ICMI Cyanide Code Gold Mining Certification Audit

Summary Audit Report

Boroo Pte. Ltd.
Lagunas Norte Mine

La Libertad, Peru

Submitted to:
The International Cyanide Management Institute
1012 14th Street, NW – Suite 825
Washington, DC 20005
USA

2026 Audit Cycle

15929 Avenida Venusto, Apt. 225,
San Diego,
CA, 92128, USA
www.smartaccess.us

Table of Contents

Auditor's Finding 9
Auditor's Attestation 9
DETAILED AUDIT REPORT 10
1. PRODUCTION AND PURCHASE: Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner. 10
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. 10
2. TRANSPORTATION: Protect communities and the environment during cyanide transport. 10
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. 10
3. HANDLING AND STORAGE: Protect workers and the environment during cyanide handling and storage. 11
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. 11
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 14
4. OPERATIONS: Manage cyanide process solutions and waste streams to protect human health and the environment. 16
4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures. 16
4.2 Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings. 21
4.3 Implement a comprehensive water management program to protect against unintentional releases. 21
4.4 Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions. 23
4.5 Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water 25

4.6 Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater. 25
4.7 Provide spill prevention or containment measures for process tanks and pipelines. .. 26
4.8 Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications. 28
4.9 Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality. 29
5. DECOMMISSIONING: Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities. 30
5.1 Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment. 31
5.2 Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities. 32
6. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide. 33
6.1 Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them. 33
6.2 Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures. 34
6.3 Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide. 37
7. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities. 39
7.1 Prepare detailed emergency response plans for potential cyanide releases. 40
7.2 Involve site personnel and stakeholders in the planning process. 41
7.3 Designate appropriate personnel and commit necessary equipment and resources for emergency response. 43
7.4 Develop procedures for internal and external emergency notification and reporting. . 44
7.5 Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals. 45
7.6 Periodically evaluate response procedures and capabilities and revise them as needed. 46
8. TRAINING: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner. 47
8.1 Train workers to understand the hazards associated with cyanide use. 47
8.2 Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment. 48

8.3 Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.....51

9. DIALOGUE AND DISCLOSURE: Engage in public consultation and disclosure.....52

9.1 Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns. 52

9.2 Make appropriate operational and environmental information regarding cyanide available to stakeholders. 53

Mining Operation: Lagunas Norte Mine

Mine Owner: Boroo Pte. Ltd

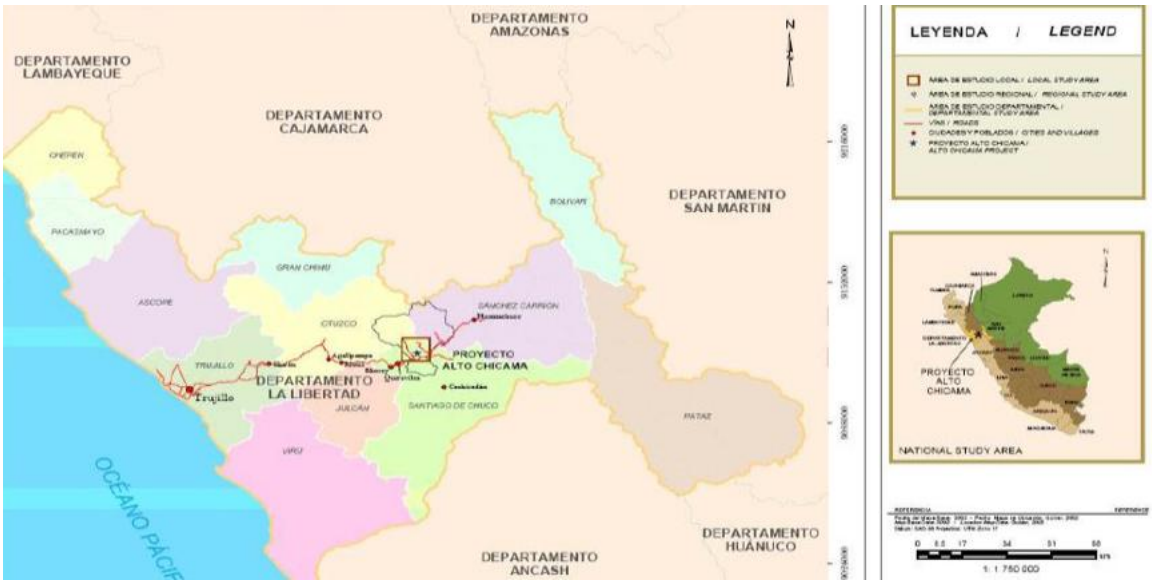
Mine Operator: Minera Boroo Misquichilca S.A.

Name of Responsible Manager: Robert Andrew Mayne-Nicholls Sécul, General Manager

Address and Contact Information:
Av. Santo Toribio 173 - Via Central 125.
Edificio Real Ocho, Piso 9 Interior 901,
San Isidro, Lima, Peru
Telephone: +51 (01) 6211088; +51 (044) 604300
rmaynenicholls@lagunasnorte.com

Location and description of the operation

The location of the Lagunas Norte mine is presented in the picture below.



The Lagunas Norte Mine, operated by Minera Boroo Misquichilca S.A. (MBM), is located in the Alto Chicama Mining District in north-central Peru (Province of Santiago de Chuco, District of Quiruvilca, Department of La Libertad), 140 kilometers east of the coastal city of Trujillo. The property is situated in the Peruvian Andes Mountains at an elevation of 4,000 to 4,260 meters above sea level and straddles the continental divide. The mine is accessed year-round by road from Trujillo and Huamachuco. The climate in the project area is characterized by defined rainy and dry seasons. The rainy season extends from November to April when approximately 1.5 meters of rainfall occurs.

Lagunas Norte operations comprise an open pit mine, two waste rock storage areas, two geomembrane-lined heap leaching facilities, process and storm water pond system, acid rock drainage treatment plant, barren solution treatment plant, a Carbonaceous Material Optimization Project (CMOP) plant to process or with carbon content, a Carbon in Column (CIC) plant, and a Merrill Crowe processing plant to recover gold, silver and mercury as a by-product and.

Ore is placed in the heap leach facilities by truck. There are two heap leach facilities fully lined with geomembrane and drain by gravity to the Sedimentation Ponds 1 and 2. Once suspended solids settle, the pregnant leach solution is directed to the Pregnant Leaching Solution (PLS) Ponds 1 and 2, each of which is connected to an emergency overflow pond or Process Overflow Ponds (POP) that provide storage for extreme storms and draindown. Gold is recovered using

conventional methods of heap leaching with dilute sodium cyanide solution. The pregnant solution from PLS ponds is processed at the Merrill Crowe and CIC plants. The concentrated solution of the CIC plant (super pregnant solution) is sent to the Merrill Crowe plant for recovery. The precipitate obtained is then smelted to get Doré bars.

Lagunas Norte has also implemented a Carbonaceous Material Optimization Project (CMOP) plant, which consists of an integrated milling circuit and subsequent leaching into tanks and activated carbon (CIL) for processing. The milling circuit also includes a classification system of ore in a wet environment for the purpose of removing the carbon content of the ore through a washing drum. The thick material resulting from this classification follows its conventional processing, while fine ore with carbon content remains in the milling circuit and subsequently leaches in the tanks. A cyanide solution is added to the leaching tanks (CIL) with a free cyanide concentration of approximately 300 ppm. Gold leaching and adsorption on the activated carbon occur simultaneously in each tank. The activated carbon is retained by inter-stage meshes that allow the flow of the pulp. The carbon flows through the circuit from the addition of sterile carbon in the last tank until removal in the first leach tank once it is loaded. The loaded carbon is then sent in batches to the desorption circuit existing in the CIC plant. The leached ore, once filtered, is transferred through a conveyor belt into the existing leach pad and then transported by trucks to a designated area within the pad.

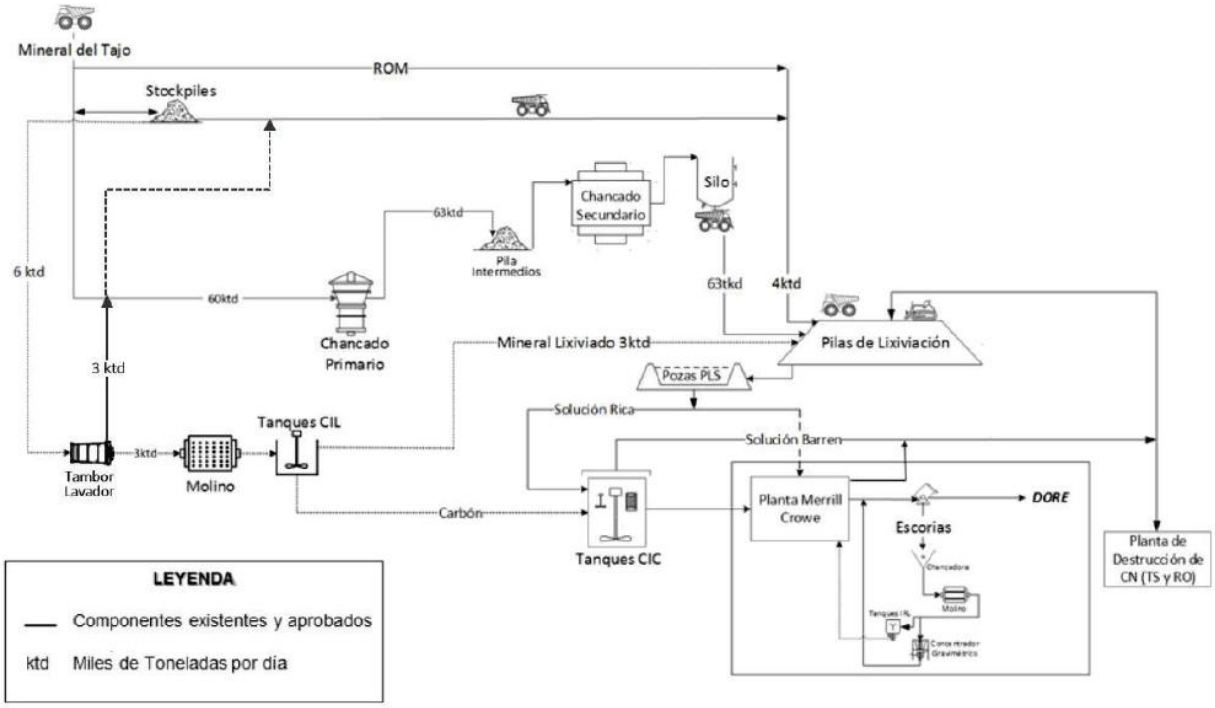
Lagunas Norte uses “raincoats” on the heap leach facilities to minimize infiltration of rainfall on inactive portions of the heap. The raincoats are high-density polyethylene (HDPE) geomembrane covers that convey clean precipitation to the storm water management system. The auxiliary facilities required for the mining operation include administration offices and buildings, laboratories, warehouses, maintenance shops, emergency facilities, electric power distribution, water supply, roads, fuel and reagent storage tanks, drainage structures, and explosive storage areas.

The scope of the recertification audit includes the following cyanide facilities: Two geomembrane-lined heap leach pads (Pad 1 and Pad 2), sedimentation ponds 1 and 2; Pregnant Leaching Solution (PLS) Ponds 1 and 2 with Leach Collection Recovery Systems (LCRS); Process Overflow Ponds (POP) 1 and 2 with LCRS; a Carbon in Column (CIC) plant; a Merrill Crowe processing plant; a three-staged Carbonaceous Material Optimization Project (CMOP) plant; however, only CMOP-2, and CMOP-3 have cyanide solution; a Carbon in Leach (CIL) plant; an excess water treatment plant; solution channels and pipelines between the leach pads, ponds and the processing plants; a cyanide mixing area including cyanide mixing and storage tanks at the Merril Crowe plant; two cyanide mixing facilities on top of Leach Pad 1 and 2; two barren tanks; and a solid cyanide storage area. There are no tailings facilities at Lagunas Norte.

Lagunas Norte receives solid sodium cyanide briquettes in one ton “bag in box” intermediate bulk container (IBC) plywood boxes, which are delivered to the site in sea containers transported by truck.

Lagunas Norte remained certified under the Cyanide Code until 2024, when its certification lapsed. Because the site chose to pursue certification again in 2026, this audit was conducted under the scope of an initial certification audit.

The Lagunas Norte mine ore processing flowsheet is presented below:



Fuente: MBM
Elaborado por: INSIDEO

Auditor's Finding

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

The information reviewed for this initial certification audit considered the period from May 2025 through June 2026.

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

Auditor's Attestation

Audit Company:	SmartAccEss Socio Environmental Consulting, LLC
Lead Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Mining Technical Auditor:	Fernando Rodriguez Emal: fernando@rdzconsulting.com
Date(s) of Audit:	June 8th – 11th, 2026

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

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

Lagunas Norte Mine		September 29th, 2026
Name of Operations	Signature of Lead Auditor	Date

SUMMARY AUDIT REPORT

1. PRODUCTION AND PURCHASE: Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

Standard of Practice

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 1.1

Discuss the basis for this Finding/Deficiencies Identified:

Sodium cyanide in briquettes purchased by Lagunas Norte during the certification period were supplied by a manufacturer certified in compliance with the International Cyanide Management Code (the Code). The site procured cyanide exclusively from Tongsuh Petrochemical Corporation Ltd., whose production facility is located in Ulsan, Republic of Korea, based on an agreement with Samsung C&T Corporation (Trading and Investment Division). Tongsuh facility was originally certified under the Code in 2008 and has maintained continuous certification. The most recent certification was issued on April 8, 2026. The auditor verified the certification status of the production facility through a review of the International Cyanide Management Institute (ICMI) website and the most recent summary audit reports for the facility.

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

Standards 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: ■ in full compliance
□ in substantial compliance

□ not in compliance with Standard of Practice 2.1

Discuss the basis for the Finding/Deficiencies Identified:

Lagunas Norte maintains records of the chain of custody documents provided by Samsung C&T Corporation, starting from Tongsuh Petrochemical Corporation Ltd. located in Ulsan, Republic of South Korea, including the maritime transporter and land transporters that handle the cyanide brought to its site, identifying all the parties in the supply chain. Sodium Cyanide from Tongsuh Petrochemical was delivered by a combination of road and rail contractors in Korea. Road distribution from the plant to the railroad facility in Ulsan is conducted by Hae Dong Logistics and then transported by railroad from Ulsan to Pusan Port by the Korea Railroad Corporation. Samsung C&T Corporation South America Supply Chain is a consolidation of all marine carriers and ports used to distribute their cyanide from Korea to their global customers, in this case, from Pusan Port in Korea to the Port of Callao in Lima as its final maritime destination. Road transportation of Cyanide from the Callao Port in Lima to Lagunas Norte was conducted by Empresa de Transportes N&V S.A.C.

All cyanide transporters involved in Lagunas Norte Cyanide supply chain during the certification period were code certified companies or provided evidence of an independent third-party audit within the recertification timeframe. Tongsuh Petrochemical facility in Korea was originally certified under the Code in 2008 and has maintained continuous certification. The most recent certification was issued on April 8, 2026. Samsung C&T Corporation South America Supply Chain was last certified under the Code in September 2023, which includes road and rail contractors in Korea, marine supply chain from Busan Port in Korea to Callao Port in Lima, including trans-loading and interim storage facility at the port. Cyanide transportation once in the interim storage facility at the port of Callao in Lima to the mine site was conducted by Empresa de Transportes N&V S.A.C, currently certified under The Code in March 2025.

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

Standards 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: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 3.1

Discuss the basis for this Finding/Deficiencies Identified:

The cyanide unloading, storage, and mixing areas were designed and constructed with solid international engineering practices, as determined by the initial certification audit in 2007, and remain substantially unchanged since that time. Lagunas Norte receives solid sodium cyanide briquettes in one ton “bag in box” intermediate bulk container (IBC) plywood boxes. The boxes are stored in a secure, concrete floor and stem wall contained and covered building. As indicated in previous certification audit reports, the cyanide unloading and storage area were designed by Tecnicas Metalicas Ingenieros in September 2005 following the overall project design criteria established by SNC-Lavalin in 2003. However, Lagunas Norte has not retained these records for this certification audit. To satisfy the requirement of the Code for this Standard of Practice, the site presented a report dated December 2025 developed by CIEMS SQB consultants “Verification of infrastructure and updated drawings of the cyanide storage area” that includes a revision and topographic survey of the facilities and new as-built drawings. The cyanide mixing area is located inside the Merrill Crowe plant. The concrete at the Merrill Crowe plant was constructed according to Golder Associates engineering criteria and specifications, while the cyanide mixing and storage tanks were constructed by SNC-Lavalin. Lagunas Norte maintains design drawings stamped by a certified professional engineer, as-built drawings, and QA/QC records at the plant area. The field component of the audit confirmed that the cyanide mixing area is located within the internal structure of the Merrill Crowe plant on concrete hardstanding and maintained in good condition. Cyanide mixing and cyanide storage tanks were located within containment concrete berms, which are sized to contain at least 110% volume of the largest tank. Lagunas Norte has implemented two cyanide mixing areas on top of Leach Pad 1 and Leach Pad 2 to improve gold recovery. As-built drawings for these facilities were available for review by the auditors.

The solid cyanide storage area is located in a dedicated facility located on competent concrete hardstanding, which is located far away from communities or surface waters. The unloading and storage areas are approximately 0.5 kilometers away from any surface water with no flow route for connection. Access to the storage area is controlled with the appropriate cyanide warning signage, is secured from weather and has adequate ventilation vents along the four sidewalls. The cyanide mixing and storage area is located approximately 25 meters from the offices in the plant building. Inside the plant, the mixing and storage tanks are inside a separate, controlled-access room. Access to the cyanide mixing area is strictly controlled and even trained individuals require specific approval from control room personnel prior to entering. All entry to the cyanide storage and mixing/storage tank area is documented. The cyanide mixing area has two fixed HCN monitors with visual and audible alarms to detect any HCN gases and evacuate the area if necessary. In addition, operators have handheld HCN monitors. The cyanide mixing area has a ventilation system that operates continuously. In addition, the cyanide mixing and storage tanks have vents with exhausts that exit through the roof of the building. The two cyanide mixing/storage tanks located on top of the leach pads are also away from people and surface waters.

Lagunas Norte has a preparation area for cyanide that includes a mixing tank and a cyanide storage tank. There are level indicators and high-level alarms installed on both tanks. These levels are continuously monitored from the process control room to ensure they are operational.

There are both a Hi-level (89%) and Hi-Hi level alarm (90%) on the cyanide storage tank and a Hi-level (86%) and Hi-Hi level alarm (90%) on the cyanide mixing tank. The interlock valve from the mixing tank to the storage tank shuts off automatically when the Hi-level indicator is reached. The auditors observed screenshots in the control room showing that the level indicators were functioning correctly. Visual alarms are also located in the plant control room. The auditors reviewed preventive maintenance records for high level alarm sensors at the cyanide storage and mixing tanks. The site calibrates these sensors every 6 months. The two cyanide mixing/storage tanks located on top of the leach pads also have level indicators and high-level audible alarms installed on both tanks.

Cyanide mixing and storage tanks are located in a separate room in the Merrill Crowe plant and contained within concrete berms with good condition concrete flooring with epoxy sealing to avoid infiltration. The bermed containment areas are sized to contain 110% of the largest tank volume and have been confirmed both as part of engineering specification checks and during the field audit. This containment area is also connected with the larger Merrill Crowe secondary containment which provides additional capacity. In addition, there are automatic sump pumps that maintain the secondary containments free of any fluids. In the case of the two cyanide mixing/storage tanks located on top of the leach pads, the liner of the leach pads itself provides the necessary containment to prevent seepage to the subsurface. During the field inspection, the containment area was noted to be in good condition, with no significant damage, spalling or cracking evident.

The cyanide mixing and storage tanks are located within a bermed concrete impoundment with epoxy sealing, which were observed to be of sound integrity and considered suitable for containment in the event of a release or tank failure. The concrete was designed and constructed as 150 mm thick reinforced with rebar on 6 by 6 inches spacing with a compressive strength of 25 MPa. The berms and containment areas are also subject to regular weekly inspections. As an additional containment control, the drainage system from the plant area directs all meteoric water to a plant emergency pond, where any cyanide solution spill would be collected and pumped back to the production circuit. In the case of the two cyanide mixing/storage tanks located on top of the leach pads, the liner of the leach pads itself provides the necessary containment to prevent seepage to the subsurface.

The solid cyanide storage area is located under a roof, secured from weather, off the ground and constructed over good condition concrete hardstanding. It also has drainage ditches to direct meteoric water away from the facility. The risk of potential contact with meteoric water is very low. The solid cyanide storage area is located in a dedicated facility with ventilation vents present along the four sidewalls. The vents are designed and constructed in such a way that prevents inlet of water in the facility. As such, it provides adequate ventilation and build-up of hydrogen

cyanide gas is unlikely to occur. In addition, procedure GSC-PLN-003 “Unloading and storage of sodium cyanide” requires that HCN gases are monitored prior to entering the storage facility to ensure that the vents are providing adequate ventilation in the unlikely event that water contacts the solid cyanide. The cyanide mixing and storage tanks are inside a separate, controlled-access room within the plant building, with adequate ventilation features. The cyanide mixing area has an automated ventilation system that operates continuously. In addition, the mixing and storage tanks have vents with exhausts that exit through the roof of the building. The cyanide mixing area has two fixed HCN monitors with visual and audible alarms to detect any HCN gases and evacuate the area if necessary. Access to the cyanide mixing area is strictly controlled and specific approval from control room personnel is required. The two cyanide mixing/storage tanks located on top of the leach pads are located outdoors and have natural ventilation. The solid cyanide storage area is located within the fenced, secure area of the mine with entry restricted at the mine gate. Access to the storage area is restricted, with the main access door locked when not in use and with no public access. The storage can only be opened with presence of two people carrying portable HCN monitors to verify that HCN gas concentration is within the safety concentration range before accessing the building. Appropriate warning signage is posted at access points. The solid cyanide storage area is dedicated to sodium cyanide storage only, with no other materials permitted to be stored. No storage of other materials was observed during the field inspection. There is a mercury storage facility adjacent to the cyanide storage facility. Lagunas Norte conducted a risk analysis prior to its construction in 2015 and determined that the materials were not incompatible. The cyanide mixing and storage tanks are located in a separate room in the Merrill Crowe plant and contained within concrete berms with good condition concrete flooring with epoxy sealing to avoid infiltration. Mixing with incompatible materials is unlikely to occur.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 3.2

Discuss the basis for this Finding/Deficiencies Identified:

Procedures for managing empty cyanide containers are described in OPR-PLN-337 “Treatment and disposal of cyanide bags and boxes”. The auditors observed a cyanide mixing process and disposal of cyanide containers and verified that the procedure was followed at all times. Lagunas Norte receives solid sodium cyanide briquettes in one ton “bag in box” intermediate bulk container (IBC) plywood boxes. Procedure OPR-PLN-337 “Treatment and disposal of cyanide bags and boxes” specifies measures undertaken to ensure that cyanide packaging materials are managed in such a manner to prevent their use for any other purposes. The procedure specifies

that bags and plastic materials are temporarily stored in the reagent storage area within the Merrill Crowe plant and then are transported by an authorized contractor to the leach pad. The cyanide bags and boxes are then disposed of in trenches located in inactive areas of the leach pad and buried. In the case of cyanide mixing on top of the leach pads, once the mixing process is finalized, the cyanide boxes and bags are transported directly to the trenches inside the leach pad. Procedure OPR-PLN-339 “Cyanide preparation” requires that empty cyanide bags are rinsed three times with rinse water after the cyanide preparation is completed. Rinse water is then sent back to the process. This practice was observed by the auditors during the field visit. In the case of cyanide mixing on top of the leach pads, procedure OPR-PLN-302 “Cyanide mixing at the Leach Pad” indicates that the bags are not triple rinsed to avoid having a freshwater line inside the leach pad area. Once the mixing is finalized, the operators, wearing appropriate personal protective equipment (PPE), transport the bags directly to the trenches inside the leach pad. The auditors assessed this practice and concluded that these bags do not need to be triple rinsed, as the risk of contamination during transport and disposal is negligible. Empty cyanide bags, once rinsed, are folded and placed temporarily, along with the wooden boxes, in the reagent storage area within the Merrill Crowe plant area and then are transported to the leach pad for final disposal. Lagunas Norte keeps a register of cyanide bags and boxes disposed of in the leach pad. Cyanide is not purchased in reusable containers and, as such, no packaging is returned to the supplier.

Lagunas Norte has procedure OPR-PLN-339 “Cyanide preparation” that outlines the requirements for inspection, observation and mixing of cyanide solutions; as well as the operation, maintenance, and function of valves, pumps and various interlocks within the cyanide mixing process. It also includes instructions for the prefill of the cyanide mixing tank with barren and caustic solution. The procedure includes a checklist for cyanide preparation that requires measuring pH levels, inspection of emergency showers and eyewash stations, inspection of HCN monitors, among other requirements for safe cyanide management. Lagunas Norte has procedure GSC-PLN-003 “Unloading and storage of sodium cyanide” that provides instructions for the safe handling of sodium cyanide boxes including handling upon receipt, storage and transport to the mixing area. Procedure OPR-PLN-339 “Cyanide preparation” requires the use of cones to isolate the area during the activity. The auditors verified that this task was performed as outlined in the procedure. The auditors also verified that the cyanide boxes in the cyanide storage area as well as in the cyanide mixing area did not have any evidence of rupturing and puncturing. Procedure GSC-PLN-003 “Unloading and storage of sodium cyanide” limits stacking of cyanide containers to a maximum height of three per stack. This practice was also verified in the field. During the field visit it was also observed that the cyanide boxes were stored within marked areas in the floor and separated from the storage walls to allow for inspections. Procedure OPR-PLN-339 “Cyanide preparation” includes a requirement for immediate clean-up of any spilled cyanide including flushing the secondary containment of the cyanide mixing area with fresh water. No spills related to cyanide mixing were reported in the last year. Procedure OPR-PLN-339 “Cyanide preparation” requires operators to use the appropriate PPE during mixing activities. These include steel-toed boots, rubber gloves, rubber boots, full face respirator, Tyvek and Tychem coveralls with attached hood, hardhat, hearing protection, and personal HCN

detector. The procedure also requires that at least three workers are present during the mixing activity. One operator is stationed at floor level, helps hook the cyanide bag in the overhead crane and observes the other two operators who, working from an elevated deck near the top of the mixing tank, break the bag, introducing the content into the mixing tank. Also, the cyanide preparation activities are observed from a room that overlooks the mixing and storage area and from the control room through a closed video circuit. Procedure OPR-PLN-302 “Cyanide mixing at the leach pad” includes the same safety measures for conducting cyanide mixing activities at the leach pad, such as appropriate personal protective equipment and having a second individual observe from a safe area. The cyanide briquettes in the boxes already come with red colorant dye. This was verified by the auditors during the filed visit. A cyanide mixing at the plant area event was observed during the audit. The review indicated that Lagunas Norte has appropriate procedures and practices to handle and prepare cyanide solutions in a safe manner. In the case of the two cyanide mixing facilities on top of each leach pad, Lagunas Norte has implemented the same controls as in the plant area following the requirements of the Code.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The scope of the recertification audit includes the following cyanide facilities: Two geomembrane-lined heap leach pads (Pad 1 and Pad 2), sedimentation ponds 1 and 2; Pregnant Leaching Solution (PLS) Ponds 1 and 2 with Leach Collection Recovery Systems (LCRS); Process Overflow Ponds (POP) 1 and 2 with LCRS; a Carbon in Column (CIC) plant; a Merrill Crowe processing plant; a three-staged Carbonaceous Material Optimization Project (CMOP) plant; however only CMOP-2, and CMOP-3 have cyanide solution; a Carbon in Leach (CIL) plant; an excess water treatment plant; solution channels and pipelines between the leach pads, ponds and the processing plants; a cyanide mixing area including cyanide mixing and storage tanks at the Merril Crowe plant; two cyanide mixing facilities on top of Leach Pad 1 and 2; two barren tanks; and a solid cyanide storage area. There are no tailings facilities at Lagunas Norte.

Lagunas Norte has developed several procedures for the safe operation and maintenance of cyanide facilities, including unloading, mixing and storage facilities, heap leach operations, Merrill Crowe and CIC plant operations, CMOP operations, and cyanide detoxification. There are approximately 40 procedures related to cyanide management. In addition, Lagunas Norte achieved ISO14001:2015 certification of its environmental management system in April 2025 and is valid for three years, which guarantees the retention of documents and records. All procedures include pictures of the tasks to be performed, a section related to PPE requirements, considerations of safety hazards and potential impacts on the environment. Procedures are reviewed and updated every two years to ensure they reflect current practices. Procedures were reviewed and found to be sufficiently detailed to enable safe operation.

Lagunas Norte has operational manuals and procedures that include critical parameters for the safe operation of cyanide facilities. The Quebrada Laguna Negra operation manual, dated January 2026, includes a decision table for the management of water in Quebrada Laguna Negra. This decision table includes maximum operating levels for all the processing ponds (i.e. PLS, POP, sediment ponds, raincoat ponds, Acid Rock Drainage (ARD)) and cyanide concentrations in underdrains, among other critical parameters. Procedure OPR-PLN-004 “Cyanide detoxification at industrial level with metabisulfite” includes the maximum cyanide concentration allowed in water discharges, which has been established at 0.1 mg/l WAD (Weak Acid Dissociable) Cyanide. The document “Update and Calibration of Water Balance Model in Goldsim” dated May 2026, prepared by Purificare Peru SAC, includes the design storm event for solution ponds (100 years, 24-hour storm event, which has been estimated at 92.5 mm) and is used in the Lagunas Norte water balance model. Procedure OPR-PLN-339 “Cyanide preparation” indicate that pH levels in the process are to be maintained above 9.8 to avoid generation of HCN gases and to maximize recovery in the plant. Lagunas Norte has not established a maximum level of cyanide concentration in process ponds (i.e. PLS, POP), as these concentrations largely depend on the operational needs. To protect birds and other wildlife from the adverse effects of cyanide process solutions, Lagunas Norte has implemented controls such as birdballs, netting and fences in ponds that could have cyanide concentrations higher than 50 mg/l WAD cyanide.

Lagunas Norte has developed and implemented operating plans and procedures for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide unloading and mixing activities as well as for storage facilities, processing facilities, heap leach facilities and all associated piping and pumps as having contact with cyanide. The Quebrada Laguna Negra operations manual has a decision table for the management of water in Quebrada Laguna Negra including maximum operating levels for all process ponds and how to operate them to retain the designed storage capacity in these facilities.

There is a Management of Change (MoC) procedure that is used at Lagunas Norte. The MoC process includes the identification and review of the proposed changes; analysis and evaluation

of the changes by a multidisciplinary team including health, safety and environmental aspects; approval, and subsequent implementation of the changes. The process includes signed off by all areas that participated in the evaluation of the changes. Action plans to implement the changes are developed and followed up until closure. The management of change process is used consistently at Lagunas Norte. A couple of examples of management of change formats related to cyanide facilities were reviewed. One of them is related to the construction of a concrete pad for safe transport of cyanide boxes from the storage area to the cyanide mixing area. The other one is related to the increment of capacity of the Zadra tank #1 in the CIC circuit.

Lagunas Norte has implemented contingency procedures for heap leach facilities and process plants to respond to upsets in water balance, deviations from design conditions, problems identified by inspections, and to address temporary shutdowns of the facilities. Procedures include step-by-step measures for stopping and starting the plant facilities, events of a power outage, provide response measures for emergencies related to failures of cyanide equipment, and response plans to address upsets in the process water balance. The Quebrada Laguna Negra operation manual has a decision table for the management of water in Quebrada Laguna Negra including actions to be taken in case of deviations from operational parameters that could affect the water balance of the operation (e.g. PLS and POP pond levels above its maximum operational level; cyanide concentrations above 0.08 mg/l WAD cyanide in raincoats and underdrains; or when WAD cyanide concentration levels from sediment pond #4 before discharging to the environment are above 0.1 mg/l, among others). As mentioned above, Lagunas Norte has several procedures for the safe operation of cyanide facilities. These procedures include actions to be taken to regain control of the operation in case of upset conditions identified during cyanide facilities monitoring and inspections. Each cyanide facility has its own emergency procedures. There are procedures for stopping the Merrill Crowe plant and the CIC plant and CMOP areas #1, 2 and 3 in case of emergency. Procedure OPR-PLN-004 “Cyanide detoxification at industrial level with metabisulfite” includes procedures to follow when there are high cyanide levels in the detox discharge. The drainage system from the plant area directs all meteoric water to the plant emergency pond, where any cyanide solution spill would be collected and pumped back to the process. This pond represents an additional contingency measure in addition to the existing secondary containment systems of the process plant facilities. In case cyanide solution overflows outside of the plant containment systems due to an upset condition, it would be captured in this emergency pond. In case of power outages, Lagunas Norte has procedure TMA-PLN-514 “Energizing and taking of loads from generation plant – power cut” that describes the steps to be taken to provide power and continue operating critical facilities. In relation to a temporary closure or cessation of operations scenario (e.g. union strike) Lagunas Norte has identified critical activities and personnel required to maintain the water balance of the facilities and avoid potential overflow of cyanide solution. The Lagunas Norte Closure Plan includes a section “Temporary Closure” that provides general measures to be taken related to cyanide facilities in such scenario, such as continuous maintenance of water management canals, pipes and pumping stations; operation of the excess water treatment plant; recirculation of process solution from the PLS ponds; installation of raincoats in leach pads;

deenergize major facilities that will not be operated during temporary closure, inspections of cyanide facilities, monitoring activities, among others.

Tanks holding cyanide solutions are inspected on a weekly basis for signs of corrosion, leakage and general deficiencies. Nondestructive tests (NDT) are also conducted to determine the integrity of the tanks holding cyanide solutions. NDT tests were conducted to 31 tanks in 2025, and there is a program in place to conduct these tests every 6 months or annually. Tanks #3, #4, and #5 of the CIC plant were repaired in 2025 as a result of the NDT tests. Weekly inspection forms include specific items to inspect secondary containments for their integrity, the presence of fluids and their available capacity. None of the containment areas has any drains to the adjacent land surface. The heap leach pads and the PLS and POP ponds are inspected on a weekly basis including liner integrity, Leak Collection Recovery Systems (LCRS), ponding on the heap surface, and levels at PLS and POP ponds. Examples of these inspection forms were reviewed by the auditors. There is one LCRS at each of the ponds (PLS and POP). Lagunas Norte takes samples of water between the liners on a weekly basis and analyzes them for cyanide concentrations and volumes of pumped fluids are recorded. Pipelines, pumps and valves in the Merrill Crowe, CIC and CMOP plants, and heap leach areas are inspected on a weekly basis. Any deficiencies identified are corrected and verified in the following inspection. Inspection forms for the plants and heap leach facilities were verified for the inclusion of items related to deterioration and leakage of pipes, pumps and valves. In addition, Lagunas Norte also conduct NDT tests to the most critical cyanide pipelines. The heap leach pads, PLS and POP ponds are inspected on a weekly basis for critical aspects according with requirements of the Quebrada Laguna Negra operations manual, including integrity of surface water diversions and available freeboard. Historical freeboard for the last year at the PLS and POP ponds was reviewed by the auditors and verified that the ponds were managed according to the design criteria. The auditors conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, water diversions, ponds freeboard and heap leach facilities. Records of the inspections conducted by Lagunas Norte to cyanide facilities were reviewed by the auditors.

Lagunas Norte has developed and implemented an inspection program for cyanide facilities with different frequencies. Process Plant personnel have a monthly inspection program that includes inspections to leach pads facilities on a weekly basis, and equipment inspections (pumps, valves, tanks, among others) at the Merrill Crowe, CIC plants and CMOP plants. Records of inspections for the last year were verified by the auditors. The Maintenance area also conducts inspections of cyanide facilities as part of their preventative maintenance program that complements the Process area inspection program. The Environmental department has an annual inspection program according to the requirements of the Quebrada Laguna Negra operation manual which frequency of inspections is every six months. Annual inspections of ponds and dams conducted by the Engineer of Record. The Quebrada Laguna Negra operation manual dated January 2026 includes all the inspections, monitoring and maintenance requirements that need to be conducted for the safe operation of cyanide facilities and to ensure they are operated according to design parameters. In the case of inspections for wildlife mortalities, process personnel

conduct daily visual inspections at the PLS, POP and leach pads as part of their routine activities. The auditors reviewed records of inspections related to wildlife sighting and mortalities. The inspection program of cyanide facilities and frequency of inspections were found to be sufficient to ensure that the operation is safe and functioning within design parameters. The auditors reviewed inspections records for the last year and verified that inspections are conducted in a consistent manner.

Lagunas Norte maintains digital records of inspections including the date of the inspection, the name of the inspector and observed deficiencies. Records of the inspection forms conducted in the field by the Process area are retained. Lagunas Norte has two mechanisms to document, track and close corrective actions identified during inspections: Corrective actions identified that are related to maintenance of equipment at the Merrill Crowe, CIC and CMOP plants or leach pad areas are managed by the Maintenance area. These corrective actions are managed using the Oracle Asset Management software, where work orders are tracked, prioritized, planned and closed. The auditors verified that corrective actions related to cyanide facilities were prioritized for prompt implementation. All other corrective actions not related to maintenance of equipment that are identified through inspections conducted by either Process, Leach pad or the Environmental areas are tracked by each department, implemented and followed up until closure. The auditors reviewed examples of items identified during inspections and records of the implementation of the corrective actions until they were closed.

The Maintenance area has a preventive maintenance program for pumps, pipelines, valves, flow meters, level sensors, pH meters, HCN monitors, sump pumps, tanks, emergency back-up power generators, and cyanide facilities in general. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time it is needed to keep equipment and installations working properly. Lagunas Norte develops a weekly plan for preventive maintenance using the Oracle Asset Management software. Preventive maintenance plans are generated automatically for each week. Corrective maintenance occurs as a result of work orders based on inspections. Work orders generated from inspection forms are entered into the system, including assigned priority. Examples of preventive maintenance records for the last year for different facilities were reviewed during the audit.

Lagunas Norte facilities require 20 MW (Megawatts) of power that is provided from the national grid. In case of power outages, the power requirements to run critical equipment and maintain the water balance is 8.3 MW. Lagunas Norte has nine emergency power generators of 1.2 MW each of them, with a total capacity of 10.8 MW of backup power. This emergency power system is connected to the critical equipment identified that needs to be running to prevent any release to the environment in case of a prolonged power outage. Lagunas Norte has implemented preventive maintenance programs for the back-up power generators to ensure they are operational when required. Lagunas Norte provided examples of preventive maintenance records for the backup power generators for the last year. A review of these records confirmed that the generators are checked every two weeks for fuel level, lighting, heating, and are start

tested. Oil changes and fuel flushes are also conducted periodically as part of the preventive maintenance program. This inspection would trigger a corrective maintenance work order if required. In case of power outages, Lagunas Norte has procedure TMA-PLN-514 “Energizing and taking of loads from generation plant – power cut” that details the steps to be taken to provide backup power when required.

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

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

Discuss the basis for this Finding/Deficiencies Identified:

Not applicable to Lagunas Norte. This Standard of Practice solely applies to milling operations.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Lagunas Norte has a positive water balance, with an average annual precipitation of 1500 mm. The operation continued using the comprehensive, probabilistic water balance simulation software, Goldsim. This model is used to generate different precipitation scenarios based on meteorological data collected at site to determine water treatment requirements as well as water needed for the process during the dry season. An external consulting company (Purificare Peru SAC) updates in Goldsim the data on a monthly basis (i.e. climate, leaching rate, pond levels, treated water discharges, among other parameters) and calibrates the model annually. The water balance includes the following factors: solution application rates; precipitation, evaporation, retention of water in the ore, raincoats on the heap leach facilities to minimize infiltration of rainfall on inactive portions of the heap; potential power outages, and the capacity and availability of water treatment systems for surface discharges. A description of the water balance model and calculations is included in Appendix 1 of the document “Update and Calibration of Water Balance Model in Goldsim” dated May 2026, prepared by Purificare Peru SAC.

The document “Update and Calibration of Water Balance Model in Goldsim” dated May 2026, describes the solution rates applied to the leach pads, which varies between 10 – 28 liters/hour/m^2. This information is collected daily from each cell that is under leaching and is used as an input into the Goldsim model. The document “Update and Calibration of Water Balance Model in Goldsim”, dated May 2026 considers a 100-year/24-hour storm event of 92.5 mm of rain. This design storm duration and storm return interval of 100 years provides a sufficient degree of probability that overtopping of the ponds can be prevented during the operational life of the facility. The auditors reviewed current free volume capacity of the PLS and POP ponds and verified that there is enough capacity to contain the 100-year/24-hour storm event. There is a weather station at Lagunas Norte (ESTM01) that collects rainfall data since 2002. ESTM01 collects meteorological data such as precipitation, evaporation, temperature, wind speed and direction, solar radiation, atmospheric pressure, and relative humidity. Data from this station and from the Shorey weather station in Quiruvilca, which is located in the vicinity of the mine operation (records from 1965 until 2002), were analyzed for use in estimating the site design precipitation. Lagunas Norte provided the most recent certificate of calibration of ESTM01 weather station. The heap leach facilities at Lagunas Norte have a surface water control system for controlling and safely directing runoff generated from upgradient watersheds around the heap leach ponds and plants. There is no freezing potential at Lagunas Norte and the amount of snow accumulation and thawing in the area is negligible. The water balance includes the following factors: solution application rates; precipitation, evaporation and seepage rates; retention of water in the ore (estimated at 2-3%), raincoats on the heap leach facilities; potential power outages; and water treatment systems for surface discharges. The heap leach operations recirculate water from the PLS and POP ponds and include addition of fresh water to maintain the required water balance for operations. No additional solution losses other than evaporation and discharges to surface water are considered in the water balance model. The water balance model considers power outage contingency simulation. The model can simulate a certain number of hours of power outage and generate different scenarios. These contingency scenarios could only occur in case the primary source of power (national grid) and the nine emergency power generators are not operational, which is a very unlikely scenario. The cyanide destruction and water discharge systems are included in the water balance model. The cyanide destruction system has a treatment capacity of 600 m3/hr. Water from the cyanide destruction system is then directed to the reverse osmosis plant for subsequent discharge from sediment pond #4 into Quebrada Laguna Negra. To reduce water treatment needs, Lagunas Norte has installed raincoats on the heap leach facilities to minimize infiltration of rainfall on inactive portions of the heap.

The Quebrada Laguna Negra operation manual includes a water balance section that indicates the maximum solution level in the ponds. In the case of POP1 the maximum solution level is 417,000 m3 and for POP2 is 613,716 m3. As mentioned before, PLS1 and PLS2 have the capacity to overflow to POP1 and POP2, respectively. Overall maximum capacity of all 4 ponds is 1’380,000 m3, while the maximum operating level of all 4 ponds is 1’261,000 m3. The cyanide destruction system has a treatment capacity of 600 m3/hr. Inspection records for the heap leach facilities and ponds for the last year were reviewed. The auditors also reviewed monitoring data

for the last year and verified that the solution volumes at the PLS and POP ponds were always managed according to the design criteria.

Lagunas Norte conducts weekly inspections and monitoring activities to heap leach pads and ponds to ensure they are operated according to the design criteria and requirements of the Quebrada Laguna Negra operation manual. This frequency is considered adequate considering the high precipitation rates in the area. Inspections include liner integrity, LCRSs, ponding on the heap surface, and levels at PLS and POP ponds, solution collection systems and diversion channels around the heap leach facilities. Records of inspection forms for the last year were reviewed. Freeboard and solution volumes in the PLS and POP ponds are monitored daily from the control room. The auditors reviewed free volume capacity data for the last year and verified it was managed according to the design criteria.

Lagunas Norte has a weather station on site (ESTM01) that collects rainfall data since 2002. ESTM01 collects meteorological data such as precipitation, evaporation, temperature, wind speed and direction, solar radiation, atmospheric pressure, and relative humidity. Data from this station and from the Shorey weather station in Quiruvilca, which is located in the vicinity of the mine operation (records from 1965 until 2022) were analyzed for use in estimating the site design precipitation. The information from ESTM01 weather station is collected by the environmental area, and once validated, is included in the water balance model every month for calibration purposes, along with other data such as solution application rate, pond levels, treated water discharges, among other parameters. The last calibration of the Goldsim water balance model was conducted in May 2026. The auditors reviewed on-site meteorological monitoring data and found them to be complete.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Lagunas Norte has implemented bird balls to restrict access of wildlife to open waters where WAD cyanide exceeds or could exceed 50 mg/l, which is the case at the PLS1, PLS2 and POP1. The auditors verified that the birdballs were effectively covering all water surfaces of the ponds of PLS2 and POP1. Birdballs at PLS1 were scattered and did not cover all the water surface; however, WAD cyanide concentration at this pond is consistently below 50 mg/l. Sediment ponds of Leach Pad 1 also have birdballs. POP2 pond does not have birdballs as WAD cyanide concentrations are below 50 mg/l. In addition, there is netting on smaller ponds that can contain process solution such as the plant emergency pond, sediment ponds in Phase 5 of Leach Pad

2, and a solution pond on top of Leach Pad 1. The auditors verified that the netting at these ponds were in good condition. Some of these ponds are fenced to prevent access of livestock. The process plant is also fenced. The secondary containment of the process pipelines that run from the leach pad to the ponds and back to the plant were free of process solution during the audit. Procedure OPR-PLN-132 “Measurement and control of irrigation density on leach pad” requires daily inspections to check for ponding and the required steps to handle surface ponding, including manual or equipment excavation to aid drainage and improve infiltration. No wildlife mortalities associated with cyanide have been reported in the last year.

Cyanide application rates at both leach pads range between 60 – 150 mg/l WAD cyanide. Lagunas Norte analyzes WAD cyanide daily at the PLS and the POP ponds. WAD cyanide concentrations at the PLS and POP ponds were reviewed since May 2025, and the values reported were consistently below 50 mg/l. PLS1, PLS 2 and POP 1 had maximum WAD cyanide concentrations of 47 mg/l. POP2 had a maximum WAD cyanide concentration of 48 mg/l. This pond receives solution from CMOP-3 and Merrill Crowe, and Lagunas Norte manages dilution in the pond to prevent WAD cyanide values exceeding 50 mg/l. Sediment ponds from Leach Pads 1 and 2 have the same values as PLS1 and PLS2 ponds. For those ponds that could contain WAD cyanide above 50 mg/l, Lagunas Norte has implemented birdballs or netting to prevent wildlife mortalities in the solution pond on top of Leach Pad 1 (WAD cyanide levels of 100 – 150 mg/l).

The PLS, POP and sediment ponds that could have WAD cyanide concentrations above 50 mg/l have either bird balls or netting on top to prevent access of wildlife. In addition, the heap leach pads are inspected daily for ponding and wildlife mortalities. Procedure MAM-PLN-019 “Control of mortality and sighting of wildlife” indicates that any person can report any sighting or mortality of wildlife by using a QR code. Lagunas Norte maintains a register of wildlife mortalities. No wildlife mortalities associated with cyanide have been reported in the last year.

Procedure OPR-PLN-132 “Measurement and control of irrigation density on leach pad” requires daily inspections to check for ponding and the required steps to handle surface ponding, including manual or equipment excavation to aid drainage and improve infiltration. Another alternative considered in the procedure is to install a netting on top of the ponding area if the ponding cannot be resolved quickly. During the site visit, no ponding was observed on the surface of the heap leach pads. No wildlife mortalities associated to cyanide have been reported during the last year due to ponding on leach pads. In addition, procedure OPR-PLN-133 “Startup of leaching in slopes” indicates that leaching should occur with a gradient towards the center of the leach pad to avoid overspray of solution and/or saturation of leach material and potential slides outside the leach pad area. Leaching is conducted at least 5 meters away from the perimeter berm of the leach pad.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Lagunas Norte discharges process treated water to Quebrada Laguna Negra, a tributary to the Rio Chuyugual from the east sediment pond #4. Point QNSP-20 is located at the sediment pond #4 discharge. The maximum cyanide concentration allowed in water discharges has been established at 0.1 mg/l WAD Cyanide. The standard in receiving waters downstream of the point of discharge is also 0.1 mg/l WAD cyanide. Monitoring of WAD cyanide at point QNSP-20 is conducted on a weekly basis; concentrations of WAD cyanide were reviewed for the period between January 2025 and April 2026 and the maximum value reported was 0.029 mg/l, which is well below 0.5 mg/l.

Lagunas Norte has to comply with the Peruvian General Water Law (LGA) at monitoring station SWQN-40, located downstream of the point of discharge from sediment pond #4. In addition, SWCH-30 and SWCH-38 upstream and downstream respectively of the confluence of the Quebrada Laguna Negra and Río Chuyugual are also monitored. Concentrations of free cyanide were reviewed for the period between January 2025 and April 2026. The concentration of free cyanide did not exceed the 0.022 mg/l standard at point SWQN-40. The maximum free cyanide value recorded in this period was 0.0105 mg/l. Monitoring at SWQN-40 is conducted every 2 weeks. Water quality samples were analyzed by ALS Peru, which is an external lab located in Lima. The auditors verified quality control and quality assurance information of the laboratory.

Lagunas Norte does not have any indirect discharges to surface water from cyanide facilities. Maximum values of free cyanide did not exceed the 0.022 mg/l standard at monitoring point SWQN-40 due to direct discharges to the Quebrada Laguna Negra. Water collected from the underdrains on leach pads and ponds do not discharge directly to the environment. If WAD cyanide concentrations are detected above 0.08 mg/l then the water is pumped back to the process; otherwise, it is sent to pond ARD#2. In addition, there is a monitoring system in place including both surface and groundwater monitoring stations located downgradient of leach pads and ponds to identify presence of any seepage. Review of surface and groundwater monitoring data confirms no cyanide related impacts have occurred to surface or groundwater receptors.

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

The operation is: ■ in full compliance

□ in substantial compliance
□ not in compliance with Standard of Practice 4.6

Discuss the basis for the Finding/Deficiencies Identified:

There is no designated downgradient beneficial use, nor any actual point of groundwater use, nor any applicable groundwater standard in the area surrounding the Lagunas Norte operation. The few houses in the vicinity of the mine are on the valley sides and obtain their household water from springs or gorges on the valley sides without potential connection to mine waters. Regardless of that, Lagunas Norte has taken measures to manage seepage from cyanide facilities including a composite clay and geomembrane liners with underdrain systems in the leach pads, ponds and pipelines corridors; leak detection recovery systems between liners of the ponds; pumps to return underdrain waters to the process circuit; secondary containments for cyanide facilities in the Merrill Crowe, CIC Plants and CMOP areas, standard operating procedures for management of cyanide facilities, among others.

There is no actual or designated downgradient beneficial use, nor any actual point of groundwater use identified by the Water National Authority (ANA), nor any applicable groundwater standard for cyanide or other parameters. Regardless of this, Lagunas Norte has a groundwater monitoring network that analyses for WAD cyanide concentrations. There are three groundwater monitoring wells downgradient of cyanide facilities (QLN-02-08C, GWLN-15, and GWLN-17). Data collected for the period February 2025 - March 2026 indicate no detection levels for cyanide species (Total, WAD and free cyanide reported values < 0.001 mg/l).

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Spill prevention and containment measures are provided for all cyanide unloading, storage, mixing and process solution tanks. Tanks located at the Merrill Crowe plant (cyanide mixing, cyanide storage and barren tanks) and the CIC plant (barren and elution tanks) are all within an interconnected concrete secondary containment which is in good condition and provides a large containment area. Secondary containment of the cyanide preparation area is connected with the larger secondary containment of the Merrill Crowe plant. Tanks located at the CMOP areas (Area 2 and 3) also have concrete secondary containments to manage 110% of the largest tank. The Merrill Crowe, CIC and CMOP plant areas are contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. All tanks are installed on ring beam foundations and are equipped with an impermeable barrier between the tank bottom and the

ground. The concrete floors are sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process. The sump pumps are included in the preventive maintenance routes. The secondary containment systems are inspected as part of the process facilities inspection program. The auditors observed that the concrete containment systems were in good condition at the time of the audit and free of any fluid.

Secondary containments for tanks at Lagunas Norte can hold 110% of the single largest tank plus precipitation. Some secondary containments are interconnected while other ones are stand-alone. The secondary containment volume calculations were reviewed and deemed sufficient. In the Merrill Crowe Plant and CIC Plant, the maximum tank volumes are 1,286 m3 and 280 m3, respectively and the secondary containment volumes are 1,877.89 m3 and 572 m3, respectively. The CIC barren tank (1,000 m3) has a separate containment area with a volume of 1,400 m3. In addition, the Plant Emergency Pond provides significant excess capacity should the secondary containments be compromised. The CMOP-2 area has 6 tanks of 1,000 m3 each and the secondary containment volume is 1,100 m3. The CMOP-3 area has 2 tanks and a thickener. The volume of the largest tank at CMOP-3 is 1,300 m3 and the secondary containment volume is 1,430 m3. Containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. The secondary containment areas are constructed of reinforced concrete. In some cases, polycarbonate containment walls are placed to account for pressurized stream of released solution that could shoot over the secondary containment boundary. The auditors observed that the secondary containments were maintained empty, with no materials stored inside them.

All containment areas have sump pits with dedicated pumps that return collected solutions into the process circuit. There are no discharges from secondary containments to the environment. The plant emergency pond has a pump to send any contained solution to the CIC barren tank and from there is sent to the leach pad. The pumps have automatic level sensors to keep the secondary containments free of water. These pumps are inspected on a weekly basis and are included in the preventive maintenance program. As stated in the Code, no specific written procedures are necessary as the containment systems have sumps and dedicated pumps and piping to return solutions to the production process. Lagunas Norte uses “raincoats” on the heap leach facilities to minimize infiltration of rainfall on inactive portions of the heap. The raincoats are high-density polyethylene (HDPE) geomembrane covers that convey clean precipitation to 6 raincoat ponds. Procedure OPR-ILN-111 “Discharge of raincoats ponds” details the process to sample water collected in the raincoat ponds prior to discharge to the environment.

Cyanide pipelines at Lagunas Norte are located within a secondary containment provided for at the process plant and leach pad areas, including concrete and plastic lined channels as well as pipe-in-pipe containment where necessary. In some cases, polycarbonate containment walls are placed at the CIC plant to account for pressurized stream of released solution that could shoot over the secondary containment boundary. There are no buried pipelines in the plant area. Pipelines connecting the leach pads, process plant, PLS and POP ponds are lined with HDPE through all its extension to convey any leaks to larger containment areas. In addition, Lagunas

Norte has installed protection devices (metal boxes) along the pipelines to prevent any high pressure releases outside of containment. Cyanide pipelines are inspected on a weekly basis as part of the routine inspections by plant personnel and are also included in the preventive maintenance program.

No cyanide pipelines present a direct risk to surface water as there is no surface water body that requires special protection over and above the containment measures previously described. Pipelines remain unchanged and retain the same safety features identified in previous audits.

As stated in previous audit reports, all cyanide mixing, storage and process tanks and pipelines are constructed of coated carbon steel, stainless steel, and HDPE; which is compatible with high pH cyanide solutions.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Quality control and quality assurance (QA/QC) programs have been implemented during the construction of cyanide facilities at Lagunas Norte. The mine maintains files with QA/QC reports for the facilities constructed since the beginning of operations including all 7 phases of Leach Pads 1 and 2, POP and PLS ponds, Merrill Crowe, CIC, the new CMOP plant (Areas 2 and 3), the cyanide preparation areas in the leach pads, and the solution pond on top of Leach Pad 1. QA/QC activities were conducted throughout the facility. Although complete information was not found for all of them, in some cases construction verification inspection reports that were part of the annexes of the QA/QC dossiers of the facilities were reviewed, which allows confirming that these activities were carried out.

Lagunas Norte QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The mine maintains files with the QA/QC reports for its cyanide facilities including the Merrill Crowe, CIC and CMOP plants, leach pads, ponds, cyanide storage area and cyanide detox plant. The QA/QC reports for leach pads and ponds include soil compaction tests, subgrade and concrete testing, fabrication material certificates and technical specifications for HDPE drainage products, liners, piping, electrical and mechanical instrumentation. QA/QC reports also include non-destructive test logs, destructive test logs, vacuum tests, pre-weld tests, destructive sample tests, and repair controls. The QA/QC program and the records reviewed and verified during the audit demonstrate that the materials are according to design specifications,

the compaction has been adequate, the foundations of the tanks are suitable, geomembranes are appropriate and have been placed according to design and assembly specifications.

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

QA/QC records for cyanide facilities are retained by Lagunas Norte. The auditors reviewed several documents in hard copy and electronic versions. The auditors also verified that QA/QC records are retained for all cyanide facilities including leach pads, ponds, Merrill Crowe and CIC plants. In the case of the CMOP areas 2 and 3, Lagunas Norte did not retain these records, however, the site provided alternative evidence, which is further explained below.

Lagunas Norte has as-built drawings/certification for most cyanide facilities which are properly stamped by a qualified engineer. In the case of the cyanide unloading and storage the site presented a report dated December 2025 developed by CIEMS SQB consultants “Verification of infrastructure and updated drawings of the cyanide storage area” that includes a revision and topographic survey of the facilities and new as-built drawings. Lagunas Norte also has quality control and quality assurance documentation for most of its cyanide facilities. In the case of the CMOP plant (Areas 2 and 3), Lagunas Norte presented QA/QC verification report conducted by PROMAP in 2025 for these facilities including chutes and hoppers, tanks, concrete and civil works, structural steel assembly, mechanical assembly of pipes, supply and installations, among others.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte uses a third-party vendor (ALS Peru) for monitoring activities at the mine site. ALS has a written procedure called “Water sampling, preservation and transport” dated April 2025, that provides a general overview of their services. This procedure provides details related to sampling techniques, duplicate and blank samples, sampling equipment, calibration of field equipment, preservation techniques, and chain of custody procedures. Lagunas Norte communicates to ALS Peru the monitoring program on a monthly basis including sample

locations and cyanide species and other parameters to be analyzed. In addition, ALS has specific procedures dated 2024 and 2025 for field measurements, water sample filtration, and assurance of results.

ALS Peru is a reputable laboratory with qualified professionals that developed the sampling and analytical protocols. The ALS Peru monitoring procedures were developed by personnel with qualifications in water sampling and monitoring activities with more than 15 years of experience in water quality matters and experience working at different labs in Lima. Analytical protocols for environmental samples are provided by ALS lab in Lima. The auditors reviewed letters of certification to verify compliance.

Lagunas Norte communicates to ALS Peru the monitoring program on a monthly basis including sample locations, frequencies, and cyanide species and other parameters to be analyzed. ALS Peru has a procedure that details preservation techniques, equipment calibration, quality control, chain of custody procedures, and shipping instructions. Water samples are sent for analysis to ALS Peru lab in Lima. Examples of completed chain-of-custody records showing proper use of the forms were reviewed. Maps showing the monitoring locations with respect to cyanide facilities were also reviewed by the auditors.

ALS field data sheets for surface and groundwater samples register in writing the weather conditions, livestock/wildlife activity, field parameters (i.e. conductivity, pH, and temperature) and groundwater levels. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered consistently.

Lagunas Norte has an annual monitoring program that is communicated on a monthly basis to ALS Peru including sample locations, frequencies, and cyanide species and other parameters to be analyzed. The monitoring program includes sampling frequencies that vary between weekly, biweekly, monthly and quarterly. Samples are sent for analysis to ALS Peru lab in Lima. Cyanide species (WAD, free, total) are analyzed on weekly, monthly and quarterly samples. Records were available and reviewed by the auditors for all sampling and monitoring activities. The frequencies of the monitoring activities were deemed to be appropriate by the auditors.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte has developed a Mine Closure Plan (MCP) in accordance with local regulations requirements of the Peruvian Ministry of Energy and Mines (MEM). The most recent update of the MCP was developed by WSP consultants in August 2024 and considers decommissioning activities for cyanide facilities. This includes decontamination of equipment (tanks, pipelines, pumps, and valves), planned draindown and removal of residual cyanide reagents, leach pad rinsing with fresh water, water treatment and quality control mechanisms, final decommissioning and disposal of cyanide facilities, and/or reclamation of facilities. The document considers decommissioning strategies for the cyanide facilities and treatment systems which include heap leach pads, process ponds and channels, Merrill Crowe plant; CIC plant, CMOP plant, and cyanide destruction plant, event ponds, seepage collection system and solid cyanide storage. Lagunas Norte has also prepared a procedure “Closure, Decommissioning and Demolition of Facilities” that establishes a process to identify and control health, safety, and environmental risks related to the closure and dismantling of facilities, equipment, materials, and operational processes of the property. The procedure includes a form as an appendix to be used during closure, dismantling, and demolition activities. At closure, once gold recovery ceases, all processing plant items and steel structures will be washed thoroughly with raw water. All concrete surfaces will be thoroughly washed down to remove any residual material. Pipelines will be flushed dependent on the material conveyed and whether they are to be re-used after closure. Current plan considers that heap leach pad rinsing water is expected to be treated in the water treatment plant until 2029.

The Lagunas Norte MCP has an implementation schedule for decommissioning activities including the sequence and duration of facilities closure. Closure activities are expected to occur between 2028 and 2066, including 5 years of closure (2028 - 2032) and 40 years of post-closure activities, mainly related to water treatment needs. Process plant decontamination and decommissioning are expected to occur between 2030 and 2032. This schedule will continue to be refined as Lagunas Norte approaches the closure period. Lagunas Norte is currently conducting progressive closure activities during operations. The schedule is divided into three phases: operations, closure and post-closure. Closure phase is the period when most physical closure actions will take place (i.e. decontamination and demolition, earthworks etc.). Post-closure is when long term water treatment, monitoring and any ongoing maintenance of the site occurs.

Lagunas Norte reviews the MCP and updates it periodically. The MCP is updated as required due to changes in operating conditions, facilities, and due to legal requirements of Peruvian regulations, which requires that the MCP is updated 3 years after its approval, and every 5 years thereafter. The current version of the MCP is dated 2024. Previous versions of the MCP are dated 2020 and a new version is being updated in 2026. Lagunas Norte submitted to the Ministry of Energy and Mines an updated Closure Plan for approval right after the field visit.

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

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

Describe the basis for this Finding/Deficiencies Identified:

The 2024 MCP developed by WSP consultants includes the cost for full implementation of the site-wide closure and reclamation plan for existing facilities, including all cyanide facilities and water treatment activities. The total closure cost, including concurrent reclamation, final reclamation and post closure activities, has been estimated at US$ 368.41 million (MM). This closure cost is updated along with the required updates to the MCP. The decommissioning and cyanide decontamination estimates provided were generated as a function of the full fund third-party implementation costs for the Merril Crowe, CIC and CMOP plants. The closure costs used by WSP were estimated using third-party unit rates from local contractors used by Lagunas Norte for earthworks, concrete, infrastructures and dismantling activities.

In accordance with Peruvian regulations, the MCP requires an update 3 years after its approval, and every 5 years thereafter. Lagunas Norte updates its closure costs every time the MCP is updated. The MCP was last updated in 2024. The closure cost was estimated at US$368.41, which has increased from the 2020 closure cost, as it includes the new CMOP facilities. The auditors reviewed updated and approved MCP cost estimates for 2024.

Closure bonds have been issued by four different financial institutions (Banco Santander, Avla Peru Insurance Company, CESCE Peru, and Liberty Insurance) on behalf of Lagunas Norte for a total of US$183.9 MM. Based on MEM closure requirements, the financial assurance amount is sufficient to cover cyanide-related decommissioning activities. These bonds are updated and renewed every year. The auditors reviewed the closure bonds for 2026. As required by the Article 55 of the Peruvian Regulation for MCP´s, the MEM approved as financial mechanism the closure bonds issued for Lagunas Norte closure activities for 2026.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte has established and maintained Standard Operating Procedures (SOP), related checklists and work permits to ensure that worker exposure to cyanide is minimized and/or controlled when performing tasks such as unloading, storage facilities, cyanide mixing, heap leach operations, Merrill Crowe plant, Carbon-In-Column (CIC) plant operations, Carbonaceous materials Optimization Project (CMOP) operations, and cyanide detoxification. There are more than 30 procedures related to cyanide management. In addition, Lagunas Norte achieved ISO14001:2015 certification of its environmental management system in April 2025 and is valid for three years, which guarantees the retention of documents and records. All the procedures reviewed have sections that indicate the risks involved with each task and adequately describe safe work practices, including also the use of Personal Protective Equipment (PPE). Critical work permit systems have been developed for more general activities which apply across various areas of the plant and/or the mine operation. These include, for example, lock out/ tag out/try out, hot work and confined space entry permits.

Operating procedures provide a listing of required personal protective equipment (PPE) to prevent and/or minimize worker exposure to cyanide and/or cyanide containing solutions. Pre-start checklists for cyanide unloading, mixing and preparation were reviewed by the auditors, certifying that operators are required to identify whether they have the required PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures. Also, task observations during the cyanide transport and preparation at the Merrill Crowe plant and at the Leach Pad # 1 confirmed that hard hat, rubber boots, rubber gloves, chemical suits, face shields, handheld two-way radio, and HCN monitors were in use. Pre-work inspections prior to a cyanide mixing are completed by process personnel at the plant and by Leach Pad operators when preparing cyanide at that area. In the case of cyanide unloading, personnel must verify the work area for safety and health hazards, eye wash stations, fire extinguishers, HCN detectors, pre-use equipment checklist and the use of PPE´s. Also, pre-work inspection prior to cyanide mixing, includes PPE, HCN levels, air exhaust, closed caption camera system, eye wash stations, calibration of the HCN sensor, pH of the solution, cyanide emergency response kit, among others. Pre-work inspections for confined spaces include the verification of

conditions by obtaining a specific critical work permit provided by the Safety and Health department.

Workers at the operation are given the opportunity to provide input to procedures by conducting safety share meetings at the start of the shift with workers, including discussions and observations by workers from the previous day (Process plant and Leach Pad control). Also by Planned Task Observation mechanism in which during the interaction between supervision and workers, they can identify improvements and recommendations to be included in future updates of procedures. Site also conducts Safety Committee meetings every week, which include operator representatives, provide the opportunity to discuss procedures. A Monthly Safety Committee meeting required by Peruvian Law which also requires operator representatives, providing another opportunity to discuss procedures and potential improvements. Workers can also provide input, comments and observations on procedures using a Suggestion Box located in different locations along the operation facilities. Procedures are updated every two years. The Senior supervisor at each operational area is in charge of the update and approvals. After that, these are distributed to all personnel as a refresher. Planned Task Observations are conducted by the supervisor and if the procedure requires a modification, it is documented and inserted in the next version. Operators conduct a Hazard Identification and Risk Assessment process, however if the activity does not have a procedure a Job Safety Analysis (JSA) is conducted.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte has determined minimum pH levels for cyanide solutions to prevent the generation of HCN gas. Regarding Cyanide preparation both at the Process Plant and at the Leach Pad (according to procedure OPR-PLN-302 and OPR-PLN-339 respectively), operators verify that the pH of the barren solution should be equal or greater than 9.8 prior to mixing cyanide. To help control pH, barren solution is used to mix and dissolve solid sodium cyanide briquettes and sodium hydroxide is added to rise the pH to the desired value. pH sensors are located at the Barren and Mixing Tanks, the CMOP Area 2 circuit and the CIC plant. pH readings at the Leach Pad mixing tank is done with a manual pH sensor, (previously conducting an equipment calibration). The auditors verified records (PI system) from June 2025 to May 2026 and certified that the solution was raised and maintained above 9.8. For controlling pH in the processing circuit (Carbon-In-Columns CIC Leaching and CMOP Circuit) Lagunas Norte uses procedure CMOP-PLN-012 “Cyanide dosage and pH Adjustment”, which indicates that desired

pH in the solution should be 9.8 as a minimum within the system and for operating purposes and recovery optimization, the pH is taken up to 10.5.

Lagunas Norte has established that the areas where workers may be at risk of exposure to HCN gas are the Warehouse, Cyanide mixing area at Merrill Crowe, Cyanide mixing area at Leach Pad # 1 and Leach Pad # 2, Carbonaceous Material Optimization Project CMOP Carbon-In-Leaching area # 2, Carbon-In-Columns CIC Process Plant and Refinery. The site has determined appropriate controls including the use of appropriate PPE according to the operational procedures (which specify the PPE required) and which have been developed and implemented in the areas mentioned above. Procedure OPR-PLN-302 Cyanide Preparation indicates that HCN values of 4.7 ppm or above will trigger an evacuation of the work area only and at HCN values above 10 ppm, workers should evacuate the process plant. Fixed hydrogen cyanide gas monitors have set alarm levels at 4.7 ppm and 10 ppm respectively. Lagunas Norte has developed Personal Protection Equipment procedure that establishes requirements for the selection and use of personal protective equipment as a measure to control risks related to Occupational Safety and Health in critical activities and work areas. Workers are also required to wear portable HCN monitors.

Lagunas Norte uses fixed and portable HCN monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide. Eleven fixed HCN Detectors (Dräger PointGard 3100) are located in different areas of the plant, like CMOP-2 CIL tanks, CMOP Area 3 (cells sector), Zinc Cone Merrill Crowe, Merrill Crowe Clarifier Filters, Refinery Filter press, Merrill Crowe CN preparation and Carbon-In-Columns CIC Plant. The Dräger HCN detectors are set up at alarm # 1 at 4.7 ppm (evacuation of the working zone) and alarm 2 is set up at 10 ppm for evacuation of the process plant. Site has established a procedure that explains what a Multifunctional Operator MFO should do in a situation where the alarm sounds and has provided evidence of training. Lagunas Norte has 16 Portable devices (Industrial Scientific Gas Badge Pro) distributed in the process plant (06), Control Room Merrill Crowe (01), Leach pad (01), CMOP area 3 (01), Process Plant office (01), CMOP area 2 (01), the Carbon-In-Columns Plant (01), Supply Chain (01) – Warehouse (01), Maintenance (01), Safety and Health (01). The portable HCN monitors also has the following alarm levels; Level 1 at 4.7 ppm and Level 2 at 10 ppm.

Fixed equipment is internally inspected and tested (consisting in performing a contrast verification) every 15 days and external calibration is done every six months according to a Cyanide Gas Calibration Procedure. Instrumentation personnel perform a clean air contrast with oxygen at 0 ppm and then a contrast with HCN gas at 10 pp. Externally the HCN sensors are calibrated by Dräger representative in Peru every six months. Under normal conditions, Dräger recommends the Electrochemical sensors calibration intervals between 6-12 months. Regarding the Portable HCN monitors, these are calibrated every year by an external certified lab which has been verified to be the representatives of the manufacturer (JS Industria in Lima-Peru). The equipment is taken to Lima for calibration by badges and then returned to the mine site. Site also performs an internal contrast done every month with HCN gas at 10ppm. Then they perform a

contrast at clean air, where it returns the concentration at 0 ppm. Calibration of portable devices is established in a written procedure which also covers the calibration record process. The calibration of HCN portable devices procedure ensures that a functional text/bump test is being conducted before every use. Site has purchased a docking station and the buffer gas to perform the test according to the manufacturer manual.

Appropriate signage is displayed at the Process and CMOP Plant entrance, Warehouse, Leach pad # 1 and # 2 (CN preparation area) and throughout the various facilities to alert personnel of the presence of cyanide, access restrictions and the required PPE for the area. In addition to identification of cyanide areas and PPE requirements, signage is also used to restrict eating, drinking, smoking and open flames. Warning signs are posted in Spanish, the language of the workforce and located in areas where cyanide solution is mixed and used. Lagunas Norte also uses Globally Harmonized System Pictograms and NFPA (National Fire Protection Association) signage on mixing tanks, Merrill Crowe, CMOP Plant tanks and warehouse (health hazard, toxic and environmental impact).

High strength cyanide solution is dyed in red color for clear identification. Lagunas Norte purchased Sodium Cyanide from Tongsuh Petrochemical Inc. since June 2025. Tongsuh sends the dye mix inside the cyanide bags together with the cyanide briquettes so that during the mixing operation, the high strength (15-20%) cyanide solution turn into a red color solution.

Lagunas Norte has installed fixed safety showers and eyewash stations at strategic locations where there is a potential for exposure to cyanide. The auditors verified the Warehouse, Cyanide Mixing room and Merrill Crowe plant, CMOP Area #2 and #3 and the Carbon-In-Column CIC Plant. The Leach Pad Cyanide preparation area only has a portable eyewash station; however, an emergency response kit has been installed in close proximity with a water container for potential use to decontaminate a worker exposed to cyanide during a mixing event. Lagunas Norte has developed an Emergency Response Equipment Inspection Plan with their respective forms to register the inspection program for safety showers and eyewash stations. Safety showers and eyewash stations are checked as part of pre-work inspection checklists to ensure that they are operational and that water flows are adequate. All fixed eyewash stations have been regulated to reduce the water pressure to ensure it does not present a hazard to users. The site also has Dry Powder ABC fire extinguishers located in strategic locations throughout the warehouse, cyanide preparation, CMOP Plant, Carbon-In-Column Plant and the Merrill Crowe plant. Fire extinguishers are inspected on a monthly basis to ensure these are operative. Inspection records include dates, location, type, expiration date, brand and observations. A check list tag is attached to the extinguisher. All extinguishers observed were fitted with inspection tags, which documented monthly inspection checks. Fire extinguishers follow a preventive maintenance program conducted by a third-party maintenance firm from Trujillo, to check nozzles and pressure testing according to the expiration dates.

Lagunas Norte has established color coding for concentrated cyanide solutions which was observed by the auditors during site visit and inspection in the Merrill Crowe, CMOP and Carbin-

In-Column Process plants. Labelling to identify the solution and the flow direction has also been installed in piping including plants and Leach pad # 1 and # 2, both for pregnant leach solution pipes and barren solution sent back to the leaching system. Pipelines and tanks that contain cyanide or cyanide solutions are labeled to enable plant personnel to identify its content. Labeling is typically located at places of frequent access by personnel, reasonable distance to be able to track the lines and identity contents. For pipelines, flow direction arrows are used to allow personnel to identify the flow and possible exposures and/or response requirements for leaks and/or maintenance work. Color coding is also used to identify tanks and process solution pipelines.

The auditors verified that Lagunas Norte maintains Safety Data Sheets (SDS) for Sodium Cyanide from current manufacturer (Tongsuh Petrochemical Inc.) in hard copy and in Spanish in areas such as the cyanide warehouse, CN mixing room in Merrill Crowe and cyanide preparation at Leach Pads 1 and 2. In addition to the SDS sheets, SOP´s are also printed in Spanish and signage is available to alert personnel to chemicals and required emergency response requirements in the high-risk cyanide areas. Lagunas Norte also has banners posted with first aid procedures in the process plant (control room). All materials are written in Spanish.

Lagunas Norte has developed and applied a Safety Incident Reporting and Investigation procedure and an Environmental Incident Investigation procedure, which describes that in the event of a safety, health and environmental related incident, the emergency is activated, and workers proceed to control the situation. Within 24 hours of the incident a flash report must be prepared. This report includes a brief description of the immediate causes and the actions taken. Subsequently, the investigation of the incident is done ensuring that corrective actions are determined. Safety and health maintain a date base with all incidents registered at the site. The auditor has verified the database (Boroox) and a spreadsheet confirming that no Safety and Occupational Health incidents related to cyanide have been registered during the certification period. Lagunas Norte Environmental Incident Report Procedure indicates how to identify and report a significant CN incident (exposure, leakage, transport, among others). Investigation actions will be conducted following a Non-Conformities and Corrective actions procedure. The environmental department also maintains a date base with all incidents registered at the site.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Lagunas Norte has made available oxygen tanks, resuscitators, masks, radios, telephones, and alarms in critical areas. First aid kits are located in the following areas: Chemical lab, Control room, Carbon-In-Column CIC plant, Refinery, Crusher, Leach Pad and CMOP. The emergency kits contain 3 m³ oxygen cylinder with pressure gauge, mask with reservoir bag, manual resuscitator (Ambu bag), Gauze pads (2 packs) and sterile latex gloves. Medical teams have emergency kits with Cyanide Antidotes to be used only by medical personnel and are located in: El Sauco and Operation Topic Medical Centers. Lagunas Norte follows a procedure for Kit Control in case of Cyanide Intoxication SSA-PLN-003. The antidote kits at the medical centers contain sodium nitrite, sodium thiosulfate, examination glove, nasogastric tube and needle catheter. Automatic Resuscitators (DEA) are located in ambulances at both medical centers, administrative offices, Mine Entrance gate, Mine operations, Contractors Camp, Merrill Crowe, Truck Shop, CMOP 1 and CMOP 2. Ambulances have VHF radios as the means of communication. The site also has an emergency communication procedure with instructions to activate the alarm system by radio or telephone. All employees and visitors are trained in this system as part of the safety and first aid induction. Operators are required to carry a radio while performing their tasks. The alarm systems for all the HCN monitors and showers have a visual and sound alarm and are hard wired to the control room.

The auditors verified that Lagunas Norte maintains records of the cyanide first aid equipment inspections. Cyanide Antidote kit inspections are performed daily by the medical area, especially for registering the temperature of the antidotes. The inspection of all other kit equipment is done on a monthly basis. Expiration dates are also checked on a monthly basis. The mine has monthly formal checklists to first aid equipment located in areas where cyanide is used, to ensure it is available and in working conditions if needed. The checklist includes the inspection of oxygen tanks and resuscitators in critical areas. Cyanide kits are stored as directed by their manufacturer and replaced based on a schedule check list to ensure that they will be effective when needed and can be readily available for an emergency. Cyanide first aid equipment (oxygen) at the Merrill Crowe Plant and Leach pad is inspected prior to a cyanide solution preparation. Salus Laboris (medical provider contractor) staff perform frequent inspections of the ambulances, cyanide kit and oxygen located in the medical clinic.

Lagunas Norte medical department has updated and consolidated a “Medical Attention for a Cyanide Intoxication Case” procedure, which describes emergency guidelines to respond to cyanide exposures, first aid response, intoxication levels, cyanide poisoning symptoms, use of antidotes by medical staff, recovery, transportation and post incident medical treatment. Specific instructions are given for treating victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes. Instructions detail the steps to be taken, including cases for conscious and unconscious victims. In all cases the medical services receive the victim decontaminated by the Emergency Response Team (ERT) to receive treatment with the cyanide antidotes, if necessary.

To provide first aid and medical assistance to workers exposed to cyanide, Lagunas Norte maintains a fully equipped medical centre in El Sauco clinic and also at a smaller scale at the

Mine Operation medical center. The Mine Operations Medical center is located about 6-7 minutes vehicle ride from the process area, and it provides medical response to cyanide exposure incidents. First aid emergency response equipment includes two fully equipped ambulances on site. Lagunas Norte maintains a medical staff from contractor Salus Laboris with doctors on call, nurses, Paramedics in each shift. The infrastructure and equipment found includes medical centre El Sauco, trauma shock room and two ambulances, clinic at Old Lagunas Norte Hotel (for complex surgeries), pharmacy, emergency post at Topico Operaciones and an emergency post at medical centre with a permanent paramedic and an ambulance driver. Lagunas Norte has trained professionals at the medical center and ambulances to assist patients poisoned with cyanide 24 hours a day. Ambulances are parked at the entrance of each medical center. Ambulances are equipped with oxygen tube and resuscitator. In the medical centre, there are available beds, oxygen tubes, resuscitators, and other equipment for critical care patients. The auditors verified that Sodium thiosulfate and sodium nitrite are kept at a controlled temperature inside the medical center. Several process plant first responders have been trained in the plant to provide initial treatment efforts. Training includes Cyanide I, II and III courses and international certifications for complex medical emergency cases, including chemical intoxication and cyanide.

Lagunas Norte has developed a medical action and transport in a cyanide intoxication case procedure which indicates that, in the event of a cyanide exposure where the victim, once stabilized, requires medical attention beyond the capabilities of the on-site medical clinic, the medical staff will transport the victim in one of the ambulances to the Complex Care Unit Sanna and San Pablo at Trujillo City. Agreement has been signed by both centers in Trujillo. There is also the option of transporting a patient by plane if required.

Lagunas Norte has established a formal agreement with Complex Care Units Sanna and San Pablo located in Trujillo City, however just in cases to further evaluate patients that have been exposed to cyanide and that has been previously stabilized at the medical facilities on-site. Therefore, the offsite facilities do not treat victims directly for cyanide exposure. The agreement includes an annex with a list of Specialized Equipment and Staff. This list has been reviewed in April 2026. The list includes emergency medical staff, infrastructure, Intensive care Unit, complimentary areas and training requirements. The site has also determined that its medical facilities have qualified staff, infrastructure, adequate equipment, and expertise to respond effectively.

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

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

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

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte has in place a General Emergency Response Plan which is a general plan that establishes a series of guidelines to follow in case of any emergency and also a specific emergency plan for CN Events which describes specific response actions by the Emergency Response Team (ERT) onsite. It establishes measures in the case of exposure to a cyanide gas release or spills of cyanide solution or solid cyanide, among others. The document also describes emergency response protocols, first aid response to cyanide exposure scenarios, minimum emergency response resources, roles, and responsibilities among other elements.

Lagunas Norte Emergency Response Plan lists the various credible event scenarios for the site inclusive of cyanide incidents such as cyanide spills, exposures, and transportation accidents. CN response procedures describe areas at high-risk of CN exposure including response actions to CN gas release, including evacuation at 4.7 ppm. Lagunas Norte has developed a specific emergency plan for CN Events which describes specific response actions by the Emergency Response Team in the case of exposure to a cyanide gas release. The site has established the identification of critical risks involving transport between the entrance gate and the cyanide warehouse, and also between the warehouse to the cyanide preparation area at Leach Pad 1 and 2. ERT has developed a protocol for Emergency at the Warehouse and also a general procedure for CN incidents during transportation at the Merrill Crowe plant. Site has developed a new protocol for emergency response action during an incident of transportation of cyanide boxes between warehouse and the leach pad considering scenarios of cyanide spill in dry soil and wet soil. The site has also developed a procedure that covers incidents related to spills, fire, HCN gas generation, medical response, pipe and tanks breakage. The specific emergency protocols for cyanide storage, mixing, leaching, plant operation among others include a section of actions to be taken in case of fires. It covers the scenario of a spill with a fire activated, which considers restrictions for water use and the use of fire extinguishers. Other protocols related to emergencies during cyanide preparation cover the Carbon-In-leach plant, the CMOP Plant, and Leach Pad emergencies. In all cases it provides information on emergency response actions for high concentration pipelines, valves and tanks in the Process Plant. Any spills and leaks are to be reported and contained. Lagunas Norte has developed an Emergency in Ponds and Water Impoundments protocol to cover the scenario of an overtopping of the PLS ponds, POP ponds, indicates specific actions and responsibilities for prevention and emergency response based on the solution levels in the ponds and impoundments, including reporting, securing the area, monitoring, stopping pumps and to evaluate potential impact downgradient. In the case of power outages and pump failures scenarios are described in the Energizing and Charge Control in cases of energy shutdown procedure. In case of power outages, backup generators would keep

the solution circulation systems active. The site also considers emergency response procedures in case of uncontrolled seepage. The Laguna Negra Manual indicates that regarding leaks, the site has a Leak Collection and Recovery System. The Emergency Protocol for the Leach Pad does include actions for infiltration and leaks. Regarding Cyanide destruction facilities, the site has developed a procedure which indicates actions related to spills, HCN generation and fire among other actions to be taken. Finally, Lagunas Norte does not have a tailings storage facility nor an impoundment. The emergency scenarios at the heap leach facilities are included in the Leach Pad Emergency Protocol. In the case of a Leach pad failure, solution is directed to a contingency pond and ultimately solution will be pumped back to the system. It considers cyanide spills, infiltration, pipeline failures, tank failure and especially a leach pad potential bench slide.

The current cyanide supplier for Lagunas Norte is Samsung C&T which provides sodium cyanide produced at the Tongsuh Petrochemical plant in South Korea. Local transport from Callao Port to the mine site is run by the contractor Empresa de Transportes N&V S.A.C. Both companies have been certified as fully compliant with the Code. According to the transportation agreement and the General Emergency Response Plan, Empresa de Transportes N&V S.A.C. are responsible for the response to an emergency during the cyanide transport. Lagunas Norte keeps a copy of the transporter emergency response plan for cyanide transportation to the mine site. The plan addresses all code requirements for the transportation of cyanide. The plan includes the vehicle specifications, responsibilities for the cyanide supplier, the mine, the transporters, and external responders, permits required by the national authorities, organization chart for emergencies, communications flow in case of emergencies, and instructions for specific emergency scenarios. The contractor has also conducted a route risk assessment.

Lagunas Norte's Emergency Response Plan and the Cyanide Emergency Plan describe detailed response actions to cyanide incidents. Clearing site personnel is included in protocols related to Merrill Crowe Plant operations, CMOP Plant and Leach pad incidents. Lagunas Norte evacuation scenario for communities considers communication scenarios for potential impacts on water courses. For clearing site personnel and for communities site uses the Evacuation at the Chuyuhual Water basin in case of emergencies procedure, which has a list of all the authorities that will require communication. Site has also developed a procedure for Medical Attention for a Cyanide Intoxication Case that describes the use of antidotes and first aid measures. Control and mitigation measures of cyanide related incidents at their source are covered under the Emergency Response Plan for CN Incidents. It has been verified in protocols related to Merrill Crowe Plant operations, CMOP Plant and Leach pads. Containment measures are also covered under Laguna Negra Manual. Regarding the assessment, investigation and prevention of future releases is covered under the Lagunas Norte Incident Reporting and Investigation procedure (Safety/Health and Environmental).

7.2 Involve site personnel and stakeholders in the planning process.

The operation is: ■ in full compliance

☐ in substantial compliance
☐ not in compliance with Standard of Practice 7.2

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte solicits the input of its workforce in their emergency response planning documents during training of the Emergency Response Plan (General and CN specific) and mock drills conducted. Drills include a section to identify improvements that require inclusion in the Emergency Response Plan. Protocols have been reviewed with operators at the different areas of CN exposure risk and also a member of the ERT (related to their area of expertise and workplace) participate in the review. The ERT coordinator is present with the workforce during awareness training, providing input and feedback. Another opportunity workforce has to express their opinion is during the emergency response plan training, on the course called Cyanide III. The mine has workers representatives in the Health Safety (H&S) Joint Committee, which is a legal requirement in Peru. Representatives could make comments from other workers that need to be reviewed. No outside stakeholders have been involved in the development of the Emergency Operating Plan since they do not have designated responsibilities under the plan, however, Lagunas Norte maintains a social engagement program that allows communication and feedback between communities, stakeholders, and the mine site. Several communities are located close to mine site; therefore, Lagunas Norte has various social engagement programs that allow communication and feedback between communities, stakeholders and the mine. One mechanism that has recently successfully developed the mine is that of guided visits to mine, which are offered to the stakeholders in the surrounding area. During these guided tours the mine dedicates time to explaining to them the emergency response plan and the grievance mechanism. ERT participated in those visits, explaining the Emergency Response actions at the Chuyuhual water basin.

Lagunas Norte has on-site capabilities for dealing with all possible cyanide-related incident scenarios. The site takes full responsibility for response to cyanide release within the facility. Lagunas Norte has also established formal arrangements with offsite medical facilities in Trujillo city regarding the potential to treat patients that have been exposed to cyanide, and it has a policy to stabilize victims onsite prior to transferring them to off-site facilities. In addition to the guided visits to the mine, Lagunas Norte has various social engagement programs that allow communication and feedback between communities, stakeholders and the mine. The site also provides training on hazardous material and on the Chuyuhual Basin Emergency Plan to communities, including the Highway Police, located along the route between Trujillo and the mine site. The only activity indicated in the plan where there is community involvement is related to the information in case of a spill affecting water courses. that they should not consume water (people and domestic animals). Any other mitigation effort will be performed by Lagunas Norte personnel.

Lagunas Norte has on-site capabilities for dealing with all possible cyanide-related incident scenarios, including transportation. It also has on-site capabilities for firefighting, medical

emergencies, and hazmat cleanup. Lagunas Norte will take full responsibility for responses to a cyanide release, nevertheless it has established formalized arrangements with offsite medical facilities regarding the potential to treat patients that have been exposed to cyanide. The site has a policy to stabilize victims onsite prior to transferring them to off-site facilities. Therefore, the off-site facilities do not necessarily treat victims directly for cyanide exposure. Lagunas Norte would maintain responsibility for emergency response activities within the communities if required. Local medical, fire and police services will coordinate with the mine´s personnel in the event their response is required. Local agencies (e.g. Fire and Police) have a statutory responsibility to assist with notification and mobilization of people. As stated in the Plan, during an emergency, the Superintendent of Risk Prevention (Safety and Health) and Environment will be in charge of making contacts with institutions such as National Police, INDECI (National Institute of Civil Defense), Fire Department, Red Cross and other institutions that warrant it. The General Emergency Response Plan includes a communications flowchart and contact list featuring police and firefighters. Lagunas provide communication efforts with Municipalities and Police however these agencies don't perform any role within the Emergency Response Plan.

Lagunas Norte General Emergency Plan does not designate any responsibilities to off-site responders and communities, however, during the guided visits to the mine, the local communities and stakeholders have opportunity to learn firsthand about the emergency response plans, and also regarding the evacuation plan for nearby communities in case of a cyanide incident requiring evacuation. The mock drills completed to date at the mine have not involved external stakeholders, however, the plan includes current contact information for notifying regulatory agencies such as OSINERGMIN, General Directorate of Environmental Health (DIGESA), Ministry of Energy and Mines, Civil Defense, Labor Ministry, offsite medical facilities, the media, and other stakeholders.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte General Emergency Plan designates primary and alternative emergency response coordinators per shift (at the site level called Lead Technicians). The Incident Commander has the authority to commit the necessary resources to respond to an emergency, and to define the primary and alternative response coordinators. Regarding resources to implement the Emergency Plan, the ERT Coordinators respond to the Risk Prevention Manager who has accountability over the ERT Plan and assignment of resources. The General Emergency Plan has a list of onsite emergency personnel including First Responders and Team

Members (first aid, firefighting and hazmat). There is a duty register sheet (updated constantly) with the ERT members that are currently on duty. The General Emergency Plan details the training required for the ERT Members. Training includes advanced first aid (cyanide exposure, locations of cyanide antidote kits, medical oxygen), Hazardous Materials (Cyanide) Level I, II, and III, confined spaces, firefighting and others. The General Emergency Plan includes a call-out procedure for initiating a response to a cyanide-related emergency. It also includes office cell phone numbers for the ERT Members (24-hour availability). Lagunas Norte Security Control Center notifies on a weekly basis the updated information of emergency response personnel. It also specifies duties and responsibilities of the Incident Commander including specific duties and responsibilities for human resources, equipment, material, supplies, and communication teams. There are responsibilities for the Command Post Chief, the On-Scene Command Post and the Emergency Response Team. An emergency team may include a Security Officer, a Communications Officer, a Hazardous Materials First Aid Officer, and a Rescue Officer. The Emergency Brigade Entry and Formation procedure describes the role of each position within the emergency brigade. In section 11 of the General Emergency Plan has a list of emergency response equipment for each area where cyanide is used and for the emergency response vehicles. This list includes equipment stored in the ERT facility. All emergency equipment and supplies are inspected on a regular basis by the Emergency Response Team and Safety personnel. There is a monthly inspection program. The inspection is performed on a weekly basis as a checklist form that lists all the different equipment in each cabinet, the date, the conformance and a space in each row for comments. Daily and monthly inspection records for the first aid and antidote kits and weekly inspection records for the Hazmat equipment were reviewed to verify compliance. Lagunas Norte does not assign responsibilities for off-site responders in case of cyanide emergencies.

Lagunas Norte does not use off-site responders or consider external entities with roles and responsibilities identified in the Emergency Response Plan; therefore, no involvement or inclusion is considered in mock drills or implementation exercises. The mine has established formalized arrangements with off-site medical facilities regarding the potential to treat patients that have been exposed to cyanide. Lagunas Norte has the policy to stabilize victims on-site prior to transferring to off-site facilities. Therefore, the off-site facilities do not necessarily treat victims directly for cyanide exposure. Lagunas Norte has determined that the facilities have adequate, qualified staff, equipment and expertise to respond effectively to potential CN events.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Regarding communication procedures and contact information in case of a cyanide emergency, the Lagunas Norte General Emergency Plan includes a table with contact information for upper management, including offices in Lima and Trujillo city, Regulatory agencies (e.g. DIGESA, Ministry of Energy and Mines, Ministry of the Environment, Civil Defense, Ministry of Labor, others), cyanide supplier and transporter, National Police, off-site medical facilities, the media, and other stakeholders. The list also includes Hospitals, Medical centers, ambulances available, aerial evacuation, main contractors working on site, energy provider, police stations, government agencies, authorities in the mine area of influence. Lagunas Norte has established a procedure to update the list of managers and senior supervisors that are on shifts on a weekly basis. This list is distributed among staff and security control room.

The General Emergency Plan and the Chuyuhual Water Basin Evacuation Plan include communication procedures as well as contact information for community representatives in the nearby areas (area of social and hydrological influence). Media communication procedures are also included in the plan. The list includes 20 communities and also the Town of Quiruvilca and Huamachuco. The contact information is updated at least yearly or when changes happen (for example local government elections).

Lagunas Norte has established a requirement to notify the ICMI in case of a significant cyanide incident. The auditors verified this requirement in the General Emergency Plan (section 5.6.2), the Cyanide Emergency Plan and in the Incident Reporting procedure. Lagunas Norte has not reported any significant cyanide related incident during the certification period.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.5

Describe the basis for the Finding/Deficiencies Identified:

The Lagunas Norte General Emergency Plan and the Spill Management procedure indicate that dry cyanide spills are to be covered with impermeable plastic and shoveled and/or swept into a drum or suitable container, thus keeping the spilled material dry. The procedure indicates the use of lime in the spilled area followed by a 10% diluted solution of sodium hypochlorite. Sodium hypochlorite is stored in a container at the process plant and is to be used only in cases where the solution is contained and will not enter waterways with aquatic life. Spilled cyanide solutions within the process plant will be returned to the process circuit from the floor sumps. Liquid cyanide spills are to be contained by constructing berms, if necessary, to minimize the extent of the release and prevent it from reaching drainage systems. Cyanide contaminated soils will be disposed of in the heap leach facility. The procedure indicates the removal of contaminated soil

is based on monitoring results. The procedure also describes what final cyanide concentration will be allowed in residual soil as evidence that the release has been completely cleaned up and to declared as a “remediated area”. The ‘Cyanide Solution Spill outside the Process Plant’ Procedure requires that cyanide contaminated soils be disposed of in the heap leach facility. Spill clean-up materials such as gloves, Tyvek suits and other equipment are to be disposed of separately from the impacted soils (disposed in the Leach pad). Clean-up debris is hauled and disposed of by a certified hazardous waste carrier. Lagunas Norte uses bottled water for its mine site drinking water supply. There are no community or resident water supplies that would be at risk and potentially require an alternative water supply; however, the Chuyuhual Emergency Evacuation Protocol indicates the analysis of alternative water supplies for the communities of Sauco, Chuyuhual, Corral Grande and Pampa Verde. In the case of a potential spill in the Chuyuhual basin, Community Relations department will coordinate to provide water for consumption to the potentially affected communities.

The ‘Cyanide Solution Spill outside the Process Plant’ procedure prohibits the use of sodium hypochlorite or other chemicals to treat cyanide that has been released into surface waters. It is also mentioned in the General Emergency Plan and also in the Spill Management procedure.

Lagunas Norte has established procedures for environmental monitoring during cyanide-related emergencies that also describe the sampling and analysis process for potential affected areas, and the actions to be taken regarding sampling methodologies, parameters and, where practical, possible sampling locations. The Spill Management Standard Operating Procedure and the Water and Soil Monitoring Procedures address the potential need for environmental monitoring to identify the extent and effect of cyanide release. The necessary monitoring activities will be conducted based on the procedures “Water and Soil Monitoring” and the “Monitoring of Cyanide in Soil in an Emergency Case”. Both documents include sampling methodologies and parameters. The Spill Management Procedure also indicates the need to monitor pH, total, WAD and free cyanide in accordance with water protocols. The site also has specific procedures for water monitoring, laboratory analysis with certified labs, and the analysis method. The Laguna Negra Manual includes a section outlining actions to take in case of a spill and defining a monitoring program and also links to a potential monitoring plan to identify the potential extent of the spill and the current monitoring points in the stream.

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

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

Describe the basis for the Finding/Deficiencies Identified:

The General Emergency Plan is reviewed at least annually, taking into consideration aspects such as recommendations from mock drills, operational changes, actual incidents or other events that would change the requirements. The plan includes a list of the changes/modifications made to this document since its original version. The Plan is updated sooner than a year in certain sections, for example the “lists of management or external stakeholders” if there are changes.

Lagunas Norte conducts annual mock drills based on likely release/exposure scenarios to test the response procedure, and incorporates lessons learned from the drills into its response planning. Records of these drills are kept with the Emergency Response Team. The site has established a yearly drill program. Auditor reviewed the 2025 program that includes Hazmat drills (cyanide related) in February and October 2025. In the year 2026 program, a hazmat cyanide spill drill has been scheduled to be conducted in July 2026. Lagunas Norte conducted the drills involving the Emergency Response Team personnel that may be expected to respond to cyanide incidents. Also, these drills tested the entire cyanide emergency response process from the initial emergency callout notification through to the close-out of the response process. The site also evaluates the mock drills and identifies deficiencies and corrective actions. Lesson learned are incorporated into its emergency response planning after a mock drill, if required. Documentation includes photos, strengths, weaknesses, lessons learned and corrective actions.

The General Emergency Plan and the CN Emergency plans indicate that these will be reviewed and revised following mock drills and actual incidents as needed. Auditors verified that General Emergency Plan and Pre Emergency Plans have been updated and/or revised with the certification period. No review of the Plan has been done due to a cyanide-related emergency in the certification period as there were no cyanide-related incidents.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

All personnel and contractors that enters the site attend the course “Cyanide I, II, and III” which are coordinated by the Human Resources (HR) department. The contract-owning department

requests the signing to the HR department. An application is submitted to HR, the courses are taken online, and the grades to pass the tests are verified. Each department maintains a list of personnel who have completed the course and received a passing grade. They then manage the onboarding process according to this list. The course is valid for one year; and the refreshers courses are also registered. The courses are Cyanide Course I – Cyanide Handling (including the symptoms of cyanide exposure), Cyanide Course II – First Aid for Cyanide Poisoning, and Cyanide Course III – Cyanide Emergency Response. In addition to the courses, a Process Plant Induction is required for all personnel to be able to obtain process plant access. This induction training is described in a procedure which provides a plant overview and includes environmental, health, and safety standards for working inside the plant area, as well as cyanide risks and safe operating practices.

General Cyanide I, II and III training is refreshed at least on an annual basis to employees and contractors through Human Resources online training. Refreshment training needs are monitored by means of the Training Matrix. The training databases at Process, Maintenance and Global Supply Chain (Warehouse) departments are checked monthly which identify employees due for refreshment training. A monthly training schedule is developed and distributed to department heads so they can line up with their people for the on-line training.

Training records for Cyanide Course I, II and III (including refreshers) for Global Supply Chain (warehouse) personnel, the process plant operators and contractors are retained in the form of hard copies and also an electronic version (Excel matrix managed by HR). These records identify the trainer, trainee, topics covered, date and sign off sheet.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 8.2

Describe the basis for the Finding/Deficiencies Identified:

All personnel in job positions including cyanide unloading, mixing, production and maintenance receive training on how to perform their assigned tasks with minimum risk to worker health and safety. Process area checks with Human Resources Department if personnel have been trained in CN I, II and III. Process team follows a specific induction program ensuring the operator has been trained (desktop and field) to be able to perform their activities. Regarding Standard Operating Procedures, all personnel that work in the process plant (Merrill Crowe, CMOP, Refinery, CIC) must undergo training prior to being allowed to work. Prerequisite training requirements include site induction, plant induction, plant general/specific orientation and safety awareness (classroom & field) sessions, to ensure that all operators understand and are able to

operate the various plant circuits and activities in a safe and environmentally responsible manner. In addition, after successful completion of these training sessions, operators are assigned to a specific processing circuit and work under the direction of a competent operator until they have been deemed competent to work without direct supervision. Formal training in operating procedures is given in cyanide-related tasks, including cyanide unloading and storage, preparation, production and maintenance. Determination of competency is based on Planned task observations by qualified and/or experienced plant operators and/or maintenance personnel.

Lagunas Norte maintains a series of training programs designed to build awareness and competence for various plant activities and programs. Each training module includes a training plan which outlines the course objectives and expected competency testing requirements for the module. Training schedules, plans and modules are developed and maintained and were available for review by the auditors. Cyanide-related training modules were found at the warehouse, Merrill Crowe Process Plant, CMOP Plant, CIC Plant, Leach Pad, Maintenance and Instrumentation and Emergency Response. Training elements for each specific job are identified in the work procedures and presentations that are used as training material and are divided by department, with each of them responsible for their own personnel training program. Personnel are trained following the work procedures, which include the step-by-step process to perform the job. These work procedures include the objective, required PPE, decontamination requirements, risks associated with the cyanide task and the individual task specific steps.

Lagunas Norte has experienced personnel in cyanide processes conducting the training to operators, which is provided directly by the area leaders and supervisors who have been in their position for several years and have helped to develop the Standard Operating Procedures. Trainers at Lagunas Norte have industry experience, with adequate knowledge and qualifications to train personnel in the necessary steps and requirements for safe and environmentally sound process plant operations. They also have experience of conducting verifications via the Planned Task Observation program. For the case of Contractor companies, training has been performed by their own Safety and Health lead personnel in most cases, or by senior supervision. For the emergency response team, training on hazardous materials response, rescue in confined space, etc.; these training topics are provided by the Emergency Response team. First aid and use of cyanide kits training is provided by the mine medical staff and the contractor that manages the medical center (Salus Laboris).

All personnel in job positions that involve the use of cyanide and cyanide management are required, prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety. After completing the Cyanide I, II and III training, employees that will be interacting with Cyanide complete specific training in the process area (a prerequisite for working in the plant). Lagunas Norte has implemented a robust specific induction program with new personnel and contractors. All personnel in job positions that involve the use of cyanide and cyanide management are required, prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety.

After completing the pre-requisite training, employees complete a classroom-training program prior to working with cyanide. Individual training is provided for each specific cyanide related task that an operator will perform and includes cyanide work procedures. An on-the-job training approach is used to further training for the personnel on job activities and cyanide safety. New trainees are assigned to work in one of the circuits under the supervision of a competent operator. These trainees are required to work under direction of these competent operators until they demonstrate ability to work without direct supervision in a safe and responsible manner. Individual training in operational procedures is provided for each specific cyanide related task that an operator will perform.

Lagunas Norte requires and provides refresher training for safe handling of cyanide, for standard operating procedures related with cyanide handling, first aid for cyanide intoxication and cyanide emergency response to assure that employees and contractors continue to perform their jobs in a safe and environmentally protective manner. The site´s refresher training should be taken every year. The same requirement applies for operational procedures, which are conducted every time there are changes. Trainers (supervisors or lead technicians) keep track of employees and contractors training files at the end of the month.

To evaluate the effectiveness of task specific training related to cyanide, planned task observations are conducted by the supervisor of the trainee after-the-job training sessions. Each task is also performed after completing an IPERC (Hazard identification and Risk Assessment form) which requires ensuring the operator is using the current standard operating procedure applicable for that job. Senior supervisors or area leads that performed the training (trainee) conduct verbal assessments at the end of the course and a list with all attendees is maintained at the department. In addition to the assessment, the process plant supervisors conduct periodic Planned Task Observations in the field, helping to identify deficiencies in task procedures performed by personnel so that these deficiencies can be corrected either on the spot or via additional task training.

Cyanide Training I, II and III in Lagunas Norte is centralized by the Human Resources HR department training database (for all employees and contractors) for areas as Global Supply Chain (Warehouse), Merrill Crowe, CMOP, Heap leach pad and Maintenance. Regarding Standard Operating Procedures, specific task training in the Process area (Merrill Crowe, CMOP, CIC and Leach Pad), Maintenance, and Warehouse; each maintains its own register, including general induction records. Physical records are kept with an attendance list for each operating procedure training event, indicating the date, training title, and the name of the person providing the training. A training matrix for Cyanide I, II and III courses in excel is generated to assist plant personnel in their training progression and refresher exercises. Training records are retained throughout an individual’s employment.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Personnel responsible for unloading, mixing, production, and maintenance are trained in decontamination and first aid procedures for cyanide release incidents. Verification included review of training records in the course Cyanide Level II and level III. Level II course considers training in First Aid in the event of possible cyanide poisoning; considering parameters such as concentration, exposure time, and the person's sensitivity level, as well as the medical specialist applying antidotes and the administration of oxygen. Level III is focused on managing spills and emergency situations, flowcharts, communication channels, and responsibilities according to what is described in the Cyanide Emergency Preparedness and Response Plan under the parameters of the General Emergency Plan and the Lagunas Norte Guide to Respond to a Cyanide Incident. Specific training includes safety cyanide management, safe cyanide handling, first aid for cyanide intoxication, cyanide MSDS, cyanide emergency response, General Emergency Plan, Emergency Pre Plans, Cyanide Code, Quebrada Laguna Negra Operating Manual, spill management, equipment decontamination and plant emergency shut down, among others. Training for decontamination of a cyanide exposure victim is not included as part of the training performed, as this is conducted by the Emergency Response Team.

Lagunas Norte Emergency Response Team ERT personnel are all trained in cyanide course levels I, II and III on a yearly basis. As indicated in previous requirements, these courses consider training in First Aid in the event of possible cyanide poisoning, considering parameters such as concentration, exposure time, and the person's sensitivity level, as well as the topic of antidotes and the administration of oxygen. Also, on managing spills and emergency situations, flowcharts, communication channels, and responsibilities according to what is described in the Cyanide Emergency Plan under the parameters of the General Emergency Response Plan and the Guide to respond to a Cyanide Incident. Periodic practical training includes the use of necessary response equipment. The ERT members and coordinators have conducted external Hazmat training – Technical level III in October 2025. The external training program for 2026 is planned to be conducted in October 2026.ERT personnel are routinely involved in drills to test their competence on emergency response procedures, undergoing periodic refresher training exercises to ensure they are able and ready to respond to various scenarios across the plant.

Lagunas Norte has provided evidence that their own responders are prepared for cyanide-related emergencies involving unloading, mixing, production, and maintenance activities. Lagunas Norte has adequate staff, equipment, and expertise to respond effectively to emergencies, nevertheless, Lagunas Norte has established formal arrangements with off-site

medical facilities in Trujillo City regarding the potential to treat complex case patients that have been exposed to cyanide. Lagunas Norte has the policy to stabilize victims on-site prior to transferring them to Trujillo. Lagunas Norte maintains the agreement with the Clinica Sanna and San Pablo in Trujillo. Lagunas Norte has determined that their facilities have adequate, qualified staff, equipment and expertise to respond effectively.

Refresher training for cyanide events is conducted as part of the site training and emergency drills program. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required. Lagunas Norte Emergency Response Team personnel receive annual specific and general refresher training in Cyanide courses I, II, and III, in addition to external and internal hazardous materials training, which are also offered. Training topics include Cyanide Code, Cyanide procedures, Quebrada Laguna Negra Operating Manual, cyanide risks, cyanide kit, General Emergency Plan, and Pre Plans. They also have records of disseminating the General Emergency Preparedness and Response Plan.

Records of emergency response training are documented in a database maintained by the Emergency Response Team. These include Hazmat training conducted by internal and external parties and also refresher on the General Emergency Response Plan. In all cases, records have names of the employee and the trainer, the date of training, the topics covered, and an evaluation.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte has developed a Community External Communications Plan with a variety of activities and programs to engage community members and other external stakeholders on a regular basis. These programs include community information centers, routine face-to-face meetings/engagements, complaints and grievances, mine site visits/tours, company website, media relations team and communications. The Guided Visits/Tours to the mine site which are conducted involving community members, mostly from the mine area of influence. The objective

is to be a process that enables interaction with community members on topics like Lagunas Norte operations (including Merrill Crowe Plant, CMOP and ERT), Health, Safety and Environment (Cyanide management is covered within the Environment topics). Materials provided include CN use and CN Code Certification. Among those attending the mine visits are representatives of local governments, schools, universities, NGOs, departmental representatives, and other community referrals. Visits conducted in 2025 were a total of 10 distributed between Sep and November 2025 with approximately 15-20 visitors per visit. There were two specific questions from a representative of the Quiruvilca town and the Tres Cruces medical post asking if cyanide is discharged to the water basin. Site responded indicated cyanide in used in a closed circuit. Lagunas Norte has presented a schedule for the Guided Visits for Q3 2026, and they are currently updating the information to be presented, also identifying community groups and stakeholders to be included among other planning activities. The plan will be to start guided visits in August 2026. Another program is the Grievance Mechanism Program, a procedure enables them to receive, process, manage and resolve written or verbal complaints and grievances in a culturally sensitive, timely and consistent manner. Grievances can be received by Whatsapp, phone, e-mail or the Permanent Information Offices (OIP) in Quiruvilca and Santiago de Chuco (OIP). Site also has implemented Permanent Information Offices (OIP), located in Quiruvilca and Santago de Chuco where they can receive a series of comments, questions, information requests, support, labor request among others. Lagunas Norte maintains a register with all visits which includes the main reason for the visit, the name of the person and their contact information. Finally, another program is the Social Engagement Team visits, where Lagunas Norte provides the opportunity for stakeholders to communicate issues of concern in different ways depending on the type of stakeholder. Lagunas Norte visited various communities almost daily. Lagunas Norte has printed information available which explains about the company, including social and environmental aspects. Regarding cyanide, the pamphlets indicate the appropriate engineering controls to avoid having environmental releases. It also includes a process flow diagram, indicating how cyanide is being used in closed circuits. The pamphlets will be updated in 2026 with extra information regarding new projects.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 9.2

Describe the basis for the Finding/Deficiencies Identified:

Lagunas Norte distributes a pamphlet called “Know more about Boroo Mining” which includes information on the processing facilities and also regarding cyanide management. This information includes topics such as how Cyanide is being used in mining and other industries, how is transported to Lagunas Norte, how it is used for leaching the gold content in the ore, the

environmental controls and monitoring and also actions in case of an emergency. The site also shares information with communities about the company's management practices and offers an overview of the cyanide facilities and programs during site tours. Stakeholder concerns or complaints identified via tours, meetings, community information centers or other means are logged in the stakeholder management database, where these concerns are reviewed, evaluated and responses are provided to concerned people and/or groups. Pamphlet and presentation materials describing the operation’s cyanide management activities are written in Spanish.

Lagunas Norte Social Engagement staff stated that the local populations are Spanish speaking and that illiteracy levels are very low. Nonetheless, Lagunas Norte provides information verbally and/or visually via meetings, slideshows, and videos. Guided visits are more visual than verbal. Also, the Social Engagement staff has monthly meetings in Quiruvilca town and El Sauco and Chuyuhual community which cover several agenda topics. There is a general assembly meeting with representatives from different communities to discuss yearly planning.

Lagunas Norte has not experienced incidents related to cyanide transport, storage, use or disposal during the certification period (June 2025 - May2026). Nevertheless, the site has maintained their Emergency Response Plans and Communication systems up to date for any type of potential cyanide releases that could have significant adverse effects on health and environment. Lagunas Norte would be required to report severe incidents involving hospitalization or fatalities to the regional and national authorities, who then will make this information publicly available. The General Emergency Plan, the Cyanide Management Plan and The Incident Communication Plan have specific reporting requirements for any release of hazardous materials resulting in potential adverse effects on the environment, to safety and health of workers or communities. The General Emergency Plan and the Cyanide Emergency Plan describe several scenarios of response and remediation required in the event of emergency response. Among the incidents included in the Plan there are scenarios related to cyanide releases off the mine site. The Emergency Response Plan describes the different response actions required, as has been indicated above. The plan indicates that the reporting and communication criteria will describe the location and the nature of the incident, as well as immediate mitigation actions taken. The General Emergency Plan, the Cyanide Emergency Plan and The Incident Communication Plan describe communication statements to the public, required in the event of emergency response. Among the incidents included in the Plan there are scenarios related to cyanide releases on and off the mine site. The Emergency Response Plan and Communication plan covers communities in the area of influence, the town of Quiruvilca and El Sauco among other stakeholders. These plans also describe regulatory communication statements to the public, required in the event of emergency response, including reporting channels the mine will use to communicate incidents via press statements, reports to authorities, and web press statements. The plan indicates that the reporting criteria will describe the location and the nature of the incident, as well as immediate mitigation actions taken. The communication plan also includes an updated list of stakeholders and a Communication Action Guideline. Finally, these plans also describe the different communication and reporting channels Lagunas

Norte will use to communicate incidents. There is a specific scenario the involves exceedances of applicable limits.