



# INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

## MINING OPERATIONS SUMMARY AUDIT REPORT

PREPARED FOR THE  
INTERNATIONAL CYANIDE MANAGEMENT CODE  
CONDUCTED FOR KINROSS GOLD CORPORATION'S  
MORRO DO OURO MINE  
PERFORMED BY FERREIRA & CERQUEIRA LTDA.

AUDITOR NAME: LUIZ EDUARDO FERREIRA

FINAL REPORT DATE: January 26, 2026

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# MINING OPERATIONS SUMMARY AUDIT REPORT

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



# MINING OPERATIONS SUMMARY AUDIT REPORT

## Introduction

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

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

## Instructions

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

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

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

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



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



# MINING OPERATIONS SUMMARY AUDIT REPORT

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## Operation General Information

Name of Mine:	Kinross Brasil Mineração Ltda.
Name of Mine Owner:	Kinross Canada
Name of Mine Operator:	Kinross Brasil Mineração Ltda
Name of Responsible Manager:	Alexandre Matos (Environmental Manager)
Address:	BR-040, km 36,5, 38600-000, Paracatu
State / Province:	Minas Gerais (MG)
Country:	Brazil
Telephone:	(+5538) 3679-1020
Fax:	N/A
Email:	gabriel.mendonca@kinross.com

## Operation Location Detail and Description

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

### **Aspects of the location and description of the operation:**

KBM operates in mineral research and development, mining, processing, and gold trading. It is one of Brazil's largest gold producers, accounting for 22% of national production. With operations at the Morro do Ouro mine in Paracatu, northwestern Minas Gerais, an office in Belo Horizonte, and hydroelectric plants in Caçu and Cachoeira Alta, it is part of the Canadian group Kinross Gold Corporation. A major industrial enterprise in Paracatu, it accounts for approximately 22% of the municipality's formal jobs. It employs approximately 1,800 directly and 4,000 outsourced workers. It invests in initiatives that contribute to the region's development and is a major tax generator and promoter of other businesses in the city of Paracatu. KBM is certified by national and international standards related to health, safety, the environment, and social responsibility. The certifications of the International Cyanide Code, ISO 45001, ISO 14001 stand out. With a large expansion project, it increased the ore mining capacity and extended the mine's useful life by more than 15 years, now estimated until 2032. KBM has been certified since November 3, 2005, under the International Cyanide Code.

KBM uses solid and liquid NaCN solution both supplied by Proquigel Ltda., a Brazilian Cyanide Code certified producer. **KBM does not add cyanide solution during the milling process (refer to Standard of Practice 4.2). The ore mill circuit is not a cyanide installation.**

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Name of Operation

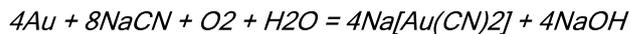
  
Signature of Lead Auditor

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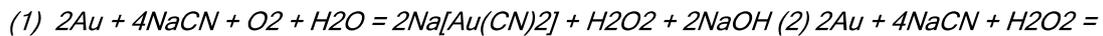
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## CIL

Gold, a noble metal, usually occurs in nature in the elemental state, as a result of its inert character in an aerated aqueous medium. Metal dissolution requires the combination of an oxidizing agent, such as oxygen, with specific complexing agents, such as cyanide and others, capable of stabilizing gold ions in solution. The cyanidation process is based exactly on the ability of cyanide to form a complex with gold according to following global reaction:



*This overall reaction takes place in two steps (sub-reactions):*



The Hydrometallurgy 3 leach circuit consists of a pre-aeration tank and 7 CIL leach tanks. It is important to mention that the concentrate from Plant 1 is currently being processed in Hydrometallurgy 3, so the entire process described below will refer to the concentrate from both Plants. The concentrate is initially sampled in an autosampler, with automatic cut-off every 15 minutes. The samples are accumulated for 8h (1 sample per shift), with the main sample and archive sample being collected during the splitting. These samples, at the end of each shift, are filtered and sent to the chemical laboratory, weighing between 300g and 500g. The characteristics of the pulp fed into the leaching circuit must respect the following values:

- % of solids between 40% and 45%;
- Granulometry - Less than 10% retained in 325# (45 microns);

After sampling, the concentrate goes directly to the pre-aeration tanks (25-TQ-501 and 25-TQ-502), with a useful capacity of 707 m<sup>3</sup> out of a total of 750 m<sup>3</sup>. In these tanks, lime and oxygen are added in order to control the pH of the pulp between 9.8 and 10.5, preventing the formation of HCN(g) and also oxidizing the cyanicides (Fe, Cu, Zn, Pb and S). In these tanks has mechanical agitation through double helix agitators and complementary agitation through oxygen injection, which is carried out

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through a slurry recirculation pump with oxygen ejectors in the discharge, called Fill Blaster. The total cyanide consumption basically depends on the mineralogical composition of the ore, the pH conditions and the contact time of the pulp containing the cyanide with the solid fraction. Only part of the cyanide is actually used to dissolve the gold. Most of it is consumed in the formation of metal ions, in addition to its oxidation caused by the injection of oxygen into the tanks. The slurry is pumped from each tank to the downstream tank through CIL inter-stage transfer sieves (Kemix), which have a 1.1 mm opening, retaining the activated carbon in the tank. The cyanidation itself occurs from 25-TQ-503 to 25-TQ-509. In tank 25-TQ-503 a previously prepared sodium cyanide solution is added at a concentration of 30 to 34 %w/v. The sodium cyanide concentration in this tank is normally controlled between 500 to 700 ppm, depending on the cyanide concentration at the end of the circuit. From 25-TQ-503 onwards, a pre-defined amount of activated carbon is maintained, in order to optimize the gold adsorption reaction, totaling a mass of 185 tons of activated carbon inside the leaching tanks: • 25-TQ-503 → 12,0%; • 25-TQ-504 → 10,0%; • 25-TQ-505 → 6,0%; • 25-TQ-506 → 5,0%; • 25-TQ-507 → 4,0%; • 25-TQ-508 → 2,0%; and • 25-TQ-509 → 1,5%.

Between tanks 25 TQ 503 to 509, the pulp remains in constant agitation with the reagents. Free cyanide and pH decrease gradually with each tank, being controlled in the last cyanidation tank between 80 to 120 ppm of free cyanide and pH~10. The residence time of the circuit is approximately 23 hours.

The addition of oxygen is carried out in the leach tanks as well and follows the following parameters: • 25-TQ-501 → 12 mg/L; • 25-TQ-502 → 12 mg/L; • 25-TQ-503 → 10 mg/L; • 25-TQ-504 → 10 mg/L; • 25-TQ-505 → 6 mg/L; • 25-TQ-506 → 6 mg/L; • 25-TQ-507/508/509 → Manual addition.

There are no measuring instruments. Currently, the activated carbon used in the circuit has a particle size of 6x12 mesh, being supplied by Haycarb. In CIL tanks, cyanide solubilizes the gold contained in the ore, and the solubilized gold is adsorbed

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onto the activated carbon. Approximately twice a day, the slurry with carbon is transferred by vertical backward impeller pumps, 25-BO-503 to 25-BO-509, to the immediately preceding tanks. In the third tank, 25-TQ-503, the pump sends the slurry with the loaded carbon through an 8" pipe and discharges it into the 25-PE-511 (Derrick screen, with 0.85mm polyurethane screen). The loaded carbon retained by the 25-PE-511 vibrating screen is transferred by gravity to the acid wash column, thus minimizing coal breakage. The tailings from the leaching circuit have an automatic sampler for liquid and solid samples, with collections every 10 minutes. After sampling, the hydrometallurgy tailings are fed through a carbon safety sieve (25-PE-510), with an opening of 0.3 mm. The coal retained in the sieve's oversize is captured in bags and stored in the area for further treatment.

## DETOX - CYANIDE DEGRADATION

The cyanide destruction reactor tank is located at the end of the CIL tank set. Reagent make-up systems are located next to the CIL tanks. The cyanide destruction process works through sodium bisulfite as the source of SO<sub>2</sub>. The cyanide destruction reactor tank is equipped with an agitator. Oxygen is introduced through an inlet line through the base to an inverted cone under the center shaft of the stirrer. The air bubbles are then directed upwards, to the zone of maximum tension of the rotor blades. Furthermore, process water is fed for dilution at flow rates close to 130 m<sup>3</sup> /h. The bisulfite solution is added at a rate sufficient to reduce free cyanide to below detection limits and also to reduce the level of dissociable cyano-complexes to weak acid (WAD = "Weak Acid Dissociable Cyanide"). The clear solution that passes through the overflow of the specific tank, which is directed to the tailings dam, is the sampling point.

## ACID WASH

The loaded carbon is directed to an acid wash column, with a capacity of 36 m<sup>3</sup> (25-CN-501). A 2% hydrochloric acid solution is pumped into the column, which overflows

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over the top and returns to the acid mix tank. The acid wash lasts approximately 3 hours, with a residual concentration of HCL close to 1.0%. After the acid wash is completed, the residual acid is neutralized with sodium hydroxide before being discarded, preventing corrosion of the equipment ahead in the circuit. The acid wash column has 4 lower and 4 upper filters (0.6 mm opening) in order to preserve the carbon inside the column.

## ELUTION AND REGENERATION

The elution cycle begins with the preparation of a 2.0 - 3.0% sodium hydroxide solution in the poor tank (25-TQ-519). The poor solution is initially preheated by pumping it through the elution heater, reaching a temperature close to 140°C. During elution, the poor solution is directed through a solution/solution and oil/solution heat exchanger to raise its temperature to 140°C before entering the elution column. The poor solution, after heating, reaches the bottom of the elution column and is then percolated through the fixed bed of loaded carbon. The solution removes the metals of interest from the activated carbon and exits through the top of the elution column. Once in the rich solution tank (25-TQ-520), the solution is pumped to the electrolytic cells in the foundry, where, after removing the gold, it returns to the poor solution tank (25-TQ-519) for elution (closed circuit). The internal pressure of the columns is 3.0 kgf/cm<sup>2</sup> and in order to keep the carbon fixed inside the elution column, filters are used, in the form of strainers, with an opening of 0.6 mm m (in the same way as it is done in acid wash column).The hydrometallurgy elution circuit has two elution columns (25-CN-502/505), so that, when one column is in operation, the other is prepared to receive the next batch. After 12 h of elution, the elution column is cooled and depressurized, then neutralization water is added twice and drained into the poor tank. After draining the elution column, the stripped carbon is pumped to the sieves (25-PE-513/516), which classify (0.7mm opening) the carbon that will go to the regeneration furnace (oversize). The undersize is directed to the 25-TQ-522, which is a tank for the storage of carbon fines generated in the circuit. The kilns (regeneration

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furnace) are divided into 2 different zones, the temperature in Zone 1 is approximately 550°C and in Zone 2 650°C. After regenerating, the reactivated carbon is directed to a water tank, called quench tank. Its function is to cool the carbon and to avoid it's contact with the oxidizing atmosphere. Further the carbon is pumped for screening (25-PE-514/517 with 0.7mm opening) to direct the oversize to the leaching circuit (CIL) and the undersize to the fines tank (25-TQ-522).

## INTENSIVE LEACHING - ACACIA

The concentrate from Knelson concentrators, located in Hydrometallurgy (XD-30 and QS48), Plant 2 (XD40, QS48 and QS70) and Plant 1 (QS48), are processed in intensive leaching reactors CS2000 (XD30 and QS48 from Hydro and Plant 1) and CS8000/8001 (XD40, QS48 and QS70 Plant 2). The concentrate drums from the Plant 1 and 2 Kelson equipment are transported by truck to the hydrometallurgy facilities. The concentrate is fed through a hoist into the cone of the reactors and transferred from the cone to the intensive leach reactor. Initially, the concentrate is percolated by water at a flow rate of 380 l/min and 800 l/min for the CS2000 and CS8000/8001 reactors, respectively. The purpose of this step is to remove the fines from the reactor, preventing them from being transferred during the solution pumping, damaging the pumps and electrolytic cells. After desliming, a cyanide solution is prepared with caustic soda and leachaid, the last is a catalyst for the leaching reaction. Once prepared, this solution is recirculated in the reactor for 6h (CS2000, CS8000 and CS8001). After completion of the leaching, the rich solution is pumped to the tank 25-TQ-520 and the tailings (solid material in the reactor) is pumped to the regrind circuit.

## ELECTROWINNING

Electrowinning cells removes precious metals from the concentrated solution by

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directly passing current fed into the electrolytic cell. The concentrated solution (electrolyte) is fed into a cell where the anodes and cathodes are arranged alternately. The power supply is powered by four voltage rectifiers and connected to anodes and cathodes. Low current density is required to increase the deposition rate. Poor electrolyte is transferred by gravity to the existing tank of depleted solution on the ground floor and pumped to 25-TQ-519 via 25-BO-537 pumps. The rich solution is pumped into the four electro winning cells (two rows with two in parallel) through 25-BO-517. Gold is electro-recovered to some extent on stainless steel cathodes. The electrolyte, with a temperature between 80 and 90 degrees centigrade, enters the electrolytic cell with a relatively high concentration of precious metals (~150 mg/L). Gold, silver, and other metals are deposited on the cathode. At the end of the process, the cathodes are removed from the cells, the gold-rich slurry is washed and pumped into a small filter press by means of an air-operated diaphragm pump. The filtered material is calcined in specific ovens for 6 hours at a temperature of 700 °C. The material retained in the filter is mixed with fluxes, often borax, sodium carbonate, sodium nitrate and silica, and fed into an existing electric induction furnace. Metal (Bullion) and slag are separated in the furnace, the last is removed to slag ingot molds; Bullion metal is shaped into ingots to be sent to the refiner, where gold and silver will be separated. The slag is remelted to ensure that there is no precious metal present prior to disposal. Guaranteed that the slag is free of precious metals, it is manually broken and directed to regrind mills. After the first melting of the bullion, it is again placed in the induction furnace, together with the addition of oxygen (3h approximately), for better refining. This process guarantees greater purity due to the removal, mainly, of lead from the bars.

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## Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

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

## Auditor Information

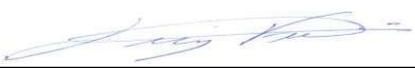
Audit Company: Ferreira & Cerqueira Ltda.  
Lead Auditor: Luiz Eduardo Ferreira  
Lead Auditor Email: luizeferreira2015@gmail.com

Names and Signatures of Other Auditors:

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

Dates of Audit: June 23-27, 2025 (on-site); October 16-17, 2025 (offsite)

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## Auditor Attestation

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

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

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# MINING OPERATIONS SUMMARY AUDIT REPORT

## 1. Acronyms

5W1H	Why? / Who? /When? / Where? /What? /How?
6M's	Environment / Human Resource / Method / Equipment / Raw Material / Measure
a.m.	Above-mentioned
ABNT	Brazilian Association of Technical Standards
ADR	Adsorption, Desorption, and Regeneration
AISC	American Institute of Steel Construction - Structural Calculations
ANM	Brazilian Mining Agency
ANSI	American National Standards Institute
ANTT	National Land Transportation Agency
APT	Prior Work Analysis
ARO	Asset Retire Obligation
ART	Technical Responsibility Certificate
ASME	American Society of Mechanical Engineers
ASTM	American Society of Testing Material
ATS	Automatic Control System
AWA	American Welding Society
AWS	American Welding Society - Welding Procedures
BSI	British Standard Institute
CAS	Chemical Abstract Service
CIC	Carbon-In-Column and
CIL	Carbon-In-Leach
CMAA	American Crane Manufacturers Association
CREA	Engineering and Agronomy Regional Council
CRI	Dam Risk Category
CSA	Canadian Standard Association
Cte	Electronic Bill Of Lading
CuSO4	Copper Sulphate
DACTE	Electronic Bill of Lading Auxiliary Document
DANFE	Electronic Invoice Auxiliary Document
DCE	Declaration of Dam Stability Condition
DDS	Daily Safety Dialogue
DG Act	Dangerous Goods Act 1985
DPA	Associated Potential Damage
EIR	Regular Inspection Extract
EPC	Collective Protection Equipment

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EPR	Self-breathing protective equipment
ETSF	Eustáquio Tailings Storage Facility
FEM	Federation of European Manufacturers
<b>FIR</b>	Regular Inspection Forms
H2O2	Hydrogen Peroxide
HCl	Hydrochloric acid
HDPE	High Density Polyethylene
HSSEC	Health, Safety, Security, Environment and Community
ICMC	International Cyanide Management Code
ICMI	International Cyanide Management Institute
IEC	International Electrotechnical Commission
INA	Water Level Meter
INMET	Meteorology Brazilian Institute
ISE	Safety Inspection Special Security
ISO	International Organization for Standardization
<b>KBM</b>	Kinross Brasil Mineração
<b>MTBF</b>	Mean Time between Failure
MTE	Ministry of Labor and Employment
<b>MTTR</b>	Mean Time to Repair
Na <sub>2</sub> S <sub>2</sub> O <sub>5</sub>	Sodium Metabisulphite
<b>NaCN</b>	Sodium Cyanide
NaOH	Sodium Hydroxide
<b>NBR</b>	Registered Brazilian Standard
NBR-16147-ABNT	Lifting and Handling Equipment - Commissioning
NBR-8400-ABNT	Mechanical Calculations
NBR-8800-ABNT	Structural Calculations
NEMA	National Electrical Manufacturers Association
<b>Nfe</b>	Electronic Invoice
NPS	Nominal Pipe Size
<b>NR</b>	Labor Regulatory Standard
NR10	Safety in Electrical Installations and Services
NR11	Transportation, Movement, Storage, and Handling of Materials
NR12	Occupational Safety with Machinery and Equipment
NR33	Health and Safety in Confined Spaces
NR35	Working at Heights
OS	Maintenance Service Order
PCA	Environmental Control Plan
PEACE	Task Preliminary Analysis.

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PFI	Pipe Manufacturing Institute
PFM	Consolidated Report of the Conceptual Mine Closure Plan for KBM Morro do Ouro
pH	Hydrogen Potential
PMP	Maximum Probable Precipitation
PPE	Personnel Protective Equipment
PQSE	Dried Chemical Powder Fire Extinguisher
PSAT	Processing Santo Antônio Tailings
PSB	Dam Safety Plan
PT	Work Permit
PVC	Polyvinyl chloride
QA/QC	Quality Assurance/Quality Control
RIS	Semiannual Dam Inspection Report
RISR	Regular Dam Safety Inspection Report
RNTRC	National Registry of Road Cargo Transporters
ROM	Run-of-mine
RPSB	Periodic Dam Safety Review
SAG	Semi-autogenous
SIGBM	Integrated Mining Dam Management System
SPDA	Atmospheric Discharge Protection Service
SS	Maintenance Service Request
SATSF	Santo Antônio Tailings Storage Facility
TAC1000	Cyande Analyzer - Process Analyzer System
Tank XII LTSF	Specific Tank No. XII Leach Tailings Storage Facility
TCO	Total Cost of Ownership
tpd	tons per day
UL-BR	Underwriters Laboratories in Brazil
UN	United Nations
WAD	Weak Acid Dissociable
yr	Year
ZAS	Self-Rescue Zone
ZSS	Secondary Security Zone

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## Principles and Standards of Practice

### Principle 1 | PRODUCTION AND PURCHASE

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

#### Standard of Practice 1.1

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

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

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

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

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## Principle 2 | TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1

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

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

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

Yes. KBM maintains the chain of custody records identifying all transporters and supply chains responsible transporting cyanide from the producer to the operation. KBM purchases solid and liquid form of cyanide. Cyanide cargo is transported from Proquigel (Camaçari and Candeias plants both at Bahia State, Brazil) directly to KBM by road in accordance with Brazilian legislation such as Resolução from ANTT 5947/21, NBR 15481/2021, NBR 16173/2021, NBR 15481/2021, NBR 15701/2020 and Labor NR 16. There is no interim storage. KBM maintains chain custody records in accordance with Brazilian laws identified as DANFE, DACTE, Nfe, CTe and Authorization for traffic of Controlled Product from the Ministry of Defense. Chain of custody records were reviewed by the auditor and it was evidenced DANFE and NFe issued by Proquigel as well as DACTE and CTe issued by the transporter clearly define information such as the seller, buyer, transporter name, the RNTRC number, cyanide amount, cyanide type, cyanide ONU number, cyanide risk class, transporter name, truck identification, container identification, driver name, dates of departure, transportation and arriving duly established and maintained as stated. The contract between KBM as buyer and Proquigel as seller defines that Proquigel shall use only use transporters that are certified as being in full compliance with the Code. The auditor compared chain of custody records with the listing of certified cyanide transporters on the Cyanide Code website to confirm that a certified transporter has transported the cyanide. Evidenced through pertinent records that cyanide was transported from Proquigel to KBM by Confins Transportes and Concordia Transportes which are certified as being in compliance with the Code (see <https://cyanidecode.org/sig-directory-type/confins-transportes-ltda-brazil/> and <https://cyanidecode.org/sig-directory-type/concordia-transportes-rodoviaros-ltda-brazil/> Besides, reviewing the above-mentioned (a.m.) web site, it was noted that both transporters certification has not been disrupted.

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## Principle 3 | HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

### Standard of Practice 3.1

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

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

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

Noted that KBM designed and constructed facilities for unloading, mixing and storing solid and liquid cyanide in accordance with cyanide producers' guidelines and Brazilian engineering requirements. This was evidenced during field audit and through reviewing several design documentations such as drawings and data sheet specification and showed that the facilities were designed and constructed as stated. During the field audit was evidenced that unloading, storing and mixing cyanide facilities have been adequately maintained and did not suffer any changes in the last three years. During the field audit evidenced that unloading, mixing and storing areas for liquid and solid cyanide are located away from other people of the plant and surface waters. The access to the process plant is controlled. All doors are locked. The unloading, storage and preparation areas are far from surface waters. During the unloading, only authorized operators are allowed to circulate in these areas. Evidenced duly implemented as required. Evidenced that KBM has defined, documented, implemented, and maintains PROC-NOR-158 - Cyanide Management, which in item 2.4 defines that liquid cyanide unloading must be performed in accordance with procedure PROC-PO-0013 - Receiving Liquid Cyanide, on a concrete floor, and the unloading area must be designed to contain any leaks. During liquid cyanide unloading, inspections are conducted in accordance with PROC-NOR-158-AN08 – Inspection of Cyanide Unloading Hose and Accessories by operators performing the activity. The cyanide storage area must have adequate ventilation to prevent gas buildup, but must be covered. Storage of incompatible materials such as acids, strong oxidizers, or explosives is not permitted. During the field audit, it was evidenced that liquid cyanide is unloaded on a concrete area as well as that the unloading area was designed and constructed to contain, recover or allow remediation of any leakage from the tanker truck or isotainer system. It was evidenced, during the field audit, that KBM has systems in place to prevent overfilling of cyanide storage tanks such as automatic level indicators, high-level alarms, shutdown valves and pumps. Evidenced that KBM defined and documented procedures establishing methodology for testing,

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maintaining and calibrating equipment, instruments and systems (previously identified as critical) in order to ensure that they are available for the normal operations and this way preventing overflowing of cyanide storage tanks. Evidenced that as well as of identified critical equipment in case of occurrence an incident involving cyanide release in this area in which the product is recovered by using environmental kits. Evidenced that KBM has been testing, maintaining and calibrating them (where applicable) in accordance Brazilian regulations laws as well as KBM's Maintenance Plan and Kinross' Calibration Plan. Evidenced, during the field audit that overfill protection equipment and instrumentation are properly functioning. For additional information, please see Principle 4. During field audit it was not evidenced that overflowing of cyanide have been occurred. It was not evidenced occurrence of incident reports. Interviewed personnel provided evidences of adequate management of actions that effectively have been performed as well as are aware of this matter. Evidenced that above mentioned instruments are considered critical and have been tested, maintained and calibrated in accordance above-mentioned Maintenance and Calibration Plan. Evidenced duly implemented. Reviewing pertinent documentation records such as drawings, construction and QA/QC records, it was evidenced that cyanide mixing and storage tanks are located on a concrete area prevent seepage to the subsurface. During field audit, it was evidenced mixing and storage areas are in good condition. Besides, evidenced that for all tanks containing high-strength cyanide solution are parked in a specific assigned concreted area. All the internal and external areas of the warehouses are concreted foundations. Reviewing pertinent documentation records such as design and construction and QA/QC records it was evidenced that secondary containments for cyanide storage and mixing were constructed of reinforced concrete which provides a competent barrier to leakage as required by Cyanide Code, Brazilian regulations and internal documented procedures. During the field audit, it was evidenced that secondary containments for cyanide storage and mixing are in good conditions free of cracks and other breeches that compromise their ability to effectively contain releases Evidenced that KBM defined, documented, implemented and maintains an Inspection Plan for Secondary Containments for Cyanide Storage and Mixing. Evidenced duly implemented. • Evidenced that Spill containment systems: storage areas for fuels and dangerous products are protected by containment basins and standardized in accordance with standard NBR 17505 -: Field audit provided evidenced that the involved areas with are in good conditions. Evidenced that KBM defined and documented that solid cyanide shall be stored in buildings roofed, off the ground and enclosed structures to minimize the potential for contact of solid cyanide with water preventing contact with precipitation. During the field audit it was evidenced that KBM stores cyanide in their original boxes, over pallets, on concreted floor, under roof, brick walls and with adequate ventilation as evidenced during the field audit. Additionally, during the field audit was noted that water systems for potable use, safety showers or and other purpose are not present in inside cyanide storage warehouse. So, they have been designed such that leaks or other potential releases will not come in contact with cyanide containers. Evidenced

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that KBM defined and documented that cyanide shall be stored with adequate ventilation to prevent the build-up of hydrogen cyanide gas. During the field audit, it was evidenced that Kinross stores cyanide with adequate ventilation to prevent the build-up of hydrogen cyanide gas. The KBM has defined, documented, implemented, maintains and provides adequate ventilation for the solid and liquid cyanide storage areas, since storage occurs in a ventilated area, with side enclosures and a top cover, with openings on the sides that ensure continuous natural ventilation. For liquid cyanide, the tank is installed in an area with side enclosures and a top cover, also ensuring adequate ventilation of the environment. In both cases, access to the storage areas is restricted and controlled. Cyanide is stored in a secure area where public access is prohibited, such as within the fenced boundary of the plant or within a separate fenced and locked area. KBM has defined, documented, implemented, and maintains PROC-NOR-158 - Cyanide Management, which in item 2.4 defines cyanide storage as the stock of liquid cyanide or concentrated cyanide briquettes. Cyanide storage must be carried out in a designated area. The warehouse must be designed and constructed in accordance with cyanide producer guidelines, applicable laws and technical standards, and/or safe and recognized engineering practices for these facilities. Access to the storage warehouse must be controlled, allowing access only in pairs. After the work shift ends, the key must be handed over to the Asset Security guard. During the field audit it was evidenced that it is duly implemented. Besides, all interviewed personnel showed to be aware of this matter. During the field audit it was evidenced that cyanide is stored separately from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products with berms, bunds, walls or other appropriate barriers that will prevent mixing.

## Standard of Practice 3.2

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

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

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

Evidenced that KBM defined internal documented procedure, which clearly defines that empty cyanide containers are prevented from being used for any purpose other than holding cyanide. During the field audit, evidenced that cyanide containers used only for holding cyanide. Evidenced duly implemented. It was noted that all operators involved with cyanide preparation have been trained as previously planned. Field Interviewed personnel showed to be aware of this matter. Internal

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documented procedure PROC-NOR-158- Cyanide Management item 2.5 - Waste Management establishes that all waste generated in the cyanide system that has the potential for cyanide contamination, whether from contaminated packaging or structures, is neutralized and decomposed to prevent alternative uses before disposal. Neutralization criteria are considered for subsequent collection and temporary storage. The waste generated must be classified as hazardous and disposed of as determined by SSMA-NOR-067 - Mineral and Non-Mineral Waste Management. Evidenced that KBM defined internal documented procedure which clearly defines that contaminated big bags and liners shall be inserted into a package (new big bag) as well as the contaminated Personnel Protective Equipment (PPE) must also be included and, then, this container shall be sealed. Then, these sealed packages are placed in a wooden box for return to Proquigel ( Camaçari and Candeias plants, Bahia ) certified as being in compliance with the Code (see <https://cyanidecode.org/sig-directory-type/proquigel-quimica-s-a-brazil/>) which will carry out the appropriated disposal in accordance with Brazilian environmental laws. It was noted that all operators involved with cyanide preparation were trained as previously planned. For additional information please see Principle 8. There is no rising, discarding or burning at KBM. During field audit interviewed personnel showed to be aware of this matter. Evidenced that KBM defined internal documented procedure which clearly defines that during the cyanide handling process shall be cleaned any cyanide residue from the outside of cyanide containers that are returned to the supplier (Proquigel) and securely close them for shipment, including the hose connections and couplings on tanker trucks and isotainers as above mentioned It was noted that all operators were trained as previously planned. For additional information. Please see Principle 8. Field interviewed personnel showed to be aware of this matter. Evidenced that KBM defined, documented, implemented and internal documented procedures which define methodology for preventing exposures and releases during cyanide unloading activities such as operation and maintenance of all hoses, valves and couplings for liquid cyanide. Reviewing inspections records it was evidenced that hoses, valves and couplings have been inspected in accordance with Brazilian legislation. During field audit was evidenced that a.m. procedures are duly implemented as well as the cyanide unloading and mixing areas are in good conditions. Evidenced that all involved personnel were trained as previously required. For additional information, please see Principles 4 and 8. Field Interviewed personnel showed to be aware of this matter. Evidenced that Kinross defined internal documented procedure, which clearly establishes methodology to prevent exposures and releases during cyanide unloading and mixing activities such as for handling cyanide containers without rupturing or puncturing since it defines tools to be used in specific activities, such as a hammer; lever; crowbar; alpha knife and how to use them. It was noted that all operators involved with cyanide preparation have been trained as previously planned. For additional information, please see Principle 8. Evidenced that that KBM defined internal documented procedure which clearly establishes methodology to prevent exposures and releases during cyanide unloading and mixing activities such as for

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limiting the height of stacking of cyanide containers since it defines that the stacking of boxes must respect the maximum limit of 03 (three) boxes. During field audit, it was evidenced that a.m. procedure is duly implemented since visiting KBM's cyanide warehouse noted that all stored cyanide are respecting the defined limiting the height of stacking of cyanide containers. In the case of occurrence an incident involving liquid cyanide release in this area, for instance any spills of cyanide of liquid cyanide from tanker trucks and isotainer the product is easily recovered by using environmental kits. It was not evidenced incident reports since last three years. During the audit it was evidenced that KBM defined, documented and implemented internal procedure which defines several management tasks related to cyanide including methodology for timely cleanup of any spills of cyanide during the transfer of liquid cyanide from tanker trucks. Additionally it is defined that Cyanide residues are stored in drums inside a sealed area, with access restricted exclusively to properly trained and authorized employees. The gate to this area has two padlocks: a key to one of them is kept in the room where the processing operation is supervised, where the employee who wishes to access it must publish a logbook and obtain authorization from the responsible supervisor. The key to the other padlock is under the control of the property security team, and access also depends on the authorization of this team. Only with the joint permission of these two areas can the employee enter the storage area. When necessary, contact is made with the cyanide supplier to send materials for transportation suitable for this type of disposal, which will subsequently be incinerated in accordance with the environmental standards applicable to the incineration of this class of waste, in accordance with Brazilian legislation. In the case of equipment or maintenance parts that will be returned to the workshop for maintenance services, wash with a 10% sodium hypochlorite solution before releasing for maintenance; collect a sample of the wash water and send it to the Laboratory for analysis of free cyanide. Note 1: If the result obtained is  $<0.50\text{ppm}$  of free cyanide, the material will be made available for maintenance. Note 2: If the result is  $\geq 0.50\text{ppm}$  of free cyanide, repeat the process until the concentration of free cyanide is  $<0.50\text{ppm}$ . For recording the results it is used the named as Release of Equipment, Pipes and Cyanide Parts for Maintenance. Evidenced that internal documented procedure which clearly establishes methodology to prevent exposures and releases during cyanide unloading requiring the appropriate use of PPE and having a second individual observe from a safe area, or observe remotely by video. It is clearly defined the PPEs to be used as well as the needing the prior inspection of them. During the field audit, it was evidenced that operators performing unloading of liquid cyanide using the appropriated PPE as stated as well as they issued pre work records as required such as: Sampled examples were: PVC boots; protective goggles; helmet with jugular; panoramic mask with gas filter; shell-type noise damper; *Long-length PVC gloves*, cowhide glove; nitrile rubber glove; tyvek or tychem coverall, radio communication, Pocket Preliminary Analysis Task (APT) and Work Permit (PT) reports. Reviewing PPE inspection records it was noted that they have been inspected before the use as previously stated. Besides, during the field audit it was evidenced a second KBM's individual operator observing the activity being

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performed from a safe area. During field audit was evidenced that a.m. procedure is duly implemented. The addition of a dye to high concentration liquid cyanide supplied by Proquigel and received at the mine is made at Proquigel facility before delivery to the KBM site. The liquid cyanide received in KBM has the dye Carmoisine for quick visual assistance in identifying the product, as required by the Cyanide Management Code program of the International Cyanide Management Institute. The use of this dye by Proquigel is registered in the (Sodium Cyanide Product Manual -POR-ENG-ESP, see: 6) and upon arrival at KBM mining the product must be operated according to the above mentioned procedure ensuring that the colorant is added. Since the addition of the dye is mandatory, it has never been evident that the dye was not used. Evidenced that defined internal documented procedure which clearly establishes methodology to prevent exposures and releases during solid cyanide unloading and mixing activities such as for addition of colorant dye to solid cyanide at the point of mixing into solution since it clearly defines all step by step for adding the artificial coloring Carmoisine Chemical Abstract Service (CAS) # 3567-69-9.

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## Principle 4 | OPERATIONS

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

### Standard of Practice 4.1

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

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

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

Evidenced that KBM has written management and operating plans and procedures for cyanide facilities such as unloading, mixing and storage facilities, process plants, tailings impoundments, encompassing Carbon-in-Leach, Detox- Cyanide Degradation, Acid Wash, Elution, Regeneration, Intensive Leaching - Acacia and Electrowinning. Evidenced that KBM-NOR-001-AN04 - Master List includes the a.m. plans and procedures. Sampled examples were: PROC- NOR-158 - Cyanide Management; KPB-32-GL-601-Q-008-MO - Eustaquio Tailings Storage Facility Operation, Maintenance, and Surveillance Manual; KPB-25-GL-601-Q-008-MO - Specific Tank No. XII Leach Tailings Storage Facility - Operation, Maintenance, and Surveillance Manual; RTS-PO-2801 - Receipt and Storage of Sodium Cyanide Briquettes and Cyanide P.A; SUPRI-PRO-130 - Cyanide Purchasing and Transportation; PROC-PO-0005 - Neutralization of Cyanide-Containing Waste; PROC- NOR-158-AN06 - Storage in the Cyanide Warehouse; PROC- NOR-158-AN07 - Permit to Work in Cyanide Areas; PROC- NOR-158-AN09 – Access Control to the Cyanide Reagent Storage Shed; PROC-PO-0013 - Receipt of Liquid Cyanide,; PROC-PO-0007 - Detox Plant Operation; PROC-PO-0007 - Leaching Operation; PROC-PO-0039 - CS 2000/CS 8000 Operation. Evidenced that KBM defined, documented, implemented and maintains internal procedures which identify and account for the assumptions and parameters on which the facility design was based and any applicable regulatory requirements as necessary to prevent or control cyanide releases and exposures consistent with applicable requirements. These documents apply to unit operations such as: Carbon-in-Leach, Detox- Cyanide Degradation, Acid Wash, Elution, Regeneration, Intensive Leaching - Acacia and Electrowinning< Eustaquio Dam, Specific Tank XII Dam. Reviewing the a.m. documentation the auditor noted that major parameters have been included in operating plans and procedures, such as: the design or required freeboard for ponds and impoundments; the concentration of cyanide discharged to and allowed in surface water; the concentration of WAD cyanide in open water contained in tailings impoundments. such as ponds, pads and conveyance channels; and the design storm

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events for process solution ponds and impoundments. Evidenced that KBM has operation's plans or procedures describe the standard practices necessary for the safe and environmentally sound operation of the facility including the specific measures needed for compliance with the Code, such as water management, inspections and preventive maintenance activities. Evidenced that KBM defined, documented, implemented and maintains KPB-32-GL-601-Q-008-MO - Eustaquio Tailings Storage Facility Operation, Maintenance, and Surveillance Manual and PB-25-GL-601-Q-008-MO - Specific Tank No. XII Leach Tailings Storage Facility - Operation, Maintenance, and Surveillance Manual which clearly define water management procedures, such as how and when tailings solutions must be managed to retain the design storage capacity in these facilities. Yes. KBM has procedures to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures, and incorporate any measures necessary to protect worker health and safety and the environment. Evidenced that KBM established, documented, implemented and maintains internal documented procedure - SSMA-NOR-021 - Management on Change. This establishes guidelines for conducting and communicating changes in a healthy, safe, and environmentally sound manner that, by their nature, modify the risk(s), leading to situations that could cause injury to people, damage to property, or the environment. This procedure also covers tests to be performed on systems, equipment, products, and processes. which establishes the guidelines to ensure that all changes are planned in relation to potential risks to health, safety, quality and the environment, and that measures are taken to ensure that they are not implemented and/or tested without proper risk analysis and the necessary controls to eliminate or minimize risks. KBM has operational contingency procedures and plans such as KBM Mine Closure Plan (PFM) that consider how cyanide will be safely managed during long-term shutdowns or cessation of operations. These documents are included in site cyanide management including locations with possible presence of cyanide with ongoing facility inspections and required maintenance, water monitoring activities or possibly draining process solution tanks and piping, draining process washing and neutralization tanks. It was evidenced that KBM has a management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases, such as: an upset in the operational water balance that presents a risk of exceeding the design containment capacity; problems identified by facility monitoring or inspection; and temporary closure or cessation of operations due to situations such as work stoppages, lack of ore or other essential materials, economics, civil unrest, or legal or regulatory actions. Evidenced that KBM defined, documented, implemented and maintains methodology for inspecting tanks holding cyanide solutions for structural integrity and signs of corrosion and leakage, secondary containments provided for tanks and pipelines for physical integrity, the presence of fluids and available capacity, and to ensure that any drains are closed and, if necessary, locked, to prevent accidental releases to the Environment, leak detection and collection systems at ponds, as required in the design documents, pipelines, pumps and valves for deterioration and leakage and ponds and impoundments for the parameters identified in their design documents as critical to their containment of cyanide and solutions and maintenance of the water balance, such as available freeboard and integrity of surface water diversions at

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unloading, storage, mixing and process areas, as applicable to the site. Reviewing inspections forms, it was evidenced that they direct the inspector to evaluate specific items. Reviewing KBM's documentation, it was evidenced that OS clearly define the named 5W1H for inspection activities. Evidenced that KBM inspects cyanide facilities on an established frequency sufficient to ensure and document that they are functioning within design parameters. Evidenced that KBM defined, documented, implemented and maintains PROC-NOR-158 - Cyanide Management which in item 2.10 establishes a system for inspections at KBM. It defines that planned inspections are intended to assess structural integrity, signs of corrosion, and leaks in tanks and piping. Secondary containment systems are inspected to assess their integrity, presence of liquids or other materials, available capacity, and to ensure that any outflows are closed to prevent accidental releases to the environment. Specific tanks and dams must be inspected to assess whether the safety parameters specified in the designs are being met, such as freeboard, infiltration, protection, etc. All inspections must be documented, recording the inspection date, the name of the person responsible for the inspection, deviations, and applicable corrective actions. In accordance with my professional judgment I conclude that inspection and monitoring programs currently in place by KBM as well as the established frequencies are adequate to ensure and document that they are functioning within design parameters that cyanide facilities ensure and document that cyanide facilities are functioning within design parameters. Evidenced that KBM's documentation identify specific items to be observed and include the date of the inspection, the name of the inspector, and any observed deficiencies as well as the natures and date of corrective actions documented, and are records have been retained. Reviewing check list, service orders it was clearly evidenced that specific items to be observed have been completely detailed in such way that it's very clear for the inspectors how they shall inspect and mainly what to observe as well as the respective acceptance criteria. Reviewing inspection records it was evidenced that they include date of the inspection, the name of the inspector, and any observed deficiencies as well as the nature and date of corrective actions (when applicable) documented, and are records retained. Evidenced that KBM defined, documented, implemented and maintains preventive maintenance programs and activities to ensure that equipment and devices function as necessary for safe cyanide management through internal documented procedures. Evidenced that KBM defined, documented, implemented and maintains PROC-PRO-081 - Maintenance management, PROC-PRO-081-AN01 - Equipment Failure Analysis Report and PROC-PRO-081-AN02 - Equipment Criticality. Evidenced during field audit, that KBM has necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. The auditor reviewed inspection, testing and preventive maintenance records and concluded that KBM has been inspecting, testing and maintaining as required.

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## Standard of Practice 4.2

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

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

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

During the audit, it was found that Kinross has an automated system for dosing and controlling cyanide concentrations (TAC 1000 - Cyanide Analyzer with integrated sampling). This system performs cyanide dosing automatically, stably, and accurately, according to the mineralogical characteristics of the material from the mine. In addition, Kinross has an automated tailings sampling system with programmed collections in continuous cycles for calculating metallurgical recovery. It was evidenced that the aforementioned systems are adequately established, implemented, and maintained. Pertinent interviewed personnel showed to be aware of this matter.

## Standard of Practice 4.3

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

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

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

The design firm contracted by Kinross developed a water balance that provides a detailed flowchart of this balance. Specifically, the hydrometallurgical process directs the waste to the Specific Tank XII. This tank, is a sealed structure, lined with compacted ferric clay and a layer of HDPE. Therefore, it is a structure that is properly designed and prepared to receive and store these materials in an environmentally safe manner, eliminating any risk of contamination. The cyanide-containing pulp settles at the bottom of the Specific Tank, while the water contained in this tailing undergoes a photodegradation process and flows through the spillway towards the Eustáquio dam. The Eustáquio dam receives only flotation tailings. The water contained in the Eustáquio dam flows its entire length and, downstream, passes through a filter before exiting through the bottom drain. Since 2020, the water from the Eustáquio dam has been fully recirculated, with no discharge into the environment. To maintain the ecological flow of the Eustáquio stream, Kinross adds

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new water from its duly authorized intakes. The Santo Antônio dam received only flotation tailings until 2015. The water still present inside passes through a filter and then through a passive treatment system composed of a limestone bed and wetlands. Kinross performs periodic monitoring at the Santo Antônio, Eustáquio, and Tanque Especifico XII tailings dams, as well as in surface water bodies and monitoring wells. This monitoring is essential for assessing possible changes in both surface waters and the water table. The results obtained from these direct monitoring efforts demonstrate that there are no discharges and/or indirect discharges of solutions containing cyanide, since the levels of total cyanide, free cyanide, and WAD cyanide remain below the limits established by the Cyanide Code and COPAM legislation 08/2022 for class 2 water bodies, as well as below the limits for human consumption and animal watering, as recommended by CONAMA 396/2008. All wells drilled at Kinross are suitable for quality monitoring, therefore they do not have significant flow for exploitation. The water is only accurate for monitoring purposes. All water for human consumption at Kinross comes from the water utility of the municipality of Paracatu. As explained previously, the cyanide pulp discarded by hydrometallurgy settles at the bottom of the Specific Tank and remains deposited, while the water contained in this waste flows directly into the Eustáquio dam, after the residence time necessary for photodegradation of the cyanide. This water is monitored periodically and the concentrations of total cyanide, WAD cyanide and cyanide remain below the limits established by COPAM legislation 08/2022 for class 2 water bodies, as well as below the limits for human consumption and animal watering, as recommended by CONAMA 396/2008. The water from the Eustáquio dam is recirculated, therefore it is not discharged into surface water. The water from the Santo Antônio dam passes through a filter and then through a passive treatment system composed of limestone bed and wetlands before subsequently being released into the environment. Evidenced that KBM defined, documented, implemented and maintains internal documented procedure Water Balance Control which defines guidelines and methodology for a KBM's comprehensive, probabilistic water balance management model in such way that it identifies and quantifies the uses, sources and consumptions of water in a standardized and traceable way, reducing potential impacts of disturbances in the operational balance. This procedure applies to the operation, processes of the metallurgical plant, dam and environmental, safety and occupational health areas. Noted that responsibilities and authorities related to water management are defined, documented and communicated. Noted above-mentioned procedure include aspects related to: a) Pluviometric analysis: measurement of the amount of rain that falls in a given area during a specific period of time It is expressed in millimeters (mm); b) Evaporation: it is the process by which water on the earth's surface turns into water vapor and is released into the atmosphere. This occurs due to the exposure of water to thermal energy from the environment, such as sunlight and c) Infiltration: refers to the process by which water penetrates the soil through the dam structure. Besides, it clarify the operational conditions such as fill daily, in the water balance control form, Water Balance information about rainfall and evaporation data (provided by Environmental Area), the volume occupied in the dam, volume of accumulated solids (m<sup>3</sup>), volume of reservoir water (m<sup>3</sup>), volume of

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accumulated solids, deposition rates, the mass processed daily, the apparent mining density, estimated volume of water in the dam reservoir, , estimated volume on the previous day, volume of precipitation on the day (m<sup>3</sup>), volume of water deposited by waste (m<sup>3</sup>, losses due to empty spaces (m<sup>3</sup>), losses due to evaporation (m<sup>3</sup>), infiltration losses, Volume of water deposited by tailings, tailings deposition rate, Evaporation losses, bathymetric results. The water balance considers all inputs and outputs that are measured such as pumping new water, pumping reused water, pumping non-rejected water through flow meters and considers rainwater and evaporation through rain gauges and evaporimeters. All this information makes up the water balance model, allowing predictability and being updated every six months through the bathymetric study of the lakes. Delving deeper into the balance in the downstream valley of the KBM structures, currently for the rainy- day scenario, a rain with Recurrence time) (RT) of 100 years occurring permanently along the entire propagation section as evidenced in (Eustaquio PAEBM and Specific Tank XII PAEBM Reviewing water management records the auditor evidenced that they include results of all analyzed parameters in the Water Balance. Evidenced duly implemented. KBM does not have neither discharge in surface waters. Reviewing the Water Balance, it was evidenced that the water balance considers the following in a reasonable and appropriate manner for the facilities and the environment considering factors such as: the rates at which tailings are deposited in tailings storage facilities; A projected duration of the storm and a storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be avoided during the operational life of the installation; The quality of existing precipitation and evaporation data in representing actual site conditions; The amount of precipitation entering a pond or impoundment resulting from surface run- on from any up gradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground; Solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface, and allowable discharges to surface water; The effects of potential power outages or pump and other equipment failures the emergency removal of water from a facility and others aspects of facility design that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility. Reviewing water management records the auditor evidenced that they include results of all analyzed parameters in the Water Balance. as already mentioned KBM does not have leach pads. Reviewing several records of Water Balance, it was evidenced that they consider the rates at which tailings are deposited in tailings storage facilities and are duly implemented. Evidenced that the water balance considers a design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility. The water balance storm model predicts a decamillennial storm. As already mentioned evidenced that the water balance considers the quality of existing precipitation and evaporation data in representing actual site conditions Data obtained from KBM's instruments are compared to Brazilian reference Meteorology Brazilian Institute (INMET) Reviewing several records of Water Balance it was evidenced that they

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are duly implemented. as already mentioned evidenced that the water balance considers the amount of precipitation entering a pond or impoundment resulting from surface run- on from any upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground. Reviewing several records of Water Balance. Effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and any upgradient watershed are not applicable. There is no potential of freezing. The water balance considers solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface. he water balance considers the effects of potential power outages or pump and other equipment failures the emergency removal of water from a facility. Reviewing several records of Water Balance, it was evidenced that they are duly implemented. KBM does not have neither discharge in surface waters. Reviewing several records of Water Balance was evidenced that they are duly implemented. Additionally, during the audit, evidenced that aspects that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility are duly considered. Evidenced the ponds and impoundments designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations. There are inspections in place to ensure the control of all parameters. The results were reviewed and showed to be in accordance Brazilian regulation laws. Evidenced that KBM implements operating procedures that incorporate inspection and monitoring activities to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment; Inspection and monitoring records as well as check list dam safety, geotechnical inspection dams were reviewed and demonstrated that the results are in accordance with Brazilian regulation laws. The dam's current instrumentation includes INA's (Water Level Indicators), piezometers, Surface Landmarks and Flow Meters. KBM measures the precipitation and compare the results to design assumptions. Records "reviewed showed be implemented as stated. Please for additional information.

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## Standard of Practice 4.4

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

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

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

Evidenced that KBM defined, documented, implemented and maintains internal procedure Environmental Monitoring Plan which aims to establish a methodology for monitoring the quality of surface and underground waters and liquid effluents generated, water potability, monitor air quality as well as monitor noise levels in the KBM environment and in strategic adjacent points, soil characterization and comparing the results obtained with the standards established by the respective applicable legislation. Kinross continuously monitors the DETOX stage to ensure that CN WAD results are below 50 ppm at the Hydrometallurgy outlet. The sampling routine consists of weekly collections by the Operations team at the Hydrometallurgy outlet (Plant). The Environmental team performs weekly collections in the Specific Tank (stage prior to the Dam). Both collections are controlled to maintain a concentration limit of 50 ppm CN WAD. During the audit evidenced that it is duly established, implemented and maintained. Interviewed personnel showed to be aware of this matter. The auditor reviewed WAD cyanide monitoring for open waters records and concluded that KBM does not present open water with WAD cyanide exceeding 50mg/l. Despite that, noted KBM has been implemented special measure (fencing) as well as metal blocking siding, walls in concrete structures in the access to administrative areas (central entrance), fences in the environmental complex and in the metallurgical plant, in addition to barbed wire fence throughout the other areas as measures used to restrict access to wild animals and cattle in all open waters of the development. KBM does not have heap leaching. Evidenced that KBM demonstrated during the audit that the cyanide concentration in open water in Tailings Storage Facilities, does not exceed 50 mg/l. Evidenced that Environmental Monitoring Plan that clearly defines the localizations points for monitoring surface waters quality, groundwater and effluents. Reviewing above- mentioned documentation, it was evidenced that it is in accordance with Resolução CONAMA 357. The location of the sampling points with their specific objectives, the physicochemical parameters (including types of cyanides such as WAD, total and free), the bacteriological parameters as well as the respective periodicity were defined as required by FEAM and IGAM. KBM does not have heap leaching. Samples for WAD cyanide determination are collected daily at the plant outlet before pumping to the tailings dam and weekly in the supernatant pond at the tailings dam. As samples are also

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collected before pumping to the tailings dam, WAD cyanide control is to stop to prevent concentrations from exceeding 50 mg/l. Reviewing pertinent WAD cyanide concentration in open waters records was evidenced that the results indicate that WAD content are less than 50 mg/l. Evidenced that there is no register of wildlife mortality caused by cyanide intoxication. Evidenced that KBM defined, documented, implemented and maintains internal documented procedure Environmental Monitoring Plan that includes monitoring of surface water, groundwater and effluents, water potability, air quality, noise and soil characterization. Evidenced that above-mentioned documentation clearly define the localizations points for monitoring surface waters quality, groundwater and effluents. It is clearly defined the methodology for monitoring of cyanide in the waters contained in the tailings dam, the forms of cyanide that are analyzed and defines the monitoring points of industrial effluents that are collected in the dam. Reviewing WAD cyanide records it was evidenced that all sampled records showed WAD cyanide concentration less than 50 mg/l in open water. The samples mentioned refer to those collected for WAD cyanide determination and not for wildlife mortality. Evidence that inspection records performed by Dam Team contain several items to be inspected and one of them is verifying the existence of some wild mortality. Reviewing record named daily Dam Inspections, which results, are consolidated in monthly reports. Evidenced duly implemented and noted that all sampled records indicate the results showing there is no wildlife mortality caused by cyanide intoxication. The operation does not apply leach solutions in a manner designed to avoid significant ponding on the heap surface and limit overspray of solution off the heap leach pad liner is Not applicable, because KBM does not have leach pads.

## Standard of Practice 4.5

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

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

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

Evidenced that KBM defined, documented, implemented and maintains internal procedure Environmental Control Plan (PCA RT-014\_159-515-2244\_02-J - Environmental Monitoring Plan issued by Golder Associates on behalf of KBM. Considering the significant environmental impacts, Environmental Plans were defined, the purpose of which is to monitor, prevent, control, mitigate, and/or offset the anticipated impacts. The recommended actions suggested in the Programs can be divided into four categories: Monitoring actions: Actions related to the implementation, operation, and maintenance of systems or procedures for monitoring significant environmental aspects, aiming to identify and verify the occurrence of

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anticipated environmental impacts; Reviewing a.m. PCA the auditor evidenced that it includes the following physical environment programs: Atmospheric Emissions Control and Air Quality and Meteorological Monitoring Program; Noise Control and Monitoring Program; Vibration and Acoustic Pressure Control and Monitoring Program for Blasting with Explosives; Water Quality Control and Monitoring Program and Hydrogeological/Hydrological Monitoring Program; Program for Control and Monitoring of Erosive Processes and Mass Movements; Program for Geochemical Characterization of Waste Material in Stockpiles and Control and Monitoring of Percolating Flows; Program for Management of Solid Waste Generated on Sites; Acoustic and Visual Barrier Program. Biotic Environment As previously explained, the cyanide-containing pulp discarded by hydrometallurgy settles at the bottom of the Specific Tank and remains deposited. The water contained in this waste flows directly into the Eustáquio dam after the necessary residence time for cyanide photodegradation. This water is monitored periodically, and the concentrations of total cyanide, WAD cyanide, and cyanide remain below the limits established by COPAM legislation 08/2022 for class 2 water bodies, as well as below the limits for human consumption and animal watering, as recommended by CONAMA 396/2008. The water from the Eustáquio dam is recirculated and therefore not discharged into surface water. The water from the Santo Antônio dam passes through a filter and then through a passive treatment system composed of a limestone bed and wetlands before being released into the environment. The auditor reviewed sampled surface water monitoring results and concluded that the concentration of WAD cyanide in surface waters have been less than 0.5 mg/l. Evidenced that KBM does not have any direct discharge of solutions containing cyanide to surface water. Evidenced that PCA includes information such as: A) methodology including Quality Assurance / Quality Control (QA/QC) data and protocols; B) Applicable legislation; C) Parameters to be analyzed for instance cyanide WAD, total and free; D) Sampling for instance points, localization, methodology, collection system, preservation, material resources; E) Responsibilities and Authorities for instance KBM Area Team, Contracted personnel, F) Recording and reviewing monitoring results. Evidenced that KBM has been monitoring for cyanide in surface water down gradient of the site is in accordance with the Resolution of the Brazilian Environmental Council (CONAMA) 357/2005 as well as required by Water Management Institute of the State of Minas Gerais (IGAM) and State Environmental Foundation of Minas Gerais (FEAM). The monitoring points of surface waters are clearly identified. Kinross conducts monitoring at all water points downstream of its dams. The results of these samples demonstrate that all points show free cyanide concentrations below the limits established by the Cyanide Code and COPAM legislation 08/2022 for class 2 water bodies. Reviewing pertinent monitoring surface water records, it was evidenced that KBM has been monitoring for cyanide in surface water and that results demonstrate there are no indirect discharges to surface water. KBM does not have any record of indirect discharge to surface water.

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## Standard of Practice 4.6

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

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

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

Evidenced that KBM defined, documented, implemented and maintains internal documented procedure Water Balance Control in order to implement water management system in such way for managing seepage control systems to protect the beneficial use(s) of groundwater beneath and/or immediately down gradient of the operation. Reviewing pertinent records it was evidenced that internal documented procedure Water Balance Control is duly implemented. All wells drilled at Kinross are suitable for quality monitoring, therefore they do not have significant flow for exploitation. The water is intended solely for monitoring purposes. All water for human consumption at Kinross comes from the water utility of the municipality of Paracatu. The cyanide areas are constructed with reinforced concrete floors with containment berms that provide containment against seepage. All cyanide solution pipelines are located within the containment areas and there are no cyanide buried pipelines. Collection drains and sumps are used to capture precipitation and any spillage and direct it to the process. The cyanide solution tanks are in areas provided of an impermeable barrier. The facilities are inspected and maintained to ensure the integrity these containment systems and prevent potential seepage. Evidenced that the secondary containments are covered by a HDPE, and all pipelines are within areas with secondary containment. During the field audit, the auditor evidenced that the involved areas are in good conditions. The tailings dam is completely covered by a synthetic geomembrane and operates daily following the procedure Reassessment and update of the KBM Eustaquio Dam Manual and Specific Tank XII Dam Manual prepared by Knight Piésold on behalf of KBM. Evidenced that ground water monitoring is in accordance with the Resolution of the Brazilian Environmental Council (CONAMA) 396 of August 7, 2009 as well as required by IGAM and FEAM. The monitoring points of groundwater are identified. Evidenced duly implemented. The auditor reviewed sampled under ground water monitoring results and concluded that both free cyanide as well as total cyanide are below levels that are protective of identified beneficial uses of the groundwater.. KBM does not use mill tailings as underground backfill. there is no record of seepage from the operation that has caused cyanide concentrations of ground water to rise above levels protective of beneficial use.

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## Standard of Practice 4.7

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

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

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

Evidenced that spill prevention or containment measures have been provided for all cyanide unloading, storage, mixing and process solution tanks. KBM has been implemented spill prevention and containment measures provided for all cyanide unloading, mixing storage and process solution tanks. During the field audit it was evidenced that all the cyanide concentrated solution and process solution tanks and vessels with 0.5 mg/l or greater WAD cyanide concentrations are provided with spill prevention and containment measures, such as secondary containment and impermeable varnish. Besides, KBM has been implemented and maintains an inspection system of containment basins duly implemented. The frequency used for this inspection was analyzed and the auditor concluded that it is appropriated. Besides, reviewing pertinent record (Inspection of Containment Basins) used for this inspection, it was noted that it contains all requirements related to Code's Standard Practice of 4.7. Results recorded in the check list demonstrated that secondary containments are as stated. During the field audit and reviewing pertinent drawings evidenced the existence of an impermeable barrier between the tank bottom and the ground for all tanks. During field audit, the auditor evidenced that that the above-mentioned areas are in excellent conditions. Evidenced that secondary containments for cyanide unloading, storage, mixing and process tanks have been sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event. Reviewing design documentations including design drawings, data on tanks and vessels, containment's available volume calculations accounting for the volume occupied by the tanks as well as observations from the field audit it was evidenced that all cyanide storage, mixing and process tanks and vessels with 0.5 mg/l or greater (WAD) weak acid dissociable contain secondary containment sized to hold a volume greater than that of the largest tank within the containment in accordance with Brazilian regulations and by Code's Standard Practice of 4.7 as well as any piping draining back to the tank, and with additional capacity for the design storm event. Besides, during field audit, it was verified through visual observation that there are no materials stored within the above-mentioned containments that compromise the necessary defined capacity. KBM has been defined, documented, Implemented and maintains internal documented procedures to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. All areas that handle cyanide and cyanide solution/pulp have level-sensor well pumps that operate automatically without the need for manual activation by people. All flow

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is pumped into the circuit and integrated into the process. The pumps have automation control logic that, when switched to Manual mode, switches to Automatic mode after 10 minutes, ensuring that the pumps are always operating independently. Reviewing designed documents was evidenced that the system to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water has been designed with sumps and dedicated pumps and piping to return all such water to the production process. Reviewing operational documented procedures, it was noted that it establishes all necessary steps to avoid discharge of cyanide solution into the environment in cases of spillage as clearly defines that no water collected in containment shall be discharged to the environment since all water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not. Interviewed personnel showed to be aware of this matter. KBM does not have process tanks without secondary containment. Besides, all cyanide tanks are installed on concrete impermeable barrier between the tank bottom and the ground. During the field audit evidenced that all KBM's cyanide process solution pipelines are provided with spill prevention to collect leaks and prevent releases to the environment. All cyanide process solution pipes, including waste pipes, are operated periodically and have secondary containments and are positioned on impermeable floors allowing leak containment and action in accordance with PAE. Secondary containments are made up of waterproof reinforced concrete floors and channels in regions where the waste pipelines are closest to the plant and geomembrane in regions where there is no concrete. During the field audit evidenced none areas where cyanide pipelines present a risk to surface water and requiring special risks. All pipelines are within controlled areas, by secondary containments. KBM defined, documented, implemented and maintains several documentations such as Isometric Drawing, As Built Drawing, Flow sheet, Data Sheet, Project Memory, Engineering Manual, Materials Technical Specification including pipes, valves, fittings, flanges and other components and other documents necessary for the execution of the project. The design and manufacture of subsidiary systems is ill be in accordance with the relevant codes and standards from regulatory agencies and institutes such as: (ABNT) Brazilian Association of Technical Standards; (ANSI) American National Standards Institute; (ASME) American Society of Mechanical Engineers; ASME B31.3 Process Piping (2034-01-4000-SPE-P-0001); ASME B31.11. Reviewing design documentation and during field audit evidenced that all cyanide tanks are made of carbon steel ASTM A-36 and pipelines are made of carbon steel ASTM 53B and ANSI B36.10 or HDPE being constructed of materials compatible with cyanide and high pH conditions.

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## Standard Practice 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  X in full compliance with  
 in substantial compliance with Standard of Practice 4.8  
 not in compliance with

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

Quality assurance and quality control programs have been implemented during construction and substantial modification of all cyanide facilities. The Eustaquio Dam Manual clearly defines roles and responsibilities. Document control for both the Dam Construction Management team and the Dam Safety Management team is carried out by the Information Management department. All processing and receipt of documentation is completed by the Information Management department, at the e-mail address [sm.arquivotecnico@kinross.com](mailto:sm.arquivotecnico@kinross.com). Technical documents are prepared by contractors according to the standard and numbering defined by Kinross. Upon document receipt, the Information Management team performs an initial review and, if the standard requirements are met, the documents are registered and made available on the Dam Management portal in specific libraries. Access to the Dam Management portal is controlled by the Information Management team which grants access according to the needs of the Dam Construction Management and Dam Safety Management technical teams. The technical team will have access to the most recent revision of the document. Therefore, the OMS Manual is to be reviewed annually and revised as required to capture changes associated with regulations, the tailings management system, and risk management. The need to revise this document may be a result of regulatory updates, new areas of construction and/or changes personnel/organizational structure, life cycle/design for the ETSF, performance criteria, or classification of the dam. Additionally, revisions may be needed based on any observed conditions during the construction process that are inconsistent with expected conditions and assumptions used for designs. The engineering design criteria and key design parameters for the ETSF were developed based on information provided by KBM, applicable Brazilian regulations, and recommendations made by Knight Piésold. Design reports for the Eustaquio Dam (Knight Piésold 2023d), Dam A (Knight Piésold 2023e), and Saddle Dam (Knight Piésold 2023f) describe specific criteria, parameters, and their development and sources defining information. Evidenced that KBM operation implemented quality assurance and quality control (QA/QC) programs during construction of the tailings impoundment and related ancillary facilities Evidenced that KBM has as quality control and quality assurance

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programs addressed the suitability of materials and adequacy of soil compaction for earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used, and for construction of cyanide storage and process tanks. Specialized contractors were hired to carry out quality control for controlling the implementation of the activities required by Cyanide Code. During the audit, through reviewing pertinent QA/QC records, evidenced that they address the items identified in this question, as applicable to the facilities at the operation as well as Quality Management Systems (QMS) and by Brazilian legislations. As already mentioned the entire construction of the tailings dam was based on Brazilian legislation and standards and the International Cyanide Code, following daily monitoring by the in-house and contracted engineering team according to documents made available to the auditor. Reviewing pertinent documents and records it was evidenced that KBM has been maintained quality control and quality assurance records for cyanide facilities. Quality control and quality assurance documentation define a systematic for inspection of facilities records as defined by orders that are automatically generated by KBM system. Evidenced that records demonstrate that KBM has been retained quality control and quality assurance records in accordance with the orders generated by Datasul system. As already mentioned the entire construction of the tailings dam was based on Brazilian legislation and standards and the International Cyanide Code, following daily monitoring by the in-house and contracted engineering team according to documents made available to the auditor. Evidenced that KBM operation implemented quality assurance and quality control (QA/QC) programs during construction of the tailings impoundment and related ancillary facilities. Evidenced that appropriately qualified personnel reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved. Verified that engineering personnel involved with the above-mentioned activity is appropriately qualified person based on their education, training, expertise and experience. Sampled example was: Daniel Rocha Engineer duly qualified in accordance Brazilian legislation and registered at Regional Council of Engineering and Agronomy (CREA). As already mentioned the entire construction of the tailings dam was based on Brazilian legislation and standards and the International Cyanide Code, following daily monitoring by the in-house and contracted engineering team according to documents made available to the auditor. KBM has available quality control and quality assurance documentation.

The reforms, changes and constructions carried out on active facilities that comprise the Cyanide Management System (CIC), including process plants, tanks, pipelines, and associated structures, are conducted under a structured Quality Assurance/Quality Control (QA/QC) process, integrated with the company's engineering, project management, and change management practices, in accordance with CIC requirements.

The need for interventions (reforms, modifications, or new constructions) is identified through routine inspections, internal and external audits (including CIC), risk assessments, operational changes, and technical reports and engineering diagnoses prepared by specialized companies. This information supports the technical evaluation, scope definition, and activity planning.

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Before implementation, the disciplines undergo a formal evaluation and approval stage, which includes technical analysis by the responsible areas, definition of regulatory and safety requirements (especially those related to cyanide), application of the Management of Change process when applicable, and formal international approval.

During the engineering, manufacturing, construction, and execution phases, QA/QC controls are applied through: • Continuous technical monitoring; • On-site inspections during each stage; • Measurement control and verification of compliance with designs, technical specifications, and CIC requirements; • Photographic records of the activities performed and • Contract oversight and verification of the quality of materials and services.

Examples of interventions carried out in the last 3 years: • Structural interventions in the Hydrometallurgy area, on pillars and platform beams between the regrinding shed and the thickeners, including partial replacement of the structure and application of paint with anti-corrosion treatment, focusing on structural recovery; • In the Regrinding (Hydrometallurgy) area, interventions were carried out on the main pillars of the shed, consisting of the application of paint with anti-corrosion treatment to the main columns of the Regrinding Building. • Construction of a new structure in the Hydrometallurgy (Acacia) area.

The closure of activities occurs formally, through the issuance of Acceptance Certificates, which confirm the technical, operational and safety conformity of the interventions performed.

Evidenced that all associated records – technical reports, engineering documents, "as-built" drawings, inspection and testing records, measurements, photographic records, material certificates, and acceptance terms – are controlled, maintained, and archived in accordance with internal procedures, ensuring traceability, information integrity, and availability for audits.

Additionally, it is worth noting that all preventive health, safety, and environmental tools used by KBM are employed during all QA/QC stages, such as hazard identification and risk assessment (as per documented procedure SSMA-PRO-075), inspection and permit systems (as per records PROC-NOR-158-AN04, PROC-NOR-158-AN05, PROC-NOR-158-AN06, PROC-NOR-158-AN07 and RTS-NOR-197-AN04), and Daily Safety Dialogues - DDS”

During the audit it was evidenced that all projects have been archived in the STOR system, under the responsibility of Kinross's Project Engineering , once completed.

The project book includes the following records and documents, ensuring traceability as determined by the Integrated Management System (IMS): Technical drawings; Bill of materials; Project specifications; Inspection records; Measurement control; Photographic records; Quality tests; Commissioning records; Technical reports; "As-built" drawings; Material certificates; Acceptance terms, among others applicable according to the type of project. It was noted duly implemented. Interviewed pertinent personnel it was noted that they are aware of this matter.

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## Standard of Practice 4.9

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

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

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

Kinross maintains a monitoring program for various faunal groups, carried out in two annual campaigns: one during the rainy season and the other during the dry season. Regarding wildlife mortality monitoring, the Biodiversity Resource Management Procedure (SSMA PRO 132) establishes the criteria for reporting whenever dead animals or animals at risk are found. In these cases, any employee must immediately notify the responsible biologists, as provided for in the monitoring flow described in the procedure. In addition, there is a spreadsheet registered in the corporate system (SSMA PRO 132 AN05 - Animal Incident Control) where all incidents involving wildlife in the company are consolidated.

Exclusively for the tailings pipeline section and the Specific Tank area, a weekly inspection is also carried out by the Operations team. One of the standard items on the checklist consists precisely of verifying the presence of dead animals in the monitored section and around the Specific Tank.

Evidenced that the KBM defined, documented, implemented and maintains a written standard procedures for monitoring activities for wildlife and water quality. Sampled examples were: SSMA-NOR-039 - Environmental Monitoring; SSMA-PO-3201 - Groundwater Sampling; SSMA-PO-3206 - Sampling in Streams, Effluents and Drinking Water; SSMA-PO-3207 - Sampling of Effluent from Specific Tanks; Standard 12.1 - Environmental Monitoring; SSMA-PRO-039-AN02 - Environmental Monitoring Points; PDRA STE-KI-007-RAD-INT-PDF001-FF dated on August 2022, issued by Sete Engenharia on behalf of KBM. Interviewed personnel showed to be aware of this matter. Evidenced Environmental Control Plan PCA of the Morro do Ouro Mine Optimization Project - RT-014\_159-515-2244\_02-J issued by Golder Associates on behalf of KBM dated May 2018. Evidenced that it defines environmental actions, plans, and programs. For Physical Environment: Atmospheric Emissions Control and Air Quality and Meteorological Monitoring Program; Noise Control and Monitoring Program; Vibration and Acoustic Pressure Control and Monitoring Program for Blasting with Explosives; Water Quality Control and Monitoring Program; Hydrogeological/Hydrological Monitoring Program; Erosive Processes and Mass Movements Control and Monitoring Program; Waste Pile Geochemical Characterization Program and Percolated Flow Control and Monitoring Program; Construction Site Solid Waste Management Program; Acoustic and Visual Barrier Program; 2. For the Biotic Environment: Operational

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Subprogram for Suppression and Use of Forest Resources; Program for Monitoring, Control, and Minimization of the Impacts of Vegetation Suppression; Floristic Rescue, Propagation, and Enrichment Subprogram; Subprogram for Monitoring Vegetation Suppression and Fauna Management; Bioindicator Fauna Group Monitoring Program; Bioindicators; Terrestrial Fauna Monitoring Subprogram; Benthic Macroinvertebrate Monitoring Subprogram; 3, For Socioeconomic Environment: Social Communication Program, Environmental Education Program; Socioeconomic Indicators Monitoring Program; Workforce Qualification Program; \$. For Specific Programs: Degraded Areas Recovery Plan (PRAD), Closure Plan, Environmental Compensation Plan, and Forest Compensation Program - Mining Enterprises. The Vegetation Clearance Monitoring and Wildlife Management subprogram aims to mitigate the impacts of habitat loss, fragmentation, and manipulation on fauna and flora; wildlife displacement; and increased roadkill identified in Section 11.3 of the Environmental Impact Assessment (EIA), which assesses environmental impacts on the biotic environment. Planned vegetation clearance activities will help mitigate the immediate impacts of vegetation removal on associated fauna, seeking to drive individuals toward surrounding areas of remaining vegetation, while also taking targeted measures to minimize the risk of wildlife collisions on the adjacent road network. The Vegetation Clearance and Wildlife Management Monitoring Program aims to minimize the direct impacts of vegetation clearing on wildlife by implementing suppression actions to facilitate the escape of local wildlife to nearby refuges, while simultaneously seeking to reduce the risk of roadkill along highways and access roads bordering the Morro do Ouro Mine Optimization Project, in addition to providing, when necessary, rescue and assistance to individuals who may need it. Terrestrial Fauna Monitoring Subprogram - Since 2015, Kinross has been conducting a wildlife monitoring program focusing on indicator groups of reptiles, amphibians, birds, non-flying mammals, and insects, covering a network of five monitoring sites. In 2017, three additional sites were added within the AEL domain of the Morro do Ouro Mine Optimization Project, seeking to obtain data to support the diagnosis of the environmental condition of the region, the target of this results evaluation (BIOFONT 2015a,b; 2016a,b; 2017a,b). The data obtained from these monitoring studies allowed us to identify the occurrence of several specific species in different threat categories at the global, national, and state levels, including data-deficient species (for which there is insufficient information available to better assess their conservation status), as well as game species—targeted for their hunting value and/or use as savannahs (desired animals). Furthermore, the data allowed us to infer the importance of remnants of savannah and forest ecosystems within the mining complex, based on their use as refuges and corridors for the region's biodiversity. Evidenced that KBM established, defined, documented, implemented and maintains internal written standard procedures for monitoring plans or procedures for wildlife and water quality in order *to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality*, which clearly define methodology for monitoring the quality of surface water, groundwater, liquid effluents, potability, air quality, noise and soil characterization and for monitoring of fauna and flora. Evidenced that they clearly define applicable legal

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requirements, sampling techniques, sampling points, parameters to be monitored, frequency of analysis, analytical procedures, necessary resources (human and material), and preliminary technical analysis of analytical results and dissemination of results. KBM defined that only uses (ISO) – International Organization for Standardization (NBR) – Norma Brasileira Registered 17025 certified laboratories to perform environmental analysis. Evidenced that all sampling and analytical protocols have been developed by KBM’s chemicals lab in accordance with AWWA, of the ANA’s and CETESB’s -National Guide for the Collection and Preservation of Samples Environmental Company, ABNT, NBR such as NBR 9897/87 - Sampling planning of liquid effluents and receiving bodies; NBR 9898/87 - Preservation and sampling techniques for liquid effluents and receptors; NBR 13895 - Construction of monitoring wells and monitoring of groundwater. Evidenced that KBM’s analytical protocols have been developed by an appropriately qualified person as defined in Code’s Definitions and Acronyms. Evidenced that KBM defined, documented, implemented and maintains SSMA-NOR-058 - Environmental Sampling Protocol, which establishes methodology specifying how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions for cyanide species. to be analyzed and quality assurance and quality control requirements for cyanide analyses. It’s clearly defined a set of technical procedures for conducting environmental samples of surface water, groundwater, liquid effluents, sterile wastewater, drinking water waste, and particulate matter, meeting the requirements of applicable environmental legislation, as well as current Technical Standards. Upon reviewing SSMA-NOR-058, the auditor verified compliance with the requirements established by ABNT standards. Examples sampled were: NBR 9897:1987 - Sampling planning in liquid effluents and receiving bodies; NBR 9898:1987 - Preservation and sampling techniques for liquid effluents and receiving bodies; NBR 9547:1997 – Suspended particulate matter in ambient air – Determination of total concentration using the large volume sampler method and NBR 15847 – groundwater sampling in monitoring wells – Purging methods. Levels of responsibility and authority are clearly defined. Examples included: Environment - Conduct sampling, preservation, and forwarding of samples to laboratories with a duly completed collection form; and Process Laboratory - Conduct sampling of flotation waste collected from the sampler and forward it to laboratories with a duly provided collection form. The Sampling Program defines that: For samples of surface water, groundwater, liquid effluents, solids, drinking water, and particulate matter, the field parameters, as well as environmental and environmental characteristics, must be recorded immediately after collection on the SSMA-NOR-058-AN01 form – Collection Form or SSMA-NOR-058-COLLECTION FORM (Easy Checklist). For water samples, these field parameters can be measured directly from the water body or in a stainless steel jar or beaker designed specifically for this purpose. Samples used for this purpose should not be sent for analysis of other parameters. If you are interested in determining these or other parameters in the laboratory, you should collect samples in different vials and fill them with water to be tested, freshly collected. For kinetic test samples, in addition to field restrictions, which must be recorded on the SSMA-NOR-058-AN02 form - Analysis Request for Kinetic Tests

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or SSMA-NOR-058-COLLECTION FORM (Easy Checklist), the volume of leachate collected and the analyses to be performed must be reported. The parameters to be applied to surface water, groundwater, and effluent samples, and their respective collection frequencies, are defined in the SSMA-NOR-039 Environmental Monitoring procedure. Duplicate and blank samples of surface and groundwater accounted for 10% of the total number of samples from compliance points in each monthly sampling campaign. This type of sample must be uniquely identified. All samples must be properly labeled, according to the internal identification model SSMA-NOR-058-AN03, to ensure correct sample identification within the laboratory. No label should contain at least the name of the point, data and parameters to be applied, and the type of preservation. If the vials are provided by the analytical laboratory, they must be preserved and labeled according to laboratory standards. Regarding sample collection and preservation, it is defined that the planning, sampling techniques, and preservation of water and liquid effluent samples must follow the standards ABNT NBR 9897 – Sampling planning in liquid effluents and receiving bodies - Procedure and ABNT NBR 9898 – Sampling preservation and techniques for liquid effluents and receiving bodies. Sampling of particulate matter must follow the standard ABNT NBR 9547 – Suspended particulate matter in ambient air - Determination of total concentration using the large-volume sampler method. Groundwater monitoring must follow the standard ABNT 15847 – Groundwater sampling in monitoring wells - Purging methods. Tailings samples and estimates for acid decision assessment purposes must follow the targets defined by renowned consulting firms on the subject. Sample preservation techniques and the volumes required for analysis will be detailed in the collection guides provided by the contracted laboratories. Evidenced that sampling conditions (weather, livestock/wildlife activity, anthropogenic influences) and procedures documented by KBM in accordance with Environmental Monitoring Plan, Biodiversity Monitoring Plan. It is defined that monitoring results reports shall include recording all sampling conditions that may affect the analysis. As already informed KBM standardized the Form models such as : SSMA-NOR-058-AN01 - Collection Form, SSMA-NOR-058-AN02 – Kinetic Test Collection Form, SSMA-NOR-058-AN03 – Environmental Sample Identification Model and SSMA-NOR-058-AN04 – Collection Form (Easy Checklist). Evidenced that : SSMA-NOR-058-AN01 - Collection Form has specific questions to be filled as follows: A) For Weather data: Rainfall in the last 24 hours: no, light, medium, or strong; Winds: yes or no; Any activity near the collection site: yes or no and weather: cloudy, rainy or humid; B) For Sampling Condition and Type: Sampling: Simple or Composite; Flask of filtered divided metals? Yes or No and Flask of preserved divided metals? Yes or No reviewing pertinent records it was verified that KBM actually records sampling conditions. Evidenced duly implemented as stated. Interviewed personnel showed to be aware of this matter. Evidenced that KBM has been conducted the monitoring at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. The monitoring frequencies are defined by FEAM and IGAM as well as Federal Brazilian legislation. My professional judgment to evaluate the adequacy of KBM's monitoring frequencies I conclude that the defined monitoring frequencies are adequate to characterize the medium being monitored

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

## Principle 5 | DECOMMISSIONING

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

### Standard of Practice 5.1

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

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

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

KBM defined, documented, implemented and maintains documented procedures for decommissioning cyanide facilities at the cessation of operations named as Conceptual Mine Closure Plan - Morro do Ouro (PAFEM) issued by WSP Consultoria e Projetos do Brasil Ltda on behalf of KBM and dated on December 30, 2024 which is identified as PAFEM-RT-004\_24688498\_02-J. the plan was prepared and registered through the Technical Responsibility Annotation ART nr MG20243237182 under the technical responsibility of Geographer Mr. Ricardo Araújo Lessa registration No. 2008114353. The technical team of the company WSP also participated in the preparation of this plan, integrated by 14 professionals including Environmental, Civil and Mining Engineers, Geologists, Hydrogeologists, Biologists and architects duly registered with their professional councils (CREA and CRBio). The auditor reviewing – KBM's PAFEM evidenced that it is in accordance with Brazilian legislation such as ANM Resolution 68 dated on April 30, 2021; Normative Deliberation ( DN) State Environmental Policy Council (COPAM) 220 dated on March 21, 2018; Registered Brazilian Standard (NBR) 13030; Mining Regulatory Standard (NRM) 19, 20 and 21; Law No. 6,938/1981 The National Environmental Policy; Law No. 12,751/2012 Brazilian Forest Code; IBAMA Normative Instruction No. 04/2011; Law No. 12,334/2010 Institutes the new National Dam Safety Policy; CONAMA Resolution No. 420/2009; Technical-Administrative Instruction No. 10/96-DFPC - 1982 Safety in the storage of sodium cyanide, potassium cyanide, triethanolamine and other chemical products, controlled by the Ministry of the Army; among others applicable legal requirements, standards and guidelines detailed in chapter 5.2 - Tables 9 and 10. Reviewing the KBM's Mine Closure Plan, the auditor evidenced that it

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is an environmental management instrument that brings together technical information, projects and actions that allow achieving environmental conditions acceptable and safe after the closure of mining activities. The KBM's Mine Closure Plan includes activities such as decontamination of equipment; removal of residual cyanide reagents; neutralization of process solutions and installation of measures necessary for control or management of surface or groundwater such as pumping and treatment systems that would operate during the facility's closure period. This Mine Closure Plan (PAFEM) is an update of the Complex's previously effective PAFEM, prepared in 2022 (ERM, 2022). This plan takes into account the guidelines established by applicable Resolutions and Normative Deliberations, as well as international codes and best practices related to mine closure, reclamation of degraded areas, and management of contaminated areas. Evidenced that KBM's PAFEM includes an implementation schedule for decommissioning activities. Reviewing pertinent documentation, it was evidenced that KBM updates its plans with sufficient frequency to reflect changes in the operation as they affect decommissioning, as well as changes in planned decommissioning techniques and measures. The respective document, item 3.1, considers the provisions of Article 10 of ANM Resolution No. 68/2021, which establishes the mandatory periodic updating of the Mine Closure Plan (PAFEM). According to the provisions, the PAFEM must be reviewed every five years or whenever there are updates to the Economic Exploitation Plan (PAE), whichever occurs first. This periodic review is crucial to ensure the incorporation of any significant changes that may have occurred to the plan during this period. Furthermore, Article 13 determines that the latest PAFEM update must be communicated to the ANM at least two years before the scheduled mine closure date, and Article 14 stipulates that, in the event of termination of mining activities before exhaustion, an updated PAFEM must be submitted.

## Standard of Practice 5.2

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

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

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

The financial estimates used to assess the self-guarantee mechanism – including SBP and KDL – are updated annually based on the company's most recent audited financial statements, ensuring that the data used is less than one year old, as required by the International Cyanide Management Code. The independent audit report on the financial statements mentions, on pages 22 and 23, that the present values of mine closure obligations are reassessed annually or whenever new relevant information becomes available, reinforcing adherence to the criterion of timeliness of financial information.. This way the last report assessed the financial data is no more than one year old. KBM developed an estimate of the cost to fully fund third-party implementation of the cyanide-

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related decommissioning measures as identified in its site decommissioning or closure plan. Item 16 of the PAFEM presents the estimated closure costs for the Morro do Ouro Mine Unit, based on the actions described in this Plan. The calculations were based on preliminary engineering (actions and works) for the closure activities, established based on data provided by Kinross and/or expedited by the WSP team. These calculations should be updated in future review stages of this Plan. The cost estimate presented in this Plan is considered to correspond to Class 5 (conceptual planning or concept screening level) according to the AACEI (American Associate of Cost Engineer International) cost estimation classification system for the mining and mineral processing industries. Due to the uncertainties inherent in some of the assumptions adopted, due to the progressive development of Kinross's knowledge regarding all matters related to closure. The estimated costs at this stage of the closure plan were obtained by estimating the quantities required to execute the activities for each structure. Specific unit costs were applied to these quantities. Evidenced that KBM's Mine Closing Plan (PAEFM) defines that asset demobilization cost estimates are updated and reviewed each 3 years, considering the evolution of operations and possible changes in projected project information of proven and probable reserves as well as and when revisions to the decommissioning plan are made that effect cyanide-related decommissioning activities. The suggested programs and actions and the respective physical-financial planning are still at a conceptual level and must be reviewed in light of the potential for changes in the local and regional socioeconomic scenario, as well as the possibility of changes in Kinross' strategic planning. Evidenced duly implemented. Provision for environmental recovery its main objective is the formation of long- term values, for financial use in the future, when the asset's use ends. The provisions taken by KBM refer to the closure of the mine, with the completion of mining activities and the deactivation of assets linked to the mine. KBM confirms an obligation to demobilize assets in the year in which it is estimated that this will occur. KBM considers accounting estimates related to the recovery of degraded areas and the costs of closing a mine as a critical accounting practice, as they involve significant amounts of provision and because they are estimates that involve several aspects, such as interest rates, inflation and useful life of the asset, considering the current combustion stage and projected combustion data for each mine. Financial audits have been carried out in accordance Brazilian and International auditing standards by a third independent of KBM, in accordance with the relevant ethical principle set out and in the Accountant's Code of Professional Ethics and in the Federal Accounting Council, complying with other ethical responsibilities, in accordance with the standards. The financial auditor who carried out the financial assessment of the self-insurance or self-guarantee mechanism presented a declared declaration that the operation or its controlling company has sufficient financial strength to comply with the decommissioning obligations. the independent financial auditor presented the Auditors' Report on the Financial Statements, concluding that he assessed that he carried out the financial assessment of the self-insurance or self-guarantee mechanism, presented a declared statement that the operation or its controlling company has sufficient financial strength to comply with the decommissioning obligation, including all actions involving cyanide.

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## Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

### Standard of Practice 6.1

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

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

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

Evidenced that KBM defined, documented, implemented and maintains internal documented procedures that clearly define methodology for describing how cyanide-related tasks such as unloading, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimize worker exposure. Sampled examples were: PROC-PO-0005 - Neutralization of Residual Cyanide in Pipes, Pumps, Sieves, Equipment, and Waste for Disposal Guide to Confined Space Identification; Early Confined Space Management; - Confined Space Entry Permit PROC- NOR-158 - Cyanide Management; KPB-32-GL-601-Q-008-MO - Eustaquio Tailings Storage Facility Operation, Maintenance, and Surveillance Manual; KPB-25-GL-601-Q-008-MO - Specific Tank No. XII Leach Tailings Storage Facility - Operation, Maintenance, and Surveillance Manual; RTS-PO-2801 - Receipt and Storage of Sodium Cyanide Briquettes and Cyanide P.A; SUPRI-PRO-130 - Cyanide Purchasing and Transportation; PROC-PO-0005 - Neutralization of Cyanide-Containing Waste; PROC- NOR-158-AN06 - Cyanide Warehouse Storage; PROC-NOR-158-AN07 - Permit to Work in Cyanide Areas; PROC- NOR-158-AN09 – Access Control to the Cyanide Reagent Storage Warehouse ; PROC-PO-0013 - Receipt of Liquid Cyanide,; PROC-PO-0007 - Detox Plant Operation; SSMA-NOR-077-AN43 - Emergency Siren Function Test; SSMA-NOR-077-AN39 - Emergency Door and Gate Inspection; SSMA-NOR-077-AN38 - Brigade Kit Inspection; SSMA-NOR-077-AN36 - Assembly Point Inspection; SSMA-NOR-077-AN35 - F4000 Mobile Pump Inspection (Vehicle and Steering); ; SMA-NOR-077-AN32 - Pump and Hydrant Inspection - Electric;SSMA-NOR-077-AN31 - Pump Inspection - Diesel; SSMA-NOR-077-AN30 - Jockey Pump Test - Electric; SSMA-NOR-077-AN29 - Foam Trailer Inspection; SSMA-NOR-077-AN28 - Foam Windsock; SSMA-NOR-077-AN26 - Fire System Reservoir Inspection;SSMA-NOR-077-AN24 - Diphoterine Kit Inspection;SSMA-NOR-077-AN22 - Self-Contained Breathing Apparatus Inspection; SSMA-NOR-077-AN21 - Emergency Lamp Inspection; SSMA-NOR-077-AN20 - Hydrant, Shelter, and Hose Inspection; SSMA-NOR-077-AN19 - Fire Extinguisher Inspection; SSMA-NOR-077-AN17 - Emergency Whistle Inspection ;; PROC-PO-1205 - Washing, neutralization, and disposal of cyanide-containing samples, glassware, and packaging; SSMA-NOR-086-AN01 - Preliminary Event Notification; PROC-NOR-158-AN12 – Monthly inspections

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of cyanide storage conditions; RTS-NOR-197-AN04 Inspection of Cyanide Receiving Cargo. . Reviewing above-mentioned procedures, it was clearly evidenced that they not only focused on operations but they also describe cyanide-related safe work practices. Process control records provided evidences that KBM has been performed its activities in such manner that it is minimized worker exposure. KBM defined and documented that before performing all activities shall be implemented and maintained records of using significant tolls for identifying potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them such as: Pocket Task Preliminary Analysis (*PEACE*) and *Preliminary Risk Analysis of the Task (APRT)*. Reviewing *PEACE* and *APRT* records during the field audit it was evidenced *pre-work* inspections have been duly implemented and recorded. Furthermore, during field audits, it was evidenced that workers cyanide involved carry out their day-to-day activities, using the necessaries PPE such as PVC boots; Long-length PVC gloves protective goggles; helmet with jugular; ; Panoramic face mask with gas filter against organic gases; Shell-type noise damper; Leather glove; Nitrile rubber glove; Tyvek or Tychem coverall; Communication radio; Portable HCN detector previously calibrated as stated and in accordance previously defined in the respective operational procedures. Evidenced that KBM defined and documented methodology for PPE's Pre-Work Inspection as well as it establishes that results shall be recorded at form - Check List for Emergency equipment items related to activities involved in cyanide". Reviewing pertinent records, it was evidenced duly implemented. Sampled examples were: SSMA-NOR-077-AN43 - Emergency Siren Function Test; SSMA-NOR-077-AN39 - Emergency Door and Gate Inspection; SSMA-NOR-077-AN38 - Brigade Kit Inspection; SSMA-NOR-077-AN36 - Assembly Point Inspection; SSMA-NOR-077-AN35 - F4000 Mobile Pump Inspection (Vehicle and Steering); ; SMA-NOR-077-AN32 - Pump and Hydrant Inspection - Electric;SSMA-NOR-077-AN31 - Pump Inspection - Diesel; SSMA-NOR-077-AN30 - Jockey Pump Test - Electric; SSMA-NOR-077-AN29 - Foam Trailer Inspection; SSMA-NOR-077-AN28 - Foam Windsock; SSMA-NOR-077-AN26 - Fire System Reservoir Inspection;SSMA-NOR-077-AN24 - Diphoterine Kit Inspection;SSMA-NOR-077-AN22 - Self-Contained Breathing Apparatus Inspection; SSMA-NOR-077-AN21 - Emergency Lamp Inspection; SSMA-NOR-077-AN20 - Hydrant, Shelter, and Hose Inspection; SSMA-NOR-077-AN19 - Fire Extinguisher Inspection; SSMA-NOR-077-AN17 - Emergency Check-List of the 5L oxygen cylinder ; Ambulance Check List;; 15L oxygen cylinder Check-List; Check List, DEA's inspections Check List • Emergency Shower RE-Check-List; • Autonomous Panoramic Mask RE-Check-List; • First Aid Kit RE-Check-List -. Reviewing pertinent PPE's inspections records it was noted that KBM has been implemented an adequate methodology for pre-inspection their PPEs before using in order to assure they are functioning in perfect physical conditions and acting as required by legal requirements.. KBM has been solicited as well as considered worker input in developing and evaluating health and safety procedures. Observed that KBM established implemented and maintains procedures to review proposed process and operational changes and modifications for their potential impacts on worker health and safety, by several ways such as formal safety meetings, informal pre-work safety sessions for instance during the named Daily Safety Dialogue (DDS), which is carried

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out daily before work begins the suggestion boxes and incorporate the necessary worker protection measures, that were developed by the work force (operators & supervisors) and approved by the responsible manager. All operators and supervisors have been trained in the pertinent operational procedures and, at least, annually (as refreshment), the work forces review the risk profile, the operational procedures and, when necessary, these ones are updated. Planned job observations are also part of the operation management system. Interviewed operators and supervisors' personnel reported KBM's management personnel to give suggestions and comments in order to improve health and safety procedures have solicited them. Evidenced duly implemented.

## Standard of Practice 6.2

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

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

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

KBM defined, documented, implemented and maintains Internal documented procedure PROC-PO-0008 - Leaching Operation which aims to standardize and detail the step-by-step and criteria for the leach operation. as well as guide users of the operational standard regarding health, safety and environmental risks, providing mitigating measures inherent to each activity of this operation. Reviewing PROC-PO-0008 - Leaching Operation it was evidenced that it mentions that the leaching operating range with a minimum pH value 9.8. In the initial stage of Checking the Leaching Area, it is determined that gas concentration must be verified before entering the area via the control panel; Check the pH of the pulp in the CIL III tanks, maintaining it between 9.8 and 10.5 to mitigate gas generation. If the pH drops, check the preparation of the lime solution, maintaining the solution density between 1.06 and 1.12 t/m<sup>3</sup>; - Visually inspect the piping, valves, and flanges of the cyanide, sodium hydroxide, calcium hydroxide, and other lines to ensure there are no chemical leaks; - Visually inspect the physical condition of the piping, flanges, hoses, and pumps containing chemical solutions; Ensure there are no leaks or unnecessarily open valves to avoid wasting water; - Delimit the area where the pulp and/or product leaks; Test the communication radio; - Evacuate the area when you hear the intermittent siren; - Check the emergency kit; - An HCN concentration  $\geq 4.7$  ppm after 15 consecutive minutes will trigger an area evacuation siren, indicating on the supervisory board; An HCN concentration  $\geq 10.0$  ppm will immediately trigger the area evacuation siren, indicating on the supervisory board; - An NH<sub>3</sub> concentration  $\geq 20.0$  ppm after 15 consecutive minutes will trigger an area evacuation siren, indicating on the supervisory board;

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An NH<sub>3</sub> concentration  $\geq 30.0$  ppm will immediately trigger the area evacuation siren, indicating on the supervisory board. Visually inspect the drainage points of the 35% cyanide line containment gutter; Whenever there is a rise in the leach tank levels, check the overflow flow of the gutter, checking for obstructions. In the Operation stage of the main equipment in CIL III, in addition to considering the operation of specific equipment such as compressor 64-CO-506 A/B, sealing water pumps 25-BO-512 A/B, water pumps 25-BO-547 A/B, reject transfer pumps 25-BO-573 A/B, sieves 25-PE-502 to 25-PE-509, it must be checked whether the pH of tanks 502/503 is between 9.8 and 10.5 as well as Perform an interlock test on the cyanide dosing pumps and valves with the pH meters of tanks 502/503. Wash the pH meter electrode and place it in a container with water pH=7, check whether it will prevent the operation of pumps 25-BO-535 A/B and dosing valves 25-CI-FCV-505/506; In the pH Control step: Check the 25TQ250 level;- Check the operation of the 25BO250 A/B lime milk pump; - Check the lime concentration, maintaining a density between 1.06 and 1.1 t/m<sup>3</sup>; and - Maintain the pulp pH between 9.8 and 10.50 in CIL III. During the oxygen dosing stage in tanks: Check the oxygen dosing system; - Open the valves that supply the oxygen dosing circuit, and set the dosing control for all tanks to automatic; Start pumps 510/569; Oxygen set point in the tanks: TQ 501: 14 mg/L; TQ 502: 12 mg/L; T TQ 503: 12 mg/L; TQ 504: 12 mg/L; TQ 505: 12 mg/L; TQ 506: 8 mg/L; - Check the tank pH before starting cyanide dosing and maintain it between 9.8 and 10.5. If the pH is <9.7, cyanide dosing should be stopped; - Verify that the TAC is operating automatically, checking via supervisory and local monitoring; - Check the cyanide tank level via supervisory monitoring; - Check the condition of the dosing lines; - Manually measure the cyanide concentration in tanks 502/503/505/509 every 2 hours and update the spreadsheet control; - Maintain the cyanide dosing in 25TQ502/503/503 to ensure the cyanide concentration at the end of the 25TQ509 circuit is between 150 and 200 ppm. In the 5s Stage: Clean and organize the area; - If cyanide-contaminated waste is generated, neutralize it according to PROC-PO-0005 - Neutralization of Residual Cyanide in Pipes, Pumps, Sieves, Equipment, and Waste for Disposal. KBM has been identified areas and activities where workers may be exposed to hydrogen cyanide gas or cyanide dust in excess of 10 parts per million (ppm) (11 mg/m<sup>3</sup>) on an instantaneous basis and 4.7 ppm (5 mg/m<sup>3</sup>) continuously over an 8-hour period, as cyanide, and require use of appropriate personal protective equipment in these areas or when performing these activities. KBM defined, documented and clearly communicated to all employees and contractors that it does not allow the employees and contractors to be exposed to cyanide concentrations. During the field audit it was evidenced that KBM uses monitoring devices in process areas and for activities involving management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas or cyanide dust exceeding 10 ppm on an instantaneous basis or 4.7 ppm continuously over an 8-hour period, as cyanide. The fixed and portable hydrogen cyanide monitors have set alarm level at 4,5 ppm. KBM's defined, documented, implemented and maintains methodology for maintenance, testing and calibrating hydrogen cyanide monitoring equipment (fixed and personnel HCN gas detector) as well as retaining related records for at least

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three years. Reviewing pertinent documentation, it was noted that a.m. procedure is in accordance with manufacturer instructions. Evidenced calibration, testing and maintenance records of HCN detectors duly established and retained. it was evidenced that KBM has been testing, maintaining and calibrating in accordance manufacturers instruction including the calibrating frequencies. In my professional experience the defined monitoring frequencies are adequate to characterize the medium being monitored and identify any change in a prompt manner. For the calibrations it was evidenced that KBM uses standards gas with 5 ppm and 10 ppm. Reviewing record calibration of standards das it was evidenced that they were calibrating in accordance ISO 17025 as well as they were calibrating being used balance to INMETRO. KBM defined and documented that warning signs shall be where cyanide is used advising workers that cyanide is present, of any necessary personal protective equipment that must be worn, and that smoking, open flames and eating and drinking are not allowed. Evidenced during the field audit that the signage is effective, covering the presence of cyanide, that eating, drinking and smoking is not allowed and also open flames are prohibited as well as the needed PPE in all cyanide areas are indicated. The operation places cyanide warning signs on storage tanks, distribution tank, pipelines, dam. During the field audit evidenced duly established and maintained. Interviewed personnel showed to be aware of this matter. Evidenced that Purchase orders valid from 2022 until December 2025 for 35% sodium cyanide solution signed between KBM (buyer) and Proquigel (seller) that , establishes "According to current guideline, published on the ICMI website for the International Cyanide Code, which indicates the need to add dye to cyanide solutions with a concentration above 15% and that, in this case, the dyeing of the solution must occur before the delivery of the product at the destination, Proquigel is responsible for such procedure and thus delivering to KBM a 35% sodium cyanide solution already with the dye added. Additionally, KBM defined and documented a cyanide solution receipt inspection system, which defines the Demand for filling out a record for liquid cyanide reception inspection in which there is a specific item for checking if the color of the cyanide solution is reddish. KBM defined, documented, implemented and maintains methodology for maintaining, inspecting and testing showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi-carbonate fire extinguishers located at strategic locations throughout the operation. Sampled examples were: Emergency Shower and low-pressure eyewash stations Inspection Checklist; - Fire Fighting System Inspection Checklist - Pump Room; KBM Extinguisher Inspection Checklist. During the field audit, it was evidenced that showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi- carbonate fire extinguishers; are clearly identified as well as they are at strategic locations throughout the operation based on the records obtained from the implementation of internal documented procedures - Assessment of Hazards and Risks to Occupational Health and Safety and Environmental Aspects and Impacts and. During the field audit, it was evidenced that KBM has showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi- carbonate fire extinguishers located at strategic locations throughout the operation and are maintained, inspected and tested on a regular basis. During field audit, it was

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evidenced that storage, and process tanks and piping containing cyanide solution have been identified to alert workers of their contents, as well as the direction of cyanide flow in pipes designated. Evidenced that KBM defined, documented, and maintains an emergency program inside the plant where all cyanide related information is available in Portuguese. It contains information on health, safety, environment, chemistry and physics related to cyanide such as Safety Data Sheet (FDS) issued by Proquigel (cyanide producer). It was evidenced the availability of the FDS for the product sodium cyanide in solution revision 7, as well as the FDS for the product sodium cyanide in powder or briquette revision 11. Both comply with NBR 14725:2023. Evidenced that KBM defined internal documented procedures SSMA-NOR-085 - Incident Analysis and SSMA-NOR-086 - Incident Recording and Reporting, PAE, PAEBM Eustaquio Dam, PAE BM Specific Tank XII Dam regarding potential operational risks mapped by the company within the scope of application and relevant to Cyanide. (FEAM and IGAM), Civil Defense and communities in the area of influence of the enterprise. Besides, KBM defined internal documented procedures SSMA-NOR-085 - Incident Analysis and SSMA-NOR-086 - Incident Recording and Reporting which define methodology for accident classification and analysis to investigate and evaluate cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety, and to respond to cyanide exposures. They apply to accidents involving KBM employees or talk about work services on the company's premises or in areas owned by them or on the company's service path (including going to or returning from work to home), or even during the performance of services under the responsibility of KBM outside its facilities. It defines that when occur cyanide exposure incidents KBM must: a) react to non-compliance and, as applicable: b) take action to control and correct it; c) deal with the consequences, including mitigating adverse environmental impacts; d) assess the need for action to eliminate the causes of non-conformity, in order that it does not repeat itself or occur elsewhere: 1) critically analyzing non-conformity; 2) determining the causes of non-compliance; 3) For the raw causes analysis determination KBM can use several techniques such as 5w1H and 6M'S (Environment / Human Resource / Method / Equipment / Raw Material / Measure) 4) determining whether similar conformities do not exist or could be possible to occur; c) implement any necessary action; d) critically analyze the effectiveness of any corrective or preventive action taken; e) make changes to the environmental management system, if necessary. Corrective actions must be accompanied by the significance of the effects of non-conformities findings, including environmental impact(s) as well as KBM must retain documented information as evidence: - the nature of the non-conformities and any subsequent actions taken; - the results of any corrective action. The classification of accidents in which there is injury is the exclusive responsibility of the occupational physician. Near misses will be classified only according to their category and their potential severity. Accidents will be classified according to their category (personal, environmental or material), according to their real severity, into five categories such as catastrophic, Bigger, Moderate, Minor or Low. During the field audit interviewed personnel showed to be aware of this matter. During field

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audit, through analyzing actual physical conditions of KBM's plan, reviewing several records and interviewing operational, maintenance, engineering and process personnel it was not evidenced that have been occurred cyanide related accident. Interviewed several personnel all of them reported that no cyanide-related incidents or lost time / near- miss incidents occurred in the last three years.

## Standard of Practice 6.3

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

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

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

Currently, Kinross has antidote kits available at its medical clinic, at the Paracatu Municipal Hospital, and at the São Lucas Hospital. The kits consist of the following intravenous medications: 25% Sodium Thiosulfate, 3% Sodium Nitrite, and 1% Methylene Blue, which must be administered exclusively by healthcare professionals properly trained to treat cases of cyanide poisoning. In cases of initial care provided in operational areas, the first response team is able to administer 100% oxygen therapy at a flow rate of 10 to 15 L/min, with the necessary resources available in the Cyanide Poisoning Kits in the areas. The first responder team is trained to use oxygen therapy during fire brigade and chemical emergency training. It should be noted that the Kinross medical post and Emergency Brigade teams operate 24 hours a day, 7 days a week, in shifts. Off-site, medications may be administered by healthcare teams from hospitals formally designated as referral centers for cyanide poisoning cases, whose emergency professionals are trained periodically. During the field audit it was evidenced that KBM has a Health Care Center fully equipped with emergency shower, potable water, ambulance, resuscitator, oxygen, antidote kits, telephone, cell phone, radio channel, specific care center and e-mail. During the field audit evidenced an alarm system readily available for use at cyanide unloading, storage, locations and elsewhere in the plant. Evidenced that KBM defined, documented, implemented and maintains methodology for inspect its first aid equipment regularly to ensure that they are available when needed, and that materials such as cyanide antidotes stored and tested as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed. Evidenced that routine inspections of first aid equipment include the oxygen kits. Reviewing KBM's Health Area documentation it was noted they clearly define the

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5W1H related to first aid equipment inspection It is defined that for Visual Inspection through checking whether the packaging is intact, with no signs of damage, moisture or tampering and confirming that all items on the checklist are present, with validity data, conservation status, as recommended in the inspection forms located as mentioned above as well as for Organization through verifying whether items are organized so they are easy to access in an emergency. Evidenced that KBM defined, established and maintains documented internal procedures that define methodology for use, handling, storage, preservation, inspection and preventive and corrective maintenance. Sampled examples were: Health Care Manual; Health Care t Equipment, Medication and Ambulance Inspection Checklist; Emergency Bag Inspection; Cyanide Antidote Control; Defibrillator Daily Checklist; Sphygmomanometer Daily Checklist Inspection; Oxygen Cylinder Checklist Inspection; Diphoterine Kit Checklist Inspection; Autonomous Panoramic Mask Checklist Inspection; TYVEK Coverall Checklist Inspection; Ambulance Checklist; Personal Protective Equipment Inspection Checklist

**FLOW** The auditor reviewed several inspection records as above-mentioned and evidenced that this requirement have been duly implemented by KBM. During the field audit interviewed personnel showed to be aware of this matter. It was evidenced that KBM defined, documented, implemented and maintains PAE which aims establishing methodology to be observed and followed in eventual emergency situations, with sodium cyanide, preserving worker health and safety as well the environmental media restoring operational normality in order to eliminate/minimize possible damages which applies to all areas of KBM that work directly or indirectly, as well as in internal and external emergencies with Sodium Cyanide. Responsibilities and authorities are clearly defined and documented. Evidenced that item PAE defines that in case of human exposure that requires action by an emergency response team, such as decontamination or treatment, it is essential that there are oxygen cylinders in the unit to administer to the poisoned person, resuscitation equipment. For additional information please see Principle 7

KBM defined, documented, established and maintains internal SSMA-PRO-040-AN35 - Cyanide Contact Emergency Flowchart. Evidenced that a.m. emergency flowchart clearly defines first aid actions applied to victims of contact with cyanide. These actions are divided into four segments. The first is called Support (scope: all levels); the second is called Removal (scope: Firefighters and Civil Firefighters); the third is called Assessment and Treatment (scope: Firefighters, Civil Firefighters, and Health Team); and the fourth is Transportation and Medication Treatment (scope: Health Team).

A) For the Support Stage: The actions and responsibilities are: Signposting access routes and controlling people and vehicles on site; Calling the Emergency Brigade (extension 1002 and radio band 09) and Occupational Medicine (extension 1001 and radio band 16 or telephone 08007220001); Informing the health team and waiting for the ambulance in the private parking lot; Assisting the care team, if requested. B) For the Removal Stage: Identify and use the necessary PPE compatible with the risk for care; Non-encapsulated level B coveralls with hoods, independent respiratory protection, nitrile gloves and PVC boots; Define the

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zoning and limits of hot, warm and cold areas; Remove the victim to an uncontaminated location (from the hot area to the warm area); Neutralize the contaminant in the affected area using Diphoterin; Use containers with lids for the reservoir of contaminated clothing and belongings; After the contamination process, remove the victim to the cold area; C) For the Assessment and Treatment: Identify and use the necessary PPE compatible with the risk for care; Non-encapsulated level B coveralls with hoods, independent respiratory protection, nitrile gloves and PVC boots; Lay the victim on a flat surface and perform CPR. If signs of CPR are present, maintain oxygen therapy by keeping the mask close to the face. If no additional signs occur, perform CPR, performing two respiratory maneuvers for every 30 cardiac massages (use oxygen at 10 to 15 L/min on the manual respirator with Ambu). D) For Transportation and Medication Treatment Stage: Transport the victim to the Outpatient Clinic or Hospital (Municipal Hospital or São Lucas Hospital), administer medication according to the medical protocol for drug treatment for cyanide poisoning, perform CPR, performing two respiratory maneuvers for every 30 cardiac massages (use oxygen at 10 to 15 l/min on the manual respirator with Ambu and maintain CPR until vital signs return or arrival at the Outpatient Clinic/Hospital where the victim will be under the care of the medical team on duty. During field audit all personnel with duties related to emergency response plans or procedures to respond to cyanide exposures interviewed showed to be aware of this matter. For additional information please see Principle 7. During field audit it was evidenced that KBM has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide. The KBM Health technical team is made up of the Occupational Medicine Physician, with the support of the nursing team, has an emergency facility, fully equipped with, first aids drugs and materials, oxygen, resuscitator, as well as the existence of adequate human resources to provide first aid and medical assistance to workers exposed to cyanide. Evidenced that KBM's Health Care is located in the Plant with Installation composed of infirmary beds, dressing room, archive room, storage of materials and medicines, occupational administrative room, reception and medical office. The first aid kit contain: • 5L portable oxygen, • Attachable oxygen catheter,• High concentration mask with reservoir,• Ambu Resuscitator Full Manual Adult Resuscitator • Difphoterin (LPMD Individual eye wash, 500ml),• Diphoterin 500ml (Spray, 200 ml. Evidenced that Health Care Manual defines the duties and responsibilities of the Occupational Physician. Examples were: Perform medical regulation of the system; – Know the company's activities and occupational risks, maintaining permanent contact with the areas of occupational health and safety, industrial management and human resources; – Prepare, coordinate and develop the Occupational Health Medical Control Program, ( PCMSO ) for the company's employees, based on legal, scientific and ethical; Be responsible for carrying out the occupational medical care provided for in the PCMSO, in order to identify early health changes in the employee, resulting from work; Implement and develop actions to promote health in the collective sphere; – Promote interest in healthy lifestyle habits in contact with workers; Provide support to administrative and human resources departments in

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developing general and specific actions aimed at preserving health and physical integrity; – Guide and direct employees in seeking treatment for various pathologies; – Decide whether or not employees need to be absent from work or change their job due to health reasons; – Guide technicians in the process of occupational adaptation of workers with physical disabilities, or those returning to work with after-effects or limitations; – Perform professional activities with permanent monitoring of the employee's health status and their exclusion from the job performed; – Adopt appropriate administrative measures immediately after identifying potentially occupational health changes, triggering, together with the competent departments, corrective and preventive actions to prevent progression and prevent occupational illnesses; – Issue service reports and technical opinions; – Know the local and regional service network; – Establish an agreement, contract or arrangement that guarantees the existence of at least one hospital unit of choice for emergency referrals; – Maintain a global and permanently updated view of the resources available for pre-hospital care and emergency doors, periodically checking their operational capacity; Receiving calls for assistance, analyzing demand, classifying care priorities, selecting means of care (best response), monitoring local care, determining the patient's destination, providing telephone guidance; – Providing direct assistance to employees in emergencies, performing possible and necessary medical procedures at the pre-hospital level, and supervising other health professionals involved; – Carrying out quality control of health services provided at the Unit; – Evaluating team performance and providing support to those responsible for the service's continuing education program; – Complying with ethical and legal prices and local and corporate standards relevant to the Service. Evidenced that the Health Care Manual defines the duties and responsibilities of the Occupational Health Nurse. Examples were: Supervise and evaluate the nursing actions of the team in Mobile Pre-Hospital Care; – Participate in training and improvement programs for emergency health personnel, especially in continuing education programs; – Perform quality control of the service in aspects inherent to their profession; Plan, execute and evaluate care for the entrepreneur, in addition to promoting their health and ensuring their safety; – Support those responsible for developing human resources for the continuing education needs of the team; – Comply with the Professional Practice Law and the Nursing Code of Ethics.. Besides, the Health Care Manual define clearly the roles for activities to be performed in accordance with Brazilian legislation. Sampled examples were: Basic rules for handling emergency situations provided for in the PAE; Parenteral administration of medication; Intramuscular administration; Intravenous route; Administration of medication via the eye; Administration of medication by inhalation; Administration of sublingual medication; Administration via topical or specific route; Administration of medication via transdermal route; Subcutaneous administration; Venipuncture technique; Direct venipuncture technique - single dose; Waste control in outpatient clinics; Storage and transportation of waste; Vector control; Cleaning and sanitation; Basic rules for cleaning and hygiene of environments Storage and control of medication; General rules for outpatient conduct; Information records; Incident books; Employee file or

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medical record; Outpatient work accidents; Risk factors; Preventive measures; Procedure in the event of an accident; Immunization of Health Professionals; Administration of medications; Procedures to be performed, regardless of the route of administration; Administration of oral medication; Administration of medications by nasal instillation; Administration of medications by otological instillation; Basic rules for handling emergency situations provided for in the PAC; Storage and control of medications; General rules of outpatient conduct; Information records; Incident books; Employee file or medical record; Outpatient work accidents; Risk factors; Preventive measures; Procedure in case of accident; Immunization of Health Professionals; the Occupational medicine's role in emergency situations such as:

- Advise the teams involved in the emergency as well as provide medical care to victims;
- Go to the Hospitals or Clinics where accident victims were sent in order to monitor their hospitalization and the evolution of the victims' condition, until they are discharged;
- Provide guidance to clinics/hospitals on special care, in particular, on chemical products;
- Monitor and register victims who were admitted to hospital establishments, informing the Field Coordinator of their number and status;
- After the emergency, make a protected record of the incident with details relating to the victims and hospital medical care.
- Communicate with family members of workers who are victims of emergency accidents.

Evidenced KBM defined an internal documented procedure for the use of diphotenin including handling, storage, preservation, inspection and the adequate way of using. Reviewing, in the Resources Human Area, qualification records it was noted that all Health Care Area Members are duly qualified as required by Brazilian legislation. evidenced that PAE clearly establishes methodology for land transporting from site to hospital. As already mentioned KBM has its own ambulance. Besides, if necessary KBM can use Mobile Emergency Care Service (SAMU) ambulances. According to the need and degree of urgency, the responsible doctor will direct the victim to reference hospitals. Sampled examples were: Hospital Municipal and Hospital São Lucas Furthermore, reviewing pertinent procurement records, it was noted that KBM has contracts with companies for the air transport of injured people. evidenced that KBM informed local medical facilities of the potential need to treat patients for cyanide exposure. Evidenced duly implemented. Sampled examples were: Hospital Municipal and Hospital São Lucas . Evidenced the existence of a formalized arrangement between KBM and a.m. hospitals in which they are aware of the potential needs that may be asked to treat a victim of cyanide poisoning. Evidenced that KBM's Health Area received training provided by Dr. Alexandre Rodrigues (operation expert MD in chemical intoxication) I and Medicine Doctor of Proquigel (cyanide producer) about treatment due to all types contamination with cyanide. Additionally evidenced that KBM's Medicine Occupational Doctor) provided training for the pertinent technical personnel of involved hospitals Besides, KBM's Health Team performed technical visits at a.m. hospitals and attested they have adequate and qualified staff, equipment and expertise to provide treatment for cyanide exposure.

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## Principle 7 | EMERGENCY RESPONSE

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

### Standard of Practice 7.1

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

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

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

The operation has procedures called HV - Hypothesis of Victims Involving Hazardous Products - Sodium Cyanide, which include the steps of the first aid to victims, carried out by the Emergency Brigade, as well as the neutralization of the chemical product, the stabilization and the removal of the victim for medical care. For referencing the care flow in cases of contact with cyanide, as well as for medical management regarding the classification of the degree of intoxication and the administration of antidotes, the following documents are used: SSMA-NOR-040-AN34 - Medication Cyanide Poisoning, SSMA-NOR-157-AN17 - Emergency Flowchart - Contact with Cyanide and SSMA-NOR-157-HV5 - Emergencies Involving Hazardous Products - Sodium Cyanide. Evidenced that KBM defined, documented, implemented and maintains several document for Emergency Response Plans to address potential accidental releases of cyanide and cyanide exposure incidents such as: HS-G-10.06.4 - PGC, SSMA-PRO-157- PAE ; KRP-32-GG-601-G-015-DG revision 19 dated on April 07,2025 - PAEBM Eustáquio Dam; KRP-25-GG-601-G-009-DG revision 14 dated on March 20, 2025 - PAEBM Specific Tank XII; SSMA-NOR-157-HV5 - Leakage of Cyanide Solution and PGC Crisis Management Plan. Noted that the a.m. emergency plans are in accordance with Brazilian regulations such as: ANM Resolution 95/22, ANM Resolution 130/23, Federal Law 12,334/10, Federal Law 14,066/20, CEPRAM Resolution 3,183/03, CBMMG Technical Instruction # 12, CBMMG Technical Instruction # 11, NRM-08 , NRM-10 , NRM-07, NR-23, NBR 12693. Evidenced that SSMA-NOR-157-HV5 describe specifically the response for all cyanide related emergencies: Catastrophic release of hydrogen cyanide from storage, process or regeneration facilities - SSMA-NOR-157-HV5 item 6; Transportation accidents occurring on site or in close proximity to the operation -SSMA-NOR-157-HV5 item 7, Cyanide releases during unloading and mixing - SSMA-NOR-157-HV5 item 8, Cyanide releases during fires and explosions - SSMA-NOR-157-HV5 item 9, Pipe, valve and tank ruptures - SSMA-NOR-157-HV5 item 10, Overtopping of ponds and impoundments - SSMA-NOR-157-HV5 item 11, Power outages and pump failures-SSMA-NOR-157-HV5 item 12, Uncontrolled seepage - SSMA-NOR-157-HV5 item 13, Failure of cyanide treatment, destruction or recovery systems - SSMA-NOR-157-

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HV5 item 14. KBM has a Cyanide Destruction System. The use of cyanide in the leaching process is controlled online and by routine sampling at pre-defined points, ensuring that cyanide is consumed in the circuit and that there is no need for a treatment system to reduce the amount of cyanide discarded. in the dam met the maximum allowed by the International Cyanide Code. Failure of tailings impoundments, heap leach facilities and other cyanide facilities - The actions relating to this item are available in SSMA-NOR-157-HV5 item 15 and in PAEBM Eustáquio Dam and PAEBM Specific Tank XII . KBM does not have heap leach facilities. Reviewing the above-mentioned documented procedures it was evidenced that they are specific for KBM. Theirs scope are for all personnel that work directly and indirectly, as well as in internal and external emergencies with cyanide. Evidenced that for each scenario mentioned at a SSMA-NOR-157-HV5 , and in PAEBM Eustáquio Dam and PAEBM Specific Tank XII clearly define the step by step that shall be implemented describing what to do, why to do it, how to do it, who should do it, where to do it, when to do it (the so-called 5W 1H). Evidenced that SSMA-PRO-157 at item 6 clearly defines responsibilities and authorities of all personnel related to failure of tailings impoundments, and other cyanide facilities. Sampled examples were: Area Managers, Emergency Response Team, Emergency Coordinator, Medical Coordinator, Nursing Technician, Emergency Brigade Leader, Emergency Brigade Members, Industrial Area Rescue Team, Remote Area Rescue Team, Environmental Emergency Response Team, and Area Evacuation Leaders. Additionally, interface areas and their respective responsibilities and authorities are clearly established too. During the field audit they were interviewed and showed to be aware of the PPE - Protective Personnel Equipment to be used. Sampled examples were: Tychem jumpsuit; Latex Gloves; Mask with filter against HCN gas; Portable Gas Detector (Sampling and continuous monitoring of exposed employees). Interviewed personnel reported that PPE must be put on first before any action, especially approaching and checking for leaks as stated. It was evidenced that the emergency scenarios contemplated in the SSMA-NOR-157-HV5 item 15 and in PAEBM Eustáquio Dam and PAEBM Specific Tank XII are consistent with the risk analysis, which is based on surveys of environmental aspects and impacts as well as hazards and risks to occupational safety and health and considering significant impacts to its workers, community and environment. Evidenced that planning for response to transportation-related emergencies has been considering, transportation route(s), physical and chemical form of the cyanide, method of transport (e.g., rail, truck), the condition of the road or railway, and the design of the transport vehicle (e.g., single or double walled, top or bottom unloading, by Confins Transportes and Concórdia Transportes As already mentioned, both of them are ICMI certified. (Please see Principles 1 and 2 for additional information). Evidenced that KBM defined methodology for accidents occurring during cyanide transportation and operations at KBM and in close proximity to the operation through SSMA-NOR-157-HV5 item 7. Evidenced that there is very efficient sharing of documentation, training and effective communications day by day of transport conditions, route conditions among KBM, Proquigel, Confins Transportes and Concórdia Transportes. Evidenced that planning for response to transportation-related emergencies has been considering,

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transportation route(s), physical and chemical form of the cyanide, method of transport (e.g., rail, truck), the condition of the road or railway, and the design of the transport vehicle (e.g., single or double walled, top or bottom unloading, by Confins Transportes and Concórdia Transportes. As already mentioned, both of them are ICMI certified. (Please see Principles 1 and 2 for additional information). Evidenced that KBM defined methodology for accidents occurring during cyanide transportation and operations at KBM and in close proximity to the operation through SSMA-NOR-157-HV5 item 7. Evidenced that there is very efficient sharing of documentation, training and effective communications day by day of transport conditions, route conditions among KBM, Proquigel, Confins Transportes and Concórdia Transportes. KBM defined, documented, established and maintains internal SSMA-PRO-040-AN35 - Cyanide Contact Emergency Flowchart. Evidenced that a.m. emergency flowchart clearly defines first aid actions applied to victims of contact with cyanide. These actions are divided into four segments. The first is called Support (scope: all levels); the second is called Removal (scope: Firefighters and Civil Firefighters); the third is called Assessment and Treatment (scope: Firefighters, Civil Firefighters, and Health Team); and the fourth is Transportation and Medication Treatment (scope: Health Team).A) For the Support Stage: The actions and responsibilities are: Signposting access routes and controlling people and vehicles on site; Calling the Emergency Brigade (extension 1002 and radio band 09) and Occupational Medicine (extension 1001 and radio band 16 or telephone 08007220001); Informing the health team and waiting for the ambulance in the private parking lot; Assisting the care team, if requested. B) For the Removal Stage: Identify and use the necessary PPE compatible with the risk for care; Non-encapsulated level B coveralls with hoods, independent respiratory protection, nitrile gloves and PVC boots; Define the zoning and limits of hot, warm and cold areas; Remove the victim to an uncontaminated location (from the hot area to the warm area); Neutralize the contaminant in the affected area using Diphoterin; Use containers with lids for the reservoir of contaminated clothing and belongings; After the contamination process, remove the victim to the cold area; C) For the Assessment and Treatment: Identify and use the necessary PPE compatible with the risk for care; Non-encapsulated level B coveralls with hoods, independent respiratory protection, nitrile gloves and PVC boots; Lay the victim on a flat surface and perform CPR. If signs of CPR are present, maintain oxygen therapy by keeping the mask close to the face. If no additional signs occur, perform CPR, performing two respiratory maneuvers for every 30 cardiac massages (use oxygen at 10 to 15 L/min on the manual respirator with Ambu). D) For Transportation and Medication Treatment Stage: Transport the victim to the Outpatient Clinic or Hospital (Municipal Hospital or São Lucas Hospital), administer medication according to the medical protocol for drug treatment for cyanide poisoning, perform CPR, performing two respiratory maneuvers for every 30 cardiac massages (use oxygen at 10 to 15 l/min on the manual respirator with Ambu and maintain CPR until vital signs return or arrival at the Outpatient Clinic/Hospital where the victim will be under the care of the medical team on duty. Furthermore, the documented internal procedure SSMA-NOR-044-AN01 defines the system for Handling and Use of Diphoterine for each type of

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Diphoterine, such as: A) Diphoterine LIS Portable Eye Wash 50ml which contains the amount of solution needed to decontaminate a single eye. To contaminate both eyes, alternate use and follow the wash with LPMD; • Ideally, use within 10 seconds of chemical spray for better effectiveness in preventing injuries. After this time, perform an additional wash with LPMD; B) Diphoterine LPMD Individual Eye Wash 500mL. This contains the amount of solution needed to decontaminate a single eye. To contaminate both eyes, rinse the use and follow the wash with another LPMD; • Ideally, use within 60 seconds of chemical spray for better effectiveness in preventing injuries. After this time, perform an additional wash with another LPMD; C) Diphoterine MICRO DAP Spray, 100ml or whichever has the amount of solution necessary to decontaminate 3% of the skin (one hand, foot, or face). For larger splashes, use MINI DAP 200ml spray; • Ideally, use within 60 seconds of the chemical spray for better effectiveness in preventing injuries. After this time, rinse with MINI DAP 200ml. D) D) Diphoterine MINI DAP Spray, 200 mL, which contains the amount of solution needed to decontaminate 9% of the skin (leg, arm, or face, for example). For larger sprays, use DAP 5L; • Ideally, use within 60 seconds of chemical spraying for greater effectiveness in preventing injuries. After this time, rinse with another MINI DAP 200 mL; E) Diphoterine DAP Portable Self-Contained Shower 5L, which contains enough solution to decontaminate up to a full body. For eye sprays, use LIS or LPMD. • Ideally, use within 60 seconds of chemical spray for best effectiveness in preventing injuries. After this time, rinse further with another DAP SL; • A DAP has a single-use system. This system ensures that the entire contents of the shower are used. KBM defined, documented, implemented and maintains several procedures in order to assure a control of releases at their source. During the field audit it was evidenced the very good conditions of the KBM site. BM did not have cyanide releases but in case of occurrence, there are specific documented procedures and personnel duly qualified to implement the necessary actions for containment, assessment, mitigation and future prevention of releases. As already mentioned, during the field audit it was evidenced the very good conditions of the KBM' site. Please see Principle 4 for additional information. Interviewed personnel showed to be aware of this matter. Interviewing personnel of several areas and reviewing meeting records it was evidenced that KBM has been involved workforce such as areas of: process, engineering, production, maintenance, social responsibility, environmental, health and safety occupational safety, dam and design personnel as well as external stakeholders, including potentially affected communities, in the cyanide emergency response planning process. Evidenced health authorities (public and private hospitals and clinics) were duly involved in KBM's cyanide emergency. Sampled examples were ANM, IBAMA, Civil Defense CENAD, SEDEC, CBMMG , Municipal Hospital, São Lucas Hospital, , Federal Police, Civil Police, Federal Highway Police, Environmental Operational Support Center, State Forestry Institute, Minas Gerais Institute of Agriculture (IMA), • Paracatu Municipal Civil Defense and Protection Coordination; • Unaí City Hall; Unaí Municipal Civil Defense and Protection Coordination; • Regional Environmental Superintendencies - SUPRAM. KBM has been made potentially affected communities aware of the nature of their risks associated with accidental cyanide

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releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions. Sampled examples were: Communities (Cunha, Santa Rita, Lagoa de Santo Antonio, São Domingos, Amoreira, Bela Vista II, Alto da Colina, Santo Eduardo). For additional information, see Principle 9. BM has been identified external entities having emergency response roles, and involved those entities in the cyanide emergency response planning process. Sampled examples were: Paracatu City Hall; SAMU, Civil Defense, CBMMG, Municipal Hospital, São Lucas Hospital, ANM, CENAD, MPF, MPE; Federal Police, Federal Highway Police, Minas Gerais Highway Police, Police; Civil Police: Federal Police; • Paracatu Municipal Civil Defense and Protection Coordination; • Unai City Hall; • Unai Municipal Civil Defense and Protection Coordination; • Regional Environmental Superintendencies - SUPRAM. Evidenced that SSMA-PRO-157- PAE at item 7.4 defines an Emergency Level Classification and according to its risk potential, the emergency should be classified as one of the following three magnitude levels: Level 1 – Emergencies of Minor Magnitude: Accidental events that can be controlled with the unit's own resources; the emergency response plan is not activated, but the event must be recorded; Level 2 – Emergencies of Medium Magnitude: Accidental events that can be controlled with the unit's own resources; the effects do not exceed the physical limits of the unit's area and do not affect routine processes; the EAP may be activated and Level 3 – Emergencies of Severe Magnitude: Accidental events whose effects may exceed the financial limits of the unit's area; they require the activation of the emergency response plan with the mobilization of all available human and material resources within the unit. This may involve the necessary involvement, as well as the activation of external resources (Fire Department, Civil Defense, Police, PAM, etc.). Besides, at item 7.17 it is defined: A) For: Alert and Internal Evacuation of Facilities: If an emergency is identified, anyone in the unit must alert the occupants and firefighters. This alert can be executed automatically by fire detection and alarm systems. However, any identified emergency scenario must be communicated via telephone or radio according to the procedure below: In any emergency, the owner who detects the emergency must activate the local firefighter team (sector), notify the team leader assigned to the building, sector, or affected area, informing them of the incident, using the radio band in their area, saying the word EMERGENCY three times or blowing a whistle for Administrative areas, reporting the incident and requesting the necessary support. Any worker, upon hearing a call for help via radio through the word EMERGENCY said 3 times or continuous whistle, must stop the activity in progress until they are reoriented by local supervision of safety conditions, as well as the resumption of activities. From this moment on, the brigade team leader and/or (supervisor, technician, controller, leader or substitute) must assess the situation and verify the need to activate the Medical Post or other Brigade members at the plant through the exclusive radio band for communication and operational management of the emergency, radio band as well as determine the general abandonment of the building due to the identified risk, they must proceed to the meeting point closest to the building; B) For: Situation Analysis After identifying the emergency area/location, the brigade leader must arrive at the scene to analyze the

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emergency and report the current situation to the emergency coordinator, who will then activate or not the general plant alarm, requesting firefighters and/or the evacuation of the area. The brigade leader and/or brigade chief and the general brigade coordinator are responsible for activating the general evacuation siren and evacuating the building, as well as summoning other firefighters when necessary. They assume the leadership role in the event, overseeing actions and making decisions regarding the need to deploy unforeseen resources, involving other area leaders (on-call personnel and managers); C) For Procedures after the Emergency Alarm is Activated: The person responsible for the gate must stop any procedures and/or services and allow entry only to emergency vehicles or persons authorized by the emergency coordinator; All vehicles circulating in the emergency area within the unit must be parked in locations that do not obstruct internal access routes and must be turned off; Firefighters must go to the emergency room meeting point so that they can proceed as a group to the emergency site for assessment and treatment. After determined the exact location of the incident, firefighters must proceed to the location determined by the brigade leader; The HSE department must be notified immediately, and the safety technician, if present at the unit, must proceed to the BE meeting point/or to the emergency location if response has already begun; Other employees not involved in the emergency must be on standby if requested to evacuate the area; During an emergency, all critical operations in the affected area must be halted; If any hazardous materials are being loaded or unloaded in the affected area or in the next area during an emergency, this operation must be stopped and the vehicle moved to a safe location, as directed by the brigade leader;

## Standard of Practice 7.2

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

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

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

Interviewing personnel of several areas and reviewing meeting records it was evidenced that KBM has been involved workforce such as areas of: process, engineering, production, maintenance, social responsibility, environmental, health and safety occupational safety, dam and design personnel as well as external stakeholders, including potentially affected communities, in the cyanide emergency response planning process. Evidenced health authorities (public and private hospitals and clinics) were duly involved in KBM's cyanide emergency. Sampled examples were ANM, IBAMA, Civil Defense CENAD, SEDEC, CBMMG, Municipal Hospital, São Lucas Hospital, Federal Police, Civil Police, Federal Highway Police,

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Environmental Operational Support Center, State Forestry Institute, Minas Gerais Institute of Agriculture (IMA), • Paracatu Municipal Civil Defense and Protection Coordination; • Unai City Hall; Unai Municipal Civil Defense and Protection Coordination; • Regional Environmental Superintendencies - SUPRAM. KBM has been made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions. Sampled examples were: Communities (Cunha, Santa Rita, Lagoa de Santo Antonio, São Domingos, Amoreira, Bela Vista II, Alto da Colina, Santo Eduardo). For additional information, see Principle 9. KBM has been identified external entities having emergency response roles, and involved those entities in the cyanide emergency response planning process. Sampled examples were: Paracatu City Hall; SAMU, Civil Defense, CBMMG, Municipal Hospital, São Lucas Hospital, ANM, CENAD, MPF, MPE; Federal Police, Federal Highway Police, Minas Gerais Highway Police, Police; Civil Police: Federal Police; • Paracatu Municipal Civil Defense and Protection Coordination; • Unai City Hall; • Unai Municipal Civil Defense and Protection Coordination; • Regional Environmental Superintendencies - SUPRAM. Evidenced that KBM engages in consultation (where applicable) and communication with stakeholders to keep PAE, PAEBM Eustaquio Dam, PAEBM Specific Tank XII. Sampled examples were: Proquigel (the cyanide producer), Confins and Concordia (the cyanide transportation companies), and Ambipar (for accident prevention, response to emergencies disinfection of environments, waste management and recovery and waste collection), KBM engages security and health authorities, emergency response suppliers, and community representatives. KBM invites specific stakeholders to participate mock emergency drills. Another implemented control is to perform periodic meetings with stakeholders, communities in order to discuss and updated (if necessary) the emergency response plan. Evidenced duly implemented.

## Standard of Practice 7.3

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

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

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

Evidenced that KBM engages in consultation (where applicable) and communication with stakeholders to keep PAE, PAEBM Eustaquio Dam, PAEBM Specific Tank XII. Evidenced that KBM's PAE, PAEBM Eustaquio Dam and PAEBM Specific Tank XII defined and documented primary and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the Plan. In this way, reviewing a.m. plans the auditor verified the appointment of Guilherme

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Cruz as Primary PAEBM Coordinator and Daniel Rocha as Alternate PAEBM Coordinator. Besides, it was evidenced that KBM's PAEBM defined and alternate emergency response coordinators have explicit authority to commit the resources necessary to implement the Plan. Besides, evidenced that PGC defines The KBM Site Crisis Management Committee which is compounded by the President - Gilberto Azevedo, the Technical Services Director Lilian Grabellos, the Vice President Stephen Allen and he Sustainable Director Alessandro Nepomuceno. Interviewing pertinent personnel showed to be aware of this matter. Evidenced that KBM's PAE, PAEBM Eustaquio Dam and PAEBM Specific Tank XII have been identified and documented Emergency Response Teams related to PAEBM. Evidenced that KBM requires appropriate training for emergency responses. Evidenced that PAE Item 7.13 clearly defines training needs for emergency responders. Evidenced that defines that a team that must act in case of emergencies that occur at the dam must be permanently trained, this being the responsibility of KBM's Senior Management. Such training becomes essential for the recognition of emergencies at all levels of severity, equally enabling the team's readiness when necessary to provide response actions to emergencies with agility and capacity. It defines two kinds of trainings (internal and external). Internal training - aims to contribute to maintaining the state of readiness, as allow greater familiarization of those involved with their elements and responsibilities inherent to the PAEBM completing the operational evolution of the aforementioned Plan. Such trainings are carried out at most every 6 months, with them being duly registered and monitored by the team who will carry out the Assessment and Declaration of Conformity and Operationality of the PAEBM. They include: Internal expository exercises - These are expository presentations in training rooms, where the procedures described in the PAEBM are explained. These are exercises based on discuss, and aim to familiarize participants with the plans, policies, agreements and current procedures; Internal Notification Flow Exercises - Prolonged exercise by the entrepreneur with the objective of testing the internal notification procedures presented in the PAEBM; Internal Simulation Exercises Hypothetical - It is a playful test of the effectiveness and operability of the PAEBM carried out in a classroom training, with time situations close to the actual forecast. It is done to evaluate the capacity and response time of the entrepreneur in case of emergency, and counts on the presence of key personnel discussing simulated scenarios; Internal Simulation Exercises Practical - It is a test that comprises field exercises simulating a situation of emergency occurred the activation and mobilization of international operations centers of emergencies, personnel and resources available, including evacuation procedures internal. It is noteworthy that the internal practical simulation must be carried out at least once a year, as per pertinent legislation. External trainings - The team that makes up the PAEBM of the KBM Eustaquio Dam and PAEBM Specific Tank XII Tailings Dam must provide annually Guidance Seminar, with the participation of city halls, civil defense organizations, of the dam, other employees of the project and the population involved in the safety of the ZAS. If formally requested by civil defense, the population involved in the ZSS can also be included in such a seminar. External training exercises promote prevention, preparedness and response to incidents and emergencies, and can even be extended to include recovery operations. Therefore, the orientation

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seminars must understand the flood map exposure involved Internal and external participants engage in discussion of security procedures. Such communication must ensure that local authorities and the community have due understanding crucial information associated with the dam in question, events such as rescue of lives. Therefore, the communication of such information must be properly configured in order to being easily received, digested and innovative. The purpose of the Orientation Seminar is to help people understand the potential dangers associated with the structure. Therefore, risk communication is a critical component of risk management. effective decision-making based on risk associated with dams and must be integrated into all aspects of the PAEBM Eustaquio Dam and PAEBM Specific Tank XII management process. Orientation Seminars must ensure that: The entrepreneur and the affected community will be partners and will have the opportunity to participate in the decisions that involve them; and, Communications regarding potential flood hazard, its consequences and solutions shared will be open, transparent and understandable. In summary, the important principles in risk communication are: Improve communication with the public and dam regulatory agencies; Emergency action plans and communication with the public are important and integral aspects to reduce the risk to life. Communication must be open and transparent; an interactive, two-way exchange of information. Present dam safety issues. Integrate risk communication strategies early and frequently. Focus communication on actions to be carried out by individuals/organizations. Discuss uncertainty in risk estimates and implement a risk management culture. Signs and warnings on infrastructure must be legible and visible. KBM performed simulated emergency situations in conjunction with city halls, civil defense organizations, dam security team, other employees of the project and the population especially in ZAS and other external stakeholders. Furthermore, Civil Defense may include the population of the ZSS. Such simulated exercises provide the opportunity to evaluate the effectiveness of the PAEBM in a situation real and demonstrate personal key readiness levels. Periodic exercises result in a improved PAEBM as lessons learned are incorporated into the updated document. Tests of Notification and Alert Systems are carried out at least annually, the objectives essentially being to confirm telephone numbers, verify the operability of means of communication as well as notification flowchart functionality. In the case of alert tests, these are carried out at least every six months through functionality tests of the sirens without the audible warnings are properly activated. The test has the following specific objectives: Test the notification system and in particular: i) test telephone numbers; ii) determine the ability to establish and maintain communications during an emergency; iii) verify the PAEBM Coordinator's ability to mobilize and activate an operational team and emergency response means. Test the alert system: i) test the operability of the alert means and verify the notification capacity quickly the population in ZAS. A highlight are the Community Awareness Raising Actions - The preparation of population communities is a risk mitigation action, being carried out through two types of actions that are, essential: Raising community awareness, promoting clarification sessions and disseminating information related to the risk of living in valleys downstream of dams and the existence of emergency (in the form of leaflets, posters, brochures); WhatsApp groups, Education and training of population communities, to

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face the eventuality of a flood caused, promote public information programs in the strictest sense, relating to the zoning of risk, the collection of the meanings of messages and the rules for evacuating populations; These programs must involve the performance of controlled exercises. Citizens residing in a risk area are duly informed about some mitigation practices of the risk that can be broken, in a simple way, as: Be informed about the entity that transmits the news of the imminent emergency, as well as the readiness status order; Know the meaning of the different alerts; Know the evacuation plan and: must be informed about the entity that transmits the news of the imminent emergency, as well as the evacuation order; must know the limits of the flood perimeter; must know the location of meeting points (and make sure that all elements also know you nearby), in the case of living in the ZAS, self-rescue sites; must know the escape routes. Such information is valuable especially for individuals residing in the ZAS, of whom, in emergency situation and given the lack of time that the situation can give, if large levels of autonomy. During field audit, interviewing pertinent personnel, reviewing several pertinent records it was evidenced that appropriate training for emergency responders have been duly implemented. It was demonstrated that the emergency brigade members are in compliance with Brazilian legislation. Evidenced that SSMA-NOR -157 AN04 - Organic Brigade List 2025 which presents the name of all qualified brigade members, the area in which they work, work shift as well as the validity of the respective trainings. Noted that they were trained in Advanced Fire Brigade Training - according to Technical Instruction (IT) IT17 of the São Paulo Fire Department, as instructor the Technical Manager - Instructor and. Private Fire Department Guilherme Reis da Silva Neiva - Individual Taxpayer Registry **107.888.606-74** duly qualified by CBMMG as record # F0002586 dated on November 30, 2023 being valid until November 30, 2025.. Evidenced that the PAEBM Eustáquio Dam and PAEBM Tanque XII Dam, in item 2.2, present the internal entities of the action and notification flowchart, including the PAEBM Coordinator, direct action groups, external consultancy, senior management and board of directors, and for each area involved, the holders, alternates and respective 24-hour contact telephone numbers are identified. Evidenced that PAS clearly defines duties and responsibilities of the coordinators and team member. Sampled examples were: A) For The emergency coordinator is responsible for assuming overall command of the situation under the leadership of the emergency control group. Their priority is to ensure the infrastructure for emergency team action. They are also the KBM Brigade Coordinator. They assess the need for internal, external, or entire surrounding area evacuation, selecting the best escape route and meeting points; Decide to reduce or even suspend facility activities during the emergency; Assume full control of emergency operations; Convene emergency brigades and instruct brigade leaders; Request support for acquiring external resources for emergency control; Maintain a permanent record of events for reporting purposes; Declare the end of the emergency after the risk situation is over or under control; Supervise emergency preparedness and response management; In the event of the emergency coordinator's absence, the shift brigade leader should assume the responsibilities of coordinating the operational actions of the brigade team during the event. B) B) The Emergency Brigade Leader is responsible for executing operational activities at the emergency site: • Assessing safety at the emergency site

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and requesting power outages if necessary; • Providing communications according to the emergency level defined in the emergency response plan; • Directing and commanding a brigade at the emergency site; • Ordering the hiring and use of internal resources; • Establishing procedures and tactics to be used for emergency control; • Ordering the interruption of emergency response operations when there is a risk to the physical safety of brigade members; • Keeping the emergency brigade team rosters up to date; • Submitting a report on the emergency to the emergency coordinator and other specific matters; • Search for evidence of fire, accidents or any event requiring emergency team intervention, identify areas where there may be a fire outbreak in the vicinity of the industrial complex and in remote areas, thus ensuring its extinction and/or mitigating risks where it is not possible to extinguish the fire. C) Brigade members are responsible for control and direct response actions at the emergency scene, under the coordination of the brigade leader. The specific actions of the brigade members are: • Protection by promoting the evacuation of personnel, isolating areas, and blocking power; • Direct control at the emergency scene through the use of techniques and equipment necessary to control accidents, identify hazards and assess existing risks in the unit/or area, and work to correct any unsafe acts and unsafe conditions found; • Periodically inspect emergency response, fire prevention, and firefighting materials and equipment and maintain free access to firefighters, hydrants, electrical panels, corridors, and emergency exits; • Periodically inspect escape routes, including their clearance and signage; • Participate in simulated exercises and be subject to a performance evaluation of practical knowledge; D) Area Evacuation Leaders They are firefighters and, when an incident requires the evacuation of people, they will be assigned to guide the evacuated population. • Walk through the entire area under their responsibility, using a whistle and/or announcing "ABANDONMENT OF AREA" loudly; • Check for people in restrooms or other enclosed spaces; • Follow escape routes, emergency paths, or directions from the brigade leader; • Guide and/or escort visitors, contractors, and any latecomers to the designated meeting point; • Know the location of people with disabilities and/or reduced mobility in the unit and execute specific procedures, paying attention to access and risks for these individuals; • Ensure that the area has been completely evacuated. If in doubt or if anyone is absent from the meeting point, immediately notify the emergency coordinator; If a brigade member is unable to perform the area evacuation leader role, another brigade member must assume this role; In the absence of the brigade leader and his/her replacement, the HSE team assumes leadership. Evidenced that PAEBM Eustáquio Dam and PAEBM Tanque Específico XII in item 8 present the logistical, material and human resources available to treat the causes of the emergency situation. Evidenced that KBM defined, documented, implemented and maintains methodologies for periodic inspections of emergency response equipment. Periodic inspections are carried out objectively which aims detect possible failures in the system, ensuring the performance of emergency tools/structures, when necessary. Evidenced that a.m. Plan includes a flowchart that clearly indicates the step-by-step inspection procedures using the tool 5W1H. Information about items to be inspected, how to perform the inspections, the frequencies of each inspection and the acceptance criteria are clearly defined. Evidenced that inspectors have been qualified in accordance with qualification criteria

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previously defined and documented. Reviewing training records, it was evidenced that inspectors have been trained in pertinent KBM's inspection procedures. Evidenced that KBM defined, implemented and maintained several internal documented procedures related to inspection and testing emergency response equipment to ensure its availability. Evidenced duly implemented. Sampled examples of inspection check list recording respective results were: Checklists of: Sprinklers And Pipes, Emergency Valves); Emergency Whistle; Emergency Shower And Eyewash; Fire Extinguishers, Hydrants, Shelters And Hoses; Emergency Lighting; Self-Contained Respirators; Diphoterine Kit; Emergency Signaling And Escape Route; Fire System Reservoir; Fire Alarm Detection System; Foam Trailer; Pumps - Electric Jockey; Pumps And Hydrants - Diesel; Pumps And Hydrants - Electric; Meeting Point; Emergency Vehicle Parking; Brigade Kit; Emergency Doors/Gates; Emergency Pressure Regulator Valves; Belt Monitor Cannon; Emergency Siren; Cyanide Emergency Kit; Environmental Emergency Towing, Personal Protective Equipment; First Aid Kit Checklist; Daily Defibrillator; Daily Sphygmomanometer; Oxygen Cylinder; Diphoterine Kit; Autonomous Panoramic Mask; TYVEK Coverall Checklist; Ambulance Equipment/Medication; Absorbent Blanket; Absorbent Pillow; Absorbent Cord; Plastic Bag for Disposal; Bag Plastic Duster and Shovel Set; Nitrile/PVC Glove; Tychem Coverall; Snake Box; Snake Catching Tongs; Herpetological Hook; Padlock with Key; Vaqueta Type Glove; Cleaning and Organization of Input Container; Zebra Tape; Hand Wash; Sawdust Package; Hook with Loop; Cargo Transportation Vehicle; Water Truck; Chemical Substance Storage: Vehicle and Mobile Equipment Commissioning; Convoy Truck; Dump Truck Excavator Inspection Fire Fighting System; Pump Room; Munck Truck

Reviewing pertinent inspections records it was evidenced that emergency response equipment has been in accordance with Brazilian regulation laws and KBM procedures. Reviewing PAE, PAEBM Eustaquio Dam and PAEBM Specific Tank XII it was evidenced that all of them clearly define the responsibilities and authorities for external responders, medical facilities and communities. As already mentioned KBM during the preparation and revision of a.m.-documented plans involves all interested parties. After formalization of KBM's Emergency Plan, a controlled copy of KBM's Emergency Plan is provided to each external stakeholder including environmental, security and health authorities, public authorities, emergency response suppliers, community representatives and medical facilities, the cyanide producer and the cyanide transporter. This system is carried out at each review of the plan in such a way that they are perfectly knowledgeable and aware of how they should act in the event of cyanide emergencies. Reviewing meeting records evidenced another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. Evidenced that the emergency response plans were reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers, community representatives. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan.

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## Standard of Practice 7.4

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

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

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

Evidenced that PAE, PAEBM Eustaquio Dam, PAEBM Specific Tank XII and PGC, clearly include procedures and contact information for notifying management, regulatory agencies, external response providers and medical facilities of the cyanide emergency. During the field audit, it was evidenced the existence of an available list containing the above-mentioned information. Reviewing this list it was noted that it contains the necessary contact information and that is updated, which includes for instance the following phone numbers: PAEBM members, PAEC members, Brigade Emergency Members, Crisis Plan members leaders, managers, general manager, public authorities, hospitals, cyanide supplier (Proquigel), cyanide transporter (Confins and Concordia) regulatory agencies FEAM, IGAM, CEDEC, SEMAD, SEJUSP, COBOM and CENAD, DRT. Evidenced that the emergency response plans have been reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers (Ambipar), community representatives. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan). The emergency communication loop is clearly defined, tested and implemented as required. Besides, reviewing the mentioned Plans it was evidenced that for external responders, the Plan it is clearly provided contact information for those responders with designated responsibilities to implement the Plan. Evidenced that PAE, PAEBM Eustaquio Dam, PAEBM Specific Tank XII and PGC include procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, and for communication with the media. During the field audit, it was evidenced the existence of an available list containing the above-mentioned information. Reviewing this List it was noted that it contains the necessary contact information related to the communities. Sampled examples were: Cunha, Santa Rita, Lagoa de Santo Antonio, São Domingos, Amoreira, Bela Vista II, Alto da Colina, Santo Eduardo. Evidenced that KBM defined, documented internal documented procedure that establishes methodology for notifying ICMI of any significant cyanide incidents, as defined in ICMI's *Definitions and Acronyms* document. . Reviewing the a.m. procedure verified that it requires that Significant incident with cyanide whose consequences are serious in terms of the environment, occupational safety, health or which affect directly interested parties. Reviewing pertinent records as well as during the field audit, interviewing personnel of various levels and areas it was not evidenced that have occurred significant cyanide incidents. Evidenced that interviewed personnel is aware of notify needings to ICMI of any significant cyanide

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incidents as stated.

## Standard of Practice 7.5

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

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

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

Emergency response procedures involving sodium cyanide spills from operations are established in the SSMA-NOR-157-HV5 standard - Emergencies Involving Hazardous Products - Sodium Cyanide, which includes the main elements discussed in the Guide for Use of the Mining Operations Verification Protocol. In the event of a cyanide slurry spill, the procedure provides for the immediate removal of the contaminated soil, with disposal in a specific tank, as well as the neutralization of the solution contained in the containment basins by means of hydrogen peroxide, followed by suction and disposal of the neutralized solution in a dedicated tank. Immediate actions also include defining a minimum contact time of two hours for chemical neutralization. The decontamination of equipment used in the collection and transport of contaminated material is carried out through triple rinsing, ensuring the elimination of cyanide residues. The procedure also establishes soil sampling, with submission to the laboratory, as a verification criterion that the remaining soil is free of contaminants, meeting the requirement of evidence of complete remediation. Additionally, actions for recovery, reconstitution, and monitoring of the rehabilitation of the affected area are planned, when applicable. Regarding the disposal of other cyanide-contaminated waste, such as empty sodium cyanide containers, these undergo specific neutralization according to procedure PROC-PO-0009 - Neutralization of Cyanide Bags and Sacks, and are subsequently sent to the Temporary Hazardous Waste Center for environmentally sound external treatment, such as co-processing or incineration. These are collected and disposed of as hazardous waste, in accordance with the guidelines of SSMA-NOR-067 - Solid Waste Management. The reuse of this waste is expressly prohibited. Finally, it is clarified that the decontamination method adopted is not limited to washing and/or dilution with water, since it involves physical removal of contaminated soil, controlled chemical neutralization with hydrogen peroxide, analytical verification through sampling, and proper disposal of waste, meeting good practices and the requirements of the Protocol. Evidenced that PAE item 7.54 defines systematics related to the decontamination process describing specific remediation measures as appropriate for the likely cyanide release scenarios, such as Recovery or neutralization of solutions or solids, Decontamination of soils or other contaminated media and Management and/or

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disposal of spill clean-up debris. Contamination refers to the process of transferring a hazardous substance through clothing, footwear, materials, and equipment, at levels above acceptable limits. Victim decontamination serves to reduce the effects of absorption and systemic intoxication of the person by the hazardous substance deposited on the skin. Decontamination also serves to prevent contamination from spreading, or what is known as secondary contamination. Due to the potential possibility of this occurring, all people, equipment, materials, and the environment must be decontaminated. Environmental soil decontamination, a technique for removing contaminants from the soil and neutralizing pH, must be performed using specific techniques. Secondary contamination also occurs through victims who are removed from the contaminated area in ambulances without prior decontamination. Decontamination must be performed whenever a victim or staff member leaves the contamination zone (hot zone). All PPE, equipment, tools, and materials that were used in the contamination zone must also be decontaminated. Regarding Decontamination Techniques: Before anyone leaves or anything is removed from the "hot zone," the operation coordinator must determine the decontamination method by which the person or object should be decontaminated. Any material or equipment that cannot be adequately decontaminated must be properly removed. Regarding the Decontamination Site: Several factors must be considered when selecting the decontamination site: • Access: The selected location should be close to the incident site, allowing people to pass directly through the decontamination area upon leaving the "hot zone," preventing them from accidentally contaminating other areas. • Whenever possible, the decontamination area should be located above or at the same level as the "hot zone," thus preventing any material or substance from reaching the decontamination area by gravity. • Surface: The decontamination area must have an impermeable surface. If a paved area is not available, it is advisable to cover the ground with plastic sheeting to prevent the material from contaminating the soil. • Lighting: A decontamination area should be well lit to reduce the potential risk of accidents within the area. Selecting a location with streetlights will eliminate the need for flashlights or generators. Otherwise, it will be necessary to obtain lights compatible with the task at hand. • Stormwater Intakes: Avoid positioning the decontamination area near stormwater inlets. If this is not possible, these access points must be protected. • Water Availability: • Water will be essential at the decontamination site. Water from water mains or water from firefighting vehicles may be used, as long as the water is clean and at a comfortable temperature for contact with human skin. If water is not available under these conditions, a reservoir of at least 0.5 m3 of water should be provided for decontaminating victims. • Exposure to surface and groundwater, fauna, flora, and soil: • Direct contact of decontamination water with surface and groundwater, soil, and contact with vegetation and animals should be avoided. • Storm drains should be closed, and during the decontamination of victims and equipment, the water should be contained in decontamination pools, and the soil protected with tarps. If effluent reaches the soil, it should be scraped off, collected, and disposed of properly. • Exposure of surface water to decontamination effluent can alter surface water quality and cause damage to flora. • Infiltration of decontamination water into

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the subsoil can reach the water table, compromising groundwater quality. Consumption of standing water can cause damage to fauna. • Atmospheric Conditions: • The decontamination site must be positioned considering the wind direction and a safe atmosphere, free from the influence of the hazardous material and from where the wind is blowing. Therefore, when selecting the site, the team must constantly measure the atmospheric conditions and monitor the wind direction. • The decontamination station should preferably be positioned perpendicular to the current wind direction or upwind of the incident site, preventing any vapors that may form from being carried by the wind to the decontamination area. The recommended PPE for the decontamination team should not exceed Level C, considering the safe atmosphere conditions, allowing the victim to remain present during decontamination procedures without using a self-contained breathing apparatus. The Decontamination Corridor: should be the access route between the zones defined as hot, warm, and cold. It should be signposted, and the ground covered with plastic tarps and/or absorbent blankets. The Hydrocarbon Containment Response Capacity for the containment of hazardous petroleum-derived hydrocarbon spills must follow the classification recommendations of the National Environmental Council (CONAMA) resolution 398/08. It must also be ensured through the unit's own resources or through a service provision contract with a contracted company. The types of leakage that serve as a reference for the correct dimensioning of the capacity response, according to the resolution of the National Environmental Council - CONAMA 398/08, are shown as follows: Small discharge up to 8 m<sup>3</sup>; Medium discharge between 8 and 200 m<sup>3</sup> and Large discharge/worst case over 200 m<sup>3</sup>. Equipment for Containment and Absorption of Hazardous Materials and Environmental Mitigation Trailer Kit Mobile containment booms - linear booms for protecting water bodies, without current, with a minimum width of: 3.5 x the width of the water body reached up to a maximum of 350 meters; Linear booms for protecting water bodies, with current, with a minimum width of: (1.5 + maximum speed in knots) x the width of the water body reached up to a maximum of 350 meters; Acquisition booms - linear booms for protecting water bodies, without current, with a minimum width of: 3.5 x the width of the water body reached up to a maximum of 350 meters; Linear booms for water body protection, with current, with a minimum width of: (1.5 + maximum speed in knots) x the width of the water body reached up to a maximum of 350 meters; Absorption blankets - a sufficient quantity to form a linear boom for water body protection, without current, with a minimum width of: 3.5 x the width of the water body reached up to a maximum of 350 meters; Sufficient quantity to form a linear boom for water body protection, with current, with a minimum width of: (1.5 + maximum speed in knots) x the width of the water body reached up to a maximum of 350 meters; Absorption peat - a sufficient quantity to absorb the hydrocarbon that was not collected or absorbed after the use of synthetic absorbents or suction, in locations that limit the use of this equipment due to their fragility and sensitivity to human presence, such as mangrove areas; Oil collection pumps - equipment with an oil collection capacity of 47.5 m<sup>3</sup>/h recommended per pump considering the worst-case spill level; Vacuum truck - with a recommended collection capacity of 2.8 m<sup>3</sup>/h and a minimum storage

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capacity of 20.0 m3. AEBM Eustáquio Dam item 12.2 defines actions to be taken in emergency situations to ensure the supply of drinking water to affected people located within flood zones. The plan contains measures coordinated with the Municipal Civil Defense and the institution responsible for water distribution in the municipality. The drinking water supply system for the urban area of the municipality of Paracatu is not compromised, as the collection of the Minas Gerais Sanitation Company and the urban population are outside the flood zone. However, the plan considers the number of people potentially impacted in the event of a Level 3 Emergency (ZAS and ZSS). This plan considers the possible impacts on the ZAS and ZSS water supply system. The information presented below concerns the regions affected by the hypothetical flood zone of the Eustáquio Tailings Disposal Facility. Thus, the buildings that will be affected were classified among Rural residences, Daycare centers, Public or commercial buildings, Schools and educational units, Hotels (with kitchen and laundry), Industries with restaurant, Industries without restaurant, Barracks or police stations, Restaurants and similar, Market and Hospitals (Health Unit). For each of these classes, the number of buildings and the number of people per building were considered, and with this, the total daily volume of water to be distributed in liters was determined. Thus, it was defined planned actions and strategies to guarantee the water supply to the affected population in the event of a rupture of the KBM tailings dam. The action protocol for Level 3 - Dam Filling aims to distribute bottled mineral water. Sampled examples of actions were: Activation of PAEBM and Crisis Committee; Contact with direct suppliers to supply bottled water and tents Installation of emergency support points and supply of mineral water to the population on a rotating basis. The resources identified required were: Bottled mineral water; Munck trucks for transporting bottled water with operator and assistant; Support tents for distributing mineral water in the municipality; Support/inspection teams for delivery to the support point The minimum recommended volume of water to be made available after a dam collapse as determined in Annex D of Resolution GMG 83/2024, the National Health Foundation (FUNASA) protocol for disaster situations was used as a reference to calculate the volume of water to be provided. These volumes provide basic access to the population, i.e., sufficient water for human consumption, food preparation, dishwashing and basic hygiene. Evidenced that KBM clearly defines that is prohibited the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. Besides, during the field audit, it was evidenced that KBM's emergency brigade does not have these kinds of chemicals in their emergency response kit. Besides, it was evidenced that Ambipar has a copy of the KBM's procedure prohibiting use of these chemicals in surface waters, as well as it includes this prohibition in its own procedures. During the field audit interviewed personnel showed to be aware of this matter. It was evidenced that PAE, PAEBM Eustaquio Dam, PAEBM Specific Tank XII , and PMA address the potential needs for environmental monitoring to identify the extent of and effects of cyanide release including sampling methodologies, parameters as well as where practical, possible sampling location. Please for

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additional information see Principle 4 related to sampling methodologies, parameters where practical, possible sampling locations. Reviewing a.m. plans it was noted that they clearly define all kind of information about sampling such as the sampling locations, sampling frequency, sampling quantity, sample preservation, and cyanide reference values in order to identify the extent and effects of cyanide release. All equipment used have been calibrated against standards nationally or internationally recognized such as NIST and INMETRO.

## Standard of Practice 7.6

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

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

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

Evidenced that KBM defined, documented, implemented and maintains methodology in order to review and evaluate the cyanide related elements of its Emergency Response Plan for adequacy on a regular basis. SSMA-PRO-157 items 7.87 and 7.88 establishes that the PAE and its respective annexes must be reviewed by a qualified professional whenever any of the following conditions exist: A) There is a significant change in industrial processes, service processes, area, or layout; B) There is a significant increase (more than 50%) in the number of people in the unit (fixed and floating population); C) The possibility of improving the plan is identified; D) And/or every 2 years. Besides, it is recommended that a qualified professional conduct a periodic audit of the plan when a significant change or any other process with a negative impact on workers is identified in a risk analysis. This audit should assess whether the plan is being implemented in accordance with ABNT NBR 15219, as well as verify whether the risks identified in the risk analysis prepared by the qualified professional have been eliminated, reduced, or controlled. An assessment report should be issued, describing the circumstances in which the requirements of this standard are not being met, explaining the foreseeable consequences of these deficiencies, and recommending the necessary measures to achieve compliance. It is also defined that after all mock emergency drills as well as after real emergencies PAE, PAEBM Eustaquio Dam and PAEBM Specific Tank XII shall be reviewed, evaluated and updated when necessary. Evidenced duly implemented. Sampled examples were: PAE revision 7 dated on April 30,2025, PAE revision 7 dated on, PAE revision 6 dated on May 30,2023, PAE revision 5 dated on September 13, 2021. Evidenced that KBM has been conducting mock emergency drills periodically as previously planned. It has been demonstrated that

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Kinross conducted emergency drills in compliance with the requirements of the International Cyanide Code in the years 2023, 2024, and 2025, covering the scenarios as per the respective items below: A, B, C, D, E, D, G, H, and I, and a scenario with a victim intoxicated by HCN.

## SIMULATIONS 2023

February 16, 2023 - Location: Chemical Laboratory

Basic Scenario: HCN Releases during Fires and Explosions

- Item D) Releases during fires and explosions

The item in question was tested, and the application of the techniques foreseen for a victim intoxicated by ACN gas originating from the incident (fire resulting in the generation of the gas) was satisfactory.

May 16, 2023 - Location: Hydrometallurgical Cyanide Warehouse - Plant I

Basic Scenario: Cyanide Leakage during the Discharge and/or Mixing Process, evolving into the emergency situations foreseen in the International Cyanide Code Standard Practice 7.1.2 items (C, E, G and I).

- Item C) Releases during unloading and mixing activities

Tested this cyanide release scenario during the unloading process, using a tanker truck as part of the scenario where, while unloading, a leak occurs in the coupling system of the connecting pipes.

- Item E) Pipe, valve, and tank ruptures

Ttested this scenario (Pipe, Valve, and Tank Ruptures). The action was tested involving the operation and mechanical maintenance teams in order to verify the problem-solving capacity. The chosen location was the 25-RE-HV-214B pump assembly and the coupling of the Isotank connection pipes.

- Item G) Power outages and pump failures

We tested this scenario (Power outages and pump failures) simulating a power outage supplied by the utility company, where it was necessary to put the emergency generator into operation.

- Item I) Failure in cyanide treatment, destruction, or recovery systems

We tested this scenario (Failure in cyanide treatment, destruction, or recovery systems) simulating failures in the measuring and dosing instruments in the Detox tank. 22/12/2023 - Location: Plant 01 and 02 and Adjacent Areas

Basic Scenario: Catastrophic generation of hydrogen cyanide gas in the hydrometallurgical plant as well as the beginning of a fire in the Truck Workshop building in Plant II. Item A) Catastrophic release of hydrogen cyanide from storage or processing facilities

Tested this catastrophic release scenario of hydrogen cyanide from storage or processing facilities. Simulated the general evacuation of the hydrometallurgical plant and adjacent areas.

## SIMULATED IN 2024

09/26/2024 - Location: Federal Highway BR 040, Unit of the 14th Delegation of the PRF - Federal Highway Police. Basic Scenario: Accident between two vehicles on the highway, involving a hazardous chemical product (cyanide), resulting in a leak, contamination of victims and the environment.

- Item B) Transportation Accidents

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In this scenario, the chemical emergency considered the transportation of the product on a heavily trafficked highway, Federal Highway BR 040, addressing the following situations inherent to the emergency scenario (leak due to a vehicle accident with a victim, containment of the leaked product, and suction of the product using a vacuum truck).

- item E) Ruptures of pipes, valves, and tanks

The observed item: the leak occurred on the side of the tank due to the impact of the vehicle against the tank, also affecting part of the connecting pipe of the valve (register) for attaching the hoses to discharge the product.

- Item H) Uncontrolled Infiltration

This hypothesis (uncontrolled infiltration) was observed on this occasion. Due to the spillage of the product generated by the collision of the two vehicles, the material flowed down the roadside gutter, reaching the ground and causing contamination/infiltration of the subsoil. The accident occurred in a paved area, but it reached the subsoil. 12/17/2024 - Area corresponds to Plant 01, 02 and Adjacent Areas

Basic Scenario: Catastrophic release of hydrogen cyanide

- Item A) Catastrophic release of hydrogen cyanide from storage or process facilities

Tested this scenario of a catastrophic release of hydrogen cyanide from storage facilities or in the process. We simulated the general evacuation of the Hydrometallurgy plant and adjacent areas.

SIMULATED 2025

03/28/2025 - Process Laboratory

- Basic Scenario: Victim Poisoned by HCN.

Evidenced that KBM defines a Tri Annual Mock Emergency Drill Plan. Evidenced duly implemented. Sampled examples were 2023 Mock Emergency Drill Plan, 2024 Mock Emergency Drill Plan and 2025 Mock Emergency Drill Plan. Evidenced that the Mock Emergency Drill Plan is in accordance with Brazilian Regulation Laws and ICMI requirements. Evidenced that KBM has been performed mock emergency drill as stated. Besides it was evidenced that KBM has been performed mock emergency drills related to PAEBM in accordance with ANM requirements. Evidenced that KBM have been conducting cyanide field emergency drills at least annually and besides include all the items discussed in the [Guidance for Use of the Mining Operations Verification Protocol](#), such as whether field drills address cyanide exposure scenarios in addition to release scenarios appropriate for the operation, and involve on-site and external personnel that may be expected to respond to cyanide incidents. Evidenced duly implemented. Evidenced that KBM has been evaluating after each emergency drill, the drill results. They are reviewed and discussed among the participants and when necessary, the opportunities of improvement raise-up during the drill are considered as corrective or preventive actions and managed adequately. Reports related to the drills and their reviewed were found in place. There have been no actual cyanide-related incidents since last three years Evidenced that the records of the simulated were duly evaluated and the pertinent actions to be done were defined, documented and implemented.

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## Principle 8 | TRAINING

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

### Standard of Practice 8.1

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

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

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

Evidenced that KBM has been trained all personnel who may encounter cyanide in cyanide hazard recognition. Evidenced that KBM established, documented, implemented and maintains internal documented procedures: RTS-PRO-061 Training and Development, version 24, and PROC-NOR-158 Cyanide Management, version 10, item 2.17, that define methodology for planning, performing, recording and evaluating effectiveness of training for all personnel who may encounter cyanide in cyanide hazard recognition the cyanide materials present at the operation, the health effects of cyanide, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure. Evidenced documented procedures KPB-32-GL-601-Q-008-MO Eustáquio Tailings Storage Facility Operation, Maintenance, and Surveillance Manual 2024, Version 1 and KPB-25-GL-601-Q-008-MO Specific Tank No. XII Leach Tailings Storage Facility - Operation, Maintenance, and Surveillance Manual 2024, Version 1, issued by Knight Piésold and Co. that define that training for new and existing personnel is considered a vital element of operations and maintenance. It is critical to the overall facility management that all personnel are properly instructed. The Owner or their designee should hold a new hire training session to go through this OMS Manual at the start of employment. It is expected that this document will be provided to personnel working on the tailings storage facilities so they may become familiar with the facility's requirements and guidelines. The Owner should also provide annual training courses for employees to reinforce the requirements of this OMS Manual, as well as inform them of any changes that have occurred since the last training. The Training sector is responsible for contracting institutions, structuring and disseminating the internal training schedule, as well as keeping training information updated and available on the training portal for consultation by employees and leaders, through the Senior system, as well as pending issues. The above-mentioned documented procedure clearly identifies the responsibilities and authorities involved such as Managers and Coordinators, Supervisors, Contracted Companies, KBM Employees, Occupational Safety and Health Management, Asset Security, Human Resources Management,

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Environmental Management (Responsible for supporting the structuring and review of the program content of the Socio-Environmental Management and International Cyanide Code training, in accordance with applicable legal, regulatory and internal requirements)), as well as Training Instructors. The Emergency Action Plan - Eustáquio Tailings Disposal Facility - Section I, item 14, Table 38 presents the systematic defined, based on articles 38, 47, and 48 of ANM Resolution No. 95/2022 (updated by ANM Resolution No. 130/2023), for internal training/simulations, as well as external training. Internal training, including the internal simulation exercises provided for in Article 47 of said resolution, must be carried out by the entrepreneur, with the supervision of the multidisciplinary technical team, at most every six months, within the annual cycle of the PAEBM Conformity and Operability Assessment (ACO). Additionally, within a one-year period, the entrepreneur must conduct two simulation exercises, one of which must be practical. These exercises must be spaced at least six months apart. The internal trainings listed are: Internal Expository Exercise, Internal Notification Flow Exercise, Internal Simulated Exercises: Hypothetical or Practical and Orientation Seminar. Among the external trainings, the following stand out: the External Simulated Exercise that takes place annually in partnership with the Municipal Civil Defense of Paracatu and the Orientation Seminar (Public Orientation Meeting) that takes place in the communities, annually, with the support of the Municipal Civil Defense of Paracatu. Evidenced duly implemented. Sampled examples were 2023 Training Needs, 2024 Training Needs and 2025 Training Needs. Evidenced training records maintained in accordance with Principle 8. Evidenced that KBM's internal documented procedures RTS-PRO-061 Training and Development, version 24 and PROC-NOR-158 Cyanide Management, version 10, item 2.17 establishes that cyanide recognition refresher training shall be performed at least yearly for all KBM's workers and contractors who may encounter cyanide. During the audit, the auditor reviewed several training records and comparing the pertinent dates concluded that KBM has been provided refresher training about cyanide hazard recognition as stated. Evidenced duly implemented. Internal documented procedure SSMA-PRO-157 PAE - Emergency Response Plan, version 7, establishes the pertinent schedule for refreshing training for Emergency Brigade. Reviewing pertinent records noted that it is duly implemented. Evidenced that cyanide-training records have been retained as stated. Evidenced that KBM internal documented procedure RTS-PRO-061 Training and Development, version 24, establishes that all trainings shall be recorded. For internal trainings it is used RTS-PRO-061-AN03 - Attendance List - Area Control and RTS-PRO-061-AN02 - Roll Call On-the-Job Training as training recording. Reviewing KBM is training records it was demonstrated that personnel received both initial and refresher training in cyanide hazard recognition. The trainings have been performed in accordance with KBM's 2024 and 2025 Training Plan. Evidenced that previously identified personnel have been trained as required in accordance with Cyanide Code requirements, Brazilian legislation and KBM's internal documented procedures.

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## Standard of Practice 8.2

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

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

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

Evidenced that KBM has been trained workers to perform their normal production tasks, including unloading, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Evidenced that internal documented procedure RTS-PRO-061 Training and Development, version 24, establishes methodology for Identification of Training Needs as well as for recording. When reviewing the afore mentioned documented procedure, it was observed that items 5 and 6, as well as the Training Matrix, clearly define the necessary training for each employee and contractor, including, for example: training in internal documented operational procedures, legal requirements trainings, in PAE, in PAEBM, which means the necessary trainings to perform their normal production tasks, including unloading, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Sampled examples were: KBM's internal documented procedures. The professionals who conduct training related to cyanide-related tasks possess the necessary technical knowledge of the activities performed, as well as effective communication skills. The instructors are trained and qualified multipliers through specific theoretical and practical training, covering risks, operational procedures, safety controls and emergency response, and training in effective communication practices. As required by KBM's internal documented procedures it was evidenced that KBM's training program clearly identifies the specific cyanide management elements that each employee must be trained in to properly perform the required tasks. Training needs clearly identify for each worker the necessary training in the respective operational procedures. Employees and contractors are trained during the admission period (introductory) and in refresher training held annually. In the general training matrix, there are tabs with the positions and the specific technical training, in which it is possible to see that for all positions the cyanide training is mandatory. Evidenced duly implemented. Sampled examples were: KBM's internal documented procedures. Sampled examples were: Board of Directors, General Management, Management of all areas, Supervisors, those responsible for the areas of safety, health and environment and change coordinators were trained in the SSMA-NOR-021 procedure - Management on Change; Responsible for Cyanide Management, Warehouse Management, Plant 1 Process Management and Hydrometallurgy, Project Management and Continuous Improvement, Dam Construction Management, Dam Compliance Management, Dam Monitoring and Safety Management, Utilities

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Management Asset Security Management, Occupational Health and Safety Management, Technological Development Management, Environmental Management, Sustainable Development Management, P1 Maintenance Management, Human Resources Management, Screening Management, Communications and Community Management, Integrated Management System were trained in SSMA-NOR-021 - Management on Change; Equipment Operator Installation III, IV and Operations Technician - PROC-PO-0008 - Leaching Operation, were trained in PROC-PO-0007 - Detox Operation, PROC-PO-0039 - CS 2000/CS 8000 Operation; Operators II were trained in PROC-PO-0013 - Receipt of Liquid Cyanide; Receipt of Liquid Cyanide, Property Security Personnel were trained in RTS-NOR-197-AN04 - Inspection of Liquid Cyanide and Briquette Cyanide Cargo, PAEBM Coordinator, Dam Compliance and Safety Team, Technical Team working directly on dams, Dam Conformation Team, Geotechnical Monitoring Team, Occupational Health and Safety Team, Environment Team, Community Relations Communication Team, Asset Security Team, Human Resources Team, Procurement Team, Public Services and Community Team have been trained in PAEBM Eustaquio Dam and PAEBM Specific Tank XII; Environmental Team, Mining Operations Team and Dam Team, Occupational Medicine Team, Shared Services Team, Drilling and Blasting Team have been trained in SSMA-PRO-039 - Environmental Monitoring Plan; During the field audit reviewing training records and interviewing pertinent personnel it was evidenced duly implemented. Evidenced that task training related to cyanide management activities have been provided by an appropriately qualified person. Evidenced that KBM's internal documented procedure Training establishes that training personnel should be familiar with the practices and procedures for which the training is given and experienced in effective communication techniques as required by the document Definitions and Acronyms for The International Cyanide Management Code dated on June 2021. Furthermore, the aforementioned procedure defines the criteria to demonstrate the adequate qualification of training personnel so that they are considered qualified as such. Evidenced duly established. Sampled examples were: The professional qualified to train a fire brigade is one person with training in Occupational Hygiene, Safety and Medicine, Civil Firefighter and/or occupational safety engineer duly registered with the competent regional councils or with the Ministry of Labor and with the military of the Armed Forces, the Military Police and the Military Fire Brigade, with complete secondary education and/or who had a specialization in Fire Prevention and Fighting (minimum course load of 60 class hours) and medical emergency techniques (minimum course load of 40 class hours) class) as well as a qualified professional is one person with proven training of at least 100 class hours in first aid and 400 class hours in preventing and fighting fires besides experienced in effective communication techniques.. Evidenced duly implemented, Evidenced that internal documented procedure Training Management establishes that all employees shall be trained prior to work with cyanide. Reviewing training records and through interviews during field audit evidenced that employees have been trained prior to working with cyanide are aware of performing theirs tasks including where cyanide can be present. Evidenced duly implemented, There is refresher training on cyanide management provided to ensure that employees continue to perform their

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jobs in a safe and environmentally protective manner in accordance with internal documented procedures RTS-PRO-061 Training and Development, version 24 and PROC-NOR-158 Cyanide Management, version 10, item 2.17 establishes that refresher training on cyanide management shall be performed at least yearly. Evidenced duly implemented, KBM's internal documented procedure RTS-PRO-061 Training and Development, version 24 establishes methodology for evaluating the effectiveness of cyanide training by testing and observation. Item 7.6 of this procedure stipulates that a Learning Assessment must be conducted during the onboarding process, and that the learning assessment will be used in job assignment training. The employee must have a grade equal to or higher than 70% (seventy percent) in the learning assessment, with the exception of Cyanide Management training, which must be equal to or higher than 80% (eighty percent). Release of the assignment is based on the average score obtained in the training. Evidenced duly implemented. Sampled examples were the training related to local fire brigades that have been trained and qualified in accordance with Brazilian legislation such as Regulatory Standard (NR) 23 - Fire protection of the Ministry of Labor and Employment; Technical Instruction (IT) 17/2016 of the Military Fire Department of the Minas Gerais State - Fire brigade; Law No. 12,929/13 - which provides for Fire and Panic Safety and Provides Other Measures; Decree No. 16,302/15 - regulates Law No. 12,929, of December 27, 2013, which provides on Fire and Panic Safety and Provides Other Measures; NBR 14023 - Registration of Leisure Activities; NBR 14276 - Fire Brigade - Requirements; NBR 14277 - Facilities and Equipment for Firefighting Training - Requirements; NBR 14608 - Professional Civil Firefighter; NBR 15219 - Fire Emergency Plan - Requirements. Sampled examples were: Brigade Members: Treinamentos, with a 24-hour workday, with the following programmatic content such as: Fire Prevention and Fighting. Applicable laws, Theory of fire, Means of spreading fire, Firefighting equipment, Abandonment of area, Fire prevention techniques, Introduction, Recognition, use of fire extinguishers and hydrants, Area Abandonment, Scene assessment, Basics of first aid, Cardiopulmonary resuscitation, Convulsions, fainting, burns and electric shock, Sprains, dislocations, bruises, fractures and hemorrhages, Techniques for immobilizing and transporting victims, Practical firefighting simulation. Evidenced duly implemented. Evidenced duly implemented. Sampled examples were: KBM's internal documented procedures. Sampled examples were: Board of Directors, General Management, Management of all areas, Supervisors, those responsible for the areas of safety, health and environment and change coordinators were trained in the SSMA-NOR-021 procedure - Management on Change; Responsible for Cyanide Management, Warehouse Management, Plant 1 Process Management and Hydrometallurgy, Project Management and Continuous Improvement, Dam Construction Management, Dam Compliance Management, Dam Monitoring and Safety Management, Utilities Management Asset Security Management, Occupational Health and Safety Management, Technological Development Management, Environmental Management, Sustainable Development Management, P1 Maintenance Management, Human Resources Management, Screening Management, Communications and Community Management, Integrated Management System were trained in SSMA-NOR-021 - Management on Change;

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Equipment Operator Installation III, IV and Operations Technician - PROC-PO-0008 - Leaching Operation, were trained in PROC-PO-0007 - Detox Operation, PROC-PO-0039 - CS 2000/CS 8000 Operation; Operators II were trained in PROC-PO-0013 - Receipt of Liquid Cyanide; Receipt of Liquid Cyanide, Property Security Personnel were trained in RTS-NOR-197-AN04 - Inspection of Liquid Cyanide and Briquette Cyanide Cargo, PAEBM Coordinator, Dam Compliance and Safety Team, Technical Team working directly on dams, Dam Conformation Team, Geotechnical Monitoring Team, Occupational Health and Safety Team, Environment Team, Community Relations Communication Team, Asset Security Team, Human Resources Team, Procurement Team, Public Services and Community Team have been trained in PAEBM Eustaquio Dam and PAEBM Specific Tank XII; Environmental Team, Mining Operations Team and Dam Team, Occupational Medicine Team, Shared Services Team, Drilling and Blasting Team have been trained in SSMA-PRO-039 - Environmental Monitoring Plan; For additional information see Principle 7. KBM's internal documented procedure RTS-PRO-061 Training and Development, version 24, establishes that training records shall be retained throughout an individual's employment documenting the training they receive as well shall include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials. The effectiveness of cyanide training is evaluated through planned task observation conducted by supervisors. During these observations, the correct adherence to operational procedures, safety practices, and the proper use of established controls are verified, allowing for the identification of opportunities for reinforcement or the need for retraining/updating. During the field audit the auditor reviewed training records as well as interviewed related personnel with the trainings performed. It was noted that workers have received initial task training; the task training addressed the critical elements of safe performance of tasks; qualified personnel provided the training; personnel were trained prior to working with cyanide in an unsupervised manner; and that KBM evaluated the effectiveness of task training. Evidenced duly implemented.

## Standard of Practice 8.3

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

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

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

Evidenced that all cyanide unloading, mixing, production and maintenance personnel have been trained in the procedures to be followed if cyanide is released, including decontamination and first aid procedures as required by internal documented

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procedure RTS-PRO-061 Training and Development. Evidenced that plant operators and maintenance employees have collaborated to elaborate the pertinent operational procedures as well as the procedures related to emergencies involving cyanide and when applicable PAE and PAEBM. Records of training were reviewed and noted that the operation and maintenance personnel have been trained in the pertinent internal documented procedures which clearly define the actions to be followed if cyanide is released (all have been trained in the operation's response procedures as required). During the field audit interviewing field personnel as well as reviewing KBM's training records, KBMs 2024 Training Plan KBM's 2023 Training Plan; KBM's Quality, Environmental, Safety and Occupational Health Policy, PAE, PAEBM, Training procedures, Operational Procedures it was clearly evidenced how KBM has been structured its response program is structured as well as that personnel involved in unloading and storing cyanide, cyanidation processes, and maintenance of cyanide facilities have received training regarding roles in response to cyanide releases and exposures it was noted that it is implemented as stated by The Code. Besides noted that field personnel are aware of such procedures. Evidenced duly implemented. Evidenced duly implemented, Reviewing pertinent training records as well as interviewing Emergency Response Coordinators and members of the Emergency Response Team it was evidenced that Emergency Response Coordinators and members of the Emergency Response Team have been trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment as well as interviewed personnel showed to be aware of this matter. Evidenced that KBM clearly identify training needs for Emergency Response Team. Evidenced duly implemented. Sampled example was: Fire Brigade Training Course Program: Brigade candidates must attend a course with a minimum workload of 16 hours, covering theoretical and practical aspects, focusing mainly on the risks inherent to the occupation group. Interviewed personnel showed to be aware of this matter. Evidenced duly implemented. Evidenced that internal documented procedures RTS-PRO-061 Training and Development establishes that KBM shall make external responders, to the extent that they are designated with specific duties or responsibilities in the Emergency Response Plan, such as local fire brigades and emergency medical services familiar with those elements of the Emergency Response Plan related to cyanide. Evidenced that have been retained appropriate records related to notes of meetings and/or correspondence with external responders. Reviewing pertinent records, it was evidenced that it is duly implemented. Sampled examples were: Note of meetings with: ANM; SEMAD; DRT, Firefighting Department; Civil Defense; SAMU; Communities (Ouro Fino, Mumbuca, Ribeirão e Rodeador) Municipal Hospital, Road Police. Evidenced that local fire brigades have been trained and qualified in accordance with Brazilian legislation such as Regulatory Standard (NR) 23 - Fire protection of the Ministry of Labor and Employment; Technical Instruction (IT) 17/2016 of the Military Fire Department of the Minas Gerais State - Fire brigade; Law No. 12,929/13 - which provides for Fire and Panic Safety and Provides Other Measures; Decree No. 16,302/15 - regulates Law No. 12,929, of December 27, 2013, which provides on Fire and Panic Safety and Provides Other Measures; NBR 14023 - Registration of Leisure Activities; NBR 14276 - Fire Brigade - Requirements; NBR

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14277 - Facilities and Equipment for Firefighting Training - Requirements; NBR 14608 - Professional Civil Firefighter; NBR 15219 - Fire Emergency Plan - Requirements. Evidenced that internal documented procedures Training Management establishes that KBM shall provide to all employees with designated roles or responsibilities in the event of a cyanide exposure or release refresher training for response to cyanide exposures and releases regularly conducted. During the audit through reviewing refresher training records of related to employees with designated roles or responsibilities in the event of a cyanide exposure and releases it was noted that KBM have been conducted refresher training annually as stated. Evidenced duly implemented. Evidenced duly implemented, Evidenced that internal documented procedures Training Management establishes that KBM shall retain training records documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials. Evidenced duly implemented. Evidenced duly implemented.

## Principle 9 | DIALOGUE AND DISCLOSURE

Engage in public consultation and disclosure.

### Standard of Practice 9.1

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

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

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

Evidenced that KBM defined, documented, implemented and maintains internal documented procedure COMU-NOR-079 Stakeholder Communication, Consultation and Participation that establishes methodology including criteria and guidelines for providing stakeholders with information on its cyanide management practices and engage with them regarding their concerns. Stakeholders are considered Individuals or groups of individuals who have an interest in the KBM's performance and the environment in which it operates, such as employees and their families, communities of influence, customers, shareholders, contractors, suppliers, government agencies, and others. Consultation is defined as Seeking opinions before making a decision. It is the process by which the company and its stakeholders jointly analyze and discuss issues of mutual interest related to health, safety, environment and social responsibility, where appropriate. Participation is defined as the Involvement in decision-making. This is the process of active and ongoing stakeholder participation in the development and critical analysis of the company's Health, Safety, and

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Environment practices and, when appropriate, in the development of the Integrated Management System. Responsibilities and authorities related to Dialogue and Disclosure are clearly defined and documented. Sampled examples of pertinent duties were: A) Area Leaders: Ensure that communications related to Health, Safety, Environment, and Social Responsibility are handled as determined by this procedure, providing employees with information relevant to their activities and guiding them on participation and consultation procedures; B) HSE Management: Support all areas of the company regarding information related to Health, Safety, and the Environment to be processed/discussed internally and externally. Manage communication records under their responsibility, as well as participate in any internal and external consultation processes that may be conducted. Develop the company's Structured DDS, proposing topics that address Health, Safety, the Environment, Responsibilities, and other matters relevant to the Integrated Management System; C) Community Communications and Relations Management: Support all areas of the company with internal and external communication processes. Manage activities in partnership with the community and information related to contact between parties (such as clarifying questions, complaints, suggestions, requests, communicating changes, etc.), in accordance with the communication policy. D) Human Resources Management: Support all areas of the company with information related to Social Responsibility that must be worked on/discussed internally and externally. Monitor communication records under your responsibility and participate in any internal and external consultation processes that may be conducted. Consultation involves the active engagement of workers and their representatives in occupational health and safety issues. This ongoing and structured process allows employees to express their opinions on risks and working conditions. The COM-NOR-079-AN05 Consultation and Participation Matrix spreadsheet organizes and documents how workers and their representatives will be involved in occupational health and safety issues. This matrix establishes communication channels and methods, identifies the groups of workers to be consulted, and defines the frequency of consultations. The goal is to ensure that consultation and participation are structured and effective, allowing employee opinions to influence decisions and contribute to the continuous improvement of the work environment. In addition to the consultation and participation matrix, consultations may also be conducted through committees and meetings, such as COMPS (Occupational Safety Professionals Committee), COMSECON (Contractors' Safety Committee), CIPAMIN (Municipal Community Safety Council), and other meetings. Records of this process should be kept in meeting minutes, official letters, and other documents, and archived by the responsible departments. The consultation process with external stakeholders (neighbors, regulatory agencies, government agencies, and others), when appropriate, may be conducted through specific meetings and/or staff, as needed. Records of the consultation processes should be archived by the responsible departments (HSE, Communication and Community Relations, and HR). Consultations related to social responsibility follow the provisions set forth in RH-MAN-091—Social Responsibility. Evidenced duly implemented. External Communication Formal or informal information related to the IMS received or transmitted, sent to the press, community, government agencies, suppliers, and other interested parties, at their request or at the initiative of Kinross Brasil Mineração. The instruments used to

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carry out this communication are:

- Dialogue Meeting – Monthly meetings held with leaders of neighboring neighborhoods. During these meetings, participant signatures must be collected and recorded on the attendance list, according to the COMU-NOR-079-AN01 form – Communication Attendance List. Communication records generated in this forum must be documented using the SSMA-PRO-090-AN01 form – Meeting Minutes, following the established minimum agenda, which includes:
  - o Environmental education;
  - o Transfers and incentives;
  - o Environmental controls;
  - o Culture and prevention;
  - o Integration program axes;
  - o Other topics as needed.
- Institutional Advertising – An initiative aimed at disseminating information through the media and communication channels (locally, regionally, or nationally).
- Integrar Program – Initiatives developed in the areas of Education, Culture, Employment and Income Generation, Health and Safety, and Environmental Education. Communication initiatives include visual identity management, campaigns, events, and publicity in the press and internal media.
- Visits Program – An initiative that allows the company to receive various stakeholders in its operational area in a structured manner, with the main objective of expanding, enhancing, and consolidating relationships with diverse audiences. Visits also provide an opportunity for Kinross to increase visibility on issues such as the safety of its operations and environmental controls, highlighting its social and environmental responsibility and values. They also enhance the positive perception of the relationship with the company, generating empathy and building trust. Registration for this program must be completed through an attendance list, institutional presentation, and a video of the managed production process, all of which are available through the Asset Security department.
- Community Environmental Monitors – This activity aims to provide transparency to the company's environmental monitoring and control processes. Community participation in monitoring activities contributes to the results, while also helping to disseminate information to the neighborhoods, as they are from neighboring communities. Biannual training is conducted with environmental monitors, and at the end of the training, data is collected. Participants' signatures are registered on the COMU-NOR-079-AN01 attendance list – Communication Attendance List.
- Open Channel (0800 038 1051) - The objective of this tool is to strengthen the company's relationship with the community by facilitating communication. Complaints, questions, and suggestions are handled within 7 days of their collection. Actions are taken to minimize negative impacts and maximize positive ones, and an analysis is subsequently performed. Information from this channel is compiled by agents and entered into our optimized system (Audire). All open communications are forwarded to the communications department, where management approves the obligations under their responsibility and directs others to the areas responsible for processing. This process ensures an efficient flow in transaction monitoring, ensuring that each one is properly addressed and handled by the appropriate departments. Handling of External Communications related to HSE and Social Responsibility are handled by those responsible for the Communications and Community Relations Department, HSE Management, and HR, considering Kinross Brasil Mineração's institutional alignment with relevant stakeholders. Communications involving suppliers/service providers are handled by the Procurement and Contract Management departments, with occasional support from contract managers in those departments. Incident reporting is covered by HSE

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Incident-NOR-086 – Incident Recording and Reporting, and Crisis Management Plan, which includes the necessary resources and strategies for communicating with public authorities, the press, hospitals, and other stakeholders. Communications with stakeholders involved in a specific process (characterized as an IMS routine) or that are not controlled by other mechanisms are not considered in the control mechanisms of the HSE, Community Relations, Communications, and HR departments. Examples include periodic analysis reports for environmental agencies, updates to the Occupational Health and Medical Control Program (PCMSO), correspondence regarding supplier/service provider qualifications, and organizational climate surveys. External communication also includes press relations, lectures, and other activities. Evidenced duly implemented, Besides reviewing COMU-NOR-079 Stakeholder Communication, Consultation and Participation the auditor evidenced that at Item 7.6 defines "Management for Compliance with Principle 9 of the International Cyanide Code - CIC" that KBM maintains a transparent dialogue with stakeholders regarding cyanide management, responsibly responding to identified concerns through the following actions: • Visiting Program – Provides interested parties with the opportunity to learn about the company. Before the visit begins, an institutional presentation of the company is given, followed by a video about the production process. This video provides an understanding of how cyanide is managed safely, ensuring the protection of workers, communities, and the environment. • Kinross Paracatu Gold Corporation Website – Information on cyanide management is available to anyone who wishes to access the content and learn about best practices for responsible cyanide management. • Open Channel (0800 038 1051) – Aims to strengthen the company's relationship with the community by facilitating communication regarding any warnings or suggestions related to noise, dust, dismantling, cyanide, among other issues. • Emergency response drills – These are conducted periodically by Kinross and the Civil Defense to guide, train, and prepare stakeholders. Evidence from these drills is available for public consultation on the Kinross website, and digital copies can be accessed at the Paracatu City Hall, the Paracatu Fire Department, the Unaí City Hall, and the CEDEC (Emergency Management Center). • Incident reporting – Incidents involving cyanide follow the criteria defined in the SSMA-NOR-086 standard – Incident Recording and Reporting. For additional information please see Principle 7. Evidenced duly implemented. External Verification and Stakeholder Engagement During audits, Kinross cooperates with external auditors by demonstrating evidence of compliance, addressing non-compliances through corrections, corrective, and preventive actions, and evaluating and pursuing opportunities for improvement to its Integrated Management System whenever possible. KBM establishes and maintains procedures to regularly communicate data and other information regarding compliance with the standard's requirements to all stakeholders. Kinross demonstrates its willingness to engage in dialogue with all stakeholders. KBM identifies as relevant stakeholders for its management system based on COMU-NOR-079-AN03 - Stakeholder Mapping. This is a dynamic spreadsheet that lists the target audience, expectations, and actions necessary to meet stakeholder expectations and maintain a good relationship with them. KBM also engages with stakeholders through Internal and Supplier Audits, through contractual clauses that reference the need for compliance with the standard, inviting the union to participate in the standard's processes, training employees, and

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complying with legislation, where applicable.

## Standard of Practice 9.2

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

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

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

Evidenced that KBM has been established, documented implemented and maintains written descriptions, in Portuguese language, how their activities are conducted, how cyanide is managed as well as how these written descriptions are available to communities and other stakeholders. Reviewing the material that was has been used it was evidenced that the information materials such as brochures, newsletters, What Sapp's, Booklet, internal and external meetings, local government offices, on websites etc (please for additional information see 9.1). Evidenced that KBM established, documented, implemented and maintains internal documented procedure Crisis Plan which was developed based on KBM's operational risks within the scope of application and relevant to Cyanide. Evidenced that above documented procedures define the creation of the crisis committee what is made up of permanent members and floating members and areas that become part of the committee according to the type of crisis. Part of Committee has executive functions, and consultative functions. According to nature crisis, roles can and should be updated. In the Crisis Committee of KBM the areas of the company integrate to act together, there is no hierarchical prevalence - except for the functions of General Manager responsible for final validation of actions and communications to the public. The responsibilities and authorities of Crisis Committ ee participants are clearly defined and documented. All Interested parties are duly communicated about KBM's Crisis Plan. Including the communities. Sampled examples were por Communities of Cunha, Santa Rita, Lagoa de Santa Rita, São Domingos, Amoreiras II, Bela Vista II, Alto da Colina e Santo Eduardo., Paracatu City Hall; Unai City Hall, Hospital Municipal, Hospital São Lucas, Paracatu Civil Defense, Unai Civil Defense,. Evidenced duly implemented. Please, for additional information See Principle 7. Evidenced duly implemented. here is no significant percentage of illiterate people in Paracatu . Anyway, during visits of KBM public relationship representatives to communities. Information like cyanide management and hazards have been given by speeches and booklets with photos are provided. Although any incident involving cyanide has been occurred last three years audit evidenced that, through its public relations process and stakeholders engagement policies and procedures, have specific communication channels to provide information, as required, related to cyanide related incidents. The information reported to the noted

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

- a) Cyanide exposure resulting in hospitalization or fatality - In the event of such incident, the operation shall communicate the Regional Labor Office of Bahia State (DRT ) Minas Gerais
- b) Cyanide releases off the mine site requiring response or remediation -In the event of such incident, the operation shall communicate with FEAM, Minas Gerais State Water Management (IGAM), Civil Defense and involved communities.
- c) Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment - In the event of such incident, the operation shall communicate with FEAM, IGAM, Civil Defense, DRT Minas Gerais and involved communities.
- d) Cyanide releases on or off the mine site, requiring reporting under applicable regulations - In the event of such incident, the operation shall communicate with IGAM, FEAM and DRT Minas Gerais
- e) Releases cause applicable limits for cyanide to be exceeded - In the event of such incident; the operation shall communicate with GAM, FEAM and DRT Minas Gerais.

This operation has not experienced any compliance issues during the previous three-year audit cycle. During the audit it was evidence that KBM maintains a Safety, Health, Environment and Quality (SHEQ) management system. This system ensures an adequate cyanide management in accordance with the Cyanide Code Principles. Since the last three years KBM did not experience neither any significant cyanide related incidents nor any compliance problems related to cyanide management. Being usual in all audit process, through sampling, opportunities of improvement (corrective and preventive) may exist and were not identified in this opportunity..Please for additional information see ICMI [Guidance for Use of the Mining Operations Verification Protocol](#) (Page 16 of 89) regarding the Compliance Statement.

Audit team conclusions:

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Based on the sampled evidences, the physical conditions of the site (installations), in the interviewed personnel and in the reviewed documentation, the audit team concluded that the cyanide management system is FULLY implemented and maintained in accordance with the ICMI Mining Operation Verification Protocol.

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