incident involving a cyanide release in this area, the product is recovered by using environmental spill kits.

JMC has two storage tanks for liquid cyanide. There are visual level indicators and high-level alarms installed at each tank. Tank levels are continuously monitored from the process control room. Arrangements remain unchanged since the previous recertification audit. The cyanide offload procedure is designed to prevent overfilling the tanks. The operators verify that the tank levels are low enough to receive the expected delivery. Cyanide offload should only occur if the tank level is at 65% or lower. The process operator is required to verify the tank levels prior to offloading. Tank level before cyanide offloading is documented in the cyanide offloading checklist. There is a Hi-level alarm on each cyanide tank. The Hi-level alarm is set at 75%. There is also a level indicator at the tanks with a visible alarm that is inspected visually during the cyanide offloading process. The level indicators in the cyanide tanks are continuously monitored from the control room to ensure they are operational. The auditors observed screenshots in the control room showing that the level indicators were functioning correctly. There is a cyanide distribution tank located at the CIP area that has an automated interlock system to prevent overfilling. This tank has a Hi-level alarm that is set at 95%. The reliability and the functionality of the level alarms are maintained through checks of tank level, checks for the offloads, and routine testing and monitoring by the operations. These sensors are included in the preventive maintenance program and are maintained every six months. Immediate attention and repair are given for an improper functioning high-level alarm.

The cyanide storage tank area remains substantially unchanged since the initial certification audit and subsequent recertification audits. The cyanide storage tanks are secured to a solid, reinforced concrete pedestal-type foundation and are contained within concrete berms with good condition concrete flooring that is an adequate barrier to prevent seepage to the subsurface. The bermed containment area is sized to contain 110% of the tank volume and has been confirmed previously as part of engineering specification checks. The containment area is equipped with a sump, pump, and automatic controls to return liquids to the process circuit. The cyanide storage tanks are located away from other products, and no smoking is allowed. The tanks, berms and containment area are inspected periodically and every time there is a cyanide offload.

the cyanide storage tanks are located within a bermed concrete impoundment, which was observed to be of sound integrity and considered suitable for containment in the event of a release or tank failure. The berms and containment area are also subject to periodic inspections. Arrangements remain unchanged since the previous recertification audit.

The cyanide storage area for liquid cyanide remains substantially unchanged since the initial certification audit and subsequent recertification audits. JMC does not use solid cyanide. There are no cyanide mixing facilities at JMC. The cyanide storage area is located outdoors, outside

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the mill building, and the tanks are vented on top. There is a fixed HCN monitor and a windsock to indicate wind direction. Build-up of hydrogen cyanide gas is unlikely to occur. The liquid cyanide storage facilities have their own fenced area; and the offloading platform is located within the fenced and secure area of the process plant where public access is controlled. There is warning signage indicating that only authorized personnel are allowed in the area. In addition, all the valves associated with the cyanide storage tank are locked. The cyanide storage tanks are located separate from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products. Sodium hypochlorite containers are stored on a platform inside the cyanide tanks secondary containment, within a small berm to prevent unwanted mixing of chemicals.

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: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 3.2

Discuss the basis for this Finding/Deficiencies Identified:

JMC only uses liquid cyanide delivered in isotanks; no drums or wooden crates are involved. JMC offloading procedure requires two process operators to monitor and control the entire offload operation. The procedure also details responses to any leaks or spillage. At the end of the offload, the process operators are required to wash down the hose connections and couplings of the isotainers. If there is any spillage or residue on the outside of the truck, offload piping, or pad, the operators wash it off and the material is collected in the drain that directs any fluids to the cyanide tanks secondary containment sump. In addition, the Standard Operating Procedure (SOP or procedure) "Offloading of Cyanide Solution 35%" indicates that any spilled product (on containment) is to be noted and cleaned up at the end of the cyanide offload, as appropriate, and to report a product release (off containment) to the area supervisors and environmental departments to determine appropriate clean up and disposal. Any spills or leaks related to a cyanide offload and onto the pad are captured in a drain that directs any fluid into the cyanide tanks secondary containment sump. The sump in the secondary containment of the cyanide tank has a pump and automatic controls to return liquids to the process circuit. Any spills that flowed off the pad would be cleaned up following the procedure "Neutralization of NaCN". These requirements were verified through field inspections, review of documentation and interviews. All personnel interviewed have knowledge of their tasks and associated risks during cyanide handling.

JMC has SOP "Offloading of Cyanide Solution 35%" that outlines the requirements for inspection, observation and offloading of liquid cyanide; as well as the operation, maintenance, and function

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of valves, pumps and various interlocks within the cyanide offloading process. There is also a cyanide offloading checklist that is used by process operators to inspect and monitor the offloads. The checklist includes inspection of emergency showers and eye-wash stations, HCN monitors, oxygen bottles, level of cyanide in the tanks, among other requirements for the safe offload of cyanide. The process operators have radios for communication with the control room in the event of an emergency. SOP "Offloading of Cyanide Solution 35%" also includes a requirement to clean up any spilled cyanide after the offload event is complete. No spills related to cyanide offloading were reported during this recertification cycle. SOP "Offloading of Cyanide Solution 35%" require the process operators to use the appropriate PPE during offloading activities. One of the process operators observes the offload conducted by a second operator that is using the appropriate PPE in the event of an emergency. The required PPE includes rubber boots, face shield, rubber gloves, rubber or neoprene suit, approved respirator, and hardhat. The operators are trained and qualified to perform this procedure and are required to use portable HCN detectors. The SOP also specifies that process operators shall conduct and monitor the connection/disconnection of the offloading process. The liquid cyanide already comes with red colorant dye. This was verified by the auditors during the field visit. A cyanide offloading event was observed during the audit. The review indicated that JMC has appropriate SOPs and practices to handle and offload cyanide solutions in a safe manner.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The scope of the recertification audit at the JMC comprises the process plant facilities including the leach tanks, CIP tanks, intensive cyanidation units (Acacia), carbon handling, cyanide offloading and storage tanks, and the cyanide distribution tank. The two mills are also included in the scope as reclaim water with cyanide content is added to the milling process. The scope also includes the tailings pipeline corridor, the B2 Tailings Storage Facility (TSF) and the reclaim water pond, and the seepage collection system. The B1 TSF has been reclaimed and is outside

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of the scope of this recertification audit. There are no treated cyanide water discharges to the environment at JMC.

JMC has developed several procedures for the safe operation of cyanide facilities, including offloading and storage facilities, leaching and CIP operations, and tailings disposal. There are approximately 40 procedures, manuals and plans related to cyanide management. In addition, in February 2025, JMC achieved ISO14001:2015 and ISO 45001:2018 recertifications of its environmental and health and safety management systems, respectively; which guarantees the retention of documents and records. All procedures include a description of the tasks to be performed, a section related to PPE requirements, considerations of safety hazards and potential impacts on the environment. Procedures were reviewed and found to be sufficiently detailed to enable safe operation.

JMC has manuals, plans and procedures in place that include critical assumptions and parameters for the safe operation of cyanide facilities. The RISR (Regular Safety Inspection Report) describes operational requirements for the TSF, such as monitoring the reclaim water pond, and maintaining a minimum freeboard of 1 meter below the discharge pipeline. TSF freeboard is monitored on a daily basis. The RISR is updated every 6 months to reflect current operating conditions. The RISR also includes a Probable Maximum Precipitation (PMP) of 10,000 years, which has been calculated at 413 mm in 24 hours. The RISR also includes a 100-year, 24-hour storm event of 211.3 mm for freeboard calculations. Procedure CIP operations indicate that a minimum pH of 10.5 shall be maintained throughout the leach/CIP circuit to minimize the evolution of hydrogen cyanide gas. This is also mentioned in other procedures. JMC does not discharge any solution containing cyanide to the environment, including surface water. Currently, JMC has not established a target of WAD cyanide concentration in the tailings discharged to the TSF. This is also reflected in the values of WAD cyanide reported at the tailings discharge points, which are usually above 50 mg/l. This topic is further discussed in Standard of Practice 4.4.

JMC has developed and implemented standard operating procedures (SOPs) for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide offloading as well as for processing facilities, TSF, and all associated piping and pumps as having contact with cyanide. The JMC Tailings Storage Facility Operation and Construction Manual includes in Section 7 a list of critical aspects and areas to be inspected and inspection frequencies, as well as water management procedures to retain storage capacity during operations. JMC has implemented an inspection program that varies between daily, bimonthly, and monthly for the cyanide offloading area, leach and CIP areas, elution and acacia areas, and tailings facilities. Inspections are conducted by process operators following requirements specified in internal documents (i.e. JMC TSF Operation and Construction Manual, SOPs). The inspections are documented using forms that include the name of the inspector, date, and a comments section where deficiencies are noted. Deficiency notifications are sent to maintenance planners where they schedule corrective maintenance via work orders. The inspection program is sufficient to assure and document that the systems are operating within

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design parameters. Workplace inspections are conducted periodically by process operators including safety equipment, piping, containments, process equipment, tailings impoundment, tailings pipeline and reclaim pond. JMC also monitors pH levels and cyanide concentrations according to operational parameters. Wildlife inspections at the TSF and reclaim pond are also conducted on a daily basis. Identified deficiencies are noted and corrected or reported to supervision for corrective action. The auditors verified inspection records for the last 3 years and found them to be complete. It is the professional opinion of the auditors that the inspection program of cyanide facilities, including offloading and storage activities, and the frequency of inspections are sufficient to assure and document that the operation is safe and functioning within design parameters. The auditors reviewed inspections records and verified that inspections are conducted in a consistent manner.

JMC has a procedure for Management of Change (MoC) that includes the identification and review of the proposed changes; identification of relevant stakeholders for the project, analysis and evaluation of the changes by a multidisciplinary team including health, safety and environmental aspects; sign off by all areas that participated in the evaluation, approval, implementation of the change, action plan, and evaluation of the change. The procedure requires Environmental and Safety personnel to review and sign-off on proposed cyanide-related process changes and modifications, prior to implementation of the changes and modifications. JMC provided evidence of MoC process related to cyanide facilities for the recertification period, such as the improvements in the cyanide offloading platform, the implementation of wildlife deterrent mechanisms in the TSF, the installation of new HCN fixed sensors, the installation of a new HCN visible and audible alarm system, and the installation of additional safety showers and eye-wash stations.

The Tailing Storage Facility Emergency Action Plan describes contingency actions for numerous situations related to management of the TSF, such as alert levels, inspections, maintenance, releases, impoundment and slope failures, communication to potential affected communities, potential flooding areas, among others. The TSF Operation and Construction Manual includes abnormal operating conditions and emergency response activities such as, leakage or failure in the tailings delivery and reclaim return lines, excessive reclaim pond limits, extreme climatic events, and seepage or slope instability. In relation to a temporary closure or cessation of operations scenario, JMC provided a document called "Contingency Plan – Temporary Closure of Cyanide Facilities" that is an appendix of the Emergency Response Plan for Cyanide (ERP-Cyanide). The Contingency Plan includes the identification of critical activities and actions to be taken if the temporary closure lasts more than 72 hours, including inspection and maintenance of cyanide facilities as well as maintaining the water balance of the TSF and avoiding potential overflow of cyanide solution. The Contingency Plan provides specific guidelines for planned or unplanned shutdown situations, ensuring the safe management of cyanide-bearing solutions, environmental protection and operational integrity throughout the downtime. In addition, it defines responsibilities, monitoring activities, procedures for chemical stabilization, preventive neutralization, and safe resumption of operations.

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Tanks holding cyanide solutions are inspected on a monthly basis. Inspection forms include inspection items such as structural integrity, signs of corrosion and leakage of tanks. Inspection forms for the last 3 years were sampled and found to be complete. Nondestructive tests (NDT) are conducted annually for tanks holding cyanide solutions including the cyanide storage tanks and distribution tank. The auditors reviewed evidence of these tests for the recertification period. Secondary containments configuration remains substantially unchanged from the previous recertification audits. None of the containment areas have any drains to the adjacent land surface. During the field visit, the secondary containments were observed to be generally free of any fluids or materials stored within them. Inspection forms include integrity of secondary containments, the presence of fluids and available capacity. Pipelines, pumps and valves are inspected monthly by the maintenance area as part of their preventive maintenance program. Process operators conduct inspections to visually check for deterioration and leakage of pipes, pumps, and valves, and for presence of salts. The TSF is inspected daily for critical aspects including available freeboard. The historical freeboard for the recertification period at the TSF and reclaim pond were reviewed and verified that they were managed according to their design criteria. The integrity of surface water diversions around the TSF are inspected every two weeks. Free cyanide concentrations in tailings pumped to the TSF are monitored daily. Presence of wildlife in the TSF is inspected daily and on a continuous basis using video cameras located around the facility. The auditors conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, water diversions, and tailings freeboard. These inspections also included cyanide offloading and storage facilities. The auditors reviewed inspections records and verified that inspections of cyanide facilities are conducted in a consistent manner.

Records of inspections are retained and were reviewed by the auditors. The inspections are documented and include the date of the inspection, the name of the inspector and observed deficiencies. Inspection forms are reviewed by the supervisor to ensure good quality of inspections. The inspection program also includes cyanide offloading and storage facilities. Corrective actions identified by maintenance personnel during their routine inspection program are managed by the Maintenance area. These corrective actions are managed using the JD Edwards maintenance management system, where work orders are tracked, prioritized, planned and closed. The auditors reviewed examples of items identified by maintenance and Process personnel during inspections and records of the implementation of the corrective actions until they were closed.

The Maintenance area has a preventive maintenance program for pumps, pipelines, valves, flow meters, level sensors, pH meters, sump pumps, filters, HCN sensors, back-up power generators, tanks and cyanide facilities in general. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time it is needed to keep equipment and facilities working properly. JMC uses the JD Edwards maintenance management system for identifying, assigning responsibility, scheduling, and tracking the completion of the preventive maintenance activities. Preventive maintenance plans are generated automatically. Work orders generated from inspection forms are entered into the system, including assigned priority. Examples of

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preventive maintenance records for the recertification period for different cyanide facilities were reviewed during the audit and were found to be complete.

JMC receives electricity from the public grid to run its operations. The operation needs between 20 – 22 MW (Megawatts) to run all mining operations. In case of power outage, there are five generators to run processing facilities, each of them with 350 kilowatt capacity. In the event of a power outage, these generators would run the control room, agitators, compressors, tailings pump, thickener pumps, lightning, and other critical facilities at the plant. These generators are test run and maintained on a weekly basis. The generators will start automatically in case of a power outage. JMC provided examples of preventive maintenance records for the backup power generators for the recertification period. A review of these records confirmed that the generators are checked weekly for fuel level, lighting, heating and are also start-tested for 15 minutes. This inspection would trigger a corrective maintenance work order if required.

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

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

Discuss the basis for this Finding/Deficiencies Identified:

JMC conducts a program to determine appropriate cyanide addition rates in the process plant and evaluate and adjust addition rates as necessary. Cyanidation tests are usually performed to identify opportunities to reduce cyanide consumption. JMC has effective controls of cyanide addition based on gold concentrations. Cyanide dosing in the JMC plant circuit is performed automatically by a cyanide analyzer. This equipment analyzes, in a short period of time, the cyanide concentration in the pulp and changes the metering pump inverter to reach the set point determined by the metallurgical team. This process guarantees the stability of cyanide concentrations in the circuit, avoiding overdosing. Procedure “Leaching Operation” describes the process for cyanide addition. To control cyanide addition, JMC monitors free cyanide in the Leach tanks and CIP tanks, along with other process parameters. Samples are taken automatically every 20 minutes at Leach Tank #3 and eventually at Leach Tank #5. The site has established a set point of 300 mg/l as NaCN. The results of the samples are discussed and adjustments to cyanide addition and cyanide detoxification operation are made based on these samples. Manual samples are also collected daily at the final CIP tank and analyzed for free cyanide. JMC does not manage cyanide addition to meet a WAD cyanide target of 50 mg/l at the spigots of the TSF.

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

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.3

Discuss the basis for the Finding/Deficiencies Identified:

JMC manages the TSF water balance using an Excel spreadsheet that considers the following factors: tailings production; tailings deposition rates; precipitation, evaporation and seepage rates; and freshwater input. JMC has zero process water discharges to surface waters. This water balance spreadsheet is sent to external consultant GWS periodically for review and calibration, with frequencies that vary between monthly, quarterly and biannually. The water balance is calibrated by using real precipitation data and tailings deposition. During the field audit it was unclear whether GWS uses a comprehensive and probabilistic water balance model to review and calibrate JMC water balance data to meet Code requirements. During preparation of this report, JMC sent evidence that the site is planning to acquire and implement a Goldsim water balance model, which has probabilistic features. The implementation of the water balance model will start in Q1 2026, which exceeds the submission timeline of this report. As such, this item has been included in a Corrective Action Plan (CAP) for the site. A description of the water balance model and calculations is described in the Tailings Dam B2 RISR (Regular Safety Inspection Report) which is updated every 6 months and is developed by an external consultant, as required by Brazilian regulations.

The Excel water balance model considers the tailings deposition rates into the TSF during the calibration process. Monthly deposition rates vary between 250 and 300 tons. Bathymetric surveys of the TSF reclaim pond are conducted periodically to evaluate consolidation of the tailings and are included in the calibration of the model. According to the RISR report, a Probable Maximum Precipitation (PMP) of 10,000 years, which has been calculated at 413 mm in 24 hours, and the 100-year, 24-hour precipitation event have been considered in the model to provide a sufficient degree of probability that overtopping of the TSF impoundment can be prevented during the operational life of the facilities. The 100-year, 24-hour storm event considered in the model is 211.3 mm. The freeboard in the TSF is regularly monitored to meet the design criteria of 1 meter below the discharge pipeline. There is one weather station at JMC that is used for water balance purposes and 4 pluviometers. The weather station and pluviometers have collected rainfall data since 2012. Evaporation data has been measured since 2016. The weather station is calibrated every year to ensure collection of good quality data. The TSF has a surface water control system on the east side for controlling and safely directing runoff generated from upgradient watersheds around them. The west side of the TSF does not have a surface water control system, and any runoff from upgradient watersheds could eventually enter the TSF. This additional surface runoff area is considered in the water balance. The water balance considers evaporation losses and calculated infiltration rates. The TSF has a geomembrane liner to reduce the potential for seepage to the subsurface and includes a

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seepage collection pond below the TSF dam to collect and return seepage back to the system. Potential power outages are not considered in the water balance as there are five generators on site as backup power to prevent any release to the environment in case of a prolonged power outage. JMC does not discharge any solution containing cyanide to the environment, including surface water. As such, this component is not considered in the water balance. Seepage from the TSF is collected in the 3 seepage ponds and pumped to the process. In addition, water from a groundwater sulfate plume from the closed TSF B1 is pumped from several groundwater wells that form a hydraulic barrier and discharges to the TSF reclaim pond and added to the process. The amount of water pumped from these wells into the process is also included in the water balance.

JMC incorporates inspection and monitoring activities into its procedures to implement the water balance and prevent the overtopping of the TSF. Inspection records for the TSF were reviewed for the last 3 years and found to be complete. The auditors also reviewed monitoring data for the last 3 years and verified that the design freeboard for the TSF (1 meter) was maintained at all times. A bathymetric survey is conducted periodically at the reclaim pond to evaluate consolidation of the tailings. The engineer of record also conducts periodic inspections of the TSF.

JMC conducts daily inspections of the TSF and monitoring activities to ensure these facilities are operated according to the design criteria. Records of inspection forms for the last 3 years were reviewed and found to be complete. The tailings dam is being constructed in stages, and the current stage elevation is well above the required storage level for storing reclaim water, impounded tailings, and storm events. The tailings operators conduct daily inspections of the reclaim pond and impoundment area to record water levels in addition to the regular instrumentation recordings. Monitoring data is used to compare the freeboard with available storage. Freeboard in the TSF and the reclaim pond are visually inspected on a daily basis. The auditors reviewed data for the last 3 years and verified that the 1-meter freeboard has been maintained at all times for the TSF. The necessary free volume in the TSF to contain the PMP event has been calculated at 484,000 m³. A bathymetric survey is conducted quarterly at the TSF pond to evaluate consolidation of the tailings.

JMC measures precipitation daily and the data is uploaded into the water balance model. The water balance model is updated and calibrated periodically by an external consultant by adding real precipitation data and tailings deposition records as mentioned in the RISR document. As mentioned above, it was unclear if the water balance model used by GWS consultants to calibrate JMC water balance has probabilistic capabilities. During preparation of this report, JMC sent evidence that the site is planning to acquire and implement a Goldsim water balance model, which has probabilistic features. Once implemented, the Goldsim water balance model will be calibrated on a periodic basis. The implementation of the water balance model will start in Q1 2026, which exceeds the submission timeline of this report. As such, this item has been included in a Corrective Action Plan (CAP) for the site. The auditors reviewed on-site meteorological monitoring data. JMC maintains the information in an Excel spreadsheet, which is then uploaded into the water balance spreadsheet. The records are complete.

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

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


Discuss the basis for the Finding/Deficiencies Identified:

Facilities with open waters at JMC that could have WAD cyanide concentrations above 50 mg/l are the reclaim water pond at the TSF and the 3 seepage collection ponds located downgradient of the TSF dam. The TSF reclaim pond, and the seepage collection ponds have consistently reported WAD cyanide values below 50 mg/l for the recertification period. The site has implemented measures to restrict wildlife and livestock access to open waters such as a fence around the mine perimeter, permanent presence of operators at the TSF, video cameras around the perimeter of TSF, and wildlife deterrents for both avian and terrestrial animals.

JMC analyzes free cyanide daily at the last CIP tank before the tails are sent to the TSF. No sampling is conducted at the spigots due to safety reasons to reach the sampling points, however, sampling at the last CIP tank is considered representative of the cyanide content that is discharged to the TSF. The auditors reviewed free cyanide concentrations in tailings at the last CIP tank for the recertification period. Average free cyanide values for the recertification period were 85 mg/l, while maximum free cyanide values reached levels of 141 mg/l. Considering a factor of 1.1 as the relation between free and WAD cyanide, based on Jacobina operational history, it is observed that the cyanide present in the operation occurs predominantly in the free form, accounting for at least 80% of the total cyanide. This characteristic indicates the absence, or only a negligible presence, of iron or other complex agents capable of forming complex cyanide species. As a result, WAD cyanide concentrations are generally above 50 mg/L. JMC production process does not include a system to destroy or lower cyanide concentrations of the tailings that are sent to the TSF. In addition, JMC has not established a target of WAD cyanide concentration in the tailings discharged to the TSF. This item has been included in a Corrective Action Plan (CAP) for the site. JMC also samples the water from the reclaim pond and analyzes it for free cyanide content. Water samples are collected every quarter from the reclaim pond itself, and daily from the reclaim water that is pumped back to the process plant. The auditors reviewed free cyanide concentrations of the reclaim water pond at the TSF for the recertification period. Free cyanide concentrations reached maximum levels of 10 mg/l (i.e. 20 mg/l WAD cyanide), which is below 50 mg/l WAD cyanide.

During the recertification period, JMC has been successful at preventing wildlife mortalities related to cyanide facilities. The TSF and reclaim pond are inspected daily for wildlife mortalities. There have been no wildlife mortalities attributed to cyanide management for the recertification

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period. The WAD cyanide values at the reclaim water pond in the TSF have been below the recommended value of 50 mg/l in a consistent manner. Maximum free cyanide reported value in the reclaim water for the recertification period was 10 mg/l (20 mg/l WAD cyanide). There were no events that exceeded WAD cyanide concentrations above 50 mg/l in the reclaim pond during the recertification period. JMC does not keep a standalone register of wildlife mortalities, however, any mortalities would be classified as an environmental incident and reported to the Corporate office. Procedure "Biodiversity Management" provides details on how to proceed in cases of wildlife that could have been intoxicated with cyanide, including an evaluation by a veterinarian to determine the cause of death, or treat the animal in case its alive.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

JMC does not have direct discharges to surface water. The mine operates with zero discharge of process solutions.

JMC does not have indirect discharges to surface water that have caused the instream concentration of free cyanide to exceed 0.022 mg/l. JMC has three seepage collection ponds located downgradient of the TSF dam. This water is collected and pumped back to the process circuit. WAD cyanide concentrations of the seepage collection ponds for the recertification period were below detection levels (<0.01 mg/l). JMC has a surface water monitoring station (SUP-34) located approximately 400 meters below the TSF dam. This station is sampled when there is presence of water. Free cyanide concentrations reported at this station are below 0.022 mg/l.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

There is no designated downgradient beneficial use, nor any actual point of groundwater use, nor any applicable groundwater standard in the area surrounding JMC operation. As stated in

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previous audit reports, JMC cyanide facilities consist of the process plant and related conveyance pipelines, tanks and containments, the tailings delivery and reclaim water pipelines, the TSF, and the seepage ponds. The main facility that may contribute to seepage to groundwater is the TSF. JMC has taken measures to manage seepage to groundwater from cyanide facilities including the installation of a geomembrane liner across the entire footprint of the TSF, 3 seepage ponds downgradient of the TSF dam and pumps to return seepage water to the process circuit. The process plant has adequate concrete spill containment to prevent seepage. The tailings delivery pipeline and reclaim water pipeline are contained within a high-density polyethylene (HDPE) lined channel inside a concrete channel that is covered to prevent spillages out of containment. JMC conducts regular inspections of the TSF, delivery pipelines and seepage ponds to ensure that the facilities are functioning as designed and protective of the environment. Additionally, JMC has installed several monitoring wells immediately downgradient of the TSF to monitor groundwater. The auditors reviewed completed inspection forms for the TSF, the seepage collection system, and a figure showing groundwater monitoring locations to verify compliance. In addition, water from a groundwater sulfate plume from the closed TSF B1 is pumped from several groundwater wells that form a hydraulic barrier and discharges to the TSF reclaim pond and added to the process circuit.

As mentioned above, there is no designated downgradient beneficial use, nor any actual point of groundwater use, nor any applicable groundwater standard. Regardless of this, JMC has a groundwater monitoring network that analyses Total cyanide concentrations. There are groundwater monitoring wells downgradient of the cyanide facilities. Monitoring wells SUB-63 and SUB-64 are located immediately below the TSF dam and are monitored quarterly. Data collected for the period between October 2022, and September 2025 indicate no detection levels for cyanide species (Total cyanide values reported were below 0.02 mg/l). There are 10 groundwater wells that form the hydraulic barrier to control the sulfate plume from TSF B1. Total cyanide concentrations for the recertification period reported values below 0.028 mg/l.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

JMC has spill prevention and containment measures for all cyanide storage and process solution tanks. These facilities remain unchanged since the initial certification audit and subsequent recertification audits. This includes the offloading area and cyanide storage tanks, the cyanide distribution tank, the leach and CIP tanks, and the carbon circuit area that contains the intense cyanidation solution tank. There are automated pumps within the containments to pump collected solutions into the process circuit. Automated sump pumps are included in the preventive

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maintenance program. The containments are constructed of cast-in-place reinforced concrete and in some cases have epoxy sealing. The cyanide storage tanks area is within a concrete containment with sufficient capacity to contain 110% of the largest tank. The containment volumes for the CIP/leach area, carbon circuit and the intense cyanidation unit are constructed to contain 110% of the single largest tank in the area. The secondary containment systems are inspected as part of the process facilities inspection system. The auditors observed that the concrete containment systems were in relatively good condition.

As stated in previous recertification audit reports, secondary containments for cyanide offloading, storage, and process tanks are sized to hold a volume at least 110% of the largest tank within the containment and piping draining back to the tank with additional capacity for the designed storm event. The secondary containment volume calculations were reviewed and deemed sufficient. Furthermore, those containments have remained unchanged since the last recertification audit. The entire process area is contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process. The containment system of the offload area has a drain towards the cyanide tanks secondary containment and also has traffic bumps that prevent any potential spill from leaving the area. Containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. The secondary containment areas are constructed of reinforced concrete. In addition, there is a battery of five concrete ponds located downgradient of the leaching and CIP areas, which collects the drainage of the secondary containments of these two areas, and could also contain any solution that exceeds the plant containment capacity and return it back to the process circuit. The auditors observed that the secondary containments were maintained empty, with no materials stored inside them.

JMC has several procedures, plans and manuals in place which are implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment. In the case of the process plant, all tanks and cyanide facilities are located inside concrete secondary containment systems with dedicated pumps that remove solutions and return them to the process circuit. The pumps have automatic level sensors to keep the secondary containments free of any fluids. The automatic pumps are included in the preventive maintenance program. There is no discharge of cyanide-containing water from the secondary containment areas as the secondary containments are not designed to discharge into the environment. As stated in the Code, no specific written procedures are necessary as the containment systems have sumps and dedicated pumps and piping to return solutions to the production process. In addition, the procedure "Neutralization of NaCN" provides details for soil remediation if a release occurs. This requirement was verified through field observations and interviews with process and maintenance personnel.

JMC has spill prevention and containment measures for cyanide process solution pipelines. These facilities remain largely unchanged since the initial certification audit and the subsequent recertification audits. JMC has constructed all pipelines with spill prevention and containment measures to collect leaks and prevent releases. Pipelines have been constructed within lined

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ditches and pipelines between separate processing buildings have a metal tray below them to convey any potential spillage into one of the secondary containment areas. Cyanide pipelines are inspected monthly using an inspection checklist. The tailings delivery and reclaim water pipelines between the process area and the TSF are located predominantly above ground. The tailings delivery pipeline and reclaim water pipeline are contained within a high-density polyethylene (HDPE) lined channel inside a concrete channel that is covered with metal panes to avoid overspray outside of containment in case of pipeline failure or leak. Where buried, the pipelines have a pipe-in-pipe configuration that will convey any spillage into containment areas. Thermographic inspections of the tailing delivery pipeline are conducted monthly.

The tailings delivery pipeline and the reclaim water pipeline are located within a high-density polyethylene (HDPE) lined channel inside a concrete channel. The pipelines cross a river located next to the process plant through a metal bridge channel. This metal bridge channel would contain and convey any potential spillage into three sumps with automatic pumps that would send any solution back to the process circuit. These sumps are inspected periodically and replaced if required. The metal bridge channel is inspected monthly with thermography to assess its structural integrity.

As stated in previous audit reports, all cyanide storage and process tanks are constructed of coated carbon steel placed on concrete foundations; liquid cyanide pipelines are constructed of carbon steel; and cyanide solution pipelines are constructed of steel or HDPE. All these materials are compatible with high pH cyanide solutions. All tanks and pipes were well supported and in good condition.

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

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.8

Describe the basis for the Finding/Deficiencies Identified:

Quality assurance and quality control (QA/QC) programs have been implemented during the construction of cyanide facilities at JMC. The site has implemented QA/QC programs for the new cyanide facilities built during this recertification period. New cyanide facilities constructed and put in operation since the 2022 audit at JMC are: Raising the elevation of the TSF impoundment – Phase 5 2A; Raising the elevation of the TSF impoundment – Phase 5 2B; Construction of two CIP Tanks (TQ03 and TQ04); and Construction of Acacia unit #2. Previous recertification audit reports mention that cyanide facilities constructed before 2022 followed QA/QC protocols, including the process plant, tailings pipeline corridor and the TSF which was found in compliance with the Code requirements. However, no additional QA/QC records were available during the

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audit for the rest of the cyanide facilities constructed before 2022. In order to be in compliance with the requirements of the Code, JMC has provided an alternate demonstration of QA/QC programs, which is discussed below.

For the facilities constructed after 2022, QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The QA/QC reports include suitability of materials and adequacy of soil compaction for earthworks including foundations, subgrade and concrete testing, fabrication material certificates and technical specifications for HDPE drainage products, geo-synthetic, liners, piping, electrical and mechanical instrumentation. For the new raises of the TSF impoundment, the auditors verified that QA/QC activities were conducted for placement of waste rock and tails in the embankment, soil compaction, granulometry, geomembrane installation, and relocation of tailings distribution lines. As-built drawings are also included in the QA/QC reports. QA/QC reports also include non-destructive test logs, destructive test logs, vacuum tests, pre-weld tests, destructive sample tests, and repair controls. As mentioned above, JMC has not retained QA/QC records for cyanide facilities constructed before 2022. Available records for previous phases of the TSF, tailings delivery pipelines and construction of the process plant are scattered and incomplete.

QA/QC records for cyanide facilities constructed for this recertification period are retained by JMC. For the cyanide facilities built since October 2022, the auditors reviewed the following documents in electronic version: As built report Jacobina Tailings Dam – Raise Stage 5 Phase 2A, developed by Dam Engenharia consultants, dated July 2024; as built report Jacobina Tailings Dam – Raise Stage 5, Phase 2B, developed by Dam Engenharia consultants, dated September 2025; QA/QC records for the CIP tanks TQ03 and TQ04 developed by ICONE Tecnologia, Engenharia e Comércio; and QA/QC records of civil, instrumentation, pipeline installation, and electric works for the Acacia unit #2. JMC has not retained a complete set of QA/QC records for cyanide facilities constructed before 2022. Records for the rest of the cyanide facilities (i.e. process plant, tailings pipeline corridor and the TSF area) were not available for review by the auditors during the field portion of the audit. In order to be in compliance with the requirements of the Code, JMC has provided an alternate demonstration of QA/QC programs, which is discussed in 4.8(5) below.

Qualified engineering companies performed the QA/QC inspections and reviews during construction of the cyanide facilities at JMC and prepared the final construction reports certifying that the facilities were constructed in accordance with the design drawings and technical specifications. The auditors reviewed records of construction reports, including as-built drawings for the new cyanide facilities. As-built drawings were properly stamped by a qualified engineer. QA/QC reports are signed by qualified personnel from reputable engineering companies and provided documentation that the facilities were built as designed.

As JMC was not able to provide evidence of the QA/QC activities conducted during construction of cyanide facilities before 2022, nor as-built certifications for cyanide constructions, an appropriate qualified person, Wilton Carlos Muricy, Civil Engineer, was retained to conduct a civil and mechanical review of cyanide facilities constructed before 2009 and issued a report that

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would provide assurance that the continued operations within established parameters will provide protection against cyanide exposures and releases. The auditors reviewed the report “Civil Structure Conformity Report” dated October 2009 that covers the cyanide offload area, cyanide storage and distribution, leaching, CIP and elution areas. For facilities constructed between 2009 and 2022, JMC retained consultant Pollo Engenharia to inspect and issue a similar report for all cyanide tanks and pipelines. The auditors reviewed the report “Mechanical Structure Conformity Report” dated October 2025 that covers the cyanide storage and distribution tanks, leaching and CIP tanks, elution tank, and cyanide pipelines. For facilities constructed between 2009 and 2022, JMC also developed an internal report called “Secondary containments Structure Conformity Report”, dated September 2025, developed by Ariel Pereira da Silva, certified Civil Engineer, that covers all secondary containments in the process plant area. All these reports include results of the inspections conducted as well as conclusions and recommendations for the safe management of cyanide facilities. In the case of the TSF, the Code requires an evaluation of dam stability as an alternative engineering review of tailings storage facilities. The auditors reviewed the report “Tailings Dam B2 RISR” (Regular Safety Inspection Report) which is updated every 6 months to reflect current operating conditions and is developed by an external consultant, as required by Brazilian regulations. These biannual reports include a declaration of stability and conclude that the TSF dam is being maintained and that the site is being operated in a safe manner in accordance with the existing protocols. It is the professional opinion of the auditors that the alternative evidences presented by JMC complies with the requirements of Standard of Practice 4.8 of the Code.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Procedure “Collection of surface water, groundwater and effluents” addresses monitoring requirements related to surface water and groundwater. The procedure includes details related to monitoring locations for surface and groundwater, frequency of samples and parameters to be analyzed, including cyanide species. This procedure is used for internal sampling conducted by JMC. In addition, JMC has retained ALS laboratories to conduct samples that will be analyzed in an external for reporting purposes to regulators. Additionally, JMC has a procedure “Biodiversity Management” that describes wildlife mortality investigation and reporting requirements. Water monitoring activities are conducted by both the Environmental department personnel for internal sampling, and ALS Laboratories for external sampling. External samples are sent to ALS Laboratory in Salvador. This lab maintains an ISO 17025 certification.

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Qualified personnel of JMC environmental department prepare and update the “Collection of surface water, groundwater and effluents” procedure every three years. Staff in charge of preparing the plan are suitably qualified, with many years of experience in environmental management and in mining activities. The plan is updated by environmental technicians with guidance and peer review, and it is ultimately revised and approved by the Environmental manager. Analytical protocols for environmental samples are provided by ALS Laboratories in Salvador, located about 5 hours away from the mine by vehicle. The auditors reviewed letters of certification and website documentation to verify compliance.

JMC monitoring procedure for internal sampling provide details related to sampling locations, chain of custody procedures, cyanide species to be analyzed, preservation and QA/QC sampling requirements. The monitoring program includes sampling frequencies for both surface and groundwater (that vary between weekly, monthly and quarterly), the suites of parameters to be analyzed (including Total, WAD and Free Cyanide) and maps showing the surface and groundwater monitoring locations with respect to cyanide facilities. Examples of completed chain of custody records for the recertification period showing proper use of the forms were reviewed.

JMC field data sheets for surface and groundwater samples register in writing sample conditions including the date, the sampler, weather conditions, presence of fauna and flora, field parameters (i.e. conductivity, pH, and temperature) and groundwater levels. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered consistently.

JMC conducts monitoring at frequencies adequate to characterize surface and groundwater and identify wildlife mortalities. Surface water samples are collected on a weekly and monthly basis, while groundwater samples are collected and analyzed quarterly. Wildlife monitoring is continuous while operators are working in the TSF and during daily inspections. External samples are sent for analysis to ALS lab in Salvador. Cyanide species (WAD, Free, Total) are analyzed in all samples. Internal samples are analyzed for Free cyanide at the onsite lab. Records were available and reviewed by the auditors for sampling and monitoring activities. The frequencies of the monitoring activities were deemed to be appropriate by the auditors.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

JMC has prepared a Closure Plan dated May 2024 that has been submitted to regulators for approval and was developed by Mineral Engenharia e Meio Ambiente. The closure plan addresses decommissioning and reclamation of all project components at the cessation of operations including the decommissioning of cyanide facilities such as TSF, the process plant and buildings. Procedure “Metallurgical Plant Decommissioning” includes activities related to decontamination of equipment that has been in contact with cyanide. The procedure indicates that tanks and pipes will be decontaminated using a solution of 50% hydrogen peroxide solution and 2% copper sulfate and then rinsed with water with pH >10 units. There is no solid cyanide storage at JMC and as such, it is not considered as a reclamation item in the Closure Plan or the decommissioning procedure. No water treatment needs for cyanide facilities are considered for the post closure phase. Remaining process solution will be treated using a Reverse Osmosis plant. Decommissioning activities include all the necessary steps to bring the facility’s components to a safe, chemically stable condition, such that they do not present a risk to people, wildlife or the environment due to their cyanide content.

JMC Closure Plan has an implementation schedule for decommissioning activities including the sequence and duration of facilities closure. The schedule includes activities to be conducted starting in the year 2047 until 2052 when closure of the TSF is projected to be completed. All other cyanide facilities, including the process plant are expected to be closed between 2047 and 2049. This schedule will continue being refined as JMC approaches the closure period.

JMC reviews its Closure Plan every 5 years as required by Brazilian regulations. The current version of the Closure Plan is dated May 2024. The auditors also reviewed the previous version of the Closure Plan, which is dated 2018. Brazilian regulations also required that a detailed closure plan be developed 2 years before closure. In addition, Pan American Silver corporate office requires its operations, including JMC, to review and update its Asset Retirement Obligation (ARO) cost estimation for the mine, including cyanide facilities decommissioning costs. These costs are reviewed and updated annually and submitted to the corporate office, where they are audited financially by an external party.

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

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

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Describe the basis for this Finding/Deficiencies Identified:

JMC has developed cost estimates for full funding of third-party implementation of reclamation and decommissioning activities described in the Closure Plan. The cost estimates include third party unit costs, local equipment rental rates, costs for engineering design and contingency. Pan American Silver asset retirement obligation (ARO) cost estimation for each mine, including cyanide facilities decommissioning costs, are reviewed and updated annually and submitted to the Corporate office, where it is audited by an external party. These costs are also calculated using third party rates.

JMC reviews its Closure Plan and updates it every 5 years. The current version of the Closure plan is dated May 2024. The total reclamation cost included in the Closure Plan is 255 million Reales (approximately US\$47 million), including decommissioning costs of cyanide facilities. ARO cost estimation is reviewed internally and submitted to the corporate office and audited every year as part of the financial statement of the company. The 2023 ARO reclamation cost estimate JMC is 222 million Reales (approximately US\$41 million) and includes decommissioning measures for the TSF, process buildings and equipment, pipeline removal, disposal of wastes, and associated overhead and administrative costs. This amount is for closure and reclamation of all facilities JMC, including decommissioning of cyanide facilities. The cost estimate included in both the Closure Plan and the ARO reclamation cost includes a budget for decontamination of cyanide facilities and the disposal of process water from cyanide facilities at closure.

As local and central authorities have no requirement for financial assurance of closure activities, JMC has established self-insurance as a financial assurance mechanism for closure activities, which includes decommissioning of cyanide related facilities. The auditors reviewed a letter from Deloitte Touche Tohmatsu dated April 4th, 2025, for the review of JMC Financial Statements as of December 31st, 2024, that includes closure and reclamation costs, verifying its conformance with the financial tests for a self-guaranteed mechanism to cover the estimated costs for cyanide-related decommissioning activities. Financial evaluation methodology used by the external financial auditor includes the assessment of the Asset Retirement Obligation (ARO) liability in the period it was incurred. Liability equals the present value of the expected cost of retirement/remediation. An asset equal to the initial liability is added to the Balance Sheet, and depreciated over the life of the asset. The result is an increase in both the assets and the liabilities. The auditors reviewed the statement from Deloitte Touche Tohmatsu and confirmed that the self-insurance was calculated including the estimated decommissioning cost and that the operation has sufficient financial strength to fulfill the self-insurance obligation. The auditors also verified the professional certification of the financial auditor.

6. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.

Standards of Practice

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

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 6.1

Describe the basis for the Finding/Deficiencies Identified:

The JMC has standard operating procedures (called SOPs) which describe the management and operation of cyanide facilities to help minimize the possibility of worker exposure to cyanide. There are also work permit forms (PPTs) that are a thorough risk analysis assessment to make sure the cyanide-specific tasks are compliant with safety standards and all the risks can be mitigated prior to any task. The SOPs and manuals have been developed for the cyanide unloading areas, mill areas, leach circuit, thickening, CIP circuit, ADR, and TSF areas. They provide detailed information about the risks involved with each task (including unloading, plant operations, entry into confined spaces, and equipment decontamination) and adequately describe safe work practices.

The reviewed cyanide-related SOPs cover a wide range of operational; maintenance, inspection, and emergency activities associated with the metallurgical plant. Tailings Pumping defines the safe transfer of tailings to disposal areas. Cyanide Operations describe the handling and use of cyanide in processing activities. Leaching Operation outlines procedures for dissolving metals using cyanide solutions. Grinding Operation addresses the size reduction of ore prior to leaching. Containment Basin Inspection and Emergency establish inspection routines and emergency response actions for cyanide containment areas. Acacia Operation covers the use of the Acacia reactor for cyanide detoxification. Decontamination of Cyanide Solution Lines describes cleaning procedures for pipelines carrying cyanide solution. Decontamination of Tanks (Metal Structure) defines the safe cleaning of cyanide-containing tanks. Unloading of NaCN Solution (approx. 35%) outlines the safe receipt and transfer of liquid sodium cyanide. Acid Washing and Neutralization describes the cleaning of equipment using acid followed by neutralization. Neutralization of Sodium Cyanide (NaCN) defines the chemical treatment to destroy residual cyanide. CIP Operation outlines the adsorption of gold into activated carbon. Elution Operation describes the removal of gold from loaded carbon. Metallurgical Plant Decommissioning defines the safe shutdown and dismantling of plant facilities. Basin Drainage and Cleaning Operation outlines the controlled removal of liquids and solids from basins. Windsock Inspection defines checks to ensure wind direction indicators are functional. Inspection of Cyanide Pumps, Pipelines, and Tanks describes routine integrity checks of cyanide-handling equipment.

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Maintenance of Pumps and Lines with NaCN Solution outlines safe maintenance practices on cyanide-containing systems. Criteria for Creation, Revision, and Approval of Inspection Plans establishes requirements for inspection documentation control. Criteria for Creation, Revision, and Approval of Maintenance Plans defines governance for maintenance planning documents. Pipeline Maintenance describes repair and upkeep of process pipelines. Flow Transmitter (2025) Inspection defines inspection of flow measurement devices. Pressure Transmitter (2025) Inspection outlines inspection of pressure instruments. Hydroflex Level Transmitter (2025) Inspection defines inspection of level measurement devices. Valve LOTOTO establishes lock-out, tag-out, and try-out requirements for valves. PT100 Temperature Transmitter (2025) Inspection describes inspection of temperature sensors. Control Valves Inspection defines checks to ensure proper valve operation. Densimeters (2025) Inspection outlines inspection of density measurement instruments. pH Transmitter (2025) Inspection defines inspection of pH monitoring equipment. HCN Gas Transmitter Inspection describes inspection of hydrogen cyanide gas detectors. Ammonia Gas Transmitter Inspection defines inspection of ammonia gas detection systems. Building Maintenance outlines general maintenance activities for plant structures. Procedures were reviewed and found to be sufficiently detailed to enable safe operation and to minimize worker exposure. Several of the documents related to cyanide management were outdated at the time of the recertification audit.

Each standard operational procedure lists the required personal protective equipment for each task. For specific and high-risk tasks, the POP will state specific PPE requirements and the necessity to conduct pre-work inspections for cyanide related tasks. The work permit forms (PPTs) include trainer and trainee requirements and acknowledgement, personal protective equipment (PPE) required, tools and specialized PPE required, consideration of safety and potential physical and chemical hazards associated with the job and procedure. In addition to the use of general PPE, such as hard-hat, steel toes boots, hearing protection, high visibility clothing, and safety glasses throughout the production area, areas and/or tasks where personnel may encounter cyanide may have additional PPE requirements. Observations during the audit confirmed that hard hats, Tyvek suits with rubber boots and rubber gloves attached to the vest, goggles, and face shields, were in use for tasks that were performed at the cyanide unloading area. Pre-work inspections are completed at the beginning of every shift and recorded using the Workplace Inspection form for each area. In addition, there is a Cyanide Offloading Safety Checklist for the delivery of all bulk reagents, including cyanide, that is filled out by the operator. The auditors reviewed records of these inspections for the cyanide-related circuits for the last three years and found them to be complete.

The JMC through on-the-job training (OJT), when the operators are trained on the SOPs, and planned task observation (OPT) routinely solicits input from the workers when developing and evaluating procedures. This is also accomplished through review of the procedures during safety meetings and during area or task training. Operators can communicate directly with supervisors regarding effectiveness and opportunities for improvement for the training and procedures. Operators conduct pre-task and job hazard analyses as well as field level risk assessments, which also provide an opportunity for feedback regarding procedures. The JMC specifically notes several opportunities for worker input, including participation in safety meetings and shift

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meetings, involvement through on-the-job training (OJT) activities, engagement in planned task observations (OPT), and contribution to procedure reviews. Additional opportunities include participation in cyanide drill reviews and assessments, involvement during inspections, and engagement through crew meetings held with area supervisors. For non-routine tasks that do not have an existing procedure a PPT is required for a thorough risk assessment analysis. The PPT requires that a supervisor is involved with the risk assessment, workers from the areas where the task is going to be performed are involved in this analysis.

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

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

Describe the basis for the Finding/Deficiencies Identified:

The Jacobina mine has determined the appropriate pH for limiting the generation of HCN gas during cyanide production activities. The operation requires a minimum pH of 10.5 (stated in the standard operational procedure of the metallurgical plant) in the thickener slurry, which is measured with installed process instrumentation. Lime pumps are linked with this sensor turns on at 10.5 and shuts down at 11. In case the pH levels below 10.2 it alarms 'low pH levels', below pH 10 the cyanide pumps are shut down – it is presented in the control logic. With the correct pH level presented in the SOP and the procedure to be followed in case the pH drops below the minimum level. Calibrations for the pH probes are performed on a regular schedule or as needed based on manual measurements. The calibration is controlled with a spreadsheet, and pH-meter calibration is done monthly with weekly cleaning. Calibration records and manual readings were reviewed by the auditor. The pH solutions are valid for one year. In case of pH calibration failures, the probe is replaced and the calibration is performed until the calibration is accepted. A screenshot from the control room and a visual trend screen were reviewed to verify that the pH was maintained as recommended with low peaks indicating calibration – the calibration record was compared against the trend, and it was confirmed. Operator logs were also reviewed, and the pH was recorded at or above the minimum specified value. Requirements for pH control within the leach/CIP circuit are specified within the JMC operational procedure and require that a minimum pH of 10.5 shall be maintained throughout the leach/CIP circuit to minimize the evolution of hydrogen cyanide gas. No cyanide mixing occurs at the Jacobina mine.

JMC has identified areas where workers may be exposed to cyanide more than 10 parts per million on an instantaneous basis and 4.7 parts per million continuously over an 8-hour period. With the highest exposure risk at the offloading procedure. Working and operational areas where potential worker exposure to cyanide are identified and monitored with stationary HCN gas monitoring units or portable HCN gas devices. Fixed monitors at JMC are located at the Cyanide

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offloading area, two units in Acacia 01, Acacia 02, cyanide distribution tank, Leaching, Refinery, Cyanide storage warehouse (not in operation). Portable HCN meters are provided and made available for use in areas where there is potential for HCN exposure, such as confined spaces, and to aid in investigation should a fixed HCN monitor show elevated levels of HCN. SOPs and PPTs have been developed for activities in which cyanide management is involved. These procedures include PPE requirements, particularly if they differ from the standard PPE required for process operations. Should operators be required to perform a task for which a POP has not been developed (non-routine task, special situation, etc.) either a Field Level Risk Assessment or Job Hazard Analysis is to be conducted depending on the risks associated with the task.

HCN levels are monitored through fixed position gas monitors. A total of eight fixed sensors are installed in the plant. These sensors are mounted in all areas of the plant in which HCN exposures are possible. The eight sensors are located throughout the JMC metallurgical plant as follows: Cyanide offloading area, two units in Acacia 01, Acacia 02, cyanide distribution tank, Leaching, Refinery, Cyanide storage warehouse (not in operation). The units are fitted with a visual alarm comprising red and amber strobes and an audible alarm. If ambient HCN concentrations above 2 ppm are detected, the amber light is activated. The red strobe signals if HCN levels exceed 4 ppm instantaneously. Above 4 ppm HCN levels, instantaneously, visual alarms are displayed at the front of the unit and on the Distributed Control System (DCS) within the main control room and on remote operator stations. A pop-up message shows up at the control room screens to alert the control room operator to start the emergency procedure. The audible alarm will sound for 30 seconds and stop for 5 seconds. In case the cyanide level reaches below 4 ppm, both visual and audible alarm stop. ERP-Cyanide details that the minimum time of detection to start the alarm off is X seconds. Jacobina reviewed the alarm levels to ensure the adequate emergency procedure is taken based on the levels. The new procedure states that at 4.7 ppm of HCN, evacuation within 100 meters of the hot zone must be carried out. And when there is detection of 10 ppm for 30 seconds – evacuation must be actioned every time it happens.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained. The models installed in the company are Ultima X5000 (seven units), and a D-Guard 2 (one unit). The Electrical and Instrumentation (E&I) group is responsible for the calibration of the fixed HCN monitors, however the calibration procedure has been done by third-party companies, MSA, Yorgos, Precisa in the last three years. From this year on, the Yorgos company is going to calibrate the fixed HCN monitors. Calibration is conducted on a semestral basis. The site's maintenance program maintains a spreadsheet that generates a work order for the calibration reminder. The calibration and maintenance schedule are considered to meet the manufacturer's recommendation for maintenance of these units. The calibration records for the recertification period were reviewed and found to be complete. Portable gas monitors are used only for specific tasks such as working in confined spaces or entering an area after HCN levels. The portable HCN monitors are calibrated annually. JMC has 7 portable gas monitors available that are capable of monitoring HCN levels – MSA's Altair Pro. Portable gas monitors must be 'bump tested' prior to use, to be checked in the check list and standard procedure. The portable HCN detectors have tags that show the current calibration date and the date of the next calibration. The calibration records are controlled by the

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maintenance and operational teams, they can be viewed by the site team, and an email is sent when the calibration is due under 10 days. When the calibration is due, the calibration company is called. In the event of a failed calibration the procedure will be repeated, and a new calibration certificate is issued. JMC presented a general monitoring and measurement devices SOP in which states that the damaged or failed-calibration devices must be removed from the operational area. The calibration contract with the Precisa company states that in case of failure or damage to the sensor, it must be replaced. The maintenance order check-list states that in case of sensor failure the replacement of the sensor will be evaluated. This requirement was verified through review of calibration and maintenance records and discussion with Industrial E&I, safety, and process personnel.

Warning signs are posted in all areas where cyanide is present advising workers that cyanide is present and that smoking, open flames and eating and drinking are not allowed. Special PPE signs are posted in areas which require special PPE beyond that worn for routine operations. Any special task requiring PPE is also indicated in the POP. The signs are in Portuguese, which is the language of the workforce. Verification was through visual inspection of the signs located in areas where cyanide solution is stored and used. These areas included cyanide storage and the process plants, including the detox circuit, as well as the Phoenix tails storage facility.

As noted in Principle 1, the Jacobina mine receives cyanide from Proquigel. The cyanide solution is delivered to the sites with red colorant dye already added. The concentrated cyanide solution used on site has a red color for clear identification. This requirement was verified by the auditors during the field visit.

Jacobina has installed showers, eye wash stations and fire extinguishers at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Showers and eye wash stations are inspected prior to beginning of each shift, and prior to beginning a task that has the potential for cyanide exposure, such as cyanide offloading. The auditors randomly checked showers and eyewashes during the site tour to verify functionality. Fire extinguishers are inspected monthly and serviced annually. The auditors randomly checked fire extinguishers to confirm they are an acceptable type for use with cyanide. All extinguishers observed were fitted with inspection tags, which documented monthly inspection checks. Verification was conducted by reviewing JMC pre-offloading inspection forms for records of shower and eye wash stations checks. The safety technician checks the fire extinguishers randomly. There is not another formal inspection beyond the monthly inspection done by a third-party company. The fire extinguisher tags provided evidence of the monthly checks, and the record of annual inspections and maintenance was provided by confirming the validity of the annual sticker. During the sodium cyanide delivery, operators were observed to check the condition and operation of safety showers prior to commencing with the cyanide offload as well as checking the conditions of the fire extinguisher in the offloading area.

The operation has identified all tanks and pipes that contain cyanide solution to alert workers of their contents. Pipes containing cyanide are marked as containing cyanide solution and flow direction is indicated. Some pipes were not identified and their flow direction and contents were

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not indicated. Cyanide storage and process tanks are marked as containing cyanide. Verification was by visual inspection. The auditors followed the cyanide solution circuit from the cyanide storage areas the mill circuits where cyanide is used. Brazilian norm requires caustic pipelines to be painted in purple. Cyanide pipelines are painted purple because of the caustic content. Slurry pipelines have labels in some parts of the plant, but not all. The Jacobina team presented the schedule of piping identification painting. The labels were replaced, repainted and work is ongoing.

The Safety Data Sheets (SDS) are available in the area, close to where cyanide is managed. All information relating to cyanide management including SDS information, SOPs and emergency response plans are provided in Portuguese, the workforce language at the site. Summarized emergency response sheets are posted around the cyanide area and locations where cyanide is present (such as Acacia and ADR). Electronic safety data sheets (SDS) are accessible to all staff from computers upon request, employees receive training in the use and interpretation of SDS. The electronic information is in a public folder and available to all employees who have login and password information to access computers in the operational and administrative areas. Cyanide hazard information is also available on signs created by the operational and safety teams and in cyanide specific training provided to all employees who may be exposed to cyanide.

In case of any incidents, injuries, occurrences of property damage, loss to process and near misses the first line of communication is verbal. The health and safety team goes to where the incident happened. An investigation is started, everything is reported in an excel spreadsheet on JMC's internal system. There's an internal portal called Singular where the incidents and accidents are recorded. Reporting is required immediately on occurrence to a supervisor who is then required to request the health and safety team to start an investigation – depending on the degree of severity. An internal system standard (PIS-04-00-4.2-031) states the line of communication to report any safety condition. Two appendices files were presented with the flowsheet of communication that will follow a communication line depending on the severity of the document. The incident report is submitted, and appropriate personnel are notified. After the investigation, an action plan is generated. The incidents are routinely assessed further, and the findings are shared at crew safety meetings. Incidents are investigated in accordance with mine's guideline with root cause analyses completed. Incidents are retained on the database for categorization and aid in prevention of recurrence. Corrective actions are followed up until closure and tracked within the Singular system. It depends on the type of action and how many days the person responsible to conclude the action will have, some are immediate, some can take longer (e.g. train the whole plant crew). The immediate actions are reported in Singular system in the 'accident' module, the mid-term and long-term actions (preventive and corrective) are also reported in the Singular system in the 'no compliance' module. There have been no major health, safety or environmental cyanide related incidents reported during the recertification period. No cyanide related emergencies occurred during this recertification period required the implementation of the emergency response procedures. The investigation procedures were implemented, as required, for no cyanide-related events. The auditors reviewed the action plans generated after incidents and accidents were all closed.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The Jacobina mine has made available antidote kits (Cyanokit), oxygen cylinders (in the plant, ERT room), resuscitators (in the emergency room), radios, telephones, and alarms at the site. Escape respirators (4 autonomous masks – self-contained breathing apparatus) are located in the plant first-aid room in the process plant where cyanide in reagent grade is present – the plant ERT room is located less than 50 meters from the cyanide unloading area. There are other escape respirators and autonomous masks in the ERT general center, close to the mine entrance. The locations of the emergency equipment were deemed to be appropriate for the operation. Oxygen bottles, resuscitators, water, and Cyanokits are located in the emergency room, the emergency response vehicle (ambulance) is parked close to the laboratory. Oxygen bottles are located in the first-aid room close to the unloading area, in the ERT room at the plant entrance and there's another oxygen cylinder in the ambulance. The emergency procedure is to remove the victim out of the hot zone, the ambulance with trained medical personnel goes to the plant with Cyanokit to be administered as soon as possible. The minimum pressure requirements of the oxygen cylinders at 20 bar according to the site's emergency SOP. All operators carry a radio while performing their tasks. The site Emergency procedure dictates communication among operators and the emergency response team in the event of an emergency. There is also a phone located at the ERT room close to the cyanide offload area. All fixed HCN monitors are equipped with an audible and visual alarm system and report back to the DCS system in the control room. Verification was conducted by visual inspection of the cyanide antidote kits, oxygen bottles, and interviews with site personnel. Seven Cyanokits are available in the emergency response room. Those are not kept in the vehicle because of temperature limits. At the external hospital there are two cyanokits. Showers and eye-wash stations are located at strategic areas of the plant where cyanide and other chemicals are used. The showers and eyewash stations are tested prior to cyanide offloading or other tasks in cyanide related areas. Safety showers and eyewash stations are tested monthly in the other areas, such as the cyanide offload and storage area are also monitored in the control room by the plant closed circuit television (CCTV) system. The control room is staffed 24 hours per day. Verification was by visual inspection and interview with process personnel and onsite emergency response staff.

Emergency response equipment is regularly checked by the medical team members and other health and safety personnel. This includes inspections of Cyanokits and first aid stations. Mine Rescue (ERT) personnel inspect the emergency response vehicle every day, including oxygen bottles, and the Cyanokits. Kits are stored in the emergency room per the manufacturer's

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recommendation for temperature. Cyanokits are only taken to the ambulance in case of emergency due to temperature limits. The requirement was verified through review of Cyanokit expiration dates, review of inspection records, visual observations, and discussions with the process operators and emergency response personnel.

The JMC ERT and plant team developed the Emergency Response Plan for Cyanide (ERP-Cyanide). The first edition and issue of the ERP-Cyanide was done in 2007. In addition, JMC also utilizes the ERP-TSF (Emergency Response Plan for Mining Tailings Storage Facilities). The documents include communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories and risk assessment. Sections within the ERP and Operating plan specifically address emergency response procedures related to cyanide releases and cyanide exposures, the ERP-Cyanide intended to address cyanide related emergencies and personnel exposures through any foreseeable route of exposure. The documents have been developed for multiple scenarios including transportation incidents, releases during unloading, releases during fires and explosions, pipe, valve and tank ruptures, overtopping of ponds, power outages and pump failures, uncontrolled seepage, failure of cyanide treatment and failure of tailings impoundments. The Operation, Maintenance, and Surveillance Plan for the TSF outlines steps and measures to be undertaken in the event of a Tailings Storage Facility emergency condition. They detail the actions and measures assigned to individuals/organizations that are responsible for responding to an emergency. These include emergency communication procedures both internal and external communications with the public and government agencies.

JMC has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide. The JMC has a fully staffed emergency response team (ERT). The team is comprised of 147 members, covering all four operating crews and administrative crew. Training at the ERT is provided on an annual basis with monthly meetings and two mock drills per month. Training includes medical/trauma response and firefighting, as well as specialized training in HAZMAT, confined space rescue, and technical (high angle rope) rescue. ERT has a permanent supporting group, such as the medical team, safety team and external resources (external firefighters, police, hospitals). In addition to the ERT, all personnel on the mine are trained in basic first aid and response to cyanide exposure, including recognizing the signs and symptoms of cyanide poisoning. The first aid room is equipped with oxygen, and first aid equipment. A manual defibrillator and AED are also located in the ambulance, which is ready to provide basic life support in the event of an emergency. The Cyanokits must be administered intravenously (IV). As the site personnel are not authorized for IV administration, the Cyanokits are transported with the patient and transferred to local emergency response personnel (ambulance or hospital) to be administered.

If a cyanide exposure victim requires medical attention, the emergency response vehicle maintained at the site can transport the victim(s) to rendezvous with local emergency medical services (EMS), typically on site, or off site, if deemed necessary. Operational Procedure Document number POP 04-03-3.5-096, the site has its own ambulance, and the document describes how the worker exposed to cyanide is transported to external medical resource. The

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ambulance is parked at the mine entrance, close to the emergency room. The Cyanokit is taken from the emergency room to the ambulance and the trained medical person will administrate the antidote intravenously. The external hospital, Santa Barbara, also has cyanokits to be used in any emergency with cyanide exposure. The hospital was evaluated and authorized to receive and treat workers exposed to cyanide by the mine designated manager and the hospital director. The hospital personnel are trained and prepared to treat any cyanide exposed workers. The auditor has reviewed the training records of the medical personnel from the site and from the hospital Santa Barbara.

The hospital Santa Barbara is located 12.3 km from the mine. This hospital was evaluated and authorized to receive and treat workers exposed to cyanide by the mine designated manager and the hospital director. The hospital personnel is trained and prepared to treat any cyanide exposed workers. The Santa Barbara hospital holds two cyanokits to be used in any emergency with cyanide exposure. The auditor has reviewed the training records of the medical personnel from the site and from the hospital Santa Barbara.

7. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

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

Describe the basis for the Finding/Deficiencies Identified:

The Jacobina mine has developed an Emergency Response Plan for Cyanide (ERP-Cyanide), In addition, JMC also utilizes the Emergency Response Plan for Mining Tailings Dams (ERP-TSF) for the TSF as reference for ERP-Cyanide. Both documents include communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories and risk assessment. Sections within the ERP and Operating plan specifically address emergency response procedures related to cyanide releases and cyanide exposures, and the ERP-Cyanide is wholly intended to address cyanide related emergencies. The various plans set out emergency response procedures for the mine sites, including cyanide releases. Procedures for initial response, first aid and spill response, and reporting are provided in the plans. The ERP-TSF outlines steps and measures that would apply specifically to emergencies related to the Tailings Storage Facility (TSF). It details communication procedures, outlines steps to be taken for event detection, the level of severity and relevant actions to be taken, including

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shutdowns. Duties of the ERT and requirements for internal and external resources are also provided.

The plans referenced above consider different scenarios appropriate to the site-specific circumstances and include procedures to respond to emergency incidents including cyanide releases. It considered all of the scenarios questioned in the Cyanide Code. The specific incident types presented under this Standard, including transportation accidents, power outages, failure of cyanide destruction systems, etc. are all addressed by the plans. The ERP-Cyanide identifies incidents applicable to release scenarios at the site, including release of hydrogen cyanide in the cyanide storage and process areas. The plans document emergency response details for onsite release of HCN. Onsite transportation accidents are described in the ERP-Cyanide. Proquigel is responsible for the product until the offloading is complete and will initiate any containment and cleanup required. The site will provide assistance to Proquigel if requested. The site must define in the ERP the distance at which it will communicate with the supplier to provide assistance if requested. The ERP-Cyanide has provisions for the site to assist in the event of a transportation accident in close proximity to the operation if requested. The ERP-Cyanide and the specific offloading SOPs address emergencies during offloading. The ERP-Cyanide also has procedures for emergency response to any leak or spill of liquid cyanide. The site receives liquid sodium cyanide solution and has no mixing activities. The ERP-Cyanide indicates that in case of fires and explosions involving cyanide, the ERT members are responsible for providing appropriate firefighting measures. The ERP-Cyanide describe measures to take for spills generated from pipe breakage, valve or tank ruptures in various areas of the Process plant. Discussed at the document: PIS-04-13-3.6-065 ERP-TSF addresses overtopping of the TSF or other ponds and includes reporting to authorities, temporary berm creation, and remediation of contaminated soils. Any solution in the temporary containment basin will be pumped back to the process, and any contaminated soil will be removed to the TSF. In case of extended power outage, the site has diesel-powered generators that automatically actuate on the agitators and pumps. Generators are linked to the critical areas as required to run pumps and recirculate process solutions. pH levels in the tanks must be manually monitored and controlled if needed. HCN gas generation is also monitored. Containment basis levels are controlled. The ERP-Cyanide and ERP-TSF describes possible scenarios of uncontrolled seepage and monitoring to determine the impact. Seepage from the leach pad, solution ponds, and TSF are discussed. Cyanide destruction is covered by the ERP-Cyanide, although there is no detox process at the JMC plant. The procedure is to isolate the area and contain the cyanide-containing solution releases or cyanide-containing solution overflow, then neutralize the cyanide using sodium hypochlorite with caution. Discussed at the document: PIS-04-13-3.6-065 ERP-TSF describes procedures for TSF failure, the ERP-Cyanide describes procedures of cyanide spills on the facility, including plans for evacuation, containment and cleanup, embankment overtopping, seepage from dams, embankment failures and cracking, embankment movement, instrument readings, bomb threats, and required notifications for each scenario.

Under the agreement between the JMC and Proquigel as the supplier, Proquigel and the transportation companies (Moscato, Ergotrans, Cofins, Concordia) are responsible for shipping cyanide to site. This responsibility extends to consideration of transport routes, storage and

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packaging of sodium cyanide solution, the condition of transport vehicles and response in the event of an emergency or release during transport. In the event of a cyanide emergency or incident on the proximities of the Itapicuru community, and the mine property, the Jacobina mine would respond to it as per the ERP-Cyanide. It is the responsibility of the supplier and transporter to comply with such requirements until the sodium cyanide arrives at and is accepted and offloaded by JMC. Should an incident occur during offsite transportation activities to the sites, response will generally fall upon the transporter and supplier; however, depending on the proximity to the site, aid from the site ERT may be requested.

The ERP-Cyanide describes specific response actions to be undertaken in an emergency. In the event of an emergency involving cyanide release, the ERP-Cyanide and ERP-TSF provide for specific actions to be undertaken in the event of a release scenario. The ERP-Cyanide detail responses specific to cyanide spills or leaks including mill solution and reagent spills and makes provision for initial response, first aid, spill reporting contacts and spill control and cleanup. The ERP-Cyanide also detail first aid measures for cyanide exposures and transportation of the cyanide antidote kits to emergency response personnel that are trained and certified to administer the antidote. Annual training for all employees at the plant, and the Operations with Cyanide for all employees at site includes training on first aid measures to be taken in the event of cyanide exposure including activation of the site emergency response plan. The location of cyanide emergency equipment such as SCBAs, HAZMAT equipment, first aid equipment, etc. are also provided. All ERT members are trained to respond to emergency incidents with several ERT members holding certification in Hazardous Material response. The ERP-Cyanide provides responders rapid access to key information necessary to address a variety of potential emergency scenarios, including cyanide-related incidents. The ERP-TSF provides specific procedures related to the Tailings Management Area and provides for specific roles and responsibilities, resources to be allocated, lines of communication, and actions to be undertaken in the event of an emergency situations which include scenarios such as overtopping, embankment failures, and earthquakes. The ERP-TSF and ERP-Cyanide include procedures and references to follow to contain/control any spill if safe to do so and assess and mitigate any future release during the emergency. Following any incident, the ERP-Cyanide requires a debrief meeting where follow up actions around the response including assessment of a root cause for the incident and mitigation to prevent any future incidents. Any emergency that has the potential to affect a community will trigger the notification requirements outlined in the ERP-Cyanide, item 18.3. The appropriate designated team member will notify all necessary parties, as required. Assigned personnel will contact emergency services, if necessary, and will inform potentially affected communities and parties. A detailed list of contact information for relevant parties is contained within the Crisis Management Plan – item 8.1.

7.2 Involve site personnel and stakeholders in the planning process.

The operation is: in full compliance
 in substantial compliance

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☐ not in compliance with Standard of Practice 7.2

Describe the basis for the Finding/Deficiencies Identified:

JMC involves its workforce in cyanide emergency response planning. During training of the ERT and after emergency mock drills, the workforce has the opportunity to provide feedback during debrief sessions. Since all employees who work around cyanide are also trained in basic cyanide emergency response, those employees also have the opportunity to provide input in the process. The Jacobina mine includes the hospital Santa Barbara as external responders in ERP-Cyanide development/planning to a limited extent. The hospital is involved knowing it is ready to respond to emergency of cyanide exposure, and it is listed. The mine maintains periodic communication with community emergency response stakeholders through participation of community with door-to-door communication from the Community Department. JMC's community department shares information about cyanide with the local people, its risks and how JMC manages it. The site coordinates the Santa Barbara Hospital but they are not necessarily involved in ERP planning; however, the role of each of the outside agencies that may be involved in an emergency are indicated in the ERP-Cyanide and Crisis Management Plan, as is the party responsible for requesting outside assistance. The Jacobina mine has a formal mutual aid agreement in place with the Santa Barbara hospital to provide outside assistance to the site. Emergency response training drills are also conducted in coordination with the local community, the Hospital and with local resources to aid in the coordination between entities in the event of an actual emergency. JMC engages extensively with local communities and provides information related to cyanide. In cyanide-related incidents, only the hospital in Jacobina town is directly involved with the emergency response plan. Fire department and police department are not directly involved in the emergency plan. Coordinated exercises are conducted to evaluate the local response of the clinic. On July 11th 2025, a mock cyanide-exposure drill an exercise was conducted involving all the steps from the start of the incident all the way to the worker transport to the Sant Barbara Hospital. The auditors reviewed records of these exercises and more for the last three years. The auditors verified that Jacobina maintains sufficient medical resources, infrastructure, and equipment to provide initial treatment for patients exposed to cyanide prior to transferring to offsite medical facilities. It is expected that any victim will be treated for cyanide on-site to the extent possible and transferred as quickly as possible to the Santa Barbara Hospital, to provide additional medical care.

The Jacobina mine has made the Itapicuru community, which the mine is located in, and it is the community with highest potential to be affected, aware of the nature of their risks associated with accidental cyanide releases. Jacobina town is located 10 km north of the metallurgical plant. JMC continues to engage the local communities through communication programs to ensure that the nature of the risks associated with cyanide are clearly communicated and that the members of the company, local community, and emergency resources understand their roles in the response to a cyanide related emergency. Community supported emergency response could be proved by the Santa Barbara Hospital. JMC periodically engages local partners to participate in tabletop exercises and emergency response drills.

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The ERP-Cyanide and the Crisis Management Document as well as document that formalizes the treatment of victims exposed to cyanide, provide lists of contacts and specific functions in which the Santa Barbara hospital is the designated external responder resource. The hospital may be requested to provide personnel support, equipment, and first response capabilities to deal with cyanide related releases and exposures. The transportation from and within the mine facility is responsibility of the mine medical team. Site ERT personnel regularly interact with local emergency response partners. External responders will only be summoned when additional support is required to respond to an emergency, and as requested by the Chief of Emergency Response or the ERT Captain managing the emergency. The Jacobina mine maintains sufficient medical resources, infrastructure, and equipment to provide initial treatment for patients exposed to cyanide, after which they would be treated in medical facilities offsite. It is expected that any victim that must be treated for cyanide onsite would be transferred to Santa Barbara Hospital to provide additional medical care.

The TSF Emergency Response Plan (ERP-TSF) describes communication with the stakeholders, it doesn't clearly describe the engagement of the local stakeholders. The ERP-Cyanide refers to the ERP-TSF for communication actions. After cyanide-exposure mock drills and incidents involving cyanide exposure, in case the incident or the mock drill involves the Itapicuru community, or the Jacobina town, the role of the communities is evaluated, and they are engaged to improve the Emergency Response Plan. The emergency response plan considers assistance from outside agencies who are consulted regarding their roles in the ERP-Cyanide. The ERP-Cyanide documents state that the plans are to be reviewed and updated at least once in 3 years or after emergencies or drills to reflect any information gathered during the response. The revision process involves responsible personnel from the areas involved. The most recent update was on August 26th, 2025, and included updates to the emergency response personnel and other necessary revisions.

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

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.3

Describe the basis for the Finding/Deficiencies Identified:

The Crisis Management Document PIS-04-00-3.6-009 provides primary and alternate designation of responsible parties for the management of an emergency, including the General Manager who has authority to ensure that sufficient and adequate resources are allocated to carry out the ERP, the Chief of Emergency Response, the Assistant Chiefs of Emergency Response, and the ERT Team Captains. This document is referred to in the ERP. The ERP-Cyanide identifies the ERT, the medical response team, the ERP Coordinator, the external

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resources (hospital) and the crisis committee. Section 19 of the ERP ERP-Cyanide mandates that training must be undertaken by the ERT and non-ERT employees, i.e. all the plant employees. It is the responsibility of the Human Resources department to ensure that training is provided and maintained. The training is given by a safety technician. The plant and TSF manager is the ERP Coordinator and has overall responsibility to ensure that the current ERT is current and viable and is supported by the General Manager, according to section 5.2. Some of the training that ERT members may undergo includes First aid, Emergency Medical Responder, Emergency Medical Technician; hazardous Material (Technician Level); High Angle (Rope) rescue; Confined space rescue; Extrication; Fire Fighting/Rescue (Structural and Wildland); Incident Command System (ICS); Cyanide-related exposure; ADE. Training records reviewed during the audit indicate that ERT members received training, as required, during the recertification period. Contact information in the Crisis Management Document includes call-out procedures and 24-hour contact information for the ER Chief. The Mayday procedure issues a call for resources over the radio, contacting personnel who are already onsite. The ER Chief or Captain will request additional resources, if required. All ERT members onsite utilize radio communication to stay in communication and can be used to initiate a larger response if necessary. Contact information for external resources is listed in the ERP-Cyanide and Crisis Management. The functions and responsibilities of site personnel in an emergency are detailed in Section 5 of the ERP-Cyanide. Emergency response equipment lists are provided in Section 13 of the ERP-Cyanide that has provisions of emergency response equipment provided for each scenario. The cyanide emergency response equipment is checked monthly by the ERT and records are retained for a minimum of 3 years. Equipment is also inspected on a regular basis as it is used by the ERT and during training sessions. The ERT has switched to an online application that assists in tracking inventory of all emergency response equipment as well as inspections and operability of equipment. If an inspection is missed or a defect is found in the equipment the Chief is notified via email and any actions needed are tracked within the system until completed. The role of outside responders is described within the plan, and it identifies the responsible parties for coordinating requests for outside resources.

The Jacobina mine has a formal mutual aid agreement in place with the Santa Barbara hospital to provide outside assistance to the site. Emergency response training drills are also conducted in coordination with the local community, the Hospital and with local resources to aid in the coordination between entities in the event of an actual emergency. The hospital team is trained and prepared for cyanide-related, there is a checklist that confirms that the cyanokits are available and within the expiry date.

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

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

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Describe the basis for the Finding/Deficiencies Identified:

The Crisis Management Plan and ERP-Cyanide, sections 8.1, and 18.3, provides the communication and notification process and procedures in the event of an emergency including request of support to outside agencies, if necessary. Among other responsibilities, the General Manager oversees all operations at the facility during an emergency and is responsible for briefing other team members and notifying corporate personnel and determining whether activation of the Crisis Management Team is warranted. The External Relations Coordinator (or designee) responds to media enquiries; the Health, Safety and Environmental Manager (or designee) advises when reporting to government agencies is required and requests mutual aid assistance if required, and also provides technical expertise related to emergencies which may have an impact on the environment and is responsible for notifying the regulators when reporting is required. The ERP-Cyanide, ERP-TSF, and Crisis Management Plan, provide contact information for the relevant regulatory agencies, including responders and medical facilities.

The ERP-Cyanide, in section 18.2, and also referring to the external parties (such as stakeholders) in the document PIS-6-04-04-3.3-002, and Crisis Management Plan contains procedures for communications and includes emergency response contact information. In the event of an incident, the site or crisis management team will contact relevant State and Federal regulators who will in turn notify affected parties in local communities as necessary. Procedures for notifying outside agencies and the media are provided in the ERP-Cyanide, ERP-TSF, and the Crisis Management Plan. Contact information for potentially affected communities and the media are included.

Section 18.3 of the ERP-Cyanide describes a signification cyanide incident (in accordance with ICMI's Definitions and Acronyms documents), identifies that notification must be made to ICMI with 24 hours of a significant cyanide incident and includes contact information for ICMI. During the recertification period the JMC did not have any signification cyanide incidents as defined by ICMI.

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: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.5

Describe the basis for the Finding/Deficiencies Identified:

JMC has an ERP called ERP-Cyanide (Plan of Emergency Response for Cyanide), item 13 considering various scenarios presented in the sub-items, the plan provides detailed information including actions (what to do), methods (how to do), responsible person (who is going to do),

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and resources (what or where) in case of any emergency considered in the scenarios. Considering use of sodium hypochlorite for both solids and solutions. The material is removed in drums using adequate tools and equipment. The procedure of decontamination and neutralization was considered the same. The same procedure for solids is the same for solutions. The clean-up procedure is done removing more material that was in contact with cyanide to ensure that everything was removed. The plan describes any contaminated, recovered or neutralized debris disposal into the tailings dam B2. The drums are transported to the TSF and disposed there. The plan includes the supply of potable and drinking water to the surrounding communities. Today, company's drinking water is provided in 20-liter containers of mineral water from external sources. Bottled drinking water is also available in break rooms throughout the mine site as well as 20-liter containers stored in the site warehouse.

The response plan ERP-Cyanide, item 6, explicitly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat any cyanide that would have been released into surface water.

In case of emergency and cyanide release during transportation close to the company, the plan states that there's identification of possible extension of contamination caused by the release of cyanide in water bodies. The plan, item 13.1.2, includes the utilization of sampling collectors and continuous monitoring and sample-taking, HCN gas monitors are also used. The plan specifies that the contamination of water bodies is free of cyanide when the free cyanide level is below 0.022 mg/L. The local remains isolated until continuous monitoring confirms the low cyanide concentration.

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

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

Describe the basis for the Finding/Deficiencies Identified:

The plan ERP-Cyanide item 22 is revised with a maximum period of 3 years, or when any mock cyanide emergency drills identify any deficiencies or when the investigation of an accident indicates and requires any changes.

JMC performs cyanide (and other) emergency mock drills at least twice a year and holds regular training sessions for the ERT. All site personnel also undergo bi-annual training for cyanide management and operation. The ERT will be trained annually in emergency response. The mock cyanide emergency drills at JMC consider 10 different scenarios, which are simulated in a 3-year period. Mock drills may include participation by the cyanide producer and transporter. The local emergency services (EMS, hospital, fire, law enforcement, etc.) are always included when the scenario has victim(s). Drills are developed to include a variety of locations and scenarios

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including environmental release, transportation accidents, cyanide releases during fires or explosions, cyanide releases during unloading and mixing, cyanide releases of pipe bursts, valves, tanks leakages, dam overflow, power outage and pump failures, uncontrolled seepage, failure on the cyanide treatment, destruction and recovery, tailings dam failures, leaching facilities, and other cyanide facilities. Drills are developed in advance and risk assessed to minimize potential impact of event unpreparedness. Some of the drills reviewed included scenarios of HCN gas exposure, cyanide solution releases, and a series of tabletop exercises performed where scenarios (such as a Tailings Storage Facility failure) are not practical to simulate. Where necessary, deficiencies are identified and improvements to the emergency response training or procedures are made. Observations made are recorded in an incident debrief document, where both positive elements of the response and opportunities for improvement are tracked and included in subsequent training events. Drill debriefs forms vary depending on which organization or agency has overall authority over the drill. Auditors reviewed the documentation (FORM-04-02-3.6-026) for the scenarios, including incident setup, which may include communication with outside entities, the sequence of events during the incident, the response details, the post-incident debrief, and the lessons learned. The scenarios appeared to have been managed with a high degree of professionalism. The files included times and dates provided by the ERT event documentation, detailed incident minutes of the response actions, pictures, a thorough debrief, and documentation of lessons learned with input from all participants. Verification was through review of records and pictures of mock cyanide drills performed during the recertification period.

The emergency response plan ERP-Cyanide item 22 is revised with a maximum period of 3 years, or when any mock cyanide emergency drills identify any deficiencies or when the investigation of an accident indicates and requires any changes.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

All new hires, contractors and visitors at JMC receive an initial general induction training on health, safety and environmental matters before they can start working or enter the mine –

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following the Brazilian norm NR-22. The cyanide training was included in the training for all employees and visitors for at least the last 3 years. New workers at the mine, including both employees and contractors, receive orientation training in accordance with NR-22. As the NR-22 training only covers general hazardous chemical training, new employees receive cyanide specific training prior to beginning work. The training on cyanide awareness to all employees covers general information related to cyanide, Emergencies Involving Cyanide, Cyanide Management: Handling, storage and how to proceed in cases of leakage and poisoning with NaCN; Industrial safety: Cyanide data; properties; good personal protection practices; emergency/firefighting; transportation and storage; care of waste and packaging. Occupational health: Cyanide poisoning; symptoms; first aid; treatment of poisoning. Occupational Hygiene: Types of risks; Health effects of contaminants; Procedure HIG.P.04; PPR - Respiratory Protection Program; NR 9 PPRA; PCA Hearing Control Program; Identifying risks; Hearing Conservation Program; good practices in handling cyanide. Environmental Protection: Solid Waste Management; Liquid Effluent Management; Environmental Concept; Classification, according to ABNT Standard NBR 10004:2004; Waste Contaminated with Cyanide; Types of Cyanide Spills; Groundwater Management; Atmospheric Emissions Management; Environmental Emergencies; Legal Liability. The cyanide awareness training also includes a test administered to each employee to demonstrate an understanding of the training content. Interviews with employees that coordinated the offload of cyanide, as well as with operations, maintenance, and ERT members at the operation were conducted, with personnel demonstrating knowledge on cyanide management. Verification of compliance against this question was done by interview with process and training personnel, and review of employee training records covering the recertification audit period. Several plant operators that participated in field interviews during the audit were selected for a random review of training records. In all cases the auditors found evidence of training records.

The cyanide hazard recognition refresher hour load is 2 hours, and it is conducted every 2 years, according to the Internal System Standard PIS-04-05-3.4-008, dated July 2025. There is not a required periodicity for the cyanide training in Brazil. Bi-annual refresher training including cyanide and hazard recognition modules is provided. The bi-annual training provided by the Jacobina Mine does include specific training for all employees, including properties of cyanide, hazards of cyanide, symptoms of cyanide exposure, emergency response, and first aid, including use of oxygen and information on the Cyanokits that are used currently. The training includes a written test. Training content is developed by process trainers, health and safety personnel, environmental personnel, human resources and emergency response personnel. The training department retains hard copies of the most recent cyanide-related training records for each employee. Training is recorded on sign-in sheets with training records signed by both trainer and trainee as well as with the knowledge test which is retained in the employee's files. ERT specific response training records are maintained by Human Resources (HR). Records are available electronically through scans of documents and certifications for ERT members, as well as being tracked in the ERT training matrix spreadsheet, which is also managed by the HR. Cyanide hazard training for ERT members is administered and recorded in the same manner as for operations personnel, as noted above. Contractors that come to the site are required to refresh

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their site-specific training bi-annually, which includes information on cyanide and cyanide hazard recognition. This requirement was verified through discussion with the Human Resources team, review of training materials, and review of selected employee training records for cyanide refresher training.

Training records, including cyanide hazard training for all employees who may be exposed to cyanide are retained by the process trainer in the form of hard copies of the training in each employees training record. The process trainer retains cyanide-related training provided to process personnel, while the Administrative Service area retains training records for all other employees. Records for new employee training, including orientation training, are retained for a minimum of five years. Training records identify the trainer, trainee, topics covered, date and sign off sheet. This requirement was verified through review of a sample of records covering the recertification period.

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: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 8.2

Describe the basis for the Finding/Deficiencies Identified:

New plant employees and any worker with cyanide related tasks receive specific training on SOPs that apply to their job position. This training is provided by the process trainer and supervisors on operating procedures including both general procedures applicable to all site areas as well as those specific to an area or task. The SOPs are used as a record of training and are signed by both the trainer and the trainee. Operators are also instructed in conducting job task analysis, field level risk assessments, and area inspections (with specific check lists), which are carried out within work areas. Training records are retained in a training file for each employee by the process trainer. Supervisors coordinate with the training department (HR) to record the training on the employee registration folder and tag that is carried by each employee with training information. Specific SOPs associated with each area are utilized to aid in the training. Operators are observed to ensure understanding of the process or task and demonstrate competence to the trainer or supervisor, as well as pass a written test before receiving sign off on a given task. Verification of compliance against this question was done by interview with the process trainer, and process personnel, and review employee training records covering the recertification audit period. The plant operators and mechanics that participated in field interviews during the audit were selected for a random review of training records. In all cases the auditors found evidence of training records.

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Each plant and cyanide-related standard operational procedure (POP) was reviewed by the auditors. Standard operating and task procedures define the steps required to complete a task and the document itself is provided as training material with sign-off required from both the trainer (supervisor or process trainer) and the trainee. The trainee is tested with written exam to ensure that the training is effective. The process trainer maintains the record of the training requirements for each specific task and retains signed training records and SOPs for each employee. General and specific training elements required for a work area are maintained by the process department, along with all signed training records. Training records were available for the recertification period.

The Jacobina mine training standard procedure requires a qualified person to train the new hires and refresher training sessions. Qualification certification of the trainers was verified by the auditors. For specific procedures for the mill and TSF operations that define the steps required to complete a task that involves handling cyanide in a safe manner, the plant/TSF supervisors and coordinators are the qualified trainers. The SOPs include a section of acknowledgement of the training received, which is signed off by the trainee and trainer that ensures the person is qualified to conduct the task. Training in specific tasks is generally provided by another qualified operator that has been fully trained and signed off on the task, under the supervision of a supervisor or process trainer. Supervisors are considered qualified to provide training based on experience. The process trainers receive instruction on “train the trainer”.

All new employees are trained to receive a minimum specified level of site orientation, as required by NR-22, before being allowed to operate onsite. NR-22 is not specific about cyanide, however since the mine uses cyanide as the main reagent in the plant, it includes cyanide hazard recognition in their training list. Training includes cyanide awareness training and, for those that will be working within the metallurgical, specific training on relevant SOPs for the job duties that they will perform. In addition, employees must complete general and specific task training before being allowed to work alone. The auditors verified this by means of interviews with workers at the processing plant. Records of the induction training and refreshers are maintained, including a spreadsheet to track cyanide training for each employee. The auditors inspected examples of these records and found them to be effectively maintained.

Bi-annual refresher is provided and includes a specific module on cyanide management covering physical and chemical characteristics of cyanide, cyanide handling, monitoring, control of pH levels, exposure limits, exposure symptoms, PPE, treatment, rescue equipment, safety showers, emergency warning systems, evacuation, disposal and spill procedures. Annual on the job training (OJT) is provided for plant specific tasks such as cyanide offloading. In case of any changes to procedures, including those related to cyanide tasks, they are reviewed and conveyed at shift safety meetings. Employees also undergo training on procedure changes, which are documented and retained by the process trainer.

Following new hire orientation and cyanide refresher training, employees complete a written test to demonstrate understanding of the material. Written tests to demonstrate understanding are

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taken for task training with sign-off by both the trainer and trainee. Employees must also demonstrate competence in completing the task through observation by the trainer. Employee activities and task competence are monitored by supervisors, or other competent people, conducting safety interactions with employees and ensuring task checklists and procedures are followed. Task observations are utilized at both processing plant and TSF facilities.

Training records are retained throughout employment history. Safety Induction and cyanide training records are retained by the process trainer and hard copies retained. Training records for each employee covering all training they receive contain the date, subject covered and are signed by both the trainer and trainee. Written tests are completed to demonstrate the employees' understanding of the training materials.

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

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

Describe the basis for the Finding/Deficiencies Identified:

JMC trains all employees, operators and sub-contractors in cyanide operation and chemical substances. Visitors receive a shorter training which cyanide is presented discussed. Plant operators that are responsible for cyanide unloading, processing, and maintenance are trained in specific procedures for each task. In cyanide emergency procedures, the operator is trained to communicate and call the ERT. The trained ERT person will act in emergency situations, including scene size up, control of the scene and release (if safe), initiating the emergency response plan, and evacuating the area if necessary. All operators within the mill and TSF facilities, which includes cyanide unloading (reagent operator), process operations, and maintenance personnel, are provided with site-specific hazard training including cyanide awareness, hydrogen cyanide monitoring, emergency response, recognition of cyanide exposure symptoms, cyanide exposure first aid, the role and operation of rescue equipment, and actions to be taken in the event of a cyanide spill including sampling. Task specific training is provided to personnel, which includes the procedures to be followed if cyanide is released. Bi-annual cyanide refresher training conducted by the site contains the steps to take for personnel to take to begin decontamination of a cyanide exposure victim which includes ensuring that they are taken to a safety shower and rinsed under the shower. The ERP (ERP-Cyanide) contains additional measures taken by the ERT to ensure decontamination of a cyanide exposure victim. All the Emergency Response Team members are all made up of employees who have voluntarily committed to the program and trained in the use of necessary response equipment such as self-contained breathing apparatus, decontamination equipment, extraction equipment and

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firefighting equipment. Emergency responders are available on all shifts. Knowledge and competence level is tested through tests, field practice and drills.

The JMC mine has an Emergency Response Team (ERT) on site, which is formed by personnel from different areas of the mine. ERT members are trained through participation in mock drill exercises as well as formal training programs. Formal training and certifications are in place for fire, first aid/medical, chemical exposure response, vehicle extrication, incident command, and technical rescue. Emergency responders are available on all shifts. All personnel working around cyanide are also trained in how to react in emergencies situations, including cyanide related events. Mock scenarios and drills are regularly undertaken to test the effectiveness of the ERT, the ERP, the CMP, and the Crisis Management Plan. The review of drill after-action reports showed that the ERT actively participated in emergency drills including those scenarios involving cyanide emergencies. Emergency Response Team Members attend monthly meeting sessions and the average of two mock drills per month. Training recycle sessions are annual and include the use and inspection of response equipment. Records of training provided to the ERT members for the last 3 years, as well as equipment inspection documentation was available for review by the auditors and were found to be complete.

The Jacobina mine has an agreement with the Santa Barbara hospital located 12.3 km away from the mine in the town of Jacobina. The hospital team is trained annually with formal training given by the cyanide manufacturer Proquigel. The local fire brigades are not familiar with the cyanide emergency response plan.

Annual refresher training is provided to employees and includes response to cyanide exposures and response to releases. The cyanide ERP refresher training courses are to be provided every year. The ERT completes monthly meeting sessions including recognition of cyanide exposure, treatment and first aid. Mock drills are also conducted at least once per year and involve operations and maintenance personnel, management, and the ERT. Personnel interviewed showed a good level of awareness of emergency response procedures in the event of cyanide exposure or release. This was confirmed through the in-person interviews and the review of training records for mill and tailings personnel and emergency response team members.

Cyanide operation and general chemical training and refresher records are retained and kept current by the human resources department with electronic copies of all training kept on file. Task training records also include sign-off by the employee and trainer with confirmation that training material has been understood. Cyanide unloading and other specific training courses in operational procedures are kept current by the plant management team and supervisor. Task training records also include sign-off by the employee and trainer with confirmation that training material has been understood. ERT specific training records are maintained by the human resources department. Training certifications status, participation in training, and the training topic are recorded into the ERT training matrix and kept electronically on the site data server. Training records include 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.

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The training records were reviewed by the auditors. Operators were interviewed during the site visit, and their names and registration numbers were taken by the auditors, their names could be found on the list of training records, with their signature and date of training completion.

9. DIALOGUE AND DISCLOSURE: Engage in public consultation and disclosure.

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

JMC uses a variety of mechanisms to provide information to stakeholders related to cyanide management, including meetings, tours to the communities around the mine and tours to the mine site. In addition, there is an open-door policy that allows stakeholders to engage with the site and voice any concerns. Every year, JMC Communications team goes to the communities of Itapicuru (right next to the mine), Jabuticaba (5 km away from the mine) and Pontilhao community (located 8 km away from the mine). Information sheets are distributed to these communities and verbal communication is provided to ensure the villagers understand how the cyanide is used and how the mine is concerned about its correct use. The open-door program receives visitors 2 to 3 times per month. NGOs, schools and universities from the Jacobina town, from the state of Bahia and from other cities and states in Brazil come to visit JMC. During the visit information about cyanide is provided to all visitors, including the importance of the Cyanide Code. JMC has two spaces where visitors are welcome to visit and learn about the operation and about cyanide. One located in downtown Jacobina, the Espaço JMC, and one located at the Itapicuru community, called CECI (Centro de Educação e Cultura do Itapicuru) where local meetings are held and information about the mine, operation and cyanide is available. There have been no cyanide related complaints or requests for information during the recertification period.

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

- The operation is: in full compliance
 in substantial compliance

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not in compliance with Standard of Practice 9.2

Describe the basis for the Finding/Deficiencies Identified:

The Jacobina mine has developed and updated written and visual descriptions of how their activities are conducted and how cyanide is managed and has made them available to communities and other stakeholders. These include JMC safety training for all visitors, which addresses how cyanide is used and identifies appropriate health and safety precautions. All persons coming on site must receive the general training and individuals working in the process area receive area specific training, including additional cyanide-related content. Cyanide Code fact sheets contain information related to the use of cyanide. Sodium Cyanide safety data sheets (SDS) are available from the manufacturer and can be provided to stakeholders. The information mentioned above can be made available and distributed in different engagement opportunities including special meetings, presentations, open-door visits, annual door-to-door, among others.

Following the code, JMC will inform ICMI in case any of the cyanide release or exposures incidents occur. JMC has a communication procedure as part of its internal communication system (PIS-04-04-3.3-002) in which the guidelines of communication in case of any incident or accident occurrence. There is an obligation to inform the government in case of an accident or incident involving employees or contractors through the CAT (Communication of Work-related Accident). In which the company has to inform the Social Security Department any person-related incident or accident. In case of an accident or incident with fatal victim, the company has to inform the Ministry of Work and Employment and National Mining Agency (ANM). In case of wildlife death, the company has to inform to the local environmental agency (INEMA). No cyanide exposures or incidents resulting in hospitalization or fatality have occurred prior during the recertification period. If an event were to occur, communication to the public would be made per the Crisis Management Plan. No cyanide releases off the mine site requiring response or remediation have occurred during the recertification period. There is a procedure in place to respond to such scenario. If an event were to occur, communication to the public would be made per the Crisis Management Plan. No cyanide releases on or off the mine site resulting in significant adverse effects to the environment have occurred during the recertification period. If an event were to occur, communication to the public would be made per the Crisis Management Plan. Cyanide releases on or off the mine site that require reporting to regulating authorities are reported via the Environmental department. If an event were to occur, communication to the public would be made per the Crisis Management Plan. No cyanide releases over applicable limits for cyanide occurred during the recertification period. If an event were to occur, communication to the public would be made per the Crisis Management Plan.

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