ICMC CYANIDE CODE SUMMARY AUDIT REPORT
RECERTIFICATION AUDIT

Peñasquito Mine, Zacatecas, Mexico
Newmont Corporation

Submitted to
International Cyanide Management Institute (ICMI)
1400 I Street, NW, Suite 550
Washington, DC 20005
United States of America

Submitted by
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Mazapil, Zacatecas, December 03, 2025

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OPERATION GENERAL INFORMATION

Name of Mine:	Peñasquito Mine
Name of Mine Owner:	Newmont Corporation
Name of Mine Operator:	Minera Peñasquito S.A de C.V.
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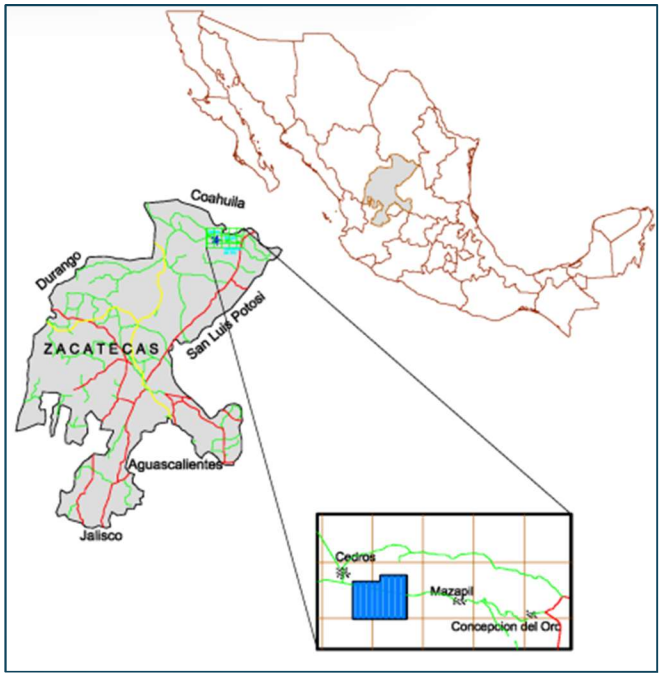
Peñasquito		December 3, 2025
Name of Mine	Signature of Lead Auditor	Date

OPERATION LOCATION DETAIL DESCRIPTION

OPERATION LOCATION

The Peñasquito It is a polymetallic mine of gold, silver, lead, and zinc, located in the municipality of Mazapil, in the state of Zacatecas, Mexico. It is situated approximately 250 kilometers northeast of the city of Zacatecas. The geographical coordinates of the mine are approximately 23.616° N latitude and 102.287° W longitude. The strategic location of the mine provides access to important transportation routes and the supplies necessary for its operations.

In 2006, Goldcorp Inc. acquired the Peñasquito project, which marked a significant milestone in its development. The company recognized the potential of the site and invested heavily in its advancement. Construction of the Peñasquito mine began in 2007, and the mine officially started production in 2010. Newmont acquired Peñasquito as part of the merger with Goldcorp, which was completed in April 2019.



OPERATION DESCRIPTION

Peñasquito is an open-pit mining operation that extracts gold, silver, lead, and zinc. It is recognized as the fifth largest silver mine globally and the second largest in Mexico. The mine processes an average of 105,000 tons of ore daily in the milling phase.

Annual gold production: 566 Koz
Annual silver production: 29,667 Koz
Annual lead production: 149 Mlbs
Annual zinc production: 377 Mlbs
Year of first production: 2009

Peñasquito receives sodium cyanide in briquettes within ISO tanks. The cyanide solution is prepared by connecting the ISO tank to the preparation tank, where it is recirculated until the briquettes are completely dissolved. Sodium cyanide solution is stored in the preparation area tanks and is later sent to the day tank, where it is distributed to the addition points.

Process Description for Sulfides Plant

At the moment of this audit, the Sulfides Plant is the only process in operation.
The Sulfides Plant is designed to extract economically valuable minerals from ore, separating these from non-valuable waste material (gangue). The process involves several steps, including size reduction, hydrometallurgical treatment (flotation), and filtration to eliminate excess water, ultimately preparing the concentrate for shipment.

Crushing Process

- Primary Crushing: The primary crushing reduces ore size typically to between 8" and 6", utilizing a FFE gyratory crusher. The crushing process is initiated when ore is unloaded from mining trucks into a 660-ton capacity hopper, where it is crushed from +16” to -5 ½”.
- The crushed material is transferred to apron feeders for further processing, ensuring a continuous feed to the SAG mill with a maximum operational capacity of 2,940 tons/hour.

Milling Process

- The milling stage focuses on reducing mineral size to a powder-like consistency, primarily combining with water to facilitate the liberation of valuable minerals from gangue prior to flotation.
- The SAG mill, equipped with steel balls, operates to grind the ore, with the majority of output directed to flotation for lead and zinc concentrates. A smaller fraction is redirected to ball mills for additional size reduction.

HPGR (High Pressure Grinding Rolls)

- HPGRs enhance the crushing of remaining ore from cone crushers, operating on the principle of compression fragmentation. They have significantly increased processing capacity by approximately 15,000 tons per day.

Flotation Process

- The flotation area processes fines from milling, where reagents are added to facilitate separation of gold, silver, and lead. The primary flotation achieves recoveries of approximately 64.5% for gold, 70.95% for silver, and 78.6% for lead.

Thickening and Filtration

- Concentrates are thickened to attain 60% solids before being filtered to meet specified moisture content required for marketing. Air is injected into filters to remove excess water, achieving final product specifications for lead (6.5-7.0%) and zinc (8.5-9.25%).

Equipment Specifications

- Detailed specifications for all critical equipment, including crushers, mills, flotation cells, and thickeners, are included, highlighting capacities, dimensions, and power ratings.

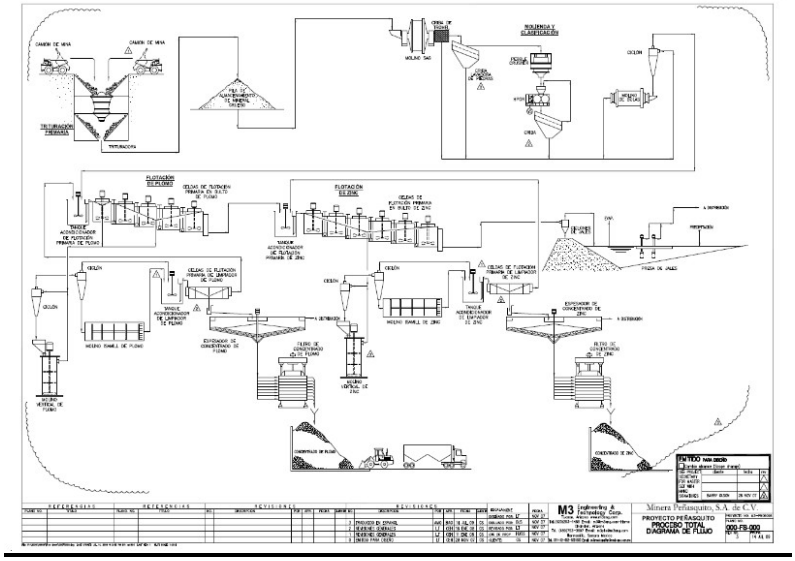


Figure 1, Sulfide Process.

Process Description for the Pyrite Leaching Plant (PLP)

The Pyrite Leach Process (PLP) ceased operations in June 2023. This audit covers the PLP Process from previous audit to June 2023, including the cleaning and decontamination of the PLP Process tanks, piping, valves, and pumps, among other components.

Process Overview

The Pyrite Leaching Plant (PLP) is designed to process lead-zinc ores through a series of efficient stages, including flotation, grinding, leaching, and detoxification. This document outlines the operational flow and key components of the process, emphasizing the interconnectivity of various systems.

Process Flowsheet

The PLP consists of several key operations:

- Flotation: Primary flotation of high and low-grade iron concentrates, followed by separation and collection.
- Thickening: Concentrates are thickened to remove excess water and prepare for subsequent processing.
- Leaching: An agitated leaching process, enhanced with oxygen, to extract gold and silver using a cyanide solution.
- Detoxification: Treatment of cyanide to meet environmental regulations.
- Merrill-Crowe Process: Recovery of gold and silver from the leach solution.

Flotation Circuit

- The primary flotation circuit includes three parallel lines, each with five flotation cells (630 m^3). High-grade concentrates are combined and directed to storage tanks, while low-grade concentrates are sent to a regrind and pre-cleaning cycle.

- Flotation reagents such as SIPX, F131A, and AF-31 are used to optimize recovery.

Grinding and Pre-Leaching

- A dedicated regrind circuit utilizes a HIG mill to achieve a particle size of approximately 55µm.
- The pre-leaching circuit aims to reduce preg-robbing effects and improve overall recovery of precious metals, using a series of flotation cells to separate carbonaceous materials.

Leaching Process

- The leaching circuit consists of eight mechanically agitated tanks arranged in series. The process utilizes a cyanide solution for gold and silver extraction, with air injected to enhance the dissolution rate.
- Key parameters such as pH and cyanide concentration are closely monitored to maintain optimal leaching conditions.

Detoxification of Cyanide

- The detoxification circuit consists of four tanks designed to treat weak acid dissociable cyanide (CNWAD). The process involves adding copper sulfate and sulfur dioxide to reduce cyanide levels to acceptable limits.

Merrill-Crowe Recovery Circuit

- This circuit involves the removal of suspended solids and oxygen from the pregnant solution, followed by the addition of zinc for precipitation of gold and silver.
- The process is monitored via a dedicated operator workstation to ensure optimal conditions for recovery.

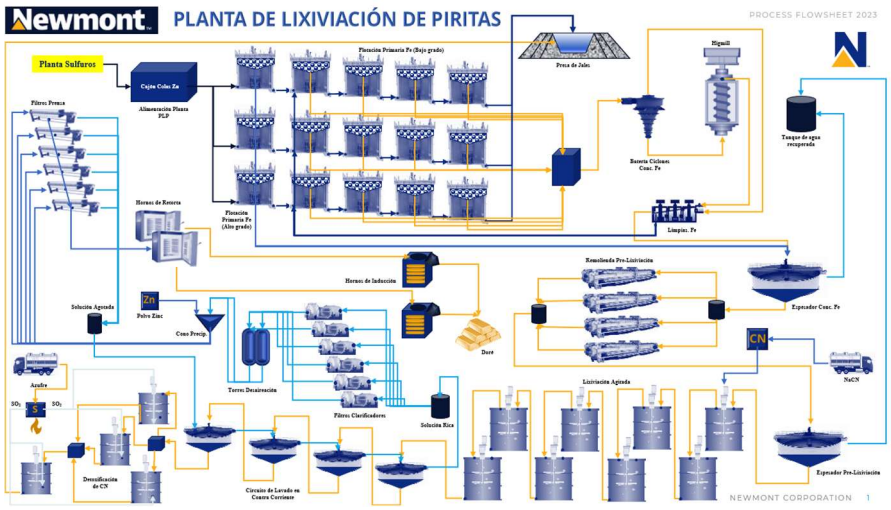


Figure 2, Pyrite Leach Plant

AUDITOR´S FINDING

The operation is	☒ **in full compliance with** ☐ in substantial compliance with ☐ not in compliance with	**the International Cyanide Management Code**

"This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle."

Audit Company:	GR Auditing
Lead and Technical Auditor:	Gabriel Rodriguez
Lead Auditor Email:	gabriellrdz@gmail.com
Dates of Audit:	May 19-22, 2025

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

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

Peñasquito		December 3, 2025
Name of Mine	Signature of Lead Auditor	Date

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PRINCIPLES AND STANDARD OF PRACTICE

Principle 1 | PRODUCTION AND PURCHASE

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

Standard of Practice 1.1

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

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

Basis for this Finding/Deficiencies Identified:

Peñasquito Mine has acquired sodium cyanide during all recertification audit period only from one producer, Draslovka Holdings, a.s., Czech Republic which US Plant and Mexican Facilities CN code certifications are:

- Draslovka US Production and Packaging Operations, CN Code current recertification audit: May 24th, 2023.
- Draslovka San Luis Potosi Bulk Transloading Facility, CN Code current recertification: Mar 11th, 2025.

The auditor reviewed the contract for the supply and transportation of cyanide and confirmed its validity at the time of the audit, along with the purchase orders and shipping records pertaining to the re-certification audit period. Peñasquito is in full compliance with this standard of practice.

Principle 2 | TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1

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

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

Basis for this Finding/Deficiencies Identified:

The operation keeps the chain of custody records that identify all transporters and supply chains involved in moving cyanide from the producer to the operation. The contract, purchase orders, and shipping records for this recertification period were reviewed. Draslovka is the only supplier for the mine, with production taking place at Draslovka's facility in Tennessee. The cyanide is subsequently transported by rail and truck to Draslovka's Bulk Transloading Facility in San Luis Potosi where is transloaded in ISO Tanks before being delivered to Peñasquito.

Current CN Code certifications for Draslovka supply chain from Memphis to Peñasquito Mine

- Draslovka US Production and Packaging Operations, CN Code current recertification audit: May 24th, 2023.
- Draslovka US Supply Chain, CN Code current recertification audit: Jun 13th, 2025.
- Draslovka San Luis Potosi Bulk Transloading Facility, CN Code current recertification audit: Mar 11th,2025.
- Draslovka Mexico Supply Chain, CN Code current recertification audit : Jun 13th, 2025.

Peñasquito is in full compliance with this standard of practice.

Principle 3 | HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

Standard of Practice 3.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All facilities for the unloading, mixing, and storage of sodium cyanide have been designed and constructed by professional engineers for the safe storage, mixing, and handling of sodium cyanide throughout the cyanide cycle at the Peñasquito mine. This can be verified in the documentation of the facilities stored in the Document Control area. These documents have been found to be in compliance with the requirements of the cyanide code in previous audits for the Oxide, Sulfide, and Pyrite Leach Plants.

During this audit cycle the auditor found that:

- The Sulfide Process has been in operation.
- The Oxide Process has not been utilized, as it has been out of operation since August 2020. This Plant was not classified as a cyanide installation during the previous audit, according to ICMI definitions. Nevertheless, previous ICMI audit reports confirmed that this Plant complied with the Code requirements related to systems designed to prevent overfilling of its cyanide storage tanks.
- The Pyrite Leach Process ceased operations in June 2023. On November 7, 2024, a memorandum was issued containing information about the cyanide process tanks of the PLP, providing data that confirmed no cyanide remained in the PLP process tanks.

The auditor has reviewed this information during the current audit and verified that the PLP cleaning report, along with data on free cyanide and WAD cyanide concentrations at the end of the process, confirms that since September 04, 2024, the PLP Plant is cyanide-free and can be classified as a Non-Cyanide Process in future audits.

Peñasquito		December 3, 2025
Name of Mine	Signature of Lead Auditor	Date

Peñasquito Mine is in a semi-desert area with a sparse population nearby; the two closest towns, Las Palmas and Las Mesas, are situated approximately four kilometers from the site. The discharge areas are sufficiently distant from these towns, posing no risk to the local population.
Due to the low frequency of rainfall, there are no perennial water sources in the vicinity. Although there is no risk of contamination to surface waters, Peñasquito has developed an emergency response plan for cases of spills inside and outside the mine.

Even though Peñasquito does not receive liquid cyanide, the ISO tank discharge areas in Sulfides, Oxides and Pyrite Leach facilities are designed with a concrete floor to prevent sodium cyanide leaks into the subsoil. This floor is sloped to direct any liquid to an automatic sump pump, which sends the spilled liquid to the preparation area tanks.

The auditor observed an ISO tank preparation, during this preparation, the ISO tank was positioned in such a way that any accidental release of sodium cyanide solution during the preparation and discharge process remains within the controlled area and does not reach the ground.

The method to prevent the overfilling of cyanide storage tanks has not changed since the last recertification audit.

In the Sulfide Plant the mixing tank, the distribution tank and daily tank have level sensors linked to the computer system in the control room.
The three tanks have audible and visual alarms sensors at:

- Tank 17 at 93%
- Tank 18 at 93%
- Tank 800TK28 at 78%

In the case of an alarm, Tank 800-TK-17 and Tank 800-TK-18 are manually shut off, while the Tank 800-TK-28 has an automatic shutoff.

Since the last certification audit, there have been no modifications to the cyanide mixing and storage tanks at the Plants.

At the Sulfide Plant, the cyanide mixing tank and the distribution tank are situated on a single solid pedestal of reinforced concrete, which is integrated into the concrete floor of the entire offloading area. The "day tank," a separate distribution tank located on the upper level of the SAG Mill, is constructed on a metal grate above the solid concrete floor of the secondary containment. This secondary containment for the day tank has a controlled discharge leading to the first level floor. The auditors observed that all the concrete foundations and containment systems were well-maintained and in good condition.

As stated in the previous certification audit report, in the Sulfide Plant the mixing and the distribution tanks are located within a single secondary containment area with reinforced concrete walls and floor and a sump pump. The “day tank” (a separate distribution tank located on the upper level of the SAG Mill) is located on a metal grate above a secondary containment with reinforced concrete walls and floor. The auditor observed that the concrete in all secondary containment areas was in good condition.

Peñasquito does not store solid sodium cyanide. Sulfide Plant receive cyanide in ISO tanks. The unloading area, mixing and preparation tanks are located outdoors, preventing the build-up of HCN gas.
Sulfide offloading areas are located within a fenced area and locked gates. Signs prohibiting unauthorized entry are posted. The auditor has reviewed the perimetral fence and found that it is good maintained.
The cyanide mixing and distribution tanks are located separately from incompatible materials. At the Sulfide Plant other materials are stored on a raised, roofed platform (open air warehouse) adjacent to the storage and distribution tanks. The platforms have concrete walls on the side that are adjacent to the cyanide offload area and do not drain towards the tanks.
The auditor observed that all chemicals stored adjacent to the offload area were compatible with cyanide.

The auditor observed during the field audit that the mixing facilities are well maintained and are consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention, and spill containment measures. Peñasquito is in full compliance with this standard of practice.

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	☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito — Name of Mine
Signature of Lead Auditor
December 3, 2025 — Date

The ISO tanks are sent to Peñasquito by the supplier with solid cyanide briquettes inside. Upon arrival at the mine, they are transported to the Sulfide preparation area, where the briquettes are mixed. Once the mixing is complete, the sodium cyanide solution is discharged into the mixing tank. After the ISO tank is emptied, it is ensured that it returns empty to the supplier's facilities. Peñasquito does not generate containers or boxes from sodium cyanide packaging because all the cyanide is received in ISO tanks.

The auditor noted that during the unloading of an ISO tank in the Sulfide area, both the ISO tank operator and Peñasquito personnel completed the start-up checklist. As part of this checklist, the ISO tank operator inspected the condition of the hoses connected to the ISO tank and confirmed that they were in good condition. Additionally, the ISO tank operators ensure that the ISO tank is thoroughly cleaned prior to leaving the mine.

The procedure MP-SOP-OPP-PR-02, Dissolution, Unloading, Transfer, and Distribution of Sodium Cyanide in Sulfide Plant, states in section 4.5, "Maintain equipment in operational condition, with scheduled maintenance and periodic calibrations." This equipment includes hoses connected to ISO tanks, valves, and couplings, among others. Additionally, operators physically

Procedure MP-SOP-OPP-PR-06, Contingency Response Plan for Operational Handling of Cyanide in the Sulfide Plant, states in its objective the following: "Effectively respond to contingencies that have the potential to occur in the operations of sodium cyanide handling. Ensure the safety of personnel involved in the operational activities of sodium cyanide: reception, dilution, storage, and distribution in the Sulfide Plant; in the maintenance activities of tanks and equipment that handle cyanide.

Ensure the safety of personnel working in the Sulfide Plant and nearby communities. Prevent impacts on the environment. The handling of sodium cyanide is included within Newmont's Fatality Risk Management (FRM) and the verification of applicable critical controls."

Procedure covers leaks and failure of offload, mixing and storage facilities. The procedures also provide contingency plans for responding to larger spills for both solid and liquid cyanide.
Nonetheless, the concrete pads and secondary containment systems would contain all spills during unloading and mixing activities.

In the preparation area, the ISO tanks are placed in the unloading area where the operator performs the startup checklist and connects the hoses to conduct a pressure test for leak detection. Once the test is completed, the Peñasquito operators initiate the preparation of the mixture, which involves recirculating the sodium cyanide solution from the preparation tank to the ISO tank and vice versa until the cyanide briquettes are completely dissolved in

the solution. This process takes more than two hours. Once the briquettes are dissolved, the solution is transferred to the preparation tank to leave the ISO tank empty. At the end of the process, the ISO tank operator disconnects the hoses and ensures that the ISO tank leaves the Sulfide unloading facilities completely clean.

The procedure MP-SOP-OPP-PR-02, Dissolution, Unloading, Transfer, and Distribution of Sodium Cyanide in Sulfide Plant, states in section 6, the necessary personal protective equipment (PPE) required to perform the operation, which includes:

- Maintenance-free respirator for particulate matter
- Rubber boots
- Type B chemical splash suit (TYCHEM)
- Helmet
- Portable HCN detector
- Face shield or goggles
- Neoprene gloves
- Safety glasses

The auditor has observed that the personal protective equipment (PPE) was used correctly while personnel were conducting the operation.

Section 3.2.23 of Procedure MP-SOP-OPP-PR-02, Dissolution, Unloading, Transfer, and Distribution of Sodium Cyanide in Sulfide Plant states that the presence of an operator as an external observer in a safe location outside the cyanide tanks area will be required. This operator will alert in case of any incident and provide support if necessary.

Additionally, the auditor has also verified that during the connection of the ISO tank, personnel from the Sulfide operation were continuously monitoring the ISO tank operator. Similarly, during the opening of valves and the initiation of the sodium cyanide mixture preparation, the ISO tank operator was observing the Peñasquito personnel. Furthermore, the control room staff monitors the operation through video cameras, covering the entire process from the arrival of the ISO tank, connection, mixing, unloading, disconnection, to its departure. Parameters such as pH levels, tank volumes, HCN detectors, etc., are also tracked on the control room screens. Any issues in the sodium cyanide preparation area are quickly detected and resolved.

The procedure MP-SOP-OPP-PR-02, Dissolution, Unloading, Transfer, and Distribution of Sodium Cyanide in Sulfide Plant, states, “To comply with provision 5H5.1 of the SEMS internal program of the company, the cyanide will be accompanied by red dye, which will facilitate the detection of any leaks that may occur during the process.”
The cyanide supplier adds red dye to the solid briquettes inside the ISO tank prior to delivery to Peñasquito.

The auditor observed the discharge of an ISO tank and confirmed that the dissolution and discharge procedures are in full compliance with the code for the current standard of practice.
Peñasquito is in full compliance with this standard of practice.

Principle 4 | OPERATIONS

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

Standard of Practice 4.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

In the previous recertification audit, Peñasquito was operating two Plants: Sulfides and Pyrite Leach Plant (PLP). At the time of this recertification audit, Peñasquito was operating only the Sulfides Plant, as the PLP Plant ceased operations in June 2023.

The scope of this recertification audit includes the following cyanide facilities: The Sulfide Plant, where cyanide is added to the ball mill and at the lead flotation circuit; and records until June 2023 of the Pyrite Leach Plant (PLP) consisting of the following main units: pyrite flotation; concentrate regrind and cleaning; thickening; post-cleaner re-grinding; agitated leaching; countercurrent decanting; cyanide detoxification; and Merrill Crowe process. The two Plants have an area for unloading, mixing, and storing cyanide.

In addition, the scope involves assessing the procedure for emptying the sodium cyanide solution and the cleaning of the tanks in the PLP.

Peñasquito has established documented management, and operating plans and procedures related to cyanide management at the Sulfide Plant and the PLP. These include protocols for unloading, mixing, and distribution tanks, as well as cyanide treatment measures aimed at safeguarding human health and the environment.

The plans and procedures are kept in a formal document control system on the Peñasquito intranet portal. A review of these documents, along with interviews with Plant operators, maintenance staff, and environmental personnel, shows that Peñasquito is equipped to manage cyanide effectively, preventing environmental releases and protecting workers and the community from exposure.

List of Operating Procedures:

Sulfide Plant:

- MP-SOP-OPP-PR-02: Dilution, Transfer, and Distribution of Sodium Cyanide at the Sulfide Plant
- MP-SOP-OPP-PR-03: Washing of Sodium Cyanide Tanks 800-TK-17, 800-TK-18
- MP-SOP-OPP-PR-04: Decontamination of PPE, Auxiliary Equipment, Pumps, Hoses, and Pipes that Came into Contact with Sodium Cyanide and Waste Disposal
- MP-SOP-OPP-PR-05: Remediation of Soil Contaminated with Cyanide
- MP-SOP-OPP-PR-06: Contingency Response Plan for Cyanide Management at the Sulfide Plant
- MP-SOP-OPP-PR-07: Application of Activated Carbon and Oxygen in Case of Emergency
- MP-SOP-OPP-PR-08: Securing the Cyanide Preparation Area in Case of Power Outage
- MP-SOP-OPP-PR-09: Inspections and Internal Audits
- MP-SOP-OPP-PR-10: Pipe Washing
- MP-SOP-OPP-PR-11: Cyanide Spill in Copper Sulfate and Deprezinc
- MP-SOP-OPP-PR-12: Dosing of Cyanide at the Sulfide Plant
- MP-SOP-OPP-PR-13: Sample Collection for Cyanide Measurement
- MP-SOP-OPP-PR-14: Cleaning of the Cyanide Day Tank Sump 800-TK-18
- MP-SOP-OPP-PR-33: Inspection of Pipes and Connections in the Cyanide Area

PLP Plant

- MP-SOP-PLP-RC-01. Operations Response Plan for Failures in Inline Cyanide Analyzers
- MP-SOP-PLP-RC-02. Receipt, Unloading, Storage, and Distribution of Sodium Cyanide at PLP Plant
- MP-SOP-PLP-RC-03. Contingency Response Plan for Cyanide Management in the Pyrite Leaching Plant (PLP)

- MP-SOP-PLP-RC-04. Response to Hydrogen Cyanide (HCN) Gas
- MP-SOP-PLP-RC-05. Unclogging Cyanide Dosing Pipeline at PLP
- MP-SOP-PLP-RC-06. Decontamination of PPE, Auxiliary Equipment, Pumps, Hoses, and Pipelines in Contact with Cyanide and Waste Disposal
- MP-SOP-PLP-RC-07. Remediation of Soil Contaminated with Sodium Cyanide at PLP Plant
- MP-SOP-PLP-RC-08. Operational Procedure for Cleaning Cyanide Mixing Tank 830TK15, PLP Plant
- MP-SOP-PLP-RC-09. Operational Procedure for Cleaning Cyanide Distribution Tank 830TK16, PLP Plant
- MP-SOP-PLP-RC-10. Confined Space Work in Cyanide Mixing Tank 830TK15
- MP-SOP-PLP-RC-11. Confined Space Work in Cyanide Distribution Tank 830TK16
- MP-SOP-PLP-RC-23. Procedure for Transferring Cyanide Solution from PLP to Sulfides

All operational procedures mentioned in Section 6 specify the personal protective equipment (PPE) required to carry out the operations. Along with the inspections to be carried out before commencing operations.
In addition, the procedure outlines the necessary safety inspections to be conducted prior to connecting the ISO tank. These inspections include verifying the proper functionality of the emergency showers and eyewash stations, HCN monitors, pH levels of the solution, and more.

Peñasquito has developed plans and procedures that describe the design criteria and applicable regulatory requirements to prevent or control cyanide releases and exposures.

The mine has documentation for all aspects of design and operation.

The design parameters for the Plant were reviewed as part of the initial audit and were found to be in full compliance with the Code. No changes have been made to those parameters since the initial audit.

Sulfide Plant:

Peñasquito contracted M3 Engineering to prepare a design criteria document for the Sulfide Plant, which contains the assumptions and parameters for the cyanide off loads area and target WAD cyanide concentrations for the tailing circuit. Operational requirements and control points from the detailed feasibility studies and project deliverables were incorporated into standard operating procedures (SOPs).

Peñasquito has developed plans and procedures in accordance with the necessary standard practices for safe and environmentally responsible operations, including the necessary measures for compliance with the Code, such as water management, inspections, and preventive maintenance activities.

The procedures detail the risks involved with each task and adequately describe safe work practices. Each procedure details task-specific measures, personal protective equipment

(PPE) requirements, and the persons responsible for verifying that the procedures for each cyanide task are implemented.

Peñasquito has reviewed and updated as necessary its procedures at least once this audit cycle.

The procedure MP-SOP-SUT-S&ER-01, Management of Change (MOC), details the process for managing changes within operations. It ensures that all modifications to production processes, operational practices, or cyanide facilities are evaluated to determine whether they might increase the potential for cyanide releases and worker exposures and incorporate any measures necessary to protect worker health and safety and the environment.

To keep tracking the changes, the Enablon system is used to report incidents, spills, and involved parties; here, the action plan is uploaded, and compliance is monitored. The implementation of changes requires authorization from several key areas, including environment, safety, operations, maintenance, and training.

Records of management of change examples completed since the last recertification audit were reviewed and found to meet the requirements of the Code.

When the oxide leaching Plant was operational, there was a water imbalance management program in place. Once that Plant was decommissioned, there was no longer a risk of exceeding the pond capacity due to the heap leaching process being out of use. In the case of dynamic PLP leaching, tanks are used instead of ponds, like the Sulfide process.

The procedure MP-SOP-OPP-PR-06, Operational Contingency Response Plan for Cyanide Management in the Sulfide Plant, outlines the following issues identified through facility monitoring or inspection:

- Clogging in the outlet line of the ISO tank during dilution and discharge.
- Cyanide solution leakage due to failure in sealing gaskets at the connections to the iso-container.
- Failure in sealing valves 80TK17 FCV02, FCV04.
- Leak in the dome.
- Leak from the pressure relief valve of the ISO tank.
- Failure in the transfer from mixing tank 800TK17 to distribution tank 800TK18.
- Leak from the pressure gauges of the distribution pumps.
- Leaks in the return line of pump 800PP31 to tanks 800TK17 and 800TK18.
- Leaks in distribution lines.
- Calibration failures of the pH meter.
- Solids inside the tank due to lack of periodic washing.
- Failures in dilution and cyanide transfer pumps 800PP19A, 800PP19B.

- Wear of the impeller in pumps 20 and 21 (Distribution pumps).
- Leak in the feed line of cyanide solution to CPP.
- Overflow of the day tank due to overfilling.

The following documents outline the actions to be taken during shutdowns due to situations such as work stoppages, lack of ore or other essential materials, economics, civil unrest, or legal or regulatory actions:

- Newmont Peñasquito Mine Closure Plan
- Procedure MP-SOP PLS-RC-01, Procedure for Care and Maintenance of Process Plant, applicable to Sulfides and PLP.
- Checklist for equipment conservation and startup routine.
- Plant Contingency Checklist, daily inspection checklist.
- Peñasquito Water Monitoring Plan 2025

Specifically, Section 8.0 of the Newmont Peñasquito Mine Closure Plan, titled "Sudden Closure," mentions the temporary closure plan in the event of any shutdowns due to situations such as work stoppages, lack of ore or other essential materials, economic factors, civil unrest, or legal or regulatory actions, among others.
This plan outlines the necessity for ongoing maintenance and regular inspections of all facilities to guarantee proper stormwater storage capacity in the process ponds and to ensure the structural integrity of all pipes, ditches, diversion structures, berms, and embankments.
Procedure MP-SOP PLS-RC-01, Procedure for Care and Maintenance of Process Plant outline the protocols for shutting down the sulfide plant areas in response to any threats that may impact the internal operations of the mine, requiring a temporary halt of activities. These protocols focus on keeping the sulfide area safe by ensuring that the cyanide solutions in tanks and pipes are fully contained, as well as preparing the area for resuming operations once the temporary closure period concludes.
Additionally, the contingency plan outlines the measures to be taken in the event that a disturbed condition results in a spill.

The operations team performs a weekly inspection to assess the structural integrity and check for any signs of corrosion or leakage in the sodium cyanide tanks 800-TK-17, 800-TK-18, and 800-TK-28 located in the Sulfide Plant. The findings of this inspection are recorded on Form 5, in accordance with the procedure MP-SOP-OPP-PR-09, which covers Inspections and Internal Audits, and is signed by both the operator and the supervisor.

Operations personnel conduct a weekly inspection of the secondary containment systems in the Sulfide Plant. This inspection is documented on Form 8, under the procedure MP-SOP-

OPP-PR-09, Inspections and Internal Audits, and is signed by the operator and the supervisor.

These secondary containment inspections include, among others, the discharge area of the ISO tank, the area of the tanks and caustic soda, the containment berm of the day tank, cracks in the floor, walls, concrete joints, free-flowing channels without obstructions, and leaks in pipelines, which are inspected and promptly corrected.

Operations personnel conduct a weekly inspection of the pipelines, pumps, and valves for deterioration and leakage in the Sulfide Plant. This inspection is documented on Form 6, under the procedure MP-SOP-OPP-PR-09, Inspections and Internal Audits, and is signed by the operator and the supervisor.

The Oxides plant is currently out of operation, so the heap leaching ponds are no longer used for storing sodium cyanide solutions. After the closure of the Oxides operations, the ponds were emptied and decontaminated, and now only contain a small amount of rainwater. The tailings dam from the Sulfides process is the only area of surface water used at Peñasquito; however, the WAD cyanide concentrations here are below 0.5 mg/l, thus it is considered a cyanide-free area. Despite this, inspections of the freeboard and integrity of surface water deviations are conducted as mentioned in the procedures for the Peñasquito tailings dam.

Peñasquito conducts and documents operational and safety inspections on a daily and weekly basis, as well as maintenance inspections according to its preventive maintenance program. This ensures that the frequency complies with design parameters. The inspection forms have identified specific items to be observed and their expected condition. The forms also included the date of the inspection, the name of the inspector, and any observed deficiencies, if any. The deficiencies are corrected as soon as possible

All inspection forms mention whether there has been a deficiency and the actions taken to resolve it. If there is any other deficiency that requires more time, it is followed up in the Enablon system. All inspections are physically archived by year and stored electronically.

Peñasquito has implemented preventive maintenance programs, and documented its activities, to ensure that the operation of the equipment and devices provides safe handling of sodium cyanide. Preventive maintenance consists of daily, weekly, monthly, quarterly, and annual inspections, depending on each piece of equipment and according to the preventive maintenance plan. In the case of pumps and valves, inspections are conducted weekly.

Maintenance inspections, consisting of a checklist provided by the maintenance system, are carried out by trained maintenance personnel according to the preventive maintenance

program. If any repair is necessary, a work order is generated at SAP, where it is determined if spare parts are in stock or if a purchase needs to be made for any that are not available.

Peñasquito performs preventive maintenance on pumps, valves, flowmeters, gauges, level sensors, pH meters, sump pumps, filters, and HCN sensors. The preventive maintenance program is also used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks. In the current audit, maintenance personnel showed some examples of work orders as well as calibration records.

The Sulfide Plant does not require backup generators for the reagent-grade cyanide circuit because it operates as a closed system that prevents backflow during a power outage. If a power outage occurs, the ball mills will cease operation, and the electronic controllers managing the cyanide feed lines from the day tank will halt the flow to the ball mills. Similarly, the electronic controller for the lead cleaner tanks will stop the flow from the day tank to those tanks as well. Additionally, all other process tanks and columns are fitted with check valves to ensure that solution movement is stopped during a power outage. Therefore, backup power is unnecessary for managing cyanide solutions at the Sulfide Plant.
Peñasquito is in full compliance with this standard of practice.

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	☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.2

Summarize the basis for this Finding/Deficiencies Identified:

As described in the previous ICMI recertification audit reports, Peñasquito uses cyanide at the Sulfide Plant to depress pyrite rather than leach gold. Cyanide is added at two points in the Sulfide Plant: the ball mills and the lead flotation circuit, with the ball mills receiving a higher dosage than the lead flotation circuit.

The carbon pre-flotation circuit (CPP) was utilized in the previous audit cycle; however, in this audit, the use of the CPP process was no longer necessary. Therefore, the only source of addition in this audit is the Sulfide area.

Flotation tests are conducted to adjust the reagent dosing, and the information is recorded in a report in Excel titled Operational Instructions for Flotation, Thickening, and Filtration. Laboratory tests are conducted on different types of ore from Chile Colorado and Peñasquito deposits at the beginning of each shift, on a daily or weekly basis, depending on the material.

The Sulfide operation has a procedure for dosing cyanide named MP-SOP-OPP-PR-12, Sodium Cyanide Dosing in Sulfide Plant and the dosage is recorded in the Daily Reagent Dosing Report.

During this recertification period, the cyanide consumption was approximately 9-12 g/ton, as the material contains less pyrite than in the previous audit, where the consumption was approximately 13-15 g/ton. These rates are significantly different from the initial rate of approximately 35 g/ton in 2007. This initial dosage was based on thousands of ore tests run at laboratories in the United States and Canada between 2004 and 2007.

Peñasquito is in full compliance with this standard of practice.

Standard of Practice 4.3

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

Summarize the basis for this Finding/Deficiencies Identified:

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

Peñasquito has continued to use a comprehensive, probabilistic water balance using Goldsim software platform. Since 2023, an external consulting company named Piteau Associates Engineering has been calibrating and updating the model. Previously the company who had updated and calibrated the model was Golder Associates.

In the past, Peñasquito had the oxide Plant which ceased operations prior to this recertification audit, oxides Plant utilized the heap leach process. The water balance used

before was specifically for controlling the overflow of its process ponds. As explained in previous audit reports, the operation has developed a water balance for the heap leach and process ponds at the Oxide Plant. The water balance is specifically intended for management of the process ponds to prevent overtopping.

The Sulfide Plant and the PLP do not have process ponds associated with its operations and therefore do not require an operational water balance to meet Code compliance. The PLP has an Emergency Pond that is for storm water collection outside of bunded (secondary containment) areas. The return from the pond can be sent to the final tailings box if needed.

Interviews were conducted with the Process Engineer and confirmed that the parameters used in the water balance modeling were being continually monitored and maintained as part of daily operations. Operating conditions of the Plant were checked during the audit to confirm that the water balance modeling was probabilistic and comprehensive. The Process Engineer demonstrated to the auditors the GoldSim model.

The 100-year, 24-hour design storm of 101 millimeters (mm) is used in the model. However, any precipitation depth can be entered if the effects of a larger or smaller event need to be evaluated in real time.

Precipitation data from the station at the Peñasquito airstrip is used for the actual daily values in the model. This station has the most data for a station nearest the mine. The average year precipitation (407mm in 1972) and the wet-year precipitation (758mm in 1976) were derived from the government station in Mazapil, Zacatecas. The water balance model also considers the quality of evaporation data in representing site conditions, as appropriate. Records at that station cover a 37-year period (1961 to 1998)

In the event of a power outage, the slurry would flow to the tailings dam without the risk of overflowing. Nevertheless, there is a system in place that prevents the flow of slurry from the tailings dam, in which the cells' darts close.

Because the oxide area has been out of operation since the last recertification audit, the ponds involved in the process are out of the scope of this audit; currently, those ponds only contain a small amount of rainwater.

The tailings dam associated with the Sulfide process is the sole pond in operation at present. This pond has no WAD cyanide levels exceeding 0.5 mg/l and is designed with a minimum freeboard of 2.0 meters. Records indicate that the freeboard consistently complies with the design specifications. Freeboard levels are measured daily at the tailings dam, and each week the dam planning team compiles the data.

Peñasquito has developed a standard operating procedure (SOP) to inspect and monitor

activities to implement the water balance and prevent overtopping the tailing dam and unplanned discharge of cyanide solution to the environment.

The SOP is for upset conditions in the process ponds, with emphasis on the contingency pond and tailings mill pond. The auditors reviewed completed examples of inspection forms for the recertification period and found them to be acceptable. Regular inspections are performed to assess the amount of freeboard in the ponds, the condition of the perimeter fencing and access gates and the condition of the geomembrane liner of the ponds.

Peñasquito has an annual inspection program for the surface water diversions around the Open pit, oxide Plant, and heap leach pad. The auditors reviewed completed inspection forms covering the audit re-certification period and found them to be acceptable.

Peñasquito updates the water balance model on an annual basis with meteorological data collected from regional weather monitoring stations. The water balance projections are revised as necessary based on actual data. Peñasquito regularly incorporates the precipitation data from the airstrip into the water balance model. Peñasquito shows the meteorological monitoring date to the auditor.
Peñasquito is in full compliance with this standard of practice.

Standard of Practice 4.4

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito does not have open waters where WAD cyanide exceeds 50 mg/L. The tailing dam is the only open water, but the data shown to the auditor were always below 50 mg/L. However, there are some restricted measures to avoid access to other areas, delineated as follows: - The perimeter is combined with cyclone mesh and barbed wire. - Sulfides, in the cyanide discharge area with cyclone mesh (Sulfides and PLP). It is secured with padlock. The auditors observed these measures to be in good condition during the site visit.

Peñasquito has demonstrated that WAD cyanide concentrations were less than 50 mg/l during the recertification period in the open waters without netting. Samples were collected at least quarterly and sometimes monthly.

WAD Cyanide Data (Maximum Value for 2025 monitoring data)

Observation Point	WAD Cyanide, mg/l	Ubication
Tailings Box	0.010	At the cyanide destruction circuit prior to release to the impoundment
Dam Basin	0.008	Supernatant pond
TK-03	0.007	Supernatant pond
TK-04	0.006	Supernatant pond

The tailings dam from the Sulfides process is the only area of surface water used at Peñasquito; however, the WAD cyanide concentrations during the recertification period, were below 0.5 mg/l, thus it is considered a cyanide-free area.

Peñasquito has not open waters with WAD cyanide concentration of 50 mg/l. Nevertheless, Peñasquito has a wildlife monitoring program for the oxide Plant in accordance with Newmont's corporate standards.

In the current audit cycle, Peñasquito did not have any animal mortality related to cyanide. The auditor reviewed a non-cyanide-related incident involving a bird accident at the mine facilities, where the final report of the incident was documented in Enablon.
Peñasquito is in full compliance with this standard of practice.

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
☒ in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 4.5

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito does not have direct or indirect discharges to surface water from the cyanide facilities. Peñasquito annually inspect the diversion through and around the site for the presence of seeps into these normally dry channels.

Peñasquito is in full compliance with this standard of practice.

Peñasquito
Name of Mine

Signature of Lead Auditor

December 3, 2025
Date

Standard of Practice 4.6

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All cyanide solutions are contained in process tanks and columns within secondary containment provided by the concrete floor of the Plant in order to prevent seepage to groundwater. The day tank (high-strength cyanide solution) on the upper floor of the Plant has a separate secondary containment, in addition to the concrete floor of the Plant to prevent seepage to groundwater.

Peñasquito has monitored for cyanide in groundwater to demonstrate that beneficial uses of groundwater downgradient of the cyanide facilities have not been affected at concentrations greater the numerical standards in Mexican regulations which stablishes a maximum of 1.0 mg/l total cyanide from the Mexican federal regulation (NOM-OOI-SEMARNAT-2021).

Peñasquito does not use mill tailings as underground backfill. And finally, Peñasquito does not have seepage that has caused cyanide concentration of groundwater to rise about levels protective of beneficial use and therefore no remedial activity is currently required.

Peñasquito is in full compliance with this standard of practice.

Standard of Practice 4.7

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito has provided spill containment measures for all cyanide mixing and process solution tanks. The tanks 800-TK-17 (mixing tank), 800-TK-18 (transfer tank) and 800-TK-28 (daily tank) have been installed on solid concrete bases within concrete secondary

containment. Sumps with automated sumps return solutions to the tank 800-YK-18. The ISO tanks unloading floor is sloped to drain to the sump pump and the liquid is sent to the tank 800-TK-18. For other process tanks and vessels containing process solutions, such as those located in the milling, flotation, and other process circuits, they have their secondary containment with the capacity to contain the volume of the largest tank, along with additional capacity for the design storm event. It is noteworthy that these tanks have remained unaltered since their construction.

The auditor observed the secondary containments to be in good condition at the time of the site visit.

Peñasquito has properly sized secondary containments, according with the original design, the second containment holds a volume 10% greater than that of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event.

Tank #	Tanque Name	Volume Largest Tank (m3)	Volume 10% Bigger than Largest Tank (m3)	Second Containment Volume Available (m3)
800-TK-17	Mixing Tank	105	115.5	160.6
800-TK-18	Distribution Tank	105	115.5	160.6
800-TK-28	Day Tank	10.21	11.23	13.22

For other process tanks and vessels containing process solutions, these are equipped with secondary containment systems. The largest tank has a capacity of 300 m^3, and the containment area is greater than 900 m^3.

Peñasquito has designed the secondary containments to not discharge to the environment and therefore no written procedures are needed to prevent discharge of contained water to the environment. Peñasquito has constructed sumps with automated pumps in the secondary containments at the sulfide cyanide dissolution facility to return cyanide solutions to the tank 800-TK-18.

The auditor observed the second containments and sumps and pumps to be in good condition at the time of the site visit. Peñasquito does not have cyanide-related tanks without secondary containment.

All cyanide process solution pipelines at Peñasquito have spill prevention or containment measure for cyanide solution pipelines to collect leaks and prevent release to the environment.

Peñasquito has constructed cyanide solution pipelines with containment measures to collect leaks and prevent releases to the environment. The pipeline containments consist of stainless-steel trays. In addition, the pipeline from the distribution tank (800-TK-189 to the day tank (800-TK-28) has a stainless still cover as a second containment. The auditor observed these pipeline secondary containments during the site visit and found them to be in good condition.

Peñasquito has constructed tanks and pipelines with materials compatible with cyanide and high pH conditions. Cyanide tanks 800-TK-17, 800-TK-18 and 800-TK-28(daily tank), along with other process tanks, have been constructed of carbon steel. Pipelines have been constructed of stainless steel.
Peñasquito is in full compliance with this standard of practice.

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	☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.8

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito implemented Quality Assurance and Quality Control (QA/QC) programs during construction of cyanide facilities, as is described and found in compliance in the previous certification audit reports. PLP QA/QC reports were reviewed in the past year by the auditor and confirm its availability in this recertification audit.

All cyanide facilities at Peñasquito have been professionally designed and constructed. The evidence to demonstrate this requirement includes design specifications and as-built drawings stamped by certified professional engineers, as described in the previous ICMI audits reports, where the design and construction drawings were reviewed and provided adequate detail to demonstrate that these facilities were designed and constructed in accordance with sound and accepted engineering practices.

Peñasquito		December 3, 2025
Name of Mine	Signature of Lead Auditor	Date

For this recertification audit, the auditors confirmed Peñasquito maintains all construction records at the mine site in the Document Control building, organized and filed in an exemplary manner for quick access and consultation. There have been no modifications to the cyanide installations since the previous certification audit.

As stated in the Peñasquito initial previous certification reports, the QA/QC documentation for the Oxide Plant, HLF and Sulfide Plant includes appropriate testing concerning the suitability of materials, welding, concrete, adequacy of earthworks and soil compaction, and installation of geomembrane liners. The program included the quality of metal fabrication at the tank vendor. The program included subgrade and concrete testing including suitability of materials, fabrication, electrical, mechanical, instrumentation, piping, concrete, and earthworks. The program included subgrade and concrete testing including suitability of materials, fabrication, electrical, mechanical, instrumentation, piping, concrete, and earthworks.

Peñasquito retains construction QA/QC files in hard copy and electronically in the Document Control area. The auditors verified that the hardcopy of the QA/QC documents have been retained for the Oxide, HLP, the Sulfide Plants, and PLP.

As stated in the previous certification audit reports, qualified engineering companies performed the QA/QC inspections and reviews during construction and prepared the final construction reports certifying that the facilities were constructed in accordance with the design drawings and technical specifications. Peñasquito has as-built drawings/certification for all cyanide facilities which are properly stamped by a qualified engineer.
Peñasquito is in full compliance with this standard of practice.

Standard of Practice 4.9

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The procedure, MA-P-MO-01, for water monitoring is used for measuring water levels in wells and for sampling surface water, groundwater, drains, and ponds of the tailings dam.

Additionally, the Daily Walk procedure describes daily wildlife monitoring and the steps for reporting mortalities. Peñasquito has used appropriately qualified personnel to develop sampling and analytical protocols. The procedure MA-P-MO-01, Water Monitoring Procedure was originally developed by WSP and qualified and experienced personnel of Peñasquito.

In addition, the analytical laboratory procedures have been supported by ALS Indequim, a laboratory accredited by the Mexican entity for accreditation (Entidad Mexicana de a Acreditacion [EMA]), as verified on the EMA website. And ALS Environmental Vancouver.
An annual sampling plan for water quality, including metals, cyanide, ions, cations, etc., is implemented, and a report with the results is obtained quarterly. The custody of the samples is maintained from the time of collection until their delivery to the ALS laboratory in Vancouver, where WAD, free, and total cyanide are analyzed.

The sampling conditions such as weather, livestock/wildlife activity, and anthropogenic influences are documented in the field sheet MA-F-MO-03, specifying anything outside of the normal, meteorological conditions, and others.

Peñasquito has monitored at frequencies adequate to characterize the media being monitored and to identify changes in a timely manner. Wildlife inspections have been completed weekly. Groundwater monitoring has been monitored quarterly.

Peñasquito is in full compliance with this standard of practice.

Principle 5 | DECOMMISSIONING

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

Standard of Practice 5.1

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

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

Peñasquito		December 3, 2025
Name of Mine	Signature of Lead Auditor	Date

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito Mine has a closure plan titled Newmont Peñasquito Closure Plan, with the last revision dated 09/2021. This plan is reviewed every five years. As part of the closure planning, an annual update of closure costs is prepared, along with a schedule of activities to be carried out. The auditor reviewed the scheduled activities for 2024 as outlined in this annual plan.

The plan includes the decontamination of areas that contain cyanide to achieve WAD cyanide concentrations below 0.5 mg/l. The decontamination plans are followed according to the operations detailed in their procedures. For example, the procedure MP-SOP-OPP-PR-03, cyanide tank washing, and the procedure MP-SOP-OPP-PR-10, piping washing.

In the case of the Oxides (Heap Leach) and Pyrite Leach Process (PLP), they have already achieved levels of WAD cyanide concentrations below 0.5 mg/L. The decontamination of PLP was included in the scheduled activities for 2024.

This plan is reviewed every five years or less if needed according to the operation needs or with the Newmont corporation standard, NEM-SER-STA-003 S&ER, Closure and Reclamation Management Standard. In addition, an annual estimate of closure costs is updated, along with a schedule of activities to be carried out.
Peñasquito is in full compliance with this standard of practice.

Standard of Practice 5.2

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

The operation is ☒ in full compliance with / ☐ in substantial compliance with / ☐ not in compliance with Standard of Practice 5.2

Summarize the basis for this Finding/Deficiencies Identified:

The estimated costs are reviewed annually. For 2024, the total cost, Asset Retirement Obligation (ARO), was estimated at $562,033,704 USD. The costs were estimated using a Standardized Reclamation Cost Estimator (SRCE), which incorporates local costs for equipment, labor, and other factors. The estimate includes the applicable cyanide facilities, as well as other non-cyanide facilities.

As part of the closure planning, an annual update of closure costs is prepared, along with a schedule of activities to be carried out. The auditor reviewed the closure costs and scheduled activities for 2024 as outlined in this annual plan.

The local government jurisdiction SEMARNAT (Secretary of Environment and Natural Resources) requires that environmental bonds be in place for each stage of the project (including closure). These bonds are updated annually. For the mine decommissioning activities, a third-party financial auditing firm confirmed for stockholders that Newmont Corporation has the ability to fund all of its financial liabilities, including the closure of the Peñasquito Mine. The auditing firm, Ernst & Young Global Limited, audits Newmont annually.

Peñasquito has an established self-guarantee as the mechanism to cover the estimated costs for closure and reclamation. For the mine decommissioning activities, a third-party financial auditing firm confirmed for stockholders that Newmont Corporation has the ability to fund all of its financial liabilities, including the closure of the Peñasquito Mine. The auditing firm, Ernst & Young Global Limited audits Newmont annually
Peñasquito is in full compliance with this standard of practice.

Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Standard of Practice 6.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito has developed procedures that outline tasks related to cyanide, such as cyanide solution preparation, ISO tank discharge, Plant operations, entry into confined spaces, and equipment decontamination prior to maintenance, to minimize worker exposure. In addition, all operational procedures at Peñasquito include the following sections:

• Section 6. Materials, Personal Protective Equipment, Tools
• Section 7. Special Precautions
• Section 8. Hazardous Waste Management
• Section 10. References and Annexes
Furthermore, some procedures have pre-work inspection if necessary.

Peñasquito operation solicits worker input in developing and evaluating health and safety procedures amount others in the revision and training of the procedures, operators write their observations and sign off on the document review, in the daily meetings at 6:30 AM and 6:30 PM as long as in the Job Safety Analysis format.
Peñasquito is in full compliance with this standard of practice.

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	☒ 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:

Section 3.2 of the procedure MP-SOP-OPP-PR-02, Dilution, off-loading, transfer, and distribution of sodium cyanide at the Sulfide Plant, mentions that the pH of tank 800-TK-17 must have a minimum value of 11.5 to ensure that there is no possibility of generating HCN inside the tank that could escape into the atmosphere and into the cyanide circuit pipes.

The supplier adds enough caustic soda to each ISO tank to achieve a pH value of 11.5 during the dissolution of the briquettes. Peñasquito does not need to add lime or caustic soda during the dissolution.

Peñasquito has online pH probes in their cyanide tanks and process circuits. pH meters are maintained on a monthly basis as part of the preventive maintenance program. pH values are displayed on monitors in the control rooms.

During the discharge of a cyanide ISO tank, the auditor checked the pH values in the control room screens and in the operation logbooks, finding pH values greater than 11.5. This demonstrates that there is efficient control over the pH of the solution.

Peñasquito has identified areas where workers may be exposed to hydrogen cyanide gas or cyanide dust in excess of 10 parts per million (ppm) (11 mg/m3) on an instantaneous basis

and 4.7 ppm (5 mg/m3) continuously over an 8-hour period. Operation areas where there is a potential for worker exposure to gas cyanide are identified and continuously monitored using fixed HCN gas monitoring units. Portable HCN monitors are also provided to workers and are available for use in locations where there is a risk of HCN exposure such as cyanide offload and mixing.

Peñasquito has also established a checklist for the daily inspection of HCN values in the Sulfide Process. Furthermore, the control room monitors display the HCN readings for all fixed HCN detectors. If any value exceeds the established limit of 4.7, an alarm is triggered on the screen. The emergency response plan states that if HCN levels reach 10 ppm, the area must be evacuated.

Peñasquito has used monitoring devices in process areas and for activities involving management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas or cyanide dust exceeding 10 ppm on an instantaneous basis or 4.7 ppm continuously over an 8-hour period, as cyanide.

In addition, Peñasquito requires that workers in areas containing cyanide use portable HCN monitors to perform cyanide and maintenance tasks, such as cyanide offload, and mixing. On the day of the site certification audit, there were 21 portable HCN monitors available and calibrated and three fixed HCN monitors located in the sulfides Tank 800-TK-17, Tank 800-TK-18, and Day Tank 800-TK-28.

HCN monitors have audible alarms set at 4.7 ppm to stop working and do activities such as venting, etc. and 10 ppm for evacuation. Section 7.6 of operating procedures outlines the actions to be taken when HCN values reach 4.7 ppm and 10 ppm. The Auditor reviewed the calibration records for both portable and fixed HCN monitors, finding that the calibration program for fixed and portable monitors is effective.

Peñasquito has a maintenance and calibration plan for the fixed HCN Drager detectors. According to the procedure MP-SOP-AM-MTTJ-02, Maintenance of Stationary HCN Sensor. Calibration is performed monthly using a 10 ppm HCN calibration gas. The calibration is performed by the Peñasquito instrument technicians. This calibration is requested by the SAP system according with the calibration plan. Additionally, an annual calibration is performed on the fixed detectors at Peñasquito by an external company, ECN (Electro Controles del Noreste), through SAP service orders. Calibration records are retained electronically and physically by the Instrumentation Department of Peñasquito by year. The auditor reviewed the calibration records of fixed HCN detectors for the last three years and found them to be in good condition.

The procedure MP-SOP-AM-MTTJ-01, Calibration of Portable Detectors, states that portable detectors must be calibrated monthly by Peñasquito instrumentation personnel using a 10-ppm calibration gas. The auditor reviewed the calibration records for two portable detectors and found them in good condition.

Peñasquito has warning signs placed where cyanide is used, advising workers that cyanide is present, any necessary personal protective equipment that must be worn, and that smoking, open flames, and eating and drinking are not allowed.

During the field audit, the auditor observed cyanide warning signs in different areas such as Sulfide sodium cyanide discharge, daily tank, sample collection (measurement) from the 4 additions of cyanide to the ball mills, sample collection (measurement) from 2 additions in the lead cleans, Pyrite Leach Process, pipes with cyanide signs, and trays with sodium cyanide signs.

Peñasquito uses Synthetic Organic Dye Red No. 40 for dyeing high-strength cyanide solution for clear identification. This is added to the ISO tanks at the sodium cyanide supplier's facilities. The auditor reviewed the specification of the red dye, FD&C Reg. 40 Granular 07704 available at the Sulfide Plant.

Peñasquito has installed showers, low-pressure eyewash stations and dry power or non-acid sodium bicarbonate fire extinguishers located at strategic locations throughout the operation and are they maintained, inspected and tested on a regular basis.

The Sulfide area has 9 showers and 9 low-pressure eyewash stations while the PLP area has 19 showers and 19 low-pressure eyewash stations. Showers and eyewash stations are inspected and tested weekly and prior to beginning of a task that has the potential for cyanide exposure (examples: cyanide preparation and opening a pipeline for maintenance) The auditor randomly checked showers and eyewashes during the site visit to verify functionality.

Peñasquito has dry powder extinguishers located in strategic locations, which are inspected and tested monthly by an external company and weekly by the Plant. The auditor randomly checked the fire extinguisher checklists to confirm they are an acceptable type for use with cyanide. Extinguishers were fitted with inspection tags, which documented monthly inspection checks from the external company, Equipos de Seguridad Semidesierto SA de RL de CV. In addition, records of these monthly inspections for the entire audit period were reviewed by the auditor.

Peñasquito has identified storage, mixing and process tanks and piping containing cyanide to alert workers of their contents. A site inspection showed that cyanide process pipelines were labelled with white-colored labels showing the direction flow, yellow- colored label with back letters, indicating the cyanide solution content, and Purple colored for all pipeline with sodium cyanide In addition the cyanide mixing, storage and day tanks were purple colored and labeled with the tank number, tank volume, tank content, and sodium cyanide hazard signage.

Peñasquito has available Safety Data Sheets (SDS) and first aid procedures in areas where cyanide is managed, including off-loading and mixing areas, control rooms and in areas at the Plant where cyanide is used. Sodium Cyanide Safety Data Sheet from Draslovka company are attached to each procedure for the Sulfides Plant; are also available in medical first aid kits and at the medical clinic.

Additionally, all procedures related to sodium cyanide, mention in section 7.3 the First Aid and Safety Aspects in Case of Cyanide Poisoning, as well as in section 7 of the Emergency Response Plan (PRE) for Cyanide."

All information related to cyanide management, including SDS information, procedures, and emergency response plans, is provided in Spanish, the workforce's language at the site, and in their most updated versions. The last version of the Sodium Cyanide HDS from Draslovka is July 19, 2022.

Peñasquito has investigated and evaluated cyanide exposure incidents using the next procedures: the Newmont Corporate Standard, Safety and Sustainability Event Management Procedure, and the Incident Investigation Procedure.
Sodium cyanide-related incidents must be reported and uploaded to the Enablon system within the first 24 hours of the event occurring. In addition, cyanide-related events must be reported to corporation within the first 24 hours of their occurrence (report generated and approved by management). The cyanide related incident is recorded in Enablon to follow up the investigation, root causes, corrective action plan, etc.

Peñasquito has not had any incident related with cyanide during this audit period. However, the auditor reviewed two non-cyanide incidents to verify the following procedure. Peñasquito is in full compliance with this standard of practice.

Standard of Practice 6.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito has oxygen, resuscitator, antidote kits (Nithiodote: Sodium Nitrite and Sodium Thiosulfate, and Cyanokit: Hydroxocobalamin), radio, telephone, mobile, and alarm systems available for use at cyanide unloading, storage and mixing location and in other places at the Sulfide Plan.

First aid supplies located in sulfide areas: oxygen tank with resuscitator, activated charcoal, and water. Operations personnel are trained in the use of oxygen and activated charcoal. Safety personnel conduct weekly inspections to ensure that the first aid kits in the areas are completed and in good condition.

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Peñasquito has two different antidote kits: Cyanokit (hydroxocobalamin) and Nithiodote (sodium nitrite / sodium thiosulfate). Medical personnel are trained in the administration of Cyanokit and Nithiodote and conduct weekly inspections to ensure that the first aid kits in the medical clinic are completed and in good condition. It is important to note that at Peñasquito, all emergency plans and procedures have removed references to amyl nitrite, leaving Nithiodote (sodium nitrite and sodium thiosulfate) and Cyanokit (hydroxocobalamin) as the available antidotes for use in cases of cyanide poisoning.

Peñasquito has inspected its first aid equipment regularly to ensure that it is available when needed, and that materials such as cyanide antidotes are stored and/or tested as directed by the manufacturer and replaced on a schedule to ensure that they will be effective when needed.

The antidotes used by Peñasquito are:
a). Nithiodote, which consists of the following:

- A 10 ml glass vial of sodium nitrite injection at 30 mg/ml (containing 300 mg of sodium nitrite).
- A 50 ml glass vial of sodium thiosulfate injection at 250 mg/ml (containing 12.5 grams of sodium thiosulfate).

It is stored in the Peñasquito clinic according to the manufacturer's instructions at a controlled room temperature between 20 °C and 25 °C (68 °F - 77 °F), for which they use refrigerators. The boxes containing Nithiodote are marked with expiration dates.

b). Cyanokit (Hydroxocobalamin), which consists of one 250 ml glass vial containing 5 g of lyophilized hydroxocobalamin for injection.

It is stored in the Peñasquito clinic following the manufacturer's guidelines at a controlled room temperature below 25 °C, utilizing the same refrigerators as those used for Nithiodote (which requires a controlled room temperature between 20 °C and 25 °C). The boxes containing hydroxocobalamin are labeled with expiration dates.
Medical staff inspect the cyanide antidote kits and oxygen cylinders weekly at the clinic and the safety department personnel inspect oxygen cylinders and activated charcoal at the process Plant and documented these inspections in the verification sheets.

The auditor physically reviewed some inspections while auditing the medical personnel at the clinic and examined weekly verification forms for oxygen and activated charcoal in the processing Plant area for the dates of March 24, 2024, and July 21, 2024.

The operation has developed a procedure to respond to cyanide exposures, ERP, Emergency Response Plan for Cyanide. Section 11 of the Emergency Response Plan for Cyanide (ERP) includes the steps to be taken in response to cyanide exposures. Additionally, in the medical area, there is a Procedure for Patient Transfer.

Peñasquito has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide. The onsite clinic is staffed with medical personnel seven days a week. The clinic is equipped with defibrillation equipment, medical oxygen, resuscitators, and antidotes. All medical personnel are knowledgeable in the correct use of the antidotes. Seven members of the medical department received refresher training titled Medical Emergencies with Sodium Cyanide provided by the cyanide supplier's doctor, Draslovka, on October 10, 2024. Decontamination is provided through the safety showers and initial oxygen can be provided by process workers who have been trained in the use of the equipment.

Peñasquito has developed a procedure to transport cyanide-exposed workers to the hospitals in the cities of Concepcion del Oro and Saltillo which are qualified to treat cyanide-exposed workers. The procedure includes land and air transportation. In both cases, a mine doctor or paramedic accompanies the patient and takes the antidotes to the hospital. The auditor reviewed the procedure and interviewed the Emergency Response Team and Internal Doctors to verify compliance. Peñasquito has three ambulances for medical emergencies, ambulance 252,162, and 251. And one ambulance for back up, ambulance 62.

Cyanide treatment is provided on-site by Peñasquito medical staff in the clinic. Peñasquito would manage any cyanide exposure as the first response without involving other local clinics. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the Doctor will decide if transfer to other local hospitals is required to provide additional medical care.
Peñasquito has formalized arrangements with the one local hospitals IMSS (Mexican Institute of Social Security) located in Concepcion del Oro so that this provider is aware of the potential need to treat patients for cyanide exposure.

There is a memo signed in May 2025 by IMSS hospitals acknowledging receipt and confirming understanding of their defined roles and responsibilities in a cyanide emergency. Peñasquito has trained the IMSS hospital of Concepcion del Oro in the medical emergencies involving sodium cyanide
Peñasquito is in full compliance with this standard of practice.

Principle 7 | EMERGENCY RESPONSE

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

Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has developed an Emergency Response Plan (ERP) to address potential accidental releases of cyanide and cyanide exposure incidents, which include: emergency phone numbers, rescue equipment, immediate actions in case of emergency, spill incidents, emergency organization, emergency communication, medical emergencies, cyanide exposure/poisoning, fatal or potentially fatal accidents, evacuation, environmental incidents, major spills, cyanide emergency response outside the mining unit and, media control and statements.

The procedure SOP-OPP-PR-06, Contingency Response Plan for Cyanide Handling, considers the potential cyanide failure scenarios appropriate for its site-specific environmental and operating circumstances.

Section 11.1 of the Emergency Response Plan, ERP, mentions the release of hydrogen cyanide from storage, process or regeneration facilities, section 18 of the Emergency Response Plan, ERP mentions the Cyanide Emergency Response Outside the Mining Unit.

Procedures MP-SOP-S&R-COM-01, Procedure for Spill Reporting and MP-SOP-OPP-PR-06, Contingency Response Plan for Cyanide Handling detail cyanide releases during unloading and mixing.

Section 5.1.4.c of the Emergency Response Plan refers "In the case of fire and/or explosion, the source and extent of the spilled materials must be identified and reported."

Procedure MP-SOP-OPP-PR-06, Contingency Response Plan for Cyanide Handling explains how to control a pipe, valve and tank ruptures.

The procedure MP-SOP-OPP-PR-08 mentions the securing of the cyanide preparation area in the event of a power outage.

Overtopping of ponds and impoundments is not applicable. uncontrolled seepage is not applicable due to Peñasquito no longer has processes that require the use of ponds with sodium cyanide solutions.

Peñasquito decontaminates sludge from the sulfide process area to send it to the tailings dam once decontaminated. A failure in the DETOX process would not have a significant impact. Peñasquito no longer has processes that require the use of ponds with sodium cyanide solutions, and the tailings dam does not contain sodium cyanide. Nevertheless, the procedure MP-SOP-S&R-COM-01, Procedure for Spill Reporting, includes the tailings dam.

The Emergency Response Plan describes the necessity of evacuating affected areas in case of any emergency. The evacuation routes and meeting points are also detailed in the ERP.

Peñasquito has two different antidote kits mentioned in their plans and procedures: Cyanokit (hydroxocobalamin) and Nithiodote (sodium nitrite / sodium thiosulfate)

The Emergency Response Plan describes that in the event of a release, depending on its magnitude, the priority should be to ensure the safety of nearby individuals by evacuating the area. Once the area is secured, appropriate personal protective equipment (PPE) should be used to control the release at its source.

The Emergency Response Plans and procedures describe how to contain and mitigate spills. In addition, procedures in place prevent further incidents and ensure the safety of personnel and the environment. Peñasquito is in full compliance with this standard of practice.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

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

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito involved its workforce and external stakeholders, including potentially affected communities, in the cyanide emergency response planning process. Peñasquito personnel review and update the Emergency Response Plan annually. External stakeholders, including potentially affected communities are involved in the annual talks on the Emergency Response

Plan, cyanide, and transportation information. Their comments are taken into consideration, and the plan is updated if necessary.

The departments of Social Responsibility, Environment, and Operations conduct talks in the 12 communities closest to Peñasquito, where the ISO tank carrying sodium cyanide passes. In these talks, the Emergency Response Plan for Cyanide Exposure is shared, which includes the steps to take in the event of an incident involving the ISO container during the transportation of cyanide.
In addition, information about the risks of cyanide, how it is handled, side effects, color, odor is provided, as well as a brochure on the cyanide code, which mentions what cyanide is, its uses, and other relevant information.

The Emergency Response Plan (ERP) do not provide specific functions to external responders and communities, as Peñasquito is located far from communities with established civil protection services. Even though in the community talks external stakeholders including civil protection, local fire departments, police, PROFEPA (Environmental Agency), and communities are made aware of the nature and risks associated with accidental cyanide releases. Stakeholders provide their observations and comments, which are taken into account and incorporated into the Emergency Response Plan if necessary.
Peñasquito is in full compliance with this standard of practice.

Standard of Practice 7.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan (ERP) includes a diagram titled "Peñasquito Mining Emergency Response Organization," which delineates the roles, responsibilities, and authority levels of emergency response coordinators for different emergency scenarios at the site, Including primary and alternate emergency response coordinators.

The Emergency Response Team is identified in the ERP, and it maintains an updated list of team members. This list includes emergency brigades' personnel (33 responders and 4 captains), and medical personnel (5 doctors and 4 nurses). Additionally, there is a list of 8 responders from the Plant team. The list includes their names, area, supervisor, phone number,

and radio frequency. The contact information for senior process personnel is also included in the plan.

Peñasquito provides appropriate training to emergency response personnel. Each week, the brigade staff receive internal training on various types of emergencies and products, including cyanide (hazardous materials with cyanide, incident command, use of antidotes, cyanide poisoning, etc.). Records of this training were presented to the auditor.

Additionally, brigade personnel receive external training from the cyanide supplier and/or external training companies. For example, the following training sessions were conducted during the audit period: emergency response to hazardous chemicals, provided by EHSA Programas S.A. de C.V., 16 hours on February 22-23, 2023. 16 brigade members attended the course, emergency response to sodium cyanide, conducted by cyanide supplier Draslovka, on July 4, 2024, with 5 brigade members and training staff participating and medical emergencies involving sodium cyanide, also by Draslovka, on October 3, 2024, were attended by 3 paramedic brigade members and 7 medical personnel.

The Emergency Response Plan (ERP) includes 24-hour contact information and call-out procedures for the emergency response team, coordinators, and members. And outlines the duties and responsibilities of the coordinators and the emergency response team.

The Emergency Response Plan lists the emergency response equipment that is available on-site. Peñasquito has three closed trailers equipped for emergency response, which include, among other items: ERA's MSA and Scoot, Scoot reserve tank, safety cones, oxygen, spill kit, anti-spark tools, level A equipment, absorbent drum, decontamination tub, and level B equipment. This equipment is inspected weekly to ensure that it is complete and in good condition. The auditor reviewed some weekly inspections, and during the audit tour, the auditor also examined the emergency response equipment, finding that the equipment and inspections meet the requirements of the code. Peñasquito has procedures to inspect emergency response equipment to ensure its availability, such as the emergency inventory formats for hazmat trailers 01, 02 and 03.

Peñasquito ERP include contact information for external responders, such as local hospitals, fire departments, and community resources.

Peñasquito General ERP and Cyanide ERP do not assign any responsibilities to external responders and communities. Nevertheless, external stakeholders, including Civil Protection, local fire departments, police, PROFEPA (Environmental Agency), and communities, have been engaged by Peñasquito through regular stakeholder engagement activities. These stakeholders are kept informed about the nature and risks associated with accidental cyanide releases.
Peñasquito is in full compliance with this standard of practice.

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Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

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

Summarize the basis for this Finding/Deficiencies Identified:

Section 3 of the Emergency Response Plan (ERP) includes contact information for notifying management, regulatory agencies, external response providers, and medical facilities in the event of a cyanide emergency. Section 9.1.3 includes phone numbers for notifying potentially affected communities about the cyanide-related incident and any necessary response measures. Section 7.1.2 states that the Public Relations area of Peñasquito will handle any external information and/or communication with the media. Peñasquito will inform ICMI about any major cyanide incidents, as outlined in ICMI's Definitions and Acronyms document, following the Peñasquito communication procedure titled "Cyanide Spill Escalation and Reporting Requirements."
Peñasquito is in full compliance with this standard of practice.

Standard of Practice 7.5

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Procedure MP-SOP-OPP-PR-06, Operational Contingency Response Plan for Cyanide Handling in Sulfide Plant, mentions the different emergencies involving sodium cyanide, including liquid and solid spills. Additionally, this plan outlines the scenarios for recovering leaks in pipelines. One example of this remediation is the recovery of the solution in the sulfide discharge area, where the solution is directed by gravity to the sump pit, from which the sump pumps send the spilled solution to tank 800-TK-18.

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Procedure MP-SOP-OPP-PR-05, Remediation of Soil Contaminated with Cyanide, details the steps to be taken when the spill occurs outside the secondary containment. It must be controlled by using absorbent materials and/or constructing emergency containment dikes, maintaining the alkaline solution with lime, and pumping as much cyanide solution as possible back into the lixiviation process. Remove a layer of contaminated soil and place it in bags and/or containers, and subsequently, the quantity of removed material must be recorded for hazardous waste management.

The procedure MP-SOP-OPP-PR-05, Remediation of Cyanide-Contaminated Soil, details in Section 3.3 the remediation of soils contaminated with cyanide. Contaminated soil is removed and placed in bags and/or containers, and subsequently, the quantity of material removed is recorded for hazardous waste management. All soil contaminated with cyanide is disposed of through a certified company.

Once the contaminated soil is removed, hypochlorite is used to neutralize any possible traces of cyanide that may remain at the site, ensuring proper remediation. The procedure also mentions the preparation of hypochlorite for neutralizing traces of cyanide in the soil.

The procedure MP-SOP-OPP-PR-04, Decontamination of PPE, Auxiliary Equipment, Pumps, Hoses, and Pipes that Came into Contact with Sodium Cyanide and Waste Disposal, states that all personnel working on the remediation of the contaminated area must undergo decontamination of their boots and equipment whenever they exit the affected area. Decontamination should be performed in the decontamination tubs for reagents. Upon completion of the activity, all support equipment must be washed and decontaminated, and waste materials should be disposed of as hazardous waste for future confinement.

The procedure MP-SOP-OPP-PR-05, Remediation of Cyanide-Contaminated Soil, details that once the contaminated soil is removed, hypochlorite is used to neutralize any possible traces of cyanide that may remain at the site, ensuring proper remediation. The procedure also mentions the preparation of hypochlorite for neutralizing traces of cyanide in the soil. Hypochlorite is stored in the reagent area (area 800). Furthermore, section 3.1.2 of procedure MP-SOP-OPP-PR-05 details the specific location within the reagent area (800) where the hypochlorite can be found.

Additionally, the procedure states that a soil sample from the spill area is taken for analysis at a certified laboratory to determine the concentration of cyanide. The procedure also describes the final concentration of cyanide that will be allowed in residual soil as evidence that the spill has been completely cleaned up.

Furthermore, the procedure MP-SOP-S&R-COM-01, Spill Reporting Procedure, details in Section 3.2 the containment of the spill, in section 3.3 the cleanup of the area, and details the waste management plan, where cyanide-contaminated waste is assigned an authorization number (32-PMM-I-0026-2009). Additionally, the format MP-FOP-S&ER-COM-01is used to register waste information.

Peñasquito has prohibited the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide that has been released into surface water. As

stated in the Emergency Response Plan, Section 15, Major Spill Emergency Procedure: “In the event of spills into surface waters, the use of sodium hypochlorite, ferrous sulfate, hydrogen peroxide, and any other chemicals that may harm aquatic life is prohibited.”

Section 3.3.8 of the procedure MP-SOP-OPP-PR-05, "Remediation of Soil Contaminated with Cyanide," states that it is necessary to take a soil sample from the spill area for analysis in a certified laboratory to determine if a concentration of 0.2 ppm has been reached. Additionally, Section 3.1 of the procedure WAD, MP-SOP-SP-ML-48, Cyanide WAD Sampling for Analysis, details the sampling process for WAD analysis.
Peñasquito is in full compliance with this standard of practice.

Standard of Practice 7.6

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito reviews and evaluates the cyanide related elements of its Emergency Response Plan (ERP) on an annual basis Section 9.1.7 details the annual review of the cyanide Emergency Response Plan (ERP), with the last review conducted on January 31, 2025. The most recent update has removed amyl nitrite as a first aid antidote for cyanide poisoning.

Emergency drills involving cyanide are conducted annually, accompanied by checklists to follow during each drill (Emergency Brigade Checklist).

2025: Cyanide Solution Spill Drill, April 30, 2025
In this mock drill, an emergency response for a cyanide spill and exposure to cyanide was practiced. The exercise began with the detection of a leak in the dosing of tank 402TK01, where the leak traveled along the walls of the tank, generating HCN, which was inhaled by one of the operators. The emergency was initiated using the panic button, which prompted the evacuation of personnel and the arrival of emergency response teams and medical assistance. The person exposed to HCN gas was treated, the leak was contained, and the spill was cleaned up, fully adhering to the emergency protocol.

2024: Hydrogen Cyanide Leak Drill, October 29, 2024
In this mock drill, an emergency response for a cyanide spill and exposure to cyanide was also practiced. The person exposed to HCN gas was attended to, the leak was contained, and the spill was cleaned up, following the emergency protocol completely. A corrective

action plan was developed at the end, which included training for new brigade members and additional training on the use of the panic button and issues with radio communication that were not understood in some areas. All corrective actions were monitored using the Enablon System.

2022: Cyanide Spill Drill, February 3, 2022
This event occurred in the PLP unloading area, where a damaged hose caused a pressurized leak of cyanide solution, splashing the operational staff, who were equipped with personal protective equipment (PPE) to prevent direct contact with the solution.
In these drills, emergencies involving personnel exposure and cyanide spills have been practiced. Plant personnel have activated the emergency response using the panic button, decontaminated personnel contaminated with cyanide using emergency showers, and the emergency response teams have contained and cleaned the spills, removing exposed personnel from the contaminated area. If they have not yet been decontaminated by operational staff, the brigade members perform this task. Medical personnel administer antidotes and discharge patients who were contaminated with sodium cyanide.

Peñasquito evaluates and updates the Emergency Response Plan (ERP) annually after conducting mock drills if necessary and following incidents. Peñasquito conducts mock drills once a year to practice and prepare for emergencies, as well as to review the effectiveness of its emergency response plans. One example of this was a corrective action identified after the drill in January 2011, which highlighted the need to modify the ERP to better define the communication responsibilities of emergency commanders.

Peñasquito has not experienced any cyanide-related incidents. The Emergency Response Plan (ERP) is reviewed annually. The auditor reviewed the last three years' actions from the drills and found that there has been no need to make any changes to the Emergency Response Plan (ERP). Peñasquito is in full compliance with this standard of practice.

Principle 8 | TRAINING

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

Standard of Practice 8.1

Train workers to understand the hazards associated with cyanide use.

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

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito trains all personnel who may encounter cyanide in cyanide hazard recognition, in accordance with its annual training plan, which includes two modules (Module A and Module B) for training related to cyanide.

Module A of the Peñasquito Training System focuses on the General Safe Handling of Cyanide, which is provided to all personnel every two years.
Module B of the Peñasquito Training System pertains to Safe Handling of Cyanide. It is a more detailed presentation than Module A and is designed for personnel who handle cyanide and is conducted annually.
Training records are maintained in the Success Factors system for Peñasquito employees and in the Mobiliseme system for contractors and visitors.

Modules A y B are imparted to the operation Plant personnel while Module A is imparted to office personnel, contactors and visitors. Training records have been maintained both physically and electronically since 2019. Training records for Peñasquito employees are kept in the SuccessFactors system, while those for contractors and visitors are stored in the Mobiliseme system.
The auditor reviewed the electronic training records for two individuals from the operations team and for one external person.
Peñasquito is in full compliance with this standard of practice.

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	☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 8.2

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito train workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases.

All operational personnel at Peñasquito receive a cyanide hazard recognition training in the Module B as they work in areas where sodium cyanide is used.

Module B details various topics including: 1) What is Cyanide, 2) Routes of Exposure to Cyanide, 3) Identification of the Hazard of Sodium Cyanide, 4) Safety Data Sheet (SDS), 5) Signage, 6) Safety Equipment, 7) Red Ink, 8) HCN Detector, 9) Alarm Ranges, 10) pH Control, 11) Personal Protective Equipment (PPE), 12) Transportation of Cyanide, 13) ISO Tank, 14) Emergency Reporting, 15) Emergency Kit, 16) First Aid for Cyanide Poisoning (health effects of cyanide), 17) Oxygen Administration System, 18) First Responders, 19) PPE for Cyanide Handling, 20) Cyanide Spills, 21) Preparation of Calcium Hypochlorite, 22) Type A, B, and C Suits

Additionally, Peñasquito has a Plant operational capability matrix that outlines the skills required for operators to obtain positions of greater responsibility and higher rank. This capability matrix consists of 64 technical standards and operation procedures for which specific training is provided.
In the case of Plant operations, the training includes all operational procedures for Sulfides, which includes all cyanide-related work tasks. The auditor reviewed the files for two Sulfide Plant operators and confirmed that both had completed the required training to perform their operations.

Peñasquito personnel delivering the training have over 15 years of experience, including three specialists in process Plant operations, two in laboratory settings, and two in maintenance. In addition, the external personnel providing training from the supplier also possess extensive experience.

Peñasquito has trained its employees before working with cyanide in the following manner: they first receive training in Modules A and B, then they receive training on the operational procedures of the Plant, after they accompany experienced employees to gain field knowledge and an exam is conducted to determine if they are fit to work with cyanide, finally, they are released to production.

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The Peñasquito training system includes refresher training on cyanide management provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. Peñasquito has an annually operational refresher training program for the plan, which includes all cyanide-related work tasks including in the operational procedures.

Additionally, Mexican regulations require refresher hazard recognition training in Module A, which is conducted every two years, and Module B, which is conducted annually. The auditor reviewed the files for two sulfide plant operators and confirmed that both had completed the required training to perform their operations.
Peñasquito conducts evaluations of the courses offered, and some require an assessment while employees perform operations in the field. The exams are kept both physically and electronically. The auditor observed the exams of two individuals from the operation; these exams included the name, date, and grade of the course.

Records are maintained in the SuccessFactors system for Peñasquito employees and in Mobileseme for contractors and visitors. These systems are linked to the personal training Kardex records, Furthermore, physical files for each employee are kept in the training area, organized by individual records, training records are maintained and include the names of both the employee and the trainer, the training date, the topics addressed, and the examination results.

Peñasquito is in full compliance with this standard of practice.

Standard of Practice 8.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All cyanide unloading, mixing, production, and maintenance personnel have been trained in the procedures to be followed in the event of a cyanide release, including decontamination and first aid, for example the procedures:
MP-SOP-OPP-PR-04. Decontamination of PPE, Auxiliary Equipment, Pumps, Hoses, and Pipes that Came into Contact with Sodium Cyanide and Waste Disposal,

MP-SOP-OPP-PR-05. Remediation of Soil Contaminated with Cyanide,
MP-SOP-OPP-PR-06. Contingency Response Plan for Cyanide Management at the Sulfide Plant, this procedure includes decontamination of cyanide exposure victims.
MP-SOP-OPP-PR-07. Application of Activated Carbon and Oxygen in Case of Emergency,
MP-SOP-OPP-PR-08. Securing the Cyanide Preparation Area in Case of Power Outage
MP-SOP-OPP-PR-10. Pipe Washing,
And MP-SOP-OPP-PR-11. Cyanide Spill in Copper Sulfate and Deprezinc.

The emergency response coordinator and the emergency response team have been internally trained by the Safety and Health personnel on the Emergency Response Plan. This training includes the utilization of the emergency response equipment and is conducted in accordance with the annual training matrix for the emergency response team.

Additionally, they receive external training from the provider Draslovka at the Emergency Brigade Training School (ECBE) in Celaya, Mexico. The last training session took place on November 8, 2024, where 5 brigade members from the Plant participated.

External responders received training in the elements of the emergency response plan related to cyanide during meetings with the communities where civil protection personnel have attended some of these talks.

Peñasquito has completed refresher training for response to cyanide exposures and releases annually. All personnel, regardless of the area where they work, take the inductions and annual refreshers in response to cyanide exposures and releases in addition to their work procedures in their respective areas.

Peñasquito retains records documenting the cyanide emergency response training, including the names of the employees and the trainers, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.
Peñasquito retains physical training records, which document the date of training, topics covered, and exams, for three years in the training area. After this time, the records are transferred to document control for extended storage, complying with Mexican legislation that mandates retention for a minimum of five years.

Peñasquito is in full compliance with this standard of practice.

Principle 9 | DIALOGUE AND DISCLOSURE

Engage in public consultation and disclosure.

Standard of Practice 9.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Peñasquito has provided stakeholders with information on its cyanide management practices and engages with them regarding their concerns. The community relations area is responsible for establishing the link between Peñasquito and the nearby communities. Currently, 12 people work in this area. Discussions are held with these communities, offering talks on cyanide management and potential emergencies that may arise at the Plant and during transportation.

For stakeholders' concerns, the procedure MP-SOP-STRC-01, Management and Response to Complaints, Requests, and Inquiries, is followed. Questions and concerns regarding cyanide are addressed during talks with the communities, as well as through WhatsApp or phone calls. Requests are entered into the Enablon system for follow-up.
Peñasquito is in full compliance with this standard of practice.

Standard of Practice 9.2

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

The operation is	☒ 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:

Peñasquito has developed written descriptions of how their activities are conducted and how cyanide is managed. This information is disseminated to stakeholders through discussions in the communities regarding cyanide talking points, the emergency response

procedure, topics related to cyanide, and also through the distribution of Spanish written pamphlets containing information about sodium cyanide.

An invitation to a community meeting was presented to the auditor for review. As well as some lists of attendance at this kind of meeting.

Peñasquito has disseminated information on cyanide in verbal form, where a significant percentage of the local population is illiterate. This includes public verbal presentations and banners. Two verbal presentations records were provided to the auditor.

Section 7.1.2 of the Emergency Response Plan outlines the communication protocol to follow in the event of any cyanide release or exposure incidents.
The Communication Committee reviews the information regarding cyanide release or exposure incidents before making it public.

In the event of cyanide exposure resulting in hospitalization or fatality, as outlined in the General Emergency Response Plan (ERP), Peñasquito will promptly report any such incidents to the STPS, Work and Social Prevention Secretary and the Public Ministry. This information will also be made publicly available by these regulatory agencies.

In the case of cyanide releases from the mine site that require response or remediation, the mine will report these incidents to SEMARNAT (Secretaría de Medio Ambiente y Recursos Naturales) and the affected communities, as outlined in the General Emergency Response Plan (ERP). This information will also be made publicly available by SEMARNAT. Additionally, it will be included in Newmont's annual Corporate Sustainability Report, which is accessible to the public.

In the event of cyanide releases, whether on or off the mine site, that result in significant adverse effects on health or the environment, the mine will report these incidents to SEMARNAT (Secretaría de Medio Ambiente y Recursos Naturales) and the affected communities, as specified in the General Emergency Response Plan (ERP). This information will also be made publicly available by SEMARNAT. Furthermore, it will be included in Newmont's annual Corporate Sustainability Report, which is accessible to the public.

In the case of cyanide releases on or off the mine site requiring reporting under applicable regulation, the mine will report these incidents to SEMARNAT (Secretaría de Medio Ambiente y Recursos Naturales) and the affected communities, as outlined in the General Emergency Response Plan (ERP). This information will also be made publicly available by SEMARNAT. Additionally, it will be included in Newmont's annual Corporate Sustainability Report, which is accessible to the public.

If any releases exceed the applicable limits for cyanide, the mine will notify SEMARNAT (Secretaría de Medio Ambiente y Recursos Naturales) and the affected communities, as specified in the General Emergency Response Plan (ERP). This information will also be made publicly available by SEMARNAT.

Peñasquito is in full compliance with this standard of practice.

Peñasquito		December 3, 2025
Name of Mine	Signature of Lead Auditor	Date