SUMMARY AUDIT REPORT

Gold Mining Operations

Summary Audit Report

for

Minera Florida Ltda.

June 2022

Prepared by NCABrasil Expert Auditors Ltd.

www.globalsheq.com

This report contains 24 (twenty-four) pages.

Celso Sandt Pessoa

Rio de Janeiro, RJ, Brasil.

02/March/2024

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FOR GOLD MINING OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.

2. The name of the mine operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report. The lead auditor's signature at the bottom of the attestation on page 3 must be certified by notarization or equivalent.

3. An operation that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.

4. The Summary Audit Report and Corrective Action Plan, if appropriate, with all required signatures must be submitted in hard copy to:

ICMI (International Cyanide Management Institute)
1400 I Street, NW, Suite 550.
Washington, DC, 20005, USA.
Tel: +1-202-495-4020.

5. The submittal must be accompanied with 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report on the Code Website, and 2) a completed Auditor Credentials Form. The letter and lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.

6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable gold mining company.

7. The description of the operations should include sufficient information to describe the scope and complexity of the gold mining operation and gold recovery process.

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Name of Mine: Minera Florida Ltda.
Name of Mine Owner: Pan American Silver
Name of Mine Operator: Minera Florida Ltda.
Name of Responsible Manager: Jorge Zuñiga (Process Engineer)
Address: Villa San Jeronimo de Alhué, Santiago, Chile.
State/Province: Santiago Country: Chile
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NOTE:

Yamana Gold owned the Minera Florida operation when this Cyanide Code certification audit was conducted, but at the time of certification, ownership had changed to Pan American Silver, and subsequently, Minera Florida Limitada (a subsidiary of Pan American Silver) became a Signatory to the International Cyanide Management Code.

Location detail and description of operation:

Minera Florida Ltda. is an underground mine operation and process plant, located at Villa San Jeronimo de Alhué, a small town situated 150 km south of Santiago de Chile. The access to the operation is made through asphalted road. The operation is focused in the production of gold and silver (metallic bullion) and zinc concentrate. Basically, the operation process is:

Process in Plant begins by separating Mine Ore in three products; Oversize (5-20 inches), Middle size (1-4 inches) and Small Size (under 10 mm), those products are destined to Primary Crusher (Oversize), Secondary Crusher (Middle) and Stockpile (Small).
After crushing process mine ore goes to stockpile (100% under 10 mm) and is feeding to the three PLC (Planta de Lixiviación de Concentrado) mills with a total rate of 125 TMS/h and 74,500 TMS/month, where TMS means Tonelada Métrica Seca (Dry Metric Ton) and “h” means hora (hour). Cyanide solution is not added at the milling process. Grinding product, with 80 of 120µm (microns), is concentrated in bulk flotation process, 15 times, to obtain gold concentrate that is sent to PLC leaching. Fresh tailings of bulk flotation are sent directly to PTR (Planta de Tratamiento de Relaves) leaching (without going through a regrinding).After the PTR leaching, the pulp enters into the carbon in pulp circuit (CIP) for adsorption and desorption of the gold contained in the liquid. This rich solution is sent to Electrowinning (EW) process. After PLC leaching, the liquid part of the pulp is separated to enter to EW process, where it joins with the rich solution from PTR, in this step the precious metals return to solid state as cathodic mud, which is filtered and dried to go to smelting furnaces and form the Doré Metal bars. These bars are dispatched to the final customer. Solid part separated of the rich solution in PLC, goes through the Plates Filter obtaining a product with 10% of humidity that is denominated leaching gravel. This gravel is feeding to the Lead-Zinc Flotation Plant, where it is obtained a commercial product of 40% Zinc and 8% Lead. From EW poor solutions with residual free cyanide of 2.5 gpl (gram per liter) are sent to PTR leach to be mixed with the bulk flotation tailings. The gold solution of bulk flotation tailings in PTR leaching, can achieve a better performance by adding additional cyanide to the content in the EW poor solution (additional of +0.5 kg NaCN/ton), reaching gold recovery values of 60% in PTR. Increasing the global recovery of gold in the plant to 91.13%. The residual cyanide contained in the LIX (leaching)-CIP effluent is destroyed in DETOX process, using sodium bisulfite and hydrogen peroxide as chemical agents to achieve this cancellation. The final tailings (after detox) are sent to the deposit in paste, without going through again the flotation of zinc PTR.

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Auditor's Finding

This operation is:

X in full compliance
☐ in substantial compliance ***(see below)
☐ not in compliance

with the International Cyanide Management Code.
This operation has experienced compliance issues during the previous three-year audit cycle which are discussed in this report under Standard(s) of Practice 6.2.

***** The Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company: NCA Brasil Expert Auditors Ltd. (www.globalsheq.com)
Audit Team Leader: Celso Sandt Pessoa
E-mail: celsopessoa@ncabrasil.com.br or celso@globalsheq.com (ICMI qualified lead auditor, since 2006, and TEA (Technical Expert Auditor).
Names and Signatures of Other Auditors: none

Date(s) of Audit: 07 ~17/03/2022 (on-site), 06 ~09/06/2022 (on-site) and
28 ~ 30/08/2022 (off-site).

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 Summary 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 Code Verification Protocol for Gold Mine Operations and using standard and accepted practices for health, safety and environmental audits.

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

Standard of Practice1.1: *Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.*

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

Summarize the basis for this Finding/Deficiencies Identified:
The operation buys solid NaCN from AGR Pty., where AGR means Australian Gold Reagents, an ICMI (where ICMI means International Cyanide Management Institute) certified Australian cyanide producer, in accordance with the information available at ICMI´s website.

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

Standard of Practice 2.1: *Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.*

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

Summarize the basis for this Finding/Deficiencies Identified:
All transportation documentation from AGR plant in Australia and the mining operation is retained by the mining operation. The transportation documentation includes: AGR certificate of origin, AGR statement indicating the transporter used between the AGR plant and Fremantle port (Australia), Bill of Lading issued by the sea transporter (MSC/ Mediterranean Ship Cruisers), between Freemantle port and Chilean port, road transportation document (guia de remesa) issued by the Chilean transporters ((Transportes Verasay Ltda. and Aucan Logistics SPA). Reviewed such transportation documentation, between 2019 and 2022, in this opportunity. Aucan Logistics SPA was not certified during this audit, but the operation showed an ICMI approval allowing the operation to use this transporter (only in 2022), because Transportes Verasay Chile (an ICMI certified transporter) was struggled with the high demand for cyanide transportation, and this was causing delays in cyanide delivery to the mining operation. AGR Pty. Australian supply chain, Central and South America Supply Chain and Ocean Freight Supply Chain are certified by ICMI, in accordance with the information available at ICMI´s website.

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The two NaCN storage warehouses (one at PTR and other at PLC) were designed and constructed in accordance with Chilean Engineering Standards, as well as mixing cyanide facilities They remain without any change since 2018. Design and construction documentation are retained by the operation and maintained at the operation technical library. Both warehouses are inside plant fenced areas, with restricted access, far from administrative offices and surface waters as well as mixing cyanide facilities The operation does not use liquid cyanide solution. Only uses solid NaCN briquettes. The solid NaCN boxes are unloaded over concreted floor. In the event of any incident during unloading or internal transport between the warehouse and the preparation tank, the recovery, with plastic shovels and plastic brushes, is very simple. All process tanks are provided with level sensors, which are maintained by the operation (they are included in the instrumentation preventive maintenance plan). All process tanks volumes are not used 100%. Alarm 1 is 85% and alarm 2 is 90%, as evidenced during the audit at control rooms. All process tanks are constructed inside secondary containments, constructed of structural concrete covered with HDPE (High Density Polyethylene) geomembrane, as evidenced during the field audit and reviewed at design and construction documentation. Cyanide mixing and storage tanks are placed over concrete bases and inside concreted secondary containments as evidenced during the field audit. All secondary containments are constructed of structural concrete covered with HDPE and process tanks are constructed, according API 650 standard (where API means American Petroleum Institute), of carbon steel. The solid NaCN boxes are stored inside specific designed warehouses, under a roof and off the concrete ground (over pallets), as evidenced during the field audit. Both warehouses were evidenced to be dry. Both warehouses were designed and constructed with ventilation windows and exhaustion systems, as evidenced during the field audit and reviewing design and construction documentation. Related to liquid cyanide solution mixing and distribution tanks, they are located in open areas inside the production plants with natural ventilation. Both warehouses are constructed inside the plant fenced area, with restricted access (only authorized personnel are allowed to enter these areas), with security control, and the warehouses are locked with two lockers. Related to liquid cyanide solution mixing and distribution tanks, they are located in the same areas, inside the production plants. Both warehouses are used specifically to store solid NaCN boxes. No other products are allowed to be stored in these warehouses. Related to liquid cyanide solution mixing and distribution tanks, they are constructed of carbon steel which offer a good barrier to avoid contact with potential incompatible materials that are not present in this tanking areas.

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

The operation is:
- **X** in full compliance with
- ☐ in substantial compliance with Standard of Practice 3.2
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

After use, the two bigbags are neutralized into specifically construct tanks fulfilled with hydrogen peroxide (15%) solution. After neutralization is complete (after 24 hours), the bigbags are washed and dried and disposed into de NaCN wooden boxes that are sent for final disposition at an approved environmental services supplier. All the sea containers returned to the NaCN seller or to the sea transporter (MSC) is inspected, cleaned (brushed) and sealed, before returning to the above-mentioned stakeholders.

All valves, pumps, tanks, secondary containments, are included in the operation preventive maintenance plan. It was not evidenced that hoses are used during the preparation of cyanide solution. Valves and flanges are replaced when necessary. It is cheaper to have this approach instead including them in a preventive maintenance plan. Operational procedures are in place defining the steps to be followed during cyanide solution preparation, including the operation of valves. Such operations are performed from the control room or manually at the tanking area.

All NaCN boxes are handled with the help of forklifts, operated by qualified operators. It was evidenced, during the field audit, that all NaCN boxes are kept in order, without puncturing or rupturing. The stacking limit is three boxes, according to the producer instructions. This was evidenced during the field audit. Evidenced, during the field audit, that the cyanide solution preparation areas are kept clean, in accordance with a documented operational procedure.

The cyanide solution preparation is always performed by two operators and monitored from the control rooms. Specific PPEs are defined, in a documented operational procedure, to be used during the NaCN solution preparation. Evidenced, during the field audit, the preparation of one NaCN solution batch. AGR already supplies solid NaCN with dye colorant (light red), as evidenced during the field audit.

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

Standard of Practice 4.1: *Implement management and operating systems designed to protect human health and the environment utilizing contingency planning and inspection and preventive maintenance procedures.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation designed, documented, implemented and maintains a SHEQ (Safety, Health, Environmental, Quality) management system which includes the management of cyanide. The system includes operational procedures such as reception, storage and handling of solid cyanide, strong cyanide solution preparation, CIP operational control, TSF operational control, decontamination of cyanide installations prior to maintenance activities, working at confined spaces, among others and management procedures such as change management, incident reporting and investigation, water balance management, emergencies and crisis management, communication management, among others. All operational procedures are based on the design premises, examples of such aspects are the design or required freeboard for ponds and impoundments, the concentration of WAD cyanide (Weak Acid Dissociable, which is an operationally defined group of cyanide species that undergo dissociation and liberate free cyanide when refluxed under weakly acidic conditions (pH 4.5~6.0)) in open water contained in tailings impoundments and the design storm events for process solution ponds and impoundments, and were updated along the time, in accordance with the change management procedure. Legal requirements are also addressed at the operational and management procedures. All operational and management procedures describe specifically the actions to be done in order to achieve the planned results. Hazards, risks and operational controls are addressed in the operational procedures. The required PPEs and prework inspections are also addressed in such operational procedures (or safe work procedures). The preventive maintenance management system and the maintenance inspection management system are included in the documented management system. The operation designed, documented, implemented and maintains a change management procedure which is applicable to several types of changes such as engineering changes, employees' changes, documentation changes among others. The change management procedure demands the participation of different stakeholders in order to review the proposed change, always including representatives of the environmental, health and occupational safety processes. The operation developed a contingency plan related to the management of any upset in the water balance, in the dry season and in the rainy season. There were no such of upsets in the water balance in the last four years. Any problem related to monitoring results (e.g: free cyanide content in surface waters) or detected during process plant inspections (e.g: pump leakages) are managed through the corrective actions management process. In the last four years there were no environmental monitoring nonconformances.

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Minor mechanical problems were evidenced during maintenance inspections and corrective maintenance orders were issued and timely implemented. The operation developed and implemented a crisis management plan. The operation faced a 41 days strike between December 2021 and January 2022. The leaching operations stood in neutral mode (only agitation) and the maintenance team kept the leaching installations working in a satisfactory way.

It is important to note that routine operations, beyond maintenance ones, were maintained during the strike. The solid NaCN storage warehouses were kept closed and secured, cyanide solution was not prepared, environmental monitoring was performed among other operational activities. There was a group of workers that were not on strike. The operation was not invaded or attacked by strikers. Private and public security protocols were implemented.

The operation defined, documented and implemented specific inspection checklists focused on the process plants installations. Records of such inspections are retained by the operation. Reviewed inspection records performed between 2019 and 2022, mainly the ones performed during the strike performed in the operation, as above mentioned. The inspections are performed per area and includes all the installations included in that area (e.g: tanks, secondary containments, valves, pumps, piping, instrumentation). All cyanide containing tanks are inspected on a monthly basis. The inspection scope is focused on corrosion signs, leakages, pipelines, joints, valves and structural integrity. It is an integrated inspection, including the secondary containment, the tanks concreted base. Records of such inspections are retained and were reviewed during this opportunity. During the field audit, it was evidenced that those installations are well maintained. As previously mentioned, the inspection of secondary containment, for tanks and piping, are included in the monthly inspection scope. During the field audit, it was evidenced that such installations are well preserved. The TSF is inspected every fifteen days and all quality and operational aspects of the TSF (Tailings Storage Facility) are inspected, in accordance of the Chilean law, and includes the inspection of the physical integrity of surface water diversions required to maintain the water balance. During the field audit, it was evidenced that such installations were well maintained. Records of such inspections are retained by the operation. Inspections results performed between 2018 and 2022 were reviewed. The results showed that the TSF is well maintained. Major problems were not identified. Pipelines, pumps and valves are included in the inspection scope. All cyanide installations are included in a preventive maintenance program, and inspections are performed in order to confirm the effectiveness of the preventive maintenance program. The TSF is inspected every fifteen days in accordance with the Chilean laws for this type of installation, as previously mentioned. This inspection is part of the dynamic water balance management system. Cyanide containing installations (tanks, pipes, pumps, valves, secondary containment) are inspected on a monthly basis, in between preventive maintenance activities. The TSF is inspected every fifteen days, according to the Chilean laws. Inspection checklists were developed and implemented. The inspection results are recorded in this checklist, that are retained by the operation in accordance with the quality records management procedure. The checklist addresses the quality aspects to be inspected and the acceptance criteria to be observed. If opportunities of improvement are identified, corrective or preventive maintenance orders are issued and implemented. Such cases were evidenced during this opportunity. Corrective maintenance orders are issued when the inspection result demands one. All corrective maintenance orders are dated and, when concluded, are retained by the operation. Some corrective maintenance orders issued between 2018 and 2022 were sampled and reviewed during this opportunity. In my professional opinion, as a mechanical engineer, both, the preventive maintenance frequencies and the maintenance inspection frequencies, are adequate to ensure the adequate functioning of the cyanide related installations and equipment.

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The operation designed, documented, implemented and maintains a preventive maintenance program focused on tanks, pipelines, pumps, valves, secondary containments and instrumentation (e.g: pHmeter, HCN detector, level transmitter). The frequency of preventive maintenance is variable. For process tanks, for example, every five years they pass through a complete check in accordance with API 650 and API 653 standards (where API means American Petroleum Institute). In my professional experience, the defined preventive maintenance frequency is adequate to maintain the process installations in a safe way. It was evidenced that the PLC plant is passing through a general overhauling, where tanks and associated parts (pipelines) are being painted and all secondary containments being maintained. Records of preventive maintenance orders performed during the last four years were reviewed. It was evidenced that the operation has emergency power resources (diesel generators) to operate pumps and other equipment (e.g: agitators) to prevent unintentional releases and exposures in the event its primary source of power is interrupted (the operation has five diesel generators providing around 7.5 MWh (mega watt-hour) for different installations)). The back-up power generator equipment is covered by a preventive maintenance program (annual) and inspections. The generators are turned on every two weeks. Records of such activities are retained by the operations and were reviewed during this audit.

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

The operation is:
- **X** in full compliance with
- ☐ in substantial compliance with Standard of Practice 4.2
- ☐ not in compliance with
- ☐ not subject to

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide solution is not added during the milling phase, but the operation has strategies to minimize the use of cyanide. The operation conducts a program to determine appropriate cyanide addition rates and optimize gold recovery. This program is based on metallurgical tests (bottle testing) and is performed in accordance with the ore quality that will be leached. Cyanide consumption metrics are defined and the results until June 2022 indicates that the planned results for cyanide consumption will be reached. The addition of cyanide solution in the leaching process is automatic through a cyanide and pH analyzer and controller (TAC 1000) device.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Minera Florida developed a comprehensive, probabilistic and dynamic water balance system, focused on the process plants and the TSF, which includes the reference to the design assumed inputs and outputs, and the real inputs and outputs. The water balance is managed and monitored on a daily basis, in accordance with the water balance model defined by a Yamana Gold corporate management procedure (Lavalin model). The model considers the storm rain return of 10000 years/ 230 mm/ 48 hours (0.001% probability to fall during the life of mine (LoM PLC = 2030 and LoM PTR=2036)), where LoM means Life of Mine. The operation region is suffering a decrease of rain in the last five years. The operation has a reserve of 234,000 cubic meters (TSF) that is much more than enough to retain this storm rain amount. The rates at which tailings are deposited at the TSF is considered in the model. The model considers the storm rain return of 10000 years/ 230 mm/ 24 hours (0.001% probability to fall during the life of mine (LoM = 2030 (PLC) and 2036 (PTR))). The operation region is suffering a decrease of rain in the last five years. The operation has a reserve of 234,000 cubic meters (TSF) that is much more than enough to retain this storm rain amount. The desertification process in Chile is increasing. The operation has the precipitation and evaporation data since 1989 (Summary Water Fall by Years). The precipitation resulting from surface run-on from the up-gradient watershed did not enter in a pond (TSF), because there is a specific channel constructed to conduct this water (from surface run-on) out. This channel surrounds the TSF. The freezing potential is nil. The solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface has no significant impact on the water balance. There are no discharges to surface water (the operation works on a closed circuit). The operation has a power backup system that provides sufficient energy to maintain the pumping and agitation system working. The process plant pumping system has a redundancy of two pumps. There is no leach pad at the operation. The operation does not release effluents on surface waters. No other aspects are considered in the water balance model. The operation has a reserve of 234,000 cubic meters (TSF) that is much more than enough to retain all storm rain amount. The TSF is inspected every fifteen days, according to the Chilean legislation. The TSF operates within the design freeboard. During the field audit, it was observed that the TSF is well maintained, including the perimeter channel. The operation monitors precipitation and evaporation and compares with the historical values. It was observed that the rain profile is decreasing along the years and the evaporation profile is increasing.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All the operation perimeter is fenced. The amount of WAD cyanide (Weak Acid Dissociable, which is an operationally defined group of cyanide species that undergo dissociation and liberate free cyanide when refluxed under weakly acidic conditions (pH 4.5~6.0)), in the effluent inside the TSF is maintained below 50 ppm. The operation developed and implemented an environmental monitoring plan, which includes the monitoring of the open waters. The monitoring frequency is defined in accordance with the environmental permits hold by the operation. Tailings samples are taken at the discharge points and at the liquid portion of the TSF. Reviewed monitoring results between 2018 and 2022 for WAD cyanide all results at TSF are below 50 ppm. The TSF inspections, performed every fifteen days, includes the verification of dead animals inside the TSF. There were no cases since 2018. The operation has no leach pads.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

There is no direct discharge of process effluents on surface waters (Estero Alhué). The operation operates in a closed circuit. This was evidenced during the field audit. The operation does not discharge process effluents on surface waters. The operation environmental monitoring plan includes the monitoring of the Estero Alhué (creek) up and down gradient of the operation. All results, between 2018 and 2022 for free cyanide is below 0.002 ppm (not detected). There were no environmental impacts on the surface waters (Estero Alhué) since 2018.

Standard of Practice 4.6: *Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.*

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

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Summarize the basis for this Finding/Deficiencies Identified:

Beyond the dynamic water balance management, where dewatering is not a critical aspect that could impact the water balance and, consequently, the underground water quality, the operation monitors the quality of ground water on a regular basis, in accordance with the Chilean laws. The operation installed several piezometers around the process area, in different depths. The operation monitors the content of free cyanide in underground waters taking samples in all piezometers (some of them are dry) installed by the operation. All results between 2018 and 2022 are below 0.002 ppm (not detected). The operation does not use tailings as backfill, as evidenced during the field audit. There were no impacts on the underground water between 2018 and 2022.

Standard of Practice 4.7: *Provide spill prevention or containment measures for process tanks and pipelines.*

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

Summarize the basis for this Finding/Deficiencies Identified:

All process tanks are constructed inside secondary containments, made of structural concrete and covered with HDPE geomembrane, as evidenced in the design specifications, construction records and during the field audit. All the secondary containments are designed to hold 115% of the biggest tank volume inside the containment plus the storm rain return, which probability is 0.001% during LoM. All secondary containments are provided with automatic floor pumps, inside a sump. All effluent collected inside a secondary containment is pumped back to the process tank. Evidenced this system during the field audit. All process tanks are constructed inside secondary containments. All cyanide containing pipelines and joints have a secondary containment in order to avoid any spillage or leakage. It was evidenced two types of containment, the first one a pipe inside a pipe, for pressurized pipelines and half pipeline containment for non-pressurized pipelines. This was evidenced in design documentation and during the field audit. there are no cases where cyanide containing pipelines are a risk to surface waters. All cyanide containing tanks are constructed of carbon steel and pipelines, depending on the diameter are made of carbon steel or HDPE. Evidenced through the design documentation and during the field audit.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has a technical library where the design and construction documentation related to both plants, PLC and PTR, are stored. There were no substantial changes in the configuration of both plants since 2018. Please refer to the previous audit reports, because the previously reviewed documentation remains the same.

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As previously mentioned, the process plants did not suffer no major changes since 2018. Soil compaction test records, TSF geomembrane installation documentation, welding procedures and records, material specifications and quality records are still retained by the operation, in specific data-books. Commissioning records and as-built documentation, for both plants (PTR and PLC) are still retained by the operation. Since the operation first certification, the design and construction documentation related to both leaching plants (PLC and PTR) are retained by the operation. They were sampled and reviewed several times since then and found in conformance.

Standard of Practice 4.9: *Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation, according to the Chilean mining legislation, developed, documented and maintains an environmental monitoring plan for normal and emergency situations (Programa Anual de Monitoreo Ambiental de Águas), this plan, as well the TSF monitoring plan, includes the monitoring of wildlife. All analytical methods were developed by AGQ Chile S.A, an ISO 17025/2017, accredited by the Instituto Nacional de Normalización de Chile, and are based on the SMWW (Standard Methods for Water and Wastewater/ ed. 23). The monitoring plan defines where the samples shall be taken, in accordance with the environmental permits and AGQ Chile protocols define how the samples shall be taken, preserved and transported to AGQ laboratory. The cyanide types to be analyzed are total, WAD and free, depending on the monitoring point. AGQ´s sampling protocol (and custody record as well) addresses the environmental conditions where the samples were taken. Reviewed such protocol/ record from samples taken between 2018 and 2022. The monitoring frequencies are defined by the environmental permits and, in my professional experience, are adequate to characterize the medium being monitored.

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

Standard of Practice 5.1: *Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation, in accordance with the Chilean mining legislation, developed, documented and approved (Resolución Exenta # 1150, dated 30/04/2019, issued by Sernageomin/ Servicio Nacional de Geologia y Mineria), a detailed mining decommissioning and closure plan.

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The operation decommissioning and closure plan was prepared by Golder+MWH+Stantec (plan # MWH-MFL-13048-REP-MAMB-002(0)). Related to the cyanide facilities and installations, the plan addresses neutralization, rinsing, dismantle, disposition and after closure activities, such as environmental monitoring. The closure plan defines the implementation schedule for PLC (LoM=2030) and PTR (LoM=2036). The closure plan must be updated, at least, every five years.

Standard of Practice 5.2: Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation calculated the value of 1,640,432 .00 UFs (were UF means Financial Unit defined by the Chilean Central Bank and is linked with Chilean Pesos and the US$ value), to implement the closure plan by a third party. The closure plan cost estimate is updated, at least, every five years. According to the Chilean legislation (law # 20551), the operation must have financial guarantees, issued by an official bank, on behalf of Sernageomin. It was evidenced that the operation issued, with Scottia Bank, financial guarantees, which are annually re-issued on behalf of Sernageomin. Evidenced such guarantees issued between 2019 and 2022.

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

Standard of Practice 6.1: Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce or control them.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation designed, documented, implemented and maintains a set of safe work procedures which includes operational and management ones, such as leaching operations, cyanide solution preparation, solid cyanide handling and storage, sampling activities, neutralization of cyanide containing installations before maintenance activities, elution activities, working at confined spaces. All safe work procedures clearly define the necessary PPE that must be used to perform an activity which involves cyanide. Pre-work inspections, such as PPE inspection, forklift inspection, crane inspection, fire extinguisher inspection, shower and eye-washer inspection, among others are addressed at the safe work procedures. Records of such inspections are retained by the operation and were reviewed during this opportunity. The draft safe work procedures are prepared by the plant operators who will perform that activity, reviewed by process supervisors and approved by a process engineer.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation defined two ranges of pH that shall be observed during cyanide solution preparation (between 11 and 12) and during leaching process (between 10.2 and 10.8). Verified during the field audit and through interviews with plant operators and supervisors that these values are kept under control. Also evidenced that the operation installed pHmeters in specific process tanks. Such pHmeters are included in the preventive maintenance plan, and pHmeters maintenance and calibration records were reviewed during this audit. The areas with such HCN generation potential, such as cyanide solution preparation tank, cyanide solution addition tanks, elution column, were identified and specific and adequate PPEs are mandatory to be used in such areas. Such areas are well identified as evidenced during the field audit. The operation installed fixed Drager HCN detectors in such areas and operators also use portable Drager HCN detectors. Both HCN detector types are included in the preventive maintenance and calibration program. Both types of cyanide detectors are calibrated to alarm in two points: 2.5 ppm (alarm 1) where operators must contact and inform the control rooms and 4.5 ppm (alarm 2) where the operators must inform the control rooms and leave the area. Records of such activities are retained by the operation and were reviewed during this opportunity. Reviewed calibration records between 2019 and 2022. Safety signage and safety pictograms are placed in specific places in the process plants, including the solid NaCN warehouses, which are inside the fenced perimeter of the process plants, at process plant installations including pipelines and the TSF. Safety signage includes information related to cyanide, the PPEs that must be used, that is forbidden to eat, drink and smoke in such places and also open flames are not allowed. The cyanide solution is dyed for clear identification. AGR Australia Pty. supplies solid NaCN briquettes with dye colorant. Evidenced dyed solution during the field audit (cyanide solution preparation activity). It was evidenced during the field audit that shower and low-pressure eye-washers are available in specific assigned places at the process plants. Such installations were tested during the field audit and worked adequately. The operation uses dry chemical powder fire extinguishers (ABC type) in the process plant area. Such fire extinguishers are annually maintained and monthly inspected by the occupational safety process. Records of such activities are retained by the operation and were reviewed during this audit. Fire extinguishers are also checked before some cyanide related activities (pre-work inspection). All process tanks are identified by color (purple) and safety signage that cyanide is present. In the same way all pipelines containing cyanide are identified by color, safety signage and the flow direction identified, including the ones that transfer (and return) the tailings to the TSF. Evidenced during the field audit. AGR´s MSDS are available in the warehouse, in the cyanide solution preparation area and at process plants, documented in Spanish, as well as first aid procedures for cyanide intoxication and chemical burning, as evidenced during the field audit. The operation designed, documented, implemented and maintains and incident (real or potential) reporting and investigation procedure.

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There was a minor potential incident, involving cyanide, between 2018 and 2022. A small amount of cyanide solution sprayed over the operator overall (Tyvec). No injuries to the operator were observed. The operator himself proceeded in accordance with the safety protocols and went into the emergency shower. This incident was adequately investigated, and improvement actions were defined, implemented and showed to be effective.

Standard of Practice 6.3: *Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.*

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

Summarize the basis for this Finding/Deficiencies Identified:

In both process plants (PLC and PTR) there are first aid resources such as oxygen and water and communication mean such as radios and telephone, as evidenced during the field audit. The operation has an ambulatory located between the two process plants, equipped with oxygen bottles, , mechanical breathing apparatus (ambu/ / artificial manual breathing unit), which may be used manually or associated with pressurized medicinal oxygen, additional antidotes such as sodium nitrite and sodium thiosulphate, radio, telephone, external automatic defibrillator and two ambulances. The medical team (per-shift) is composed by one doctor and six paramedics. During the cyanide solution preparation, the activity is always monitored by the operation doctor and a paramedic, with one ambulance nearby. All medical resources are inspected and tested by the paramedics on a regular basis. Records of such inspections are retained by the operation and reviewed during this audit. All cyanide antidotes were evidenced to be adequately stored and within the valid date defined by the producer. All medical support is supplied by a third-party supplier (ESACHS), which developed a first aid protocol (ESA-PE-013(4)) that includes cyanide intoxication and chemical burning. The operation has its own ambulatory equipped with resources to attend workers exposed to cyanide. The operation has two ambulances that are able to transport stabilized workers to Villa Alhué hospital, or to Melipilla hospital (Clinica Maitenes) or to Hospital del Trabajador in Santiago. The Villa Alhué hospital, the Melipilla hospital (Clinica Maitenes) and the Hospital del Trabajador were evaluated by ESACHS technical team and, depending on the decision of the operation doctor, all three hospitals are adequate to be used. The Hospital del Trabajador in Santiago city is a high complexity hospital and a reference hospital in Chile.

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

Standard of Practice 7.1: *Prepare detailed emergency response plans for potential cyanide releases.*

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

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Summarize the basis for this Finding/Deficiencies Identified:

According to the Chilean mining legislation, the operation designed, documented, implemented and maintains an emergency response manual (GGI/R02 (1.06)) and a specific cyanide related emergency response plan (GGI-P28/R02 (1) = ERP)). The ERP was developed by different internal stakeholders such as process plant team, maintenance team, occupational health professionals, occupational safety team and environmental professionals. This scenario (catastrophic release of hydrogen cyanide from storage, process or regeneration facilities) is addressed at the emergency response plan (ERP), mainly related to cyanide solution preparation and elution column process. The ERP addresses the activities that must be performed in emergencies involving solid NaCN transportation inside the operation and in the vicinity of the operation. The ERP addresses the response to emergencies related to releases during unloading and mixing. The ERP addresses the response activities to be performed during fires, mainly in the solid NaCN warehouses and explosions (elution column). The ERP describes the activities to be done in the event of pipes, valves and tanks ruptures. The ERP has a specific chapter related to TSF related emergencies, including overtopping and failure due to earthquakes. The ERP addresses the response activities to be done in the event of power outages (backup generator system) and pumps failures (redundancy two system). Uncontrolled seepage is not a critical emergency scenario for the operation because all the process plant areas and the TSF were designed and constructed (soil compaction, concreted floor (secondary containments) covered with HDPE membrane and the TSF, beyond the soil compaction, is covered with HDPE membrane). Underground water monitoring confirms the effectiveness of such operational aspects. The ERP addresses the response activities to be done in the event of failure of cyanide detox system. The ERP has a specific chapter related to TSF related emergencies, including overtopping and failure and other cyanide related installations, due to earthquakes. The primary responsibility related to solid NaCN transportation emergencies is from the cyanide seller (AGR supply chain). After the solid NaCN delivery in a Chilean port, the cyanide is transported by road (truck) by Transportes Verasay and, exceptionally, by Aucam Logistics. In the event of transport emergencies in the vicinity of the operation, the operation emergency response team will participate also. The cyanide boxes are transported within a 20´sea container. The ERP addresses the activities to be performed related to the clearing of internal stakeholders (the first step is to reunite the site personnel in specific meeting points and then, under a brigade member orientation, to leave the operation) and also potentially affected communities. The ERP addresses the use of antidotes, such as oxygen and sodium nitrite, and additional first aid measures, as previously mentioned. The ERP was developed by different stakeholders, including the process plant and maintenance teams. During the audit, a theoretical drill was performed at the PLC control room, involving two plant operators, one field plant operator and a mechanical maintenance technician. The drill result was in conformance with the planned activities (potentially contaminated steam release from the elution column). The ERP addresses, where necessary, containment actions such as containing berms, assessment and mitigation action such as the use of calcium oxide to neutralize cyanide spillage and the review of the real or potential emergency (learning from incidents approach), resulting in the definition and implementation of corrective and preventive actions.

Standard of Practice 7.2: *Involve site personnel and stakeholders in the planning process.*

The operation is:
- **X** in full compliance with
- ☐ in substantial compliance with Standard of Practice 7.2
- ☐ not in compliance with

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Summarize the basis for this Finding/Deficiencies Identified:

The ERP was developed by different internal stakeholders and submitted to external stakeholders such as Villa Alhué Civil Defense, Military Fire Fighters, local Police (Carabineros de Chile) and community representatives, during specific planned meetings (refer to Principle # 9). The ERP includes several external stakeholders such as Villa Alhué hospital, Civil Defense, Military Fire Fighters and Police (Carabineros de Chile). In order to maintain the ERP updated, the same process above mentioned is followed. Different stakeholders are involved in the ERP preparation and update.

Standard of Practice 7.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation defined an Emergency Response Committee in order to manage any type of emergencies. The emergency coordinator is the general manager, that may be replaced by the plant manager, that may be replaced by the Occupational Safety manager. The emergency committee is composed of distinct internal stakeholders. The operation has a qualified Emergency Response Brigade. All requirements to be an emergency response brigade member are clearly defined. All volunteers must pass through a medical/ psychological evaluation, theoretical and practical training and a final evaluation to be qualified. All brigade members, including the Emergency Response Committee contact information, are available at the ERP. Beyond that, there is a WhatsApp Group related to the Emergency Response Team. Call-out procedures includes the communication, by radio, with security and control rooms, which will trigger the emergency contacting the emergency response team coordinator. The emergency communication loop is clearly defined at the emergency response plan.

There are specific activities defined to emergency coordinators, brigade leader and brigade members, as well as for external stakeholders. The operation maintains a master list of all emergency response resources that must be available at the site. There is a specific emergency response room were such resources are stored. This was evidenced during the field audit. All emergency response resources are monthly inspected by the brigade members. Records of such inspections are retained by the operation and were reviewed during this audit. The operation promotes meetings and performs emergency mock drills, involving external stakeholders, where the roles of external stakeholders are communicated, and all involved stakeholders become aware about their roles during an emergency response.

Standard of Practice 7.4: *Develop procedures for internal and external emergency notification and reporting.*

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

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Summarize the basis for this Finding/Deficiencies Identified:

The ERP addresses the communication loop to be followed during an emergency, which includes the communication with external stakeholders (including ICMI, hospitals, firefighters, public authorities, press, among others). As previously mentioned, the operation develops a communication loop involving the contact with internal and external stakeholders, including communities' representatives, press institutions and public authorities. Communication to ICMI is included in the operation communication loop. No significant cyanide related incident has occurred between 2018 and 2022.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The ERP defines, in the event of solid NaCN leakage or NaCN solution spillages, the actions to be performed in both cases (recovery or neutralization of solutions or solids). The ERP describes neutralization of soils or other contaminated media. In the event of solid NaCN (briquettes) real incidents, the plan indicates that calcium oxide powder shall be poured over the briquettes, then collected with plastic shovels and brushes, put inside plastic bags and disposed into de NaCN preparation tank. It is important to note, as previously mentioned, that solid NaCN is handled over concreted surfaces. In the event of cyanide solution or pulp spillage, outside the secondary containments, such spillage shall be neutralized with hydrogen peroxide (10%) solution, which is available in the plants inside 1000-liter plastic containers. The operations uses natural absorber to dry the impacted area, which are disposed into plastic bags and sent for final disposition at the TSF. In order to confirm the effectiveness of the neutralization process, soil samples are taken every 5 cm, in depth, until the value of total cyanide is null.

It is important to note that all process tanks and cyanide containing pipelines are protected by a secondary containment and the soil in the process plants were compacted. Such installations are far from Estero Alhué a small creek that is in the perimeter of the operation. Any contaminated and neutralized debris, including soil, will be disposed at the TSF. In the event of any surface water (Estero Alhué) contamination, the operation has alternate water sources, such as water wells, that will be used to provide drinking water to any affected community. It is important to note the water of Estero Alhué is not the primary water resource for the community of Villa San Jeronimo de Alhué, which is located downstream of this creek. Although the probability to impact the Estero Alhué waters is very low, in the event of such emergency the ERP clearly defines that the use of any chemical product is forbidden to be used to mitigate the impact of potentially containing cyanide effluent on the surface water. The environmental monitoring plan addresses the necessary monitoring of contaminated soil, water and air, defining sampling protocols, the type of cyanide to be monitored and the acceptance criteria.

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Standard of Practice 7.6: *Periodically evaluate response procedures and capabilities and revise them as needed.*

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

Summarize the basis for this Finding/Deficiencies Identified:

In the event of real or potential emergencies, after mock drills or external emergencies related to cyanide, the ERP is reviewed and updated if necessary. The operation plans and performs, on an annual basis, emergency mock drills. Due to Covid 19 pandemic in 2020, the operation did not perform an emergency mock drill. Reviewed emergency mock drills performed in 2019, 2021 and 2022. The mock drills are integrated impacting three dimensions, safety, health and environment. After the drill the results are reviewed by the attendees in order to confirm if the drill was a real situation the specific ERP would work and if the attendees performed their roles in accordance with the planned activities. In all three cases, opportunities of improvement (corrective and preventive) were identified and implemented, resulting in the update of the ERP. There were no cyanide related real incidents or emergencies during the last three years.

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

Standard of Practice 8.1: *Train workers to understand the hazards associated with cyanide use.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation developed an integrated safety, health and environmental induction training for all stakeholders arriving in the operation, including the ICMI auditor, where there is a specific chapter about the cyanide management system. The operation's induction training adequately addresses cyanide related impacts, such as the cyanide effects on the safety and health of the employees, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure. Environmental impacts of the cyanide are also informed. The induction also includes the cyanide types present at the operation.

Records of such training sessions are retained by the operation and were reviewed during this audit. For internal stakeholders (including permanent contractors), the operation performs a refresh induction training every three years. Records of such refresh training sessions are retained by the operation and were reviewed during this audit.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

After passing through the safety, health and environmental induction training, the new employees or contractors that will work in activities involving cyanide are assigned to be trained specifically in the operational procedures (safe work procedures) during one work shift (8 days/ 96 hours). After that, they will work, under supervision, another work shift in order to be qualified to work in the process plants. The operational training is focused on the operational procedures (safe work procedures) that are linked with activities involving cyanide. All operational training is provided by process operators, supervisors and/ or process engineers. All new employees or contractors that will work in activities involving cyanide are trained and qualified before working with cyanide, as previously mentioned. In order to ensure that the employees that work with cyanide maintain their knowledge, the operation performs refresh training sessions every three years or, in the event of any update in the operational procedures, all involved employees are promptly trained in the new version of the operational procedure (safe work procedure). The training effectiveness is evaluated in two phases, the first one during the theoretical training through tests and the second phase through planned job observations while they are working under supervision. Records of such evaluations are retained by the operation and were reviewed during this audit. The job rotation in the operation is low and, between 2019 and 2022, only a couple of new employees were admitted to work in the process plant. All training related records are retained by the operation, by the Human Resources management process. Initial and refresh training records were sampled and reviewed during this opportunity. The reviewed training records addresses the name of the trainees, the name of the instructors, the dates of the training, the topics covered by the training and the conclusions about the performance of the employees.

Standard of Practice 8.3: *Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.*

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

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Summarize the basis for this Finding/Deficiencies Identified:

All employees that work directly with cyanide receive specific emergency related training (general knowledge) which includes first aid procedures, decontamination of workers, neutralization of leakages over soil or other surfaces like concrete. Records of such trainings are retained by the operation and were evidenced during this audit. During the field audit, some plant operators and supervisors were interviewed and demonstrated they are aware about general and specific aspects of emergency response activities. The emergency response coordinators are trained in the response protocols related to emergencies with cyanide and the resources that are necessary to respond to such situations. The Emergency Brigade members are volunteer employees that pass through medical / psychological evaluations, theoretical and practical training before being qualified as brigade members. Records of such trainings are retained by the operation and were reviewed during this opportunity. Annually, the coordinators and brigade members participate in emergency mock drills, as part of their permanent training program. All external stakeholders that are included in the emergency response plan, such as firefighters, local police (Carabineros de Chile) and Vila Alhué hospital professionals are aware about their role in cyanide related emergencies and also participates in emergency mock drills. Records of such meetings and mock drills are retained by the operation and were reviewed during this audit. Beyond the annual mock drill program, the brigade members requalified/ retrained every year. Records of such activities are retained by the operation and were reviewed during this audit. The initial and refresh training records, beyond the emergency mock drill reports, addresses the attendee's names, their performance, the training scope, instructors' names, dates and instructors' feedback about the trainee performance.

9. DIALOGUE: Engage in public consultation and disclosure.

Standard of Practice 9.1: Provide stakeholders the opportunity to communicate issues of concern.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has a specific communication process to interact with internal and external stakeholders (e.g: press, communities, public authorities). On a regular basis, the operation promotes specific meetings with the communities in order to discuss several aspects, including the cyanide management model. Records of such meetings, performed in 2019, 2021 and 2022 were reviewed during this audit. In 2020 such presential meetings were not performed due to Covid 19 pandemic.

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Standard of Practice 9.2: *Make appropriate operational and environmental information regarding cyanide available to stakeholders.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation designed and documented ((triptych) specific information about the cyanide management at the operation that are available to internal and external stakeholders and are distributed during the meetings with the communities. It was evidence that most of the external stakeholders are educated and literate. The operation has a specific communication process to interact with internal and external stakeholders (e.g: communities, public authorities, press, employees). Between 2019 and 2022 there were no critical incidents involving cyanide that resulted in fatalities, hospitalization, major environmental impacts (e.g: cyanide releases off the mine site requiring response or remediation, cyanide releases on or off the mine site resulting in significant adverse effects to the environment, cyanide releases on or off the mine site requiring reporting under applicable regulations and releases cause applicable limits for cyanide to be exceeded) that deserved to be communicated to the general public (internal and external). In the event of such real and confirmed incidents, the operation developed and documented a Crisis Management plan, which was reviewed during this opportunity and includes a specific chapter about the communication management during a crisis situation. The communication will be led by the corporation spokesman through press releases, press conferences, social media publications, meetings with public authorities, phone calls and emails.

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