

DYNACOR
VETA DORADA CHALA
Gold Processing Plant

SUMMARY AUDIT REPORT
FOR THE
INTERNATIONAL CYANIDE
MANAGEMENT CODE

APRIL 2024



Parque Federico Blume 142, Miraflores, Lima, Perú
Tel +51.947.259.440 | Email bpizzorni@cyanideauditor.com | Web CYANIDEAUDITORS.COM

Contents

Contents..... 2

Operation General Information..... 4

Operation Location Detail and Description 4

Auditor’s Finding..... 10

Compliance Statement 10

Auditor Information 10

Auditor Attestation 10

Principles and Standards of Practice 11

Principle 1 | PRODUCTION AND PURCHASE 11

 Standard of Practice 1.1 11

Principle 2 | TRANSPORTATION 12

 Standard of Practice 2.1 12

Principle 3 | HANDLING AND STORAGE 14

 Standard of Practice 3.1 14

 Standard of Practice 3.2 19

Principle 4 | OPERATIONS..... 22

 Standard of Practice 4.1 22

 Standard of Practice 4.2 31

 Standard of Practice 4.3 32

 Standard of Practice 4.4 34

 Standard of Practice 4.5 36

 Standard of Practice 4.6 36

 Standard of Practice 4.7 38

 Standard of Practice 4.8 40

 Standard of Practice 4.9 43

Principle 5 | DECOMMISSIONING 45

 Standard of Practice 5.1 45

 Standard of Practice 5.2 47

Principle 6 | WORKER SAFETY..... 48

 Standard of Practice 6.1 48

 Standard of Practice 6.2 49

 Standard of Practice 6.3 53

Principle 7 | EMERGENCY RESPONSE 56

 Standard of Practice 7.1 56

 Standard of Practice 7.2 57

 Standard of Practice 7.3 58

 Standard of Practice 7.4 60

 Standard of Practice 7.5 60

 Standard of Practice 7.6 61

Principle 8 | TRAINING 64

 Standard of Practice 8.1 64

 Standard of Practice 8.2 65

 Standard of Practice 8.3 66



Principle 9 | DIALOGUE AND DISCLOSURE 69
Standard of Practice 9.169
Standard of Practice 9.270



Operation General Information

| | |
|------------------------------|--|
| Name of Mine: | Dynacor - Minera Veta Dorada S.A.C. |
| Name of Mine Owner: | Dynacor - Minera Veta Dorada S.A.C. |
| Name of Mine Operator: | Dynacor - Minera Veta Dorada S.A.C. |
| Name of Responsible Manager: | José Sánchez – Sustainable Development Manager |
| Address: | Calle Dean Valdivia 148, Edificio Platinum Plaza I, Oficina 601, San Isidro Lima. |
| State/Province/Country: | Lima, Perú |
| Telephone/E-Mail: | Tel: +51 650-0300 jsanchez@vetadorada.pe |

Operation Location Detail and Description

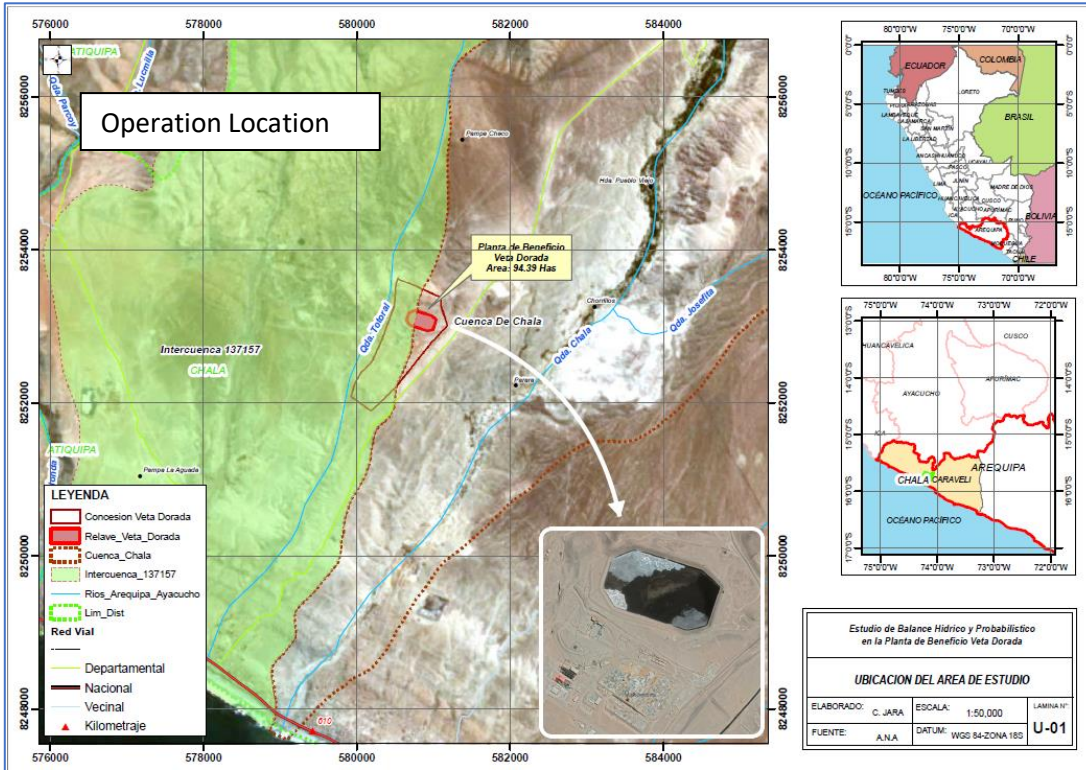
Veta Dorada gold processing plant (Veta Dorada) is located in the district of Chala, Arequipa, approximately 400 kilometers north of Arequipa city, at an altitude of 115 meters above sea level. Geographically located on the left bank of the Totoral creek.

Access to the project area is via a 7-kilometer road from Chala (population 11,000 approximately). The nearest towns are Chala and Chala Viejo, both about 7 km from the Plant site.

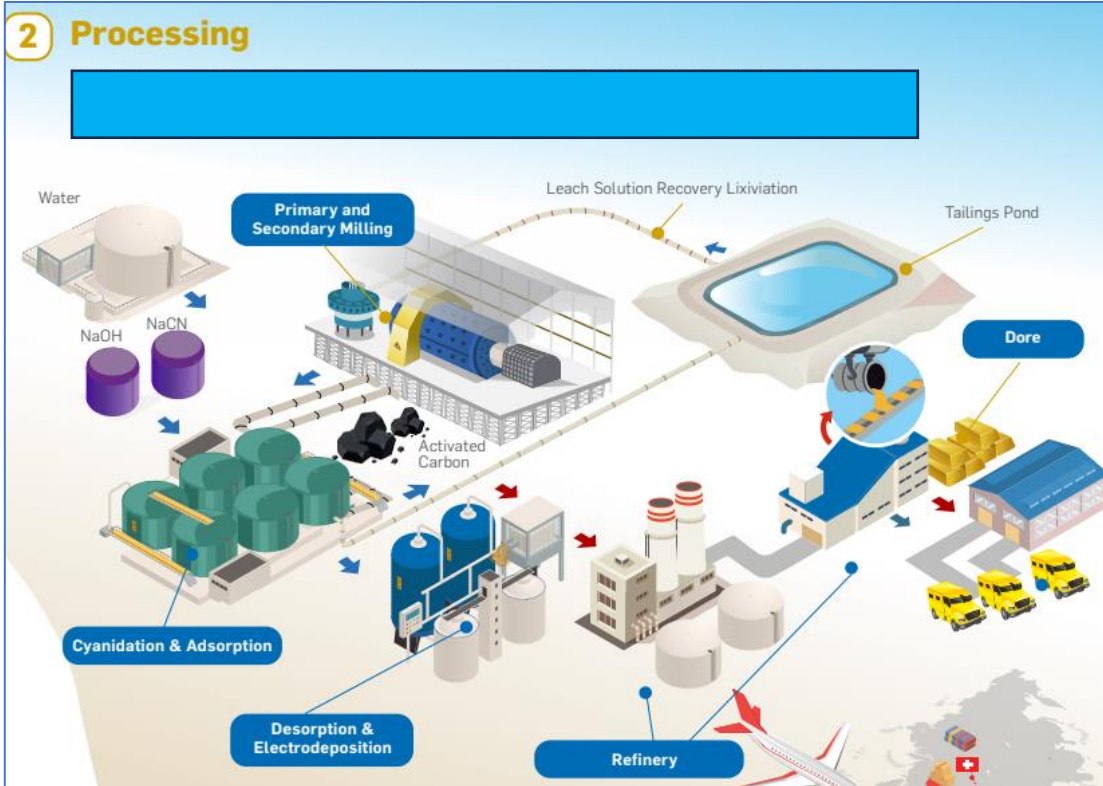
Sodium cyanide solid briquettes is delivered to Veta Dorada's process plant in one-ton Intermediate Bulk Containers (IBC) within sea containers by ICMI certified trucking companies. On arriving to the site, IBC are unloaded from the sea container and stored in the dedicated warehouse for cyanide, located within the limits of the process plant and near to the cyanide solution preparation area.



Veta Dorada Process Plant Location



BP



In late 2016, the Veta Dorada gold ore-processing plant, a CIP (carbon-in-pulp) operation, opened at 300-tonne-per-day (tpd) capacity (102,000 tpd). As of November 23, 2022, Dynacor increased its operations to a fully expanded ore processing capacity of 516 tpd.

Veta Dorada is a plant that obtains its raw material through the purchase of minerals from small mining producers and artisanal miners. The plant mineral process facilities are:

- weighing and storage;
- crushing, milling, and sorting;
- cyanidation area;
- chemical laboratory with its respective sample preparation section and chemical analysis section;
- metallurgical laboratory;
- desorption area; and
- tailings storage facility.

The process plant consists of conventional metallurgical technology suitable for the style of ore mineralization. The process encompasses crushing and grinding of the ore, agitated leaching, counter-current decantation, carbon desorption, electrodeposition, and smelting.



The counter-current decantation tailings are pumped to the lined tailings storage facility (TSF) located at 0.5 km nor-east of the Process Plant. The tailings basin is approximately 7 hectares. The nearest permanent residences are at 7 km away downstream of the TSF.

Weighting and storage area

On arriving to the plant the ore is weighed, then physical characteristics of the ore are verified. If the grain size is greater than 3/4", it goes to the crushing area and is deposited in the corresponding hoppers.

If the ore has a granulometry of less than 3/4", it goes directly to the storage field for unloading, homogenization and sampling.

Crushing, grinding, and sorting area

The plant has 3 crushing circuits, which are used according to the size and amount of ore. For batches of good tonnage and maximum size of 7", grinding circuit N° 1 is used, for small batches of more or less 5 tons, grinding circuit N° 2 is used. Crushing circuit N° 3 is auxiliary.

Tertiary closed circuit (product for milling)

This circuit has a 5-ton throughput hopper, whose material (blending) is discharged by mean of conveyor belts to a vibrating screen with a 3/8" mesh opening, The fine (undersize) goes directly to a 150-ton capacity fines hopper and the coarse (oversize) is fed to an impact crusher.

Grinding and Sorting

The plant installed capacity is 516 ton/day; it has three 7' x 8' ball mills, one for primary grinding, one for secondary grinding and the other one for regrinding. The grinded ore feeds a 12" hydrocyclone. The underflow (coarse) is fed into the secondary mill, whose discharge from this mill is joined into the pumping box of the primary mill discharge, thus closing the grinding circuit.

The overflow of the hydrocyclone (fine) is fed to the tertiary mill, which is pumped to the 12" hydrocyclone; the underflow (coarse) is fed to the tertiary mill which discharge is attached to the pump box, thus closing the circuit. The fines of the hydrocyclone overflow are fed to the leach tanks.



Cyanidation and Adsorption

Liquid sodium cyanide is used in the gold extraction process, delivered from the cyanide tank for mixing and storing the cyanide solution. The system for preparing cyanide solution consists of an elevated hopper where the cyanide briquettes are poured and swept away by a barren solution stream and transported by gravity through a pipeline to the cyanide mixing and storage tank located about 15 m away.

Liquid sodium cyanide is added to the ore at the entrance of the primary mill. The strength of the cyanide is according to the head law and ranges from 500 to 1,000 parts per million (ppm), the sodium hydroxide is used to maintain pH to 11. The leaching of the gold (Au) and silver (Ag) values begins in the mills.

The fine slurry from the overflow of the 12" hydrocyclone passes into a mechanical agitation circuit composed of 5 leaching tanks of dimensions 28' x 28', these tanks are placed in series, thus forming a circuit that allows the slurry to be agitated in a period of approximately 40 hours.

The discharge stream from the last cyanidation tank passes to 6 adsorption tanks of dimensions 24' x 24' containing activated carbon, from where the loaded activated carbon is harvested as the final product.

This activated carbon circulates in the system counter-current to the flow of the pulp, where the loaded carbon is harvested for desorption. The adsorption time is approximately 30 hours and the general tailings of the process come out of the last tank.

Desorption

The harvested carbon from the first tank is taken to the desorption process, this carbon is loaded into a closed tank (reactor) of 6 ton capacity to be under the action of a recirculating solution composed of 1,000 ppm of sodium cyanide and 2,000 ppm of caustic soda, diluted all in distilled water at a temperature of 130 °C, This solution will be fed from the bottom of the tank and discharged from the top of the tank, to four electrowinning cells located in the desorption section. The desorbed carbon is discharged with water into the ponds for subsequent chemical or thermal reactivation, if applicable, and finally returns to the adsorption tanks in the plant.

Carbon Reactivation

Chemical and thermal reactivation treatments are used in order to regenerate desorbed carbon.



Chemical Reactivation. - The desorbed carbon is loaded into a reactor at an average of 6,000 kg (dry weight) and is washed initially with water, then with hydrochloric or nitric acid and finally rinsed with water for a period of 2 to 3 hours each wash. The function of the acid is to remove calcium and silica trapped by the carbon.

Thermal Reactivation. - There is an "OILON" thermal regeneration equipment, in which the carbon that comes from the desorption process is heated to temperatures ranging between 500 °C to 600 °C in order to eliminate any organic matter taken by the carbon in the process.

Subsequently, the regenerated carbon is sifted to remove the fines and is added back to the cyanidation process to extract any Au values they may contain.

Electrodeposition

The solution of the desorption product forms two circuits with the electrolytic cells with cathodes and anodes, in the steel wool cathode the precipitate of Au, Ag and Cu is formed, from where they will be recovered.

The cathodes are treated with hot nitric acid, the precipitate obtained is washed and filtered, and then attacked with aqua regia for refining. The precipitate obtained is neutralized and filtered, then it is taken to the smelter. The precipitate is melted, and the final product is obtained, the golden bar.

Tailings Storage Facility

The plant has a lined tailings storage facility (TSF) of around 900,000 m³ capacity, to which the process slurry is pumped through a 6' x 4' pump to the TSF, from where the barren solution is recovered and pumped (recirculated) to the plant to return to the process.

Veta Dorada's process plant is displayed in a schematic below. The operations in this schematic were reviewed during the certification auditing process.



Auditor’s Finding

This operation is

- in full compliance
- in substantial compliance
- not in compliance

with the International Cyanide Management Code.

Compliance Statement

This operation is in Full Compliance with the International Cyanide Management Code.

Auditor Information

| | |
|-----------------------------|---|
| Audit Company: | BP Cyanide Auditors S.A.C. |
| Lead and Technical Auditor: | Bruno Pizzorni bpizzorni@cyanideauditor.com |
| Date(s) of Audit: | December 3 to 5, 2023 |

Auditor Attestation

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

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



Principles and Standards of Practice

Principle 1 | PRODUCTION AND PURCHASE

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

Standard of Practice 1.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Veta Dorada acquires cyanide from ICMI (International Cyanide Management Institute) certified production plants. In occasion of the site visit the operation was using sodium cyanide briquettes produced by Draslovka Mining Solutions (Draslovka), former Chemours, from its ICMI certified production facility Draslovka Memphis Plant was last recertified in full compliance on 24 May 2023. Veta Dorada was also consuming sodium cyanide from Tae Kwang Industrial Co., Ltd, currently certified on 21-August-23.

Draslovka plant certification can be seen on the page within the link: <https://cyanidecode.org/sig-directory-type/draslovka-mining-solutions/>

Tae Kwang Industrial Co., Ltd, plant certification can be seen on the page within the link: <https://cyanidecode.org/sig-directory-type/taekwang-industrial-co-ltd-republic-of-korea/>

The auditor interviewed Veta Dorada’s cyanide warehouse responsible, visited de warehouse and reviewed the purchase orders for sodium cyanide, commercial invoices, and goods, finding it in conformance.



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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has chain of custody records identifying all transporters and supply chains responsible transporting cyanide from the producer to the operation. The auditor reviewed the purchase orders and chain of custody records identifying each transporter, supply chain, and supply chain component that participates in transporting cyanide from both cyanide production facilities (Draslovka and Tae Kwang) to the plant site, confirming that each of these parties is certified or is part of a certified supply chain. The operation purchases cyanide produced by Draslovka and Take Wang Industrial from Mercantil S.A. Draslovka Global Ocean Supply Chain currently ICMI certified 7-Apr-22 and Samsung C&T South America Supply Chain currently certified 21-Sep-23, transport cyanide until the port of Callao, Lima, Perú. From Callao port, cyanide is transported by Contrans S.A.C. Supply Chain currently certified 2-Aug-23, to its warehouse in Callao and from there by Mercantil Supply Chain currently certified 1-Apr-22 to its warehouse and to mine sites.

Draslovka fills Intermediate bulk containers (IBC) with sodium cyanide at its Memphis, Tennessee plant. These IBC are accommodated in 20-foot sea containers, which are closed and sealed. This operation is included in the certification audit of the cyanide code of the Memphis plant. Draslovka Global Ocean Supply Chain certification can be seen on the page within the link: <https://cyanidecode.org/sig-directory-type/draslovka-mining-solutions-czech-republic-transportation-operations/>

Samsung C&T South America Supply Chain transports Tae Kwang’s cyanide produced at its Ulsan plant South Korea. Samsung C&T South America Supply Chain certification can be seen on the page within the link: <https://cyanidecode.org/sig-directory-type/samsung-ct-corporation-republic-of-korea/>

Contrans S.A.C. certification can be seen on the page within the link:



<https://cyanidecode.org/sig-directory-type/contrans-s-a-c-peru/>. Mercantil Supply Chain certification appears within the link: <https://cyanidecode.org/sig-directory-type/mercantil-s-a-peru/>

All transporters identified in these supply chains are certified with Cyanide Code. The auditor compared the purchase and transport, confirming that the cyanide was transported by certified transporters listed on the ICMI's website, finding full compliance with Standard of Practice 2.1.



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:

The cyanide warehouse and the unloading yard have concrete floors in good condition, the warehouse has brick walls, concrete, and metallic mesh. The roof is covered by galvanized corrugated roofing sheet.

The system for preparing cyanide solution consists of an elevated hopper equipped with a winch for hoisting the cyanide bags, where there is also a supply of barren solution. Through a blade installed in the hopper, the cyanide briquettes are poured into the hopper where area swept away by the barren solution stream and transported by gravity through a high-density polyethylene (HDPE) pipeline to the cyanide mixing and storage tank located about 15 m away.

The cyanide preparation hopper is made up of a metal structure that supports a raised hopper, secondary concrete containment, pump, HDPE pipelines and valves. The metal tank for mixing and storing the cyanide solution, as well as the hopper area, have a contingency pool and concrete gutters.

Although no formal quality assurance/quality control (QA/QC) program was conducted during the construction of the facilities for unloading, storing, and mixing cyanide, the operation showed in substitute records of:

- review and approval of design and construction documents by the local regulatory agencies resulting in the plant operating license; and
- a complete facility inspection report prepared by Prevconsult, an appropriately qualified professionals engineers substantiating that the facilities can continue to be safely operated within established parameters that are consistent with the Code’s Principles and Standards of Practice.



Prevconsult engineers visited Veta Dorada's plant site in Chala in September 2023 performing a series of inspections to the cyanide installations including the facilities for unloading, storing, and mixing cyanide, to determine by visual inspection the condition of the concrete, metal, and conduction (piping) structures in the various cyanide facilities at Veta Dorada site plant.

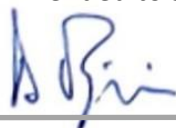
Previously the inspection, Prevconsult engineers reviewed the existing structural plans and specifications of the facilities as its own responsibility, in order to ensure that they comply with current design standards and codes. They reviewed the processes followed in the plant as well as the basic criteria of structural inspection, guidelines for the inspection and preliminary evaluation of concrete structures, corrosion in reinforced concrete structures and inspection instructions to detect typical defects of HDPE pipe. They used the guidelines applicable to the structural inspection procedure such as the American Concrete Institute (ACI) specifications ACI 318-08 and ACI 315, the American Society Standards for Materials Testing (ASTM), the American Institute of Steel Construction (AISC) specification AISC 360-10 and the International Cyanide Management Code.

A field visit was carried out by two registered engineers: a civil engineer and a mechanical engineer, who were in charge of structural inspection and works with the purpose of observing and measuring the corresponding installations, both reinforced concrete and metal, as well as identifying damage to the structures. Professionals involved in this evaluation also included a registered mining engineer with Ph.D. in Mining and Environmental. All drawings certificates, inspection registers and reports are signed and stamped by the engineers.

During the inspection, qualitative research techniques were carried out, such as direct observation, interviews with the personnel in charge of the installations and photographic records of the installations. The professionals inspected the cyanide warehouse and the maneuvering yard outside the warehouse, verifying its condition, the materials of the components of the different elements and facilities, the elevated hopper of the cyanide preparation and its support structure and discharge tube. They inspected the cyanide mixing tank including its structures, pumps, pipes, and gutters, as well as the secondary containment system made up of pools, gutters, and sumps.

Prevconsult report includes inspection sheets and inspection certificates for each element reviewed location plans, layouts and elevation plans, conclusions, and recommendations. The report conclusions state among others, that:

- The concrete structures inspected: slabs, contingency pools and walls are in good condition, with no cracks or considerable damage. Only small local or specific fissures were observed, as well as small, localized rust spots.
- The metal structures are in good condition, without witnessing any considerable damage; Localized areas with corrosion due to exposure to the environment can be appreciated, so it is recommended to sand these areas and paint them with some



- frequency.
- The operation is in compliance with the standardization of its structures and is consistent with the specifications of the drawings.
 - There are no water leaks and dampness in the canals, walls, and contingency pools.
 - Cyanide is stored with proper measures to minimize its exposure to moisture. The warehouse is also adequately ventilated to prevent the accumulation of hydrogen cyanide gas and cyanide dust. The warehouse is located in a secure area where public access is prohibited.
 - Tanks containing cyanide solutions have no signs of deterioration, corrosion, or leakage, as well as on valves, pipes, and containments.

The operation's cyanide facilities were evaluated by registered professional engineers who determined they are "fit for service" and can continue to be safely operated according to their existing procedures.

Equipment including cyanide tanks, vessels, pipelines, pumps and associated valves and fittings, concrete and steel structures supporting this equipment, and secondary containments of process solution tanks and vessels were evaluated from a stability and containment perspective, as appropriate, concluding the report the equipment is fit to continue functioning as currently operated.

The reagent-strength cyanide unloading, storage and mixing facilities are located away from offices and shops where workers congregate and fenced with locked gates. These facilities are away from communities and from surface water bodies - surface water does not exist around the plant of the arid climate. The closest towns are Chala to the west and Chala Viejo to the east, both approximately 7 kilometers away from the plant site. Veta Dorada plant is geographically located on the left bank of the Totoral creek, an ephemeral water course.

The operation has portable hydrogen cyanide (HCN) gas monitors equipped with visual and audible alarms, secondary containment installations and specific emergency procedures for notification, evacuation, response, and remediation, as appropriate for the situation. Access to the warehouse during offloads and moving boxes is restricted. The process plant where the cyanide mix occurs is restricted.

During the site visit the auditor observed that outside the cyanide warehouse, hollow areas can be seen in the ground, which could allow water to accumulate from the rain drainpipe, on the right side. Also the warehouse back door, which is permanently closed, showed an area that does not have protection against surface runoff. To be in compliance with the Code, the auditor required the operation to create adequate slopes around the warehouse in such a way that neither surface runoff nor runoff from rainwater could pose a risk of water entering the cyanide warehouse. After the site visit, the Veta Dorada sent photographs showing that



adequate slopes had been formed by earthworks that allowed them to prevent the accumulation of water around the warehouse. They also sent photos showing that the rear door of the warehouse had been annulled, in its place they had put a concrete parapet that prevented any entry of surface runoff water along with a cyclonic mesh that completed the rear vertical enclosure of the warehouse. No additional information was required to find this question in compliance with the Cyanide Code.

Veta Dorada does not receive liquid cyanide from a tanker truck or isotainer system. However, the entire cyanide offload area at the warehouse is constructed of reinforced concrete slab-on-grade (i.e., pad, curbs, parapets, footings, and tank foundations), which provides a competent barrier to seepage. The concrete area was in good condition at the time of this onsite verification audit.

The cyanide mixing and storage tank is equipped with functioning overflow protection. The process plant has an ultrasonic level sensor installed on the cyanide mixing and distribution tank at the preparation area. This level is regularly inspected and maintained. The sensor instrumentation is equipped with an audible/visual alarm system. The sensor trigger the alarm at 95% of the volume of the tank. The mixing tank must be at 50% of its capacity or less before receiving more cyanide. The method to prevent the overflowing of cyanide mixing and distribution is in compliance with the Code.

The operation has developed and implemented procedures for routinely inspecting, maintaining, and testing the overflow protection equipment and instrumentation to ensure it is functioning properly. The auditor reviewed the sensor maintenance records with the responsible and verified that maintenance of the sensors is being conducted on an appropriate basis, confirming this equipment is in place and functional through inspection of the operation and review of the inspection, testing and maintenance records.

The operation uses the same cyanide tank for mixing and storage, which is installed with a concrete impermeable barrier between the tank bottom and the ground that will prevent seepage to the subsurface environment. This tank is secured to solid, reinforced concrete foundations. The containment floor and tank foundations are monolithic, and the floor is thickened beneath the foundation plinths. This foundation and floor system serves to prevent any seepage from the tank bottoms from entering the ground. The auditor observed that these concrete foundations were in good condition.

The secondary containment for the cyanide storage and mixing tank is constructed with concrete, providing a competent barrier to leakage. During the site walk through, the auditor confirmed by visual inspection that containment was free of cracks or any breaches that could compromise its ability to effectively contain releases.

The process plant area, where this tank is installed, is contained within a reinforced concrete



pad surrounded by curbs, parapets, and stem walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills will be pumped to the grinding thickener tank.

Cyanide at Veta Dorada's warehouse is stored with the following measures:

- a) In a roofed enclosed building to prevent contact with precipitation and on concrete pad to minimize the potential for contact with rainwater. No water systems are present in cyanide storage areas. A safety shower and low-pressure eye wash station is located near of the cyanide warehouse.

During the auditor's inspection of the cyanide warehouse perimeter, observed that the surrounding terrain had level irregularities with hollow parts showing traces of previously accumulated water from the roofing rain draining pipe. Also, at the back side of the cyanide warehouse did not show protection against entering water from surface runoff due to the presence of another entrance gate. Terrain at this side had positive slope towards the cyanide warehouse where there was an access gate made up of a sliding galvanized mesh door that was completely permeable to any surface runoff coming from the outside. Although the process plant is located in an arid area, there are occasionally rains, and they are particularly intense in a year with "El Niño" phenomenon which is proved to happen every 6 to 10 years. This finding was declared in Non-Compliance. The auditor asked Veta Dorada to secure the warehouse to ensure no surface enters to the cyanide warehouse.

After the audit, Veta Dorada sent pictures of the works performed leveling end sloping the terrain around the cyanide warehouse where it showed the work carried out to move earth with adequate slopes that kept any surface current away from the warehouse. Also Veta Dorada canceled the backdoor warehouse which never used, constructing a concrete parapet of approximately one meter on site, guaranteeing impermeability against any surface runoff. with a vertical enclosure up to the roof, made up of galvanized mesh wire to allow ventilation. No additional requirements and information was necessary to declare this Protocol Question in Full Compliance with the Cyanide Code.

- b) The cyanide enclosed storage is ventilated in the event of hydrogen cyanide (HCN) gas generation for any reason. Both the warehouse doors and the upper windows provide particularly good ventilation since they are made of cyclonic mesh. The operation stores solid cyanide wooden boxes inside a locked warehouse with sufficient capacity to store all the cyanide boxes inside. The warehouse is covered with a metal frame and corrugated metal roof. There is passive ventilation in the warehouse. Before entering to the warehouse the personnel measures the HCN concentrations by mean of a portable HCN monitor. The cyanide mixing and distribution tank is located in the plant area covered by an industrial roofing with a perimetrical fence made of cyclonic mesh, allowing excellent ventilation to the hole plant area.
- c) For overall security purposes, both solid and liquid reagent-strength cyanide are stored



to prevent access by unauthorized personnel. The cyanide warehouse is always locked; the reagent area with high strength cyanide solution is located within the boundary of the plant and access is controlled. The entire perimeter of Veta Dorada site is brick fenced; this fence includes the process plant, the camps, the storage yards, and the offices. Access to the site is restricted and only authorized people can enter. Signs prohibiting unauthorized entry are posted. The mill area where the cyanide mix and distribution tank is located is a secure area where public access is prohibited.

- d) Veta Dorada does not store any other chemicals in the cyanide storage warehouse other than cyanide. No smoking, drinking, or eating is allowed within the cyanide storage areas. The auditor observed that there were no other materials stored in the cyanide warehouse other than response supplies. The cyanide mix and distribution tank is located within a separate concrete berm and sump area. By visual inspection, the auditor confirmed that the system would prevent mixing of other reagents in the event of spills.

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.

✓ in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

Veta Dorada receives solid sodium cyanide briquettes with a primary packaging in a polypropylene super-sack filled to 1 ton. The super-sack is then placed in a polyethylene bag to protect the material from water and humidity; finally the packaged material is placed in a wooden box. The operation has written procedures for the management, rinsing and disposal of the super-sacks and wooden boxes. A cyanide mix was observed to verify that the operation is following its procedures for mixing and disposal of the cyanide boxes and super-sacks (bags).

- a) To prevent empty cyanide containers from being used for any purpose other than holding cyanide, the Standard Operational Procedure (SOP) UCH-PDM-PETS-014 Sodium Cyanide Solution Preparation requires empty cyanide boxes to be dismantled and temporarily stored in a locked on-site facility. The boxes and bags are disposed of in an off-site certified landfill. Inspection of the chain of custody records for the individual boxes was completed.
- b) The operation rinses the empty cyanide plastic bags with water three times and adds the rinse water to the cyanidation process during the same process of preparing the cyanide



solution. They have a pipe with water installed on the cyanide hopper where they insert the bag and opening the valve, they proceed to rinse it three times. The rinse solution drains into the mixing tank. Veta Dorada then inspects the boxes to verify that there are no residual briquettes.

- c) The dismantled cyanide boxes and rinsed bags are disposed of in an off-site certified landfill.
- d) Veta Dorada does not return any cyanide containers to the vendor.

To prevent exposures and releases during cyanide unloading and mixing activities, the operation has developed and implemented the following Standard Operating Procedures (SOP):

- a) The SOP Sodium Cyanide Solution Preparation outlines the requirements for inspection, observation and mixing of cyanide. This procedure includes instructions for the operation of critical valves related to the addition of caustic, barren solution, connection with the mixing/storage tank and operation of valves and couplings during the mixing. The procedure also address the maintenance of the valves and couplings related to cyanide mixing, storing and distribution activities. The SOP UCH-ALM-PETS-006 Sodium Cyanide Download covers the responsibilities and the work procedure for receiving the cyanide shipment and storing it in the warehouse. Veta Dorada conducts a safe work risk analysis before cyanide is moved from the warehouse to the process plant. The plant supervisor conducts a meeting with the mix operator and the two observers before a mix event and reviews the mix procedure.
- b) The SOP Sodium Cyanide Solution Preparation has specific instructions that address the safe transport from the warehouse to the mixing area and then offloading the boxes. Various departments (i.e., medical) are notified that this activity will occur. Traffic is controlled around the unload area using traffic cones and the presence of Safety Personnel.
- c) The warehouse SOP Sodium Cyanide Download specifies a maximum stacking height of three IBC (Intermediate Bulk Container) plywood boxes. In addition, the operation has posted signs limiting the stacking height to three boxes in the warehouse.
- d) Procedure Sodium Cyanide Solution Preparation has written instructions addressing the prompt clean-up of solid cyanide spills during mixing. Any liquid spills or leaks within the concrete containments has to be pumped from the mixing area sump back into the process circuit. Operators are trained to hose down the spill areas immediately.
- e) The procedure for cyanide solution preparation requires the operators to wear Personnel Protection Equipment (PPE) including Tychem suits, full-face shield, dust respirator, hardhat, rubber boots, acrylic nitrile gloves and a personnel HCN monitor personnel during mixing. The procedure requires that a minimum of three operators be present for



the mixing. The operators are someone to open the boxes and super-sacks, a second person to operate the hoist lifting the super-sacks to the hopper and pour the cyanide briquettes to prepare the cyanide solution. It is also required There a third operator, which is usually a supervisor, as an observer in the area. The auditor observed a pre-mix safety meeting and then a cyanide-mixing event during this certification audit. The auditor observed that they follow was properly the procedure. The auditor also reviewed completed records of pre-task checklist.

- f) Red colorant dye comes inside the cyanide bags in a concentration that provides for clear visual identification. The auditors inspected the offload area, the mixing and holding tank for evidence of spillage and there was no evidence during or after the mixing event of red-dyed cyanide solution.

Implementation of all these procedures was verified by observation and interviews with the personnel responsible for performing these tasks.



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:

Veta Dorada has written plans and procedures (SOPs) for operating its cyanide facilities in a manner which protects its workers and the environment. Since the Code defines Process Solution as any solution with a concentration of 0.5 mg/l WAD (Weak Acid Dissociable) cyanide or greater, the following are the cyanide facilities identified in the operation:

- Cyanide warehouse for solid cyanide storage in IBC’s.
- Reagent-strength cyanide hopper and storage/mixing tank.
- Ball mill equipment (3 units); 80% of the high concentration cyanide solution is added in mill 1 and the and the remaining 20% in mill 2.
- Five Leaching tanks (Carbon in Leah or CIL).
- Counter-current decantation (CCD) area.
- Desorption process area.
- Carbon reactivation process.
- Electrodeposition process
- Barren solution tank;
- Tailings storage facility
- All pumps, piping, gutters, and appurtenances connecting these facilities.
- Secondary containments associated with cyanide storage and production facilities.

Among the plans and procedures the auditor reviewed are:

- SOP Sodium Cyanide Download
- SOP Sodium Cyanide Solution Preparation
- SOP Cyanide in Pulp Sampling
- SOP Cyanidation Parameters Control



- SOP Barren Solution Recovery
- SOP Tailings Disposal
- SOP Hazardous Waste Classification
- Monitoring of Topographic Control and Slope Stability of the Tailings Deposit
- Emergency Plan for the Use, Handling, Storage, Handling and Disposal of Cyanide Waste
- SOP Change Management Procedure
- SOP Dismantling of Equipment and Installations for Closure
- SOP Operation and Maintenance of Hoses, Valves and Couplings
- SOP Handling Empty Boxes and Bags Containing Sodium Cyanide
- SOP Maintenance in Tanks and Mills (Confined Spaces).
- SOP Decontamination of Equipment Prior to Maintenance
- SOP First Aid in Cyanide Poisoning
- SOP Patient Transfer in Case of Cyanide Poisoning
- SOP Preventive Maintenance of Electric Power Generators
- SOP Electrical Network Switching to Power Generators
- Tailings Operation Manual 2023
- Contingency for Interruption or Temporary Closure of Operations
- SOP Inspection of Barren and Tailings Solution Pipes

These procedures are adequate to provide measures to protect human health and the environment. The auditor reviewed the operation's written operating plans and procedural documents confirming that they address the safe operation of all cyanide facilities. Implementation of the plans and procedures was confirmed through inspection of these activities and interviews with the personnel responsible for performing these activities, and review of available documentation.

When reviewing the work procedure Cyanide Solution Preparation the auditor observed it does not involve measuring the pH before starting the preparation nor includes how will they raise the pH in case it was below the required parameter. Also it did not indicate the level of the cyanide tank required to start the preparation, when to start the tank agitator.- In terms of personal protective equipment, the use of Tychem suits was not required although used by the operator at the hopper and finally, if the protective suits were going to be reused or discarded and if reused how would this be managed. This Protocol Question was declared in Substantial Compliance.

After the audit, Veta Dorada sent the auditor a recent version of the work procedure addressing all the observed items, finding it in conformance with the Code requirements. The procedure states in case the pH of the solution below the accepted parameter, the operator immediately must add caustic soda through the pumping system of the soda tank to the 200 m³ tank of barren solution to regulate the pH and bring it to ranges greater



than or equal to the accepted parameter. Then the operator will measure the pH again verifying that its value. Once the increase in PH is verified, the caustic soda addition pump will be turned off and the cyanide preparation will begin, all pH measurements are recorded in the established format. The Auditor reviewed pictures of the caustic soda pumping system installed en completed pH records corresponding to the cyanide preparation events. The cyanide tank must be at 25% of its capacity before preparing more cyanide solution, protective suits are discarded after every cyanide preparation. No additional information was required to find ¿d this Protocol Question in Full Compliance.

Veta Dorada operational plans and procedures provide the link between its design and the necessary operational practices. The site's operating plans and procedures, reference the assumptions and parameters on which the design was based, as well as applicable regulatory requirements related to prevention of cyanide releases and exposures, to allow the operation keep track of why it is operating according to a specific plan. The operation's plans also identify and account for the design storm event(s) for the tailings pond, the only process pond in the operation.

The major parameters included in the operating plans and procedures are among others:

- The operating freeboard in the tailing's storage facility is 1 meter (m).
- The concentration of free cyanide discharged to the tailing's storage facility must be below 900 ppm.
- pH of the process plant cyanide solution to be greater than 10.5.

The auditor interviewed personnel responsible for the operation and maintenance of the facility. Personnel showed good awareness of program requirements.

The operation's management system address those aspects of the operation that are necessary for protection of workers, communities, and the environment. Specific items addressed in operating plans or procedures include:

- Water management procedures, such as how and when TSF solutions must be managed to retain the design storage capacity in this facility is described in the document Tailings Operation Manual 2023.
- Inspection program for the cyanide facilities such as process tanks and pipelines, and tailings impoundments.
- Preventive maintenance programs for critical equipment.

Equipment, personnel, procedures, and records from the areas containing cyanide were the focus of this audit. The procedures were available for review during the audit. Procedures address all aspects of the facility, including operational control,



environmental, health and safety topics, preventive maintenance, water balance, and inspection processes for equipment, secondary containments, environmental media, and wildlife protection. Procedures were available for normal and upset or emergency operating conditions.

Procedures were reviewed and were found to be appropriate for the operation and fully implemented. The auditor reviewed inspection records for the time period of this certification audit.

Inspection programs are implemented throughout the plant including the various cyanide facilities that include all offload areas, process tanks, pipelines, valves, pumps and secondary containments, and tailing storage facility freeboard.

Veta Dorada has a preventive maintenance for critical equipment managed by mean of an Excel worksheet. Preventive maintenance and calibration plans are generated weekly for the specific frequency of the equipment. Work orders area generated also from inspection forms, including assigned priority.

Veta Dorada has the formalized SOP Change Management Procedure for managing changes to the production processes or operating practices. The purpose of the procedure is to ensure that systematic processes are in place to evaluate any changes at the plant so that the risks of incurring negative impacts to people, environmental, property, or product quality are minimized. The procedure identifies changes to the facility or its operating practices that may increase the potential for cyanide releases and worker exposures before such changes are implemented so that they can be evaluated and addressed, as necessary.

The written procedure requires notification to environmental and safety personnel and sign offs by these departments, among others, before the change can be instituted is the best way to address this. Verification was through review of the procedure as well as completed forms that have been signed off by environmental and health and safety personnel.

For example, the auditor reviewed completed change management procedures related to the installation of a new cyanide hopper at the reagent area, also to evaluate changes in the cyanide warehouse, as additional vertical enclosure had to be installed to protect the warehouse from cross rain, confirming the ventilation was in compliance. Other example of management of change reviewed was related to installation of a net over the tailings pond water surface.

Veta Dorada has implemented contingency procedures for the process plant and tailings



storage facility to respond to upsets in water balance, problems identified by monitoring and inspections, and to address temporary closure of the operation. Procedures include step-by-step measures for stopping and starting the plant facilities, events of a power outage, provide response measures for emergencies related to failures of cyanide equipment, and response plans to address upsets in the process water balance.

In occasion of the audit, the operation was not measuring the pH of the barren solution at the mixing hopper, before beginning the process of preparing cyanide solution. pH values are measured in other places of the process, but not at this point. Given the critical importance of having pH above 10.5 to avoid HCN gas generation, the auditor raised this issue as in substantial compliance. After the audit, Veta Dorada sent a new version of the SOP Sodium Cyanide Solution Preparation where the operation established that pH of barren solution must be measured at this hose as part of the pre-task checklist, and also established in this SOP, as a contingency procedure, the steps to rise pH if it is below 10.5, by adding caustic soda to the barren tank. This is supplied with barren solution from the tailings pond. The auditor reviewed the SOP's latest version where these provisions were established, reviewed pictures of the new system installed to connect the soda tank with the barren solution tank, and also review one month completed pre-task checklist records showing pH of barren solution is being measured before pouring cyanide. All pH records showed to be above 10.5. No additional information was required to find this question in full compliance.

The SOP Contingency for Interruption or Temporary Closure of Operations considers the necessary actions to take for an unplanned closure and during temporary closure. These plans include the requirement to continue ongoing maintenance and inspection of the entire process plant, tailings facility, and to ensure that the integrity of all pipelines, trenches, structures, berms, and embankments are maintained. In a closure or upset water balance scenario, no additional tailings would be pumped to the tailing's facility.

The procedure states for temporary closure, operators must Immediately coordinate to cut off the mineral feed to the circuit, close all water supply valves, close oxygen injection valves to the tanks, and turn off solution recirculation pumps. From the tailings dam and others. They must turn off mills, pumps, leaching tanks, reactors, boilers and other electrical-mechanical equipment.

The procedure indicates that they must undergo inspection to verify that all valves, cyanide pipes, pulp transport pipes, pipe joints, industrial water valves, connections and others are completely closed. Likewise, the blocking of the electrical control panels of all plant equipment, closure of the operations control room and warehouses of reagents and supplies must be coordinated. This includes management of any cyanide on site, such as



solid cyanide stored in Intermediate Bulk Containers, reagent-grade cyanide solution stored in tanks, and lower-concentration process solution within the process facilities, such as tanks, vessels, pipelines, ponds, and impoundments, as well as conducting ongoing facility inspections and required maintenance and water monitoring activities. Indicates that if problems arise with interruptions or stoppages of the process plant due to work stoppages, lack of reagents, materials, civil unrest or legal or regulatory actions, they must immediately communicate with the plant supervisor or immediate management. To activate the contingency plan in coordination with plant management.

They will carry out continuous monitoring of the plant to evaluate the effectiveness of the measures taken and make adjustments, as necessary. If any breakdown, leak or presence of liquids in the solution transport pipes, solution dripping, formation of solids or crystallization areas, coming from cyanide solutions, is detected, the superior will be immediately informed.

Procedures reviewed with respect to management cyanide related contingencies are:

- SOP Sodium Cyanide Solution Preparation
- SOP Dismantling of Equipment and Installations for Closure
- Tailings Operation Manual 2023
- SOP Contingency for Interruption or Temporary Closure of Operations

The procedures for the plant and the tailings facility are adequate to respond to upsets in water balance, problems identified by inspections, and to address temporary closure of the operation.

Veta Dorada inspects the following at unloading, storage, mixing and process areas:

- a) The plant operators perform daily inspections of the process facilities at the beginning of their shifts and weekly documented visual inspections to tanks holding cyanide solutions for signs of corrosion, leakage, and other potential issues. These inspections are documented on the checklist PDM-FOR-001 Inspection of Structures, Tanks, Pipes, Pumps, Valves, Hoses, Ponds, Channels and Containment Systems, which considers observations as for cracks, perforations, corrosion, filtration, presence of fluids, dents, and connections, among others. The auditor reviewed the inspections records and verified that inspections are being completed on an appropriate frequency.
- b) Operations personnel perform weekly inspections of the concrete secondary containments at the process plant for their integrity, the presence of any fluids, to ensure that any drains are closed and locked, to prevent accidental releases to the environment.
- c) Veta Dorada performs weekly inspections to the spill collection systems at the cyanide



preparation, process area and trenches. All these areas have concrete containment with adequate slopes that allows any spill to drain into a sump where an automatic level detector will activate the pump to return the spill to the process. The inspections require verification that drains linking containment areas are open and free of obstructions. Operations personnel inspects for the secondary containments at the cyanide preparation area and distribution tank for cracks and general condition of the concrete. The presence of fluids is included in the inspections. Veta Dorada does not have leach pads or process ponds.

- d) Pipelines, pumps, and valves are subject to weekly visual inspections at the process plant and tailings pond for signs of corrosion and leakage. These inspections include pipes in the preparation area and process areas, as well as pregnant and barren solution pipelines.
- e) Operators perform daily inspections of water levels and tailings surface in the tailings pond, as available freeboard, and integrity of geomembrane. There are no surface water diversions required to maintain water balance as climatologically, the area is considered a dry regime because it has a rainfall deficiency in all seasons, with average annual rainfall between 0.5 to 13 millimeters, as stated in the 2023 study Water Balance and Probabilistic Analysis in the Veta Dorada Beneficiation Plant. On the other hand, the tailings pond has a crown ridge with an average height of around 15 meters above the operation ground level, so the entry of any type of surface runoff would not be possible. The auditor reviewed inspection records during the audit and verified that the inspections are being completed and recorded.

The auditor conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, tailings facility and slurry pipeline. These inspections also included cyanide unloading, mixing and storage facilities. The auditors reviewed inspection records conducted by Veta Dorada to the cyanide facilities finding to be complete.

Facility inspections have been conducted frequently enough to identify potential problems before they present a risk of cyanide release or exposure. Veta Dorada maintains a program to inspect cyanide facilities that was found to be sufficient to assure that the operation is safe and functioning within design parameters. The auditor reviewed inspection records and verified that inspections were done in a consistent manner and recorded.

In occasion of the audit site visit to the process plant, the auditor found the following issues to be corrected:

- The inspections checklist for the TSF was only being signed, the status of the equipment to be checked was not detailed in the corresponding box, it does not



specify the points of interest to be checked. Also, the Plant's inspection schedule does not reflect the frequency with which inspections were conducted in the field -more spaced.

- The auditor required to use the inspections checklists correctly, to record the inspection findings, and to record the date and maintenance work order (WO), for traceability. Also, to adapt the inspection program to what is being done in the field or to their needs in mode such to reflect programmed activities in the field.
- Maintain formal inspection records of the tailings sieve secondary containment parapet, as solids from the tailings would quickly clog the small drain, causing spillage into the natural soil.
- Need to fix with clamps the connections between high strength cyanide piping and outlets of the high concentration cyanide tank.
- It is necessary to fix the pipes containing cyanide to rigid supports since they are subject to vibrations, using accepted engineering practices. Currently, some show rope-type fixing which transmit the pump vibrations and could cause leaks, piping decoupling and spills.

After the audit, Veta Dorada sent pictures of all these issues fixed and after reviewing it and interviews by several teleconferences with the Process Plant engineers, the auditor found these issues corrected. No additional information was requested to find this protocol question in full compliance with the Code requirements.

Inspections at Veta Dorada are documented

- a) The facility inspections are documented on inspection forms, and include the date of the inspection, the name of the inspector, and any observed deficiencies. The nature and date of corrective actions are also documented along with the record of the inspection.
- b) Operational inspections are documented on checklists. Corrective actions are documented in maintenance records and work orders. The auditor verified that corrective actions related to the cyanide facilities were prioritized for prompt implementation. The auditor reviewed the operation's inspection records and maintenance records verifying that this information is recorded.

The operation has a preventive maintenance program for its cyanide facilities where a failure can result in a cyanide release or exposure. Veta Dorada has a documented preventive maintenance program to ensure that equipment and devices function as necessary for safe cyanide management. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping, and tanks, according to a maintenance program and every time is needed to keep equipment and installations properly working.

The Annual Maintenance Program 2023 which includes all the process plant equipment, is



kept in an Excel worksheet. The maintenance period is controlled by the hours of operation of each machine by means of hour meters. Hours worked are recorded every 4 days. The maintenance area performs inspections every 20 days on pumps and valves, among other equipment. The thickness of tanks is measured annually. The maintenance area performs inspections of the tanks on a monthly basis. Among others, the auditor reviewed the annual sensor maintenance program: buoys in self-starting pump pools, with the possibility of manual handling and maintenance of ultrasonic level sensors in tanks.

As part of this program, plant operators perform daily and weekly visual inspections reporting any findings as needed of equipment repair or maintenance, which are processed by the site's formal maintenance program, generating work orders, and following it until closed. Works done to equipment is record and it is available to see the equipment history.

Schedules for daily, weekly, monthly, quarterly, and annual maintenance activities for cyanide facilities are maintained electronically by means of Excel. Work orders are generated and trained maintenance personnel perform the required tasks.

The written procedure SOP Decontamination of Equipment Prior to Maintenance is in place to ensure that any equipment that contains cyanide is properly decontaminated prior to performing maintenance and that maintenance personnel are wearing the necessary PPE. The plant area delivers the equipment previously decontaminated for maintenance

The auditor inspected the cyanide facilities, reviewed maintenance records, and interviewed employees determining compliance with this provision. All personnel showed excellent awareness of cyanide safety topics and the need for proper maintenance of the equipment used in the operation. Completed work orders and calibration records were sampled and were found to be complete.

The operation has emergency generators to continue working with all the process plant to prevent unwanted stops in the production process; power outages are sporadic. According to the risk analysis carried out by the plant, in the event of power outages, spills would not occur due to the design of the plant but would cause issues of settlement of solids in the leaching tanks.

Veta Dorada has two Caterpillar C-32 diesel-powered generators 910 kW each located near the process plant. The power required to operate the plant is approximately 1,150 kW. Veta Dorada has developed and implemented the written procedure SOP Preventive Maintenance of Electric Power Generators. Maintenance is performed every 250 hours of operation. At the time of the audit, power generators were one with 8,000 hours of



operation and the other with 3,000 hours, both in good conditions.

The procedure Electrical Network Switching to Power Generators describes step by step the procedure for outages of external energy in order that generators are launched to feed all planned areas of the plant for these events.

The auditor reviewed maintenance records verifying that the operation maintains and tests this equipment as necessary to ensure that it is functional if and when needed.

Standard of Practice 4.2

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

✓ in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

The process plant has an ongoing program to determine if the standard rate of cyanide addition in an ore processing facility is sufficient, but no greater than that required, to optimize gold and silver recovery. The auditor confirmed the operation has implemented this program.

The procedure identifies anticipated changes in the characteristics of the ore fed to the mill and modifies the cyanide addition rate accordingly.

Veta Dorada is a plant that obtains its raw material (ore) through the purchase of minerals from small mining producers and artisanal miners. As the operation processes different ores, has implemented a strategy to control its cyanide addition. Through ore blending, the operation mixes ore from various sources and determines an average head grade, with which they have already identified on how much cyanide strength they should use steadily for the average of that grade calculated by blending.

If there is a new ore supplier or ore containing sulfurized or mixed matter (oxide and sulfur), metallurgical tests are done to define its treatment. Every batch mineral is inspected visually and when showing different geological conditions, it is performed a metallurgical test. The auditor reviewed several examples of the metallurgical tests performed in their lab.

As stated in the SOP Cyanide in Pulp Sampling, pulp in cyanidation is sampled in the over of the pulp at tanks TQ1 or TQ2 inlets as the case may be, and at the outlet of all tanks



TQ1 through TQ11 (metal content analysis).

As indicated by the plant manager, to determine the appropriate cyanide addition rates in the mill and to adjust addition rates as necessary, Veta Dorada performs metallurgical test as the geology of the raw material is very varied. Actual monitoring and measurement of cyanide concentrations is conducted at the last counter current tank N° 11, where cyanide concentration must be in the range between 300 – 350 parts per million (ppm) of free cyanide via bottle tests.

The operation identifies its ore to process, through the laboratory validation and report to the metallurgical engineer for its treatment. Cyanide addition is evaluated during the metallurgical tests and controlled with an optimum target set for cyanide consumption.

There are 2 cyanide addition points: at mill 1 and mill 2. Veta Dorada controls its cyanide addition, based on experience and expertise of the plant operators. Results from the daily cyanide concentration analyses are continuously used to control cyanide addition. The results are reviewed and, if changes are needed, they are communicated to the process operator.

Standard of Practice 4.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Veta Dorada has a water balance and probabilistic analysis model developed by an external contractor. The model considers the factors necessary for such an evaluation, including freshwater additions and recovered barren solution from the tailing ponds and desorption process, the tailings deposition rates, the tailings moisture content, precipitation, and evaporation. Climatologically, the area is considered extremely dry because it has a deficiency of rainfall in all seasons, with average annual rainfall between 0.5 to 13 mm. The meteorological information used for the model comes from records of four weather and rainfall stations of the National Meteorology and Hydrography Service (SENAMHI) around the area of the project.

The water balance model takes into account the uncertainty and variability inherent in



the prediction of precipitation patterns. The frequency and distribution of precipitation events is considered along with extremes and seasonal variations. The frequency analysis is based on the adoption of a probabilistic model that represents the behavior of maximum precipitation in 24 hours.

Veta Dorada has an adequate comprehensive and probabilistic water balance in Excel as a predictive tool that allows the plant to manage cyanide solutions in real time to account for foreseeable precipitation events. The auditor reviewed the water balance which considers the appropriate factors, and confirmed the site implements the necessary practices to maintain the balance on an ongoing basis.

Veta Dorada water balance considers the following in a reasonable manner:

- a) The rates at which tailings are deposited into the tailings storage facility from the process plant is calculated from the production values (as solid material) and the solid content of the tailings. This rate considered is 10.3 liter/second.
- b) The facility has considered the design storm duration of 24 hour and storm return interval of 100 years that provides a sufficient degree of probability that overtopping of the ponds and tailings storage facility can be prevented during the operational life of the facility.
- c) The quality of the on-site existing precipitation and evaporation data is representative of actual site conditions. The model consider 4 meteorological stations, from which Chaparral is the most representative.
- d) Run-on to the tailing's facility has been considered between 0.1 and 0.4 m³/sec, for a return period between 5 and 100 years, respectively.
- e) The inter-basin where the process plant is located makes freezing and thawing conditions impossible.
- f) The average daily evaporation rate is approximately 5.5 mm/day. The model also accounts for solution pumped from the seepage collection system back to the tailings facility. Losses to surface water are not considered because there are no discharges to surface water.
- g) Veta Dorada operation does not have leach pads. The effects of potential power outages or pump and other equipment failures would not have effects on the water balance. Veta Dorada has back-up power generators.
- h) Treatment capacity is not considered because there is no discharge to surface water.
- i) The impact from the phreatic surface is not considered because the groundwater table is at least 20 meters below the liner of the tailing's storage facility.

The auditor reviewed the water balance and design documents for the tailings storage facility (TSF). The minimum freeboard established is 1 meter over the TSF design storage capacity is specified. The operation's inspection records were reviewed verifying that the facility is operated with adequate freeboard and is being monitored in accordance with the



procedures and tailings operating manual. At the time of the audit, the TSF had a useful life of 1.8 years at the current tailings deposition rate.

Veta Dorada perform daily inspections and monitoring activities necessary to prevent overtopping of the TSF. The auditor reviewed the periodically report Monitoring of Topographic Control and Slope Stability of the Tailings Deposit; the Tailings Operation Manual 2023 and the SOP Tailings Disposal. Both the Manual and SOP include items for monitoring daily the tailings storage facility freeboard and monitors the daily rate of tailings deposition in the tailings pond. Verification was based on inspections records and monitoring activities that are being conducted.

In occasion of the audit, Veta Dorada was comparing monthly the data from Chaparral meteorological station with the design assumptions used to develop the water balance model, ensuring that actual precipitation data is according to that assumed for the facility design. The operation provided monitoring records for the auditor’s review. No changes or updates to the water balance have been made.

Standard of Practice 4.4

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Veta Dorada TSF has Weak Acid Dissociable (WAD) cyanide concentrations exceeding 50 mg/l. According to the review of tailings water sample analytical data for WAD cyanide from February 2023 and March 2024, WAD cyanide values in the tailings discharge at the tailing’s storage facility were 938 and 1,354 mg/L respectively; data provided by external laboratory Inspectorate an environmental division from Bureau Veritas.

During his visit to the tailings pond, the auditor observed that the tailings discharge pipe generates a dense runoff which quickly filters into the tailings beach area, vanishing any water flow after about 5 meters travel. The sand content of these tailings is high, which makes it have a great filtering capacity, this added to the high average evaporation rate that exists in the area that is 5.4 millimeters/ day. which favors a low surface moisture content of the tailings beach.



The Veta Dorada 2023 Cyanidation Tailings Management Operations and Contingencies Manual indicates, in item 3.4 Operational Controls, that the tailings operator must check the entire pipeline (pipes), until it reaches the tailings deposit, it also verifies the place where the tailings is going to be unloaded and the rapid infiltration of the deposited flow. In the auditor's judge, the short dense tailings flow across the tailings beach do not need measures to prevent avian wildlife from accessing it.

The operation has installed bird's nettings, covering the entire body of the super natant water surface in the tailings pond, thus ensuring that birds do not settle there. The rest of the tailings pond is with dry tailings so that area is not cause for concern.

In turn, as a complement to this coverage with bird's nettings, the operation is managing the tailings pond in such way to maintain a minimum surface of water by pumping water back to the plant process to ensure that the water surface is always protected by the birds netting. The area is additionally completely desert. No presence of aquatic birds was observed. And in any case, Veta Dorada complies with daily monitoring to check if there is mortality or presence of birds in the area. In the opinion of the auditor, this coverage is sufficient, and it proves to be a competent measure to restrict access of birds to the tailing pond water surface.

A second measure to restrict wildlife access to the supernatant pond is a perimeter fence around the tailing's facility. Operations check the fencing daily. The environmental department checks the fencing weekly.

The auditors reviewed completed inspection forms that included the fencing. No wildlife mortalities have occurred related to cyanide have been registered since the startup of Veta Dorada. The auditor interviewed personnel from the operations and the environmental departments and also verified that the fencing completely surrounds the tailing's facility.

The cyanide concentration in open water in the tailing's storage pond exceeds 50 mg/l WAD cyanide. The auditors reviewed analytical water quality data of the tailing's solution prior to discharge into the tailing's facility Test report with official value No. 02656L/23-MA, Testing Laboratory Accredited by the Peruvian Accreditation Body INACAL (National Quality Institute) Performed by Bureau Veritas on 13-3-2023

Although Veta Dorada cyanide concentration in open water in the tailing's storage pond exceeds 50 mg/l WAD cyanide, the operation has been successful at preventing wildlife mortality. By interview with the environmental supervisor, they had zero cyanide related wildlife mortalities during the time period they began operations as they maintain a formally documented wildlife protection and monitoring program. Operations conduct daily inspections of the tailings facility that include observation for wildlife. The program and



complete wildlife inspection forms were reviewed during this certification audit. The auditors interviewed personnel responsible for the program.

Veta Dorada do not operate with heap leach solutions.

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:

Veta Dorada does not have any direct discharges to surface water. There is no surface water in the area, except when the Chala creek is activated very rarely due to an exceptionally rainy year. Veta Dorada does not have any direct or indirect discharges to surface water. The Process Plant does not generate discharges to surface water because it is designed in a closed circuit. There are no perennial surface water features such as springs, rivers, or lakes immediately down gradient of the process plant or the tailings facility. The nearest surface water body is the Ocean Pacific, located more than 5 kilometers downstream from Veta Dorada.

Veta Dorada has no direct or indirect discharge to surface water from any facility.

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:

According to the technical data of the drilling in the wells of water quality monitoring, an impermeable horizon has been detected at a depth of approximately 57 meters. From the



analysis, it is clear that the groundwater existing in the subsoil where the Veta Dorada beneficiation plant is located is deposited in a semi-permeable geological formation and hydrogeological identified as aquitard, since these types of reservoirs contain water, but they transmit it very slowly and are therefore generally not suitable for the delivery of groundwater.

Veta Dorada has implemented specific water management and measures to manage seepage to protect the groundwater beneath and downgradient of the operation. Veta Dorada Works with beneficial use for groundwater Category 3: Irrigation of Vegetables and Animal Drink of D.S. No. 004-2017- MINAM (Ministry of Energy and Mines). Veta Dorada has 3 water quality monitoring wells downgradient the TSF and process plant. PZ-1, PZ-2 and PZ-3, of which two of them have a depth of 50 meters and one of 57 meters, likewise, it is also indicated that an aquitard has been detected whose underground water depth is at a depth of approximately 22 meters from the surface of the piezometers, and in relation to the bottom of the tailings deposit is at a depth of 12 meters.

The TSF has full lining with synthetic materials, has tailings deposition and impounded management techniques. The process plant is operated to manage seepage and protect groundwater quality. All solutions are contained in process tanks and pipelines with secondary containment provided by the concrete floor of the plant and geosynthetics in order to prevent seepage to groundwater.

The auditor reviewed the operation's solution management pond liner system, secondary containment systems, the solution recovery system from the TSF, the associated operating procedures and interviewed site personnel finding it in conformance.

Veta Dorada monitors underground quality water for total cyanide, free, cyanide and WAD cyanide, among other parameters. The auditor reviewed the report of INSPECTORATE SERVICES PERU S.A.C (Bureau Veritas), which carried out the groundwater quality monitoring In the 3 monitoring wells for the study in the operation stage at the Veta Dorada Beneficiation Plant facilities on August 28, 2023, it found that cyanide values were below 0.002 ppm for all cyanide species in all cases.

The monitoring was carried out in the 3 wells with the participation of technicians of recognized experience, with the application of criteria established in the national and international regulations in force during August 28, 2023. For the development of the analysis of the collected samples, the laboratory Inspectorate Services Perú S.A.C. accredited by INACAL Instituto Nacional para la Calidad), through registration No. LE - 031. The analysis of the samples was carried out using standard methodologies, the American Society for Testing and Materials (ASTM) and US EPA (United States Environmental Protection



Agency); as well as what is indicated in the water quality monitoring protocol of the Ministry of Energy and Mines, Mining Sub-Sector, in which the basic guidelines for the proper development of such work are proposed.

For free cyanide, ASTM D 7237-18.2018 was used. Standard Test Method for Free Cyanide and Aquatic Free Cyanide with Flow Injection Analysis (FIA) Utilizing Gas Diffusion Separation and Amperometric Detection. They do not mention the methods used for total cyanide and WAD cyanide. Cyanide content results for groundwater quality in all 3 monitor wells were below 0.002 mg/L for total, free and WAD cyanide.

These results from stations PZ-1, PZ-2 and PZ-3 report concentrations below the values for Category 3 Irrigation of Vegetables and Animal Drink of D.S. No. 004-2017-MINAM and Environmental Quality Standards (ECA) for Water.

Veta Dorada does not use mill tailings as underground backfill.

Veta Dorada 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.

Standard of Practice 4.7

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All tanks containing cyanide solution, including cyanide mixing, leach tanks and all other process solution tanks with 0.5 mg/l or greater WAD cyanide concentrations have secondary containment in Veta Dorada. Containments are adequately sized. Field inspections of the cyanide warehouse and process areas at the plant were conducted during this certification audit.

The entire process area, including the cyanide preparation area, is contained a mixed system of secondary containments ponds, gutters and sumps with automatic level pumps that return any spill back to the process, providing competent barriers to seepage. Process tanks at the plant are secured to solid, reinforced concrete plinth (pedestal-type) foundations. The secondary containment system is inspected daily as part of the process facilities inspection



system. The auditor observed that all tank foundations and concrete secondary containments were in good condition at the time of this certification audit.

The concrete floor at each containment area is sloped to drain to concrete trench drain, where any spills will be pumped to the grinding thickener tank. The pumps are activated automatically by a water level sensor at the sump and also have manual controls.

The secondary containment areas for the cyanide tanks are designed to provide sufficient containment volume for the largest tank within the secondary containment area, pipes leading that would drain back into the area, plus a significant storm event. Containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. The secondary containment areas are constructed of reinforced concrete. The design drawings and volume calculations of secondary containments for cyanide storage, mixing and process tanks were reviewed by the auditor during this initial certification audit and were determined to meet Code compliance requirements. The auditor confirmed the secondary containments were maintained empty, with no materials stored within them.

Veta Dorada has dedicated pumps within secondary containment collection areas that remove solutions and return them into the process circuit. There is no discharge of cyanide-containing water from the secondary containment areas. The automatic pumps are part of the defined preventive maintenance program.

The operation also has implemented the procedure "Operation and Maintenance of Hoses, Valves and Couplings for the Discharge and Pumping of Liquid Cyanide and the Mixture of Solid or Liquid Cyanide Monitoring Tank Levels Against Loss of Signal and Control" to maintain control of the critical tanks levels by means of visual inspections against loss of signal and losses of control in the control room.

All cyanide process tanks at Veta Dorada have concrete secondary containment. All cyanide process solution pipelines have secondary containment to collect leaks and prevent release to the environment. The process solution pipelines at the process plant include concrete secondary containment. The pipeline that carries slurry tailings to the tailing's facility is within a geomembrane protected channel. There are no cyanide pipelines at Veta Dorada that are located outside of containment. Cyanide pipelines are inspected daily as part of the routine inspections by plant personnel.

During the site visit, it was observed the pipes coming down from the barren tank with water recovered from the TSF lacked secondary containment. After the audit Veta Dorada sent photos showing this entire section of the pipeline protected by an HDPE geomembrane lined channel that offers sufficient secondary containment in case of any spill. No additional



information was required to find this protocol question in full compliance with the Code requirements.

No pipelines at Veta Dorada cross any surface waters. There is no near surface water to Veta Dorada process plant. The auditor verified no cyanide pipelines present a risk to surface discharge.

All cyanide tanks and pipelines at Veta Dorada process plant and tailings pond are constructed with materials compatible with cyanide and high pH conditions. They are made of carbon steel, stainless steel, HDPE, and polyvinyl chloride (PVC) or other materials compatible with cyanide.

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:

The auditor did not find documents of quality assurance and quality control (QA/QC) programs implemented during construction of the Process Plant and substantial modification of cyanide facilities, but the tailings facilities has a complete QA/QC program implemented during its construction. The auditor reviewed the as built plans signed by professional engineers, the QA/QC quality dossier containing soil compaction tests, geomembrane quality certificates, geomembrane welding certificates, operation manual and technical specifications among others, finding it complete and in conformance.

The QA/QC documentation for the tailing’s storage facility includes appropriate testing concerning the suitability of materials, welding, concrete, adequacy of earthworks and soil compaction, and installation of geomembrane liners. The program included concrete testing including suitability of materials, fabrication, electrical, mechanical, instrumentation, piping, concrete, and earthworks.

The operation retains the tailings storage facility QA/QC information, records were available both in electronic and hard copies.

Prevconsult engineering company performed the QA/QC inspections for the tailing’s storage



facility 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.

The auditor reviewed records of construction reports, including as-built drawings for this facility. A qualified engineer stamped the as-built drawings. QA/QC reports were signed by qualified personnel and provided documentation that the facilities were built as designed. Periodically reports were produced which included QA/QC inspections during construction. The auditor reviewed these documents to verify that the tailings was constructed in accordance with the design drawings and technical specifications. The auditor verified that the QA/QC documents are stamped and signed by a professional engineer.

Although no formal quality assurance/quality control (QA/QC) program was conducted during the construction of the process plant, the operation showed in substitute records of:

- review and approval of design and construction documents by the local regulatory agencies resulting in the plant operating license; and
- a complete facility inspection report prepared by Prevconsult, an appropriately qualified professionals engineers substantiating that the facilities can continue to be safely operated within established parameters that are consistent with the Code's Principles and Standards of Practice.

Prevconsult engineers visited Veta Dorada's plant site in Chala in September 2023 performing a series of inspections to the cyanide installations including the facilities for unloading, storing, and mixing cyanide, to determine by visual inspection the condition of the concrete, metal, and conduction (piping) structures in the various cyanide facilities at Veta Dorada site plant.

Previously the inspection, Prevconsult engineers reviewed the existing structural plans and specifications of the facilities as its own responsibility, in order to ensure that they comply with current design standards and codes. They reviewed the processes followed in the plant as well as the basic criteria of structural inspection, guidelines for the inspection and preliminary evaluation of concrete structures, corrosion in reinforced concrete structures and inspection instructions to detect typical defects of HDPE pipe. They used the guidelines applicable to the structural inspection procedure such as the American Concrete Institute (ACI) specifications ACI 318-08 and ACI 315, the American Society Standards for Materials Testing (ASTM), the American Institute of Steel Construction (AISC) specification AISC 360-10 and the International Cyanide Management Code.

A field visit was carried out by two registered engineers: a civil engineer and a mechanical engineer, who were in charge of structural inspection and works with the purpose of



observing and measuring the corresponding installations, both reinforced concrete and metal, as well as identifying damage to the structures. Professionals involved in this evaluation also included a registered mining engineer with Ph.D. in Mining and Environmental. All drawings certificates, inspection registers and reports are signed and stamped by the engineers.

During the inspection, qualitative research techniques were carried out, such as direct observation, interviews with the personnel in charge of the installations and photographic records of the installations. The professionals inspected the cyanide warehouse and the maneuvering yard outside the warehouse, verifying its condition, the materials of the components of the different elements and facilities, the elevated hopper of the cyanide preparation and its support structure and discharge tube. They inspected the cyanide mixing tank including its structures, pumps, pipes, and gutters, as well as the secondary containment system made up of pools, gutters, and sumps.

Prevconsult report includes inspection sheets and inspection certificates for each element reviewed location plans, layouts and elevation plans, conclusions, and recommendations. The report conclusions state among others, that:

- The concrete structures inspected: slabs, contingency pools and walls are in good condition, with no cracks or considerable damage. Only small local or specific fissures were observed, as well as small, localized rust spots.
- The metal structures are in good condition, without witnessing any considerable damage; Localized areas with corrosion due to exposure to the environment can be appreciated, so it is recommended to sand these areas and paint them with some frequency.
- The operation is in compliance with the standardization of its structures and is consistent with the specifications of the drawings.
- There are no water leaks and dampness in the canals, walls, and contingency pools.
- Cyanide is stored with proper measures to minimize its exposure to moisture. The warehouse is also adequately ventilated to prevent the accumulation of hydrogen cyanide gas and cyanide dust. The warehouse is located in a secure area where public access is prohibited.
- Tanks containing cyanide solutions have no signs of deterioration, corrosion, or leakage, as well as on valves, pipes, and containments.

The operation's cyanide facilities were evaluated by registered professional engineers who determined they are "fit for service" and can continue to be safely operated according to their existing procedures.



Equipment including cyanide tanks, vessels, pipelines, pumps and associated valves and fittings, concrete and steel structures supporting this equipment, and secondary containments of process solution tanks and vessels were evaluated from a stability and containment perspective, as appropriate, concluding the report the equipment is fit to continue functioning as currently operated.

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:

Veta Dorada has written procedures for the monitoring activities used to evaluate the effects of cyanide use on wildlife and groundwater quality. There is no surface water in the process plant area. The groundwater-monitoring program includes the process plant, the tailings storage facility, and groundwater wells located up gradient from all aspects of the operation and down gradient from the tailing’s storage facility.

The auditor reviewed the procedures and data records for this certification demonstrating that wildlife and ground water are being regularly monitored. Veta Dorada has not had any recorded cyanide-related wildlife mortalities.

Appropriately qualified personnel from Inspectorate Services Perú S.A.C., environmental division of Bureau Veritas company performs the groundwater sampling and laboratory tests who has also developed the analytical protocol. Inspectorate laboratory is accredited by INACAL (National Quality Institute). The monitoring plan was developed by appropriately qualified professionals who performed the project Environmental Impact Assessment elaborated by ACOMISA, a registered company in SENACE (National Environmental Certification Service) approved by local authorities.

Veta Dorada adopted the procedure from Inspectorate Services Perú S.A.C. for groundwater sampling that describes how representative samples should be taken, field parameters to take, sample preservation, sample handling, shipping instructions, chain-of-custody, field monitoring equipment calibration and quality control. The procedure specifies analysis for total, free and WAD cyanide. A third-party consultant collects the groundwater samples. The auditor reviewed examples of completed chain-of-custody forms for this certification audit



cycle showing proper use of the forms. Maps showing the monitoring locations with respect to the cyanide facilities were reviewed.

The procedure for groundwater water sampling instructs the sampler to record the field conditions during the sampling activities. The auditor reviewed Veta Dorada monitoring reports and verified that they record in writing the weather conditions, the presence of wildlife, field parameters, groundwater levels, and other characteristics of the water.

Sampling points are numbered and plotted on a map. The date of the sampling, the names of personnel involved, the dates that the samples were analyzed, and the results of the analyses were available for review for all sampling dates. The auditor reviewed completed field forms and verified that these conditions are being registered.

Veta Dorada is a zero-discharge facility and does not discharge process water to any location. The operation monitors groundwater quality down gradient and up gradient of the tailing's facility and the process plant to ensure that no indirect discharges are occurring. Groundwater monitoring is conducted quarterly at 3 quality water wells. In all cases monitoring results for all cyanide species resulted in values bellow 0.002 ppm which was the detection limit. The auditor considers the monitoring frequency as adequate.



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 Standard of Practice 5.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Veta Dorada has the written mine closure plan for the entire operation, Mine Closure Plan of the Veta Dorada Beneficiation Plant Mining Unit approved by director's resolution N° 134-2014-MEM-DGAAM, and an updated version of this plan from September 2023, which includes procedures for closing all cyanide facilities.

The plan considers those aspects of closure that address the cyanide remaining on site upon cessation of production activities and prepares the site for its closure and post closure period. The procedure UCH-SSOMA-PETS-018 Equipment and Facilities Dismantling for Closure describes the necessary activities for treating, neutralizing, managing cyanide and cyanide containing process solutions remaining in storage and production facilities in preparation for closure so that they do not present a risk to people, wildlife, or the environment due to the cyanide content.

Decommissioning activities described in the plan and the procedure include activities such as decontamination of equipment, removal of residual cyanide reagents, neutralization of process solutions and installation of measures necessary for management of surface or groundwater such as pumping systems that would operate during the facility's closure period.

For the Process Plant the plan includes, among other activities:

- Chemical neutralization of the facility to <0.5 mg / WAD CN.
- Relocation / final disposition of the CN and other reagents when closing.
- Rinse the circuit with freshwater circuit.
- Treatment with oxidant (hydrogen peroxide) to cyanide affected surfaces.
- Demolitions.



- Final disposition of the materials.

Closure procedures for the TSF include:

- Dismantling of facilities associated with TSF.
- Recovery of installations (tanks, pipes / valves etc.) and waste disposal in-situ.
- Flush the surface installations.
- Interception of runoff.
- Chemical stability.
- Periodic monitoring of the deposited tailings.
- Post-closure monitoring of leak detection.

The auditors interviewed the Sustainable Development Manager to review the updated closure plan.

The decommissioning (closure) plan includes a schedule for carrying out its proposed activities. The schedule is years after closure and shows the order in which the planned activities will be conducted and the duration of each activity starting from the point in time the operation ceases production.

Veta Dorada has developed a Gantt Chart Implementation Schedule for the mine closure that includes the major decommissioning activities for the cyanide facilities. The sequence of decommissioning activities is shown with reference to years after closure. This schedule will be refined as Veta Dorada approaches the closure period.

The plant reviews its decommissioning plan during the active life of the operation to keep them current and applicable to the actual ongoing operation as it changes over time, to reflect changes in the operation as they affect decommissioning, as well as changes in planned decommissioning techniques and measures.

The plant's decommissioning plan includes a provision requiring its periodic review, at least every five years, addressing all expansions and modifications to the operation that materially affect the plan and its estimated cost.



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 Standard of Practice 5.2
 - not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation has a cost estimate based on rates applicable to labor and equipment quotes from contractors. The cost estimate includes line items for site cyanide-related decommissioning activities and corresponding costs. The cost estimate includes add-on percentages for third party engineering design and contract administration. The cost estimate conservatively assumes that cyanide equipment is decontaminated and hauled offsite for reuse or disposal.

Veta Dorada reviews and updates the cost estimate at least every five years yearly as part of its procedures, and when revisions to the decommissioning plan are made that effect cyanide-related decommissioning activities. The auditors reviewed the updated version of the plant closure plan, supporting the plant’s stated intent to regularly review and update the decommissioning costs.

Veta Dorada showed a copy of the current bank guarantee letter delivered to the General Directorate of Mining, covering the total amount of the updated cost for the plant decommissioning plan, as the financial mechanism approved by the applicable Peruvian jurisdiction. Veta Dorada has submitted a current bank guarantee letter as the financial mechanism to cover the estimated costs for closure and reclamation.



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 Standard of Practice 6.1
 in substantial compliance with
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Veta Dorada has developed and implemented written procedures for the tasks that require management of cyanide including procedures for unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance. The operational procedures focused on the plant operations include those reviewed under Standard of Practice 4.1, which the auditor determined they describe cyanide-related safe work practices.

For critical jobs as enter to confined spaces, procedures require to perform the protocol of hazard identification, risk assessment and controls (IPERC by its acronym in Spanish). Maintenance personnel need to obtain a work permit prior to any activities in the process areas. The work permit includes an analysis of the risks associated with the work to be conducted. For non-routine activities the operation requires a work safety analysis (ATS by its acronym in Spanish) where workers evaluate the job that is about to be performed for potential hazards and plan out the work to ensure that the hazards are appropriately managed. Where necessary, procedures address pre-work inspections.

All procedures lists the required Personal Protection Equipment (PPE) such as respirators, personal hydrogen cyanide gas monitors, eye protection, protective gloves, and suits, among others. Use of personal protective equipment is also addressed in safety training programs and signs posted in specific work areas. The Health and Safety area has developed a matrix of PPE required for the whole plant. Observations during the audit confirmed that hard-hat, hearing protection, rubber boots, rubber gloves, chemical suits, face shields, approved respirator and HCN monitors were in use for tasks that were performed at the cyanide preparation area.

The operation obtains employee input regarding its health and safety procedures and considers this input in developing and evaluating its procedures. Methods include the daily safety meetings (5-minute talks), training sessions, investigation of incidents, IPERC and ATS



protocols.

During the daily safety meetings there is direct communication between supervisors and operators where worker input is considered to improve existing procedures. Records of daily safety meetings including discussion of safety issues related to cyanide were reviewed by the auditor.

Procedures related to cyanide management are reviewed and/or updated periodically with the participation of process operators. Training sessions are conducted to disseminate the updated procedures and feedback is provided by the workforce during those sessions. Records of input from workers and records of training sessions were reviewed by the auditor and were found to be complete.

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.

in full compliance with
 in substantial compliance with
 not in compliance with

The operation is Standard of Practice 6.2

Summarize the basis for this Finding/Deficiencies Identified:

Veta Dorada has determined the appropriate pH for limiting the generation of HCN gas during cyanide mixing and production activities. The procedure UCH-PDM-PETS-014 Preparation of Sodium Cyanide Solution requires a pH between 10.5 to 11 in the barren solution at the cyanide hopper and mixing tank prior to starting the mixing process. pH levels are regulated with sodium hydroxide. Observation of a cyanide mixing event confirmed that the mix tank pH was checked and recorded in the checklist prior to initiating the mixing process. The procedure UCH-PDM-PETS-013 Cyanidation Parameters Control requires the pH of the process solution to be maintained between 10.5 a 11. Requires manually taking samples every three hours at the discharges of all tanks and at the hydrocyclone. If the pH is less than 10, will have to add caustic soda to increase the basic concentration and keep it within the established parameters. This is done to limit the evolution of hydrogen cyanide gas during processing activities.

Daily pH log records were reviewed to verify that the pH was maintained as recommended and found to be acceptable.

Veta Dorada has identified the areas where workers may be exposed to cyanide. Workers are alerted to the need for necessary personal protective equipment through use of signage,



portable hydrogen cyanide (HCN) gas monitors, operating procedures, and training. When operators are alerted of HCN gas levels at 4.7 ppm, they withdraw immediately from the area of preparation and leave the work area. When the HCN gas monitor activates the alarm at 10 ppm of HCN gas, all personnel must evacuate the process plant to meet at the safe preset muster point.

Procedures have been developed for all activities in which cyanide management is involved. These procedures include a section where the PPE requirements are listed. Signage listing the PPE requirements to enter a cyanide facility has been installed at appropriate locations. The auditor observed and interviewed workers to confirm that these protective measures are being implemented.

Veta Dorada uses portable monitoring devices to confirm that controls are adequate to limit worker exposure to HCN gas. Handheld monitoring devices are set to visually and sound alert operators at 4.7 ppm and 10.0 ppm, as recommended by the Code. These two HCN values are also specified in the procedures related to cyanide management. HCN visual and audible alarms are set to alert operators.

Operators use portable HCN monitors to conduct maintenance work, confined space related work and other cyanide related tasks. Personal protection equipment (PPE) requirements defined in cyanide related procedures call for the use of a handheld HCN gas monitor during specific tasks where there is a potential for exposure to HCN gas. Process operators and maintenance personnel were observed using these monitors throughout the audit.

This requirement was verified through review of procedures, observation of monitors during site inspection and discussions with maintenance personnel.

The operation maintains, test and calibrate portable HCN gas monitoring equipment every 6 months, as recommended by the manufacturer. Records of these activities were available for review of the auditor. Records include the actual calibration information. Calibration certificates and records were reviewed and found to be complete.

This requirement was verified through review of calibration and maintenance records and discussion with maintenance and process personnel. Calibration records for the personal monitors are tracked and recorded in the preventive maintenance system. Records are maintained indefinitely.

Veta Dorada alerts its workers about to the presence of cyanide and reminds of the various prohibitions regarding its use. Warning signs are installed on gates entering the Process Plant area, the reagent area, process tank installations, at the cyanide warehouse, and at the tailing's impoundment.



Warning signs are posted in all areas where cyanide is present advising workers that cyanide is in use, indicating that smoking, open flames and eating and drinking are not allowed, and that, if required, suitable personal protective equipment must be worn. The signs are in Spanish, which is the language of the workforce. The PPE requirements are also posted in each area. Verification was through visual inspection of the signs located in areas where cyanide solution is mixed and used. These areas include cyanide storage, preparation, and the process plant.

High-strength cyanide solutions at Veta Dorada contains colorant dye for clear identification when observed out of proper containment and for clear differentiation with other solutions or rainwater that may be present. Both Draslovka and Tae Kwang Industrial Co., Ltd, the cyanide producers, include dye in the cyanide package in a concentration that provides a clear visual indicator of the presence of high-strength cyanide solution. During his visit to the site, the auditor observed that high-concentration cyanide solution at the mills' cyanide adding points, it was pink in color, verifying that cyanide produced by Draslovka. Through interviews with operations personnel, they confirmed that all the cyanide that was using the plant had dye, included Take Wang cyanide. The auditor reviewed emails sent between Veta Dorada and Mercantil, the commercial cyanide supplier, where the former requested that, as a result of their intentions to certify the Code, they should provide cyanide produced in ICMI certified plants and that come with dye. Additionally, the cyanide referral guides indicated the cyanide brand and also indicated that it came with dye, this at the suggestion of a previous internal audit.

Safety showers, eyewash stations and fire extinguishers are available at reagent cyanide off-loading, mixing and storage areas, Process Plant, and areas where personnel may be exposed to cyanide in the normal course of their work. The auditor checked the safety shower and eyewash stations to confirm they are operating properly. The safety shower and eyewash station at the cyanide warehouse is located out of the storage area to minimize the potential for leaks from water lines to come into contact with cyanide and expose workers to hydrogen cyanide gas. Showers and eye wash stations are inspected and tested daily and prior to beginning a task that has the potential for cyanide exposure (e.g., cyanide mixing, opening a pipeline for maintenance, others). Dry power fire extinguishers are available where cyanide is present. Fire extinguishers are inspected and tested monthly. In addition, maintenance and recharge of the fire extinguishers is conducted annually or as needed.

The auditor reviewed maintenance, testing and inspection records performed during this certification period demonstrating that this safety equipment has been routinely evaluated to ensure it is available if needed.

Veta Dorada has the procedure UCH-PDM-PETS-038 Tank & Pipeline Inspection which requires to identify with signs and labels tanks and pipes that contain cyanide solution, to ensure that individuals that may come into contact with cyanide or cyanide solutions



(including employees involved in maintenance, and any other individual that may be exposed to released solution) be alerted to its presence. Labeling provide workers and others with notice that a dangerous material is present as necessary to protect their health and safety.

Pipes containing cyanide are marked as containing cyanide solution and flow direction is indicated. Cyanide storage and process tanks are marked as containing cyanide. Signage of confined spaces are also placed on cyanide tanks. The auditor followed the cyanide solution circuit from the cyanide mixing area, the process plant area and pipelines transporting tailings to the tailing's storage facility. Verification was by visual inspection.

During the site inspection, the auditor requested to maintain piping with high concentration cyanide solution cleaned and remarked to clearly show the content and direction of the low, as required in the work procedure PETS UCH-PDM-PETS-038 Inspection of Tanks and Pipes. After the audit Veta Dorada sent pictures of all this piping clean and correctly identified, so no additional information was required to declare this protocol question in full compliance with the Code requirements.

Employees at Veta Dorada have access to Safety Data Sheets and information on cyanide first aid in areas where cyanide is used and particularly where reagent-strength cyanide is managed, including cyanide storage area, mixing areas, and in areas at the Process Plant where cyanide is used. Cyanide SDS information is in Spanish, the language of the workforce. Sodium cyanide Safety Data Sheets are also available in medical first aid kits and at the medical centre and is referenced in the operational procedure for Cyanide Emergencies, which is part of the Emergency Response Plan (ERP). Verification was through visual inspection confirming that first aid procedures and Safety Data Sheets were available where cyanide is used.

Veta Dorada has a written procedure for investigating and evaluating all incidents, including cyanide exposure incidents, to determine if the operation's policies and programs to prevent such incidents are adequate or whether they need to be revised. This procedure is not specific to cyanide incidents.

The auditor reviewed the procedure Incident Investigation as well as records of past investigations. No cyanide-exposition or spill incidents were found in occasion of the audit site visit.

The procedure includes a report template to be used for the incident reporting and investigation. It includes the incident location, incident description, incident nature, and immediate measures taken. Then other stage comes the incident investigation, to be used to conduct a detailed investigation of the incident. This section includes an incident description, personnel involved and injured, physical damages, incident causes, and preventive and corrective actions. Once the investigation is finished, the complete incident report is shared



in health and safety meetings, prework five minutes meetings with comments and recommendations and track compliance to the corrective actions.

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:

Veta Dorada has the necessary equipment for emergency response to a worker exposure to cyanide. The operation has sodium thiosulfate, sodium nitrite and hydroxycobalamin available at the clinic. An ambulance type II is parked located at the medical center that can also be used for evacuation, if needed. Also is available an automated electronic defibrillator (AED), manual resuscitators and cardiopulmonary resuscitation (CPR) life face masks that can be used with medical oxygen to resuscitate patients that are not breathing. Safety equipment includes, fresh water, an several oxygen bottles, at the medical center and at an emergency equipment warehouse between the medical center and the process plant, ready to be used. All operators in the plant area have means of communications as cell phones or/and radios during their daily activities, alarm buttons are installed in the process, mixing and cyanide warehouse, among other areas.

Verification was by visual examination and interview with process personnel and the onsite doctor and nurses.

Veta Dorada regularly checks the cyanide emergency response equipment to ensure it is available when required. This includes inspections of cyanide antidote kits, first aid stations, eye wash stations and emergency showers. Inspections include checks for expiration dates of cyanide antidote kits. Medical personnel periodically inspect the cyanide antidotes.

Cyanide antidotes area stored at the medical center with temperatures as indicated by the manufacturer. Antidotes expiration dates and oxygen tank pressure were checked during the audit. All antidotes were within expiration date, within the storage temperature range and oxygen tanks were fully pressurized.

Cyanide first aid equipment as oxygen an emergency showers and low-pressure eye wash stations and radios in the process area is inspected prior to cyanide mixing events. Oxygen



cylinders and emergency kits are inspected on a biweekly basis to verify that they are in good condition. The medical personnel inspect the ambulance every two weeks. Inspection records were available for review during the audit and were found to be complete.

Verification was through visual examination of the antidote expiration dates, interviews with process personnel, onsite doctor and paramedic, and review of inspection records.

Veta Dorada has developed the specific written procedure UCH-UM-PETS-020 Cyanide Exposition First Aids describing the necessary steps to be followed in the event of a cyanide exposure including personnel responsibilities, intoxication levels, first aid procedure, medical attention, derivation to the clinic and treatment. The procedure includes specific instructions for treatment of victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes, as well as specific steps to be taken for conscious versus unconscious victims. The medical staff will receive the victim decontaminated by the Emergency Response Team (ERT) for treatment with hydroxocobalamin, if required.

The Emergency Response Plan (ERP) UCH-SSOMA-PLN-003 Emergency Preparedness and Response Plan for Cyanide Use, Handling, Storage, Handling and Waste Disposal also addresses in Section 8 the actions necessary to provide first aid in case of cyanide poisoning; additionally, during his walkthrough the cyanide process plant and warehouse, the auditor was able to see some posters that briefly indicated the steps to follow to provide sell these first aids. In addition, Veta Dorada has an Emergency Response Plan and a specific procedure for Cyanide Emergencies that include response procedures for cyanide exposures and releases.

Veta Dorada has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide including a medical center nearby the process plant with a doctor, a nurse, two medical technicians and 1 paramedic driving the ambulance. Has oxygen, cyanide antidote kits, defibrillator, oxygen, stretchers, and splint, among other medical devices. The ambulance will be the first choice for transporting a patient to an off-site medical facility, if required.

Although the operation has the necessary medical capabilities and equipment on-site, Veta Dorada has the procedure UCH-UM-PETS-021 Patient Transfer in Case of Cyanide Poisoning, to transport workers to off-site medical facilities for further treatment, if required, and considers medical cases of cyanide exposure.

In the case of cyanide exposure, the victims would be transported via ambulance directly to any of the local hospitals: Nazca or Ica. Nazca is the closest hospital, at about 2 hours' drive. In the event that a cyanide exposure victim requires medical attention beyond the capabilities of the on-site medical clinic, an ambulance is maintained at the medical center to be used to transport victims to hospitals in the area. The Emergency Response Plan (ERP)



provides details on how to respond in case of cyanide emergencies and includes contact information for local hospitals. Verification was through interviews with one of the onsite doctors and review of the procedure for evacuation of workers to off-site medical facilities and the ERP.

Veta Dorada has made arrangements with the local hospitals of Nazca and Ica to provide assistance to workers exposed to cyanide and determined visiting them, that the hospitals equipment is adequate and has qualified medical physicians to respond to cyanide exposures. The auditors reviewed records of the meetings and email communications.



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.

✓ in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

Veta Dorada has the Emergency Response Plan (ERP) UCH-SSOMA-PLN-003 Emergency Preparedness and Response Plan for Cyanide Use, Handling, Storage, Handling and Waste Disposal, operating procedures, contingency plans and first aid procedures to address potential accidental releases of cyanide and cyanide exposure incidents. The ERP describes the roles and responsibilities, activities before, during and after an emergency, activation of the emergency, emergency scenarios including spills of hazardous materials, muster points, evacuation plans and mock drills.

These documents combined address several cyanide exposure scenarios such as cyanide transportation incidents, spills, and cyanide exposure (through inhalation, absorption, skin contact and ingestion). In addition, the plan describes decontamination procedures, evacuation, emergency contact information, cleanup measures, reporting requirements and others. Verification was by review of these documents and interview with the Emergency Response Team (ERT) supervisors' personnel.

The ERP and supporting procedures for emergency response to cyanide incidents provide response procedures for all potential cyanide failure scenarios required by the ICMC (International Cyanide Management Code) verification protocol for mining operations. These include catastrophic release of hydrogen cyanide; transportation accidents; releases during unloading and mixing; releases during fires and explosions; valve, pipe, or tank ruptures; overtopping of ponds and impoundments; power outages and pump failures; uncontrolled seepage; and failure of tailings impoundments.

Cyanide transporter to the plant site is an ICMI certified trucking company and as such has planning for response to transportation-related emergencies considered in the transportation route to Veta Dorada process plant, considering the physical and chemical form of the cyanide, method of transport by truck, the condition of the road and the design of the transport vehicle.



The transporter’s ERP is an Appendix of Veta Dorada’s Emergency Response Plan, in this way they would coordinate for mutual help in case of a transportation-related accident.

The emergency response planning documents do address the types of releases and responses that area expected to occur at the operation and include sufficient details so that personnel know the specific actions they are expected to take in response to the emergency. The emergency response planning documents address the types of releases and responses that can be expected to occur at the site. The documents also include use of cyanide antidotes and first aid measures for cyanide exposure, control of releases at their source, containment, assessment, mitigation, and future prevention of releases.

Veta Dorada ERP and supporting procedures describe appropriate actions to be taken in the event of a cyanide spill. These documents specifically address treatment procedures for personnel who may have been exposed to cyanide and procedures for evacuation of the process plant site.

As Veta Dorada process plant is located 7 km from the nearest community, the ERP and procedures do not include emergency considerations for communities. The cyanide transporter addresses emergency response actions for cyanide transport in case of emergencies near communities in its ERP. The Plan defines team member responsibilities, communication procedures for notifying outside emergency response resources, government agencies, the community, other stakeholders, and the media.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

✓ in full compliance with

The operation is in substantial compliance with Standard of Practice 7.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

During periodically reviews of the emergency response planning process, site personnel is involved in the emergency planning process, so they can best identify potential release scenarios, available resources, and workable responses. The ERP indicates the responsibilities and role of its workforce during an emergency response situation.

Employees and contractors at Veta Dorada receive cyanide emergency response During these training sessions and through daily meetings, the workforce has the opportunity to provide feedback in emergency response planning.



Another opportunity for the workforce to provide feedback is through evaluation of emergency response mock drills. A debrief is conducted after each mock drill to identify lessons learned from the drills and corrective actions to be taken.

This requirement was verified through discussion with ERT supervisors and review of Veta Dorada’s ERP.

Although Veta Dorada’s process plant is located 7 km from the nearest community, during the informative talk "Responsible Use and Management of Cyanide" aimed at the population of the district of Chala on October 26, 2023, Veta Dorada informed this community of the nature of the risks associated with accidental cyanide releases and consulted with them directly regarding appropriate communications and response actions.

The presentation included topics like introduction to the Cyanide Code, cyanide characteristics, safety practices, uses of cyanide, transportation practices, and the emergency response plan. The auditor reviewed copies of presentation, along with the assistance records.

The Emergency Response Plan only designates specific response roles for medical facilities, as external responders. These responders have been involved in the emergency planning process. The external medical facilities will receive any victim of an on-site exposure, they have first-hand knowledge of the site and the available resources and have interacted with Veta Dorada regarding the specific procedures to be used.

Regarding consultation with stakeholders to keep the ERP current, Veta Dorada states in its Plan, that only his own trained personnel will participate in an emergency response: Crisis Committee, coordinators, and brigades, who respond to emergencies at the Plant. No external responder has designated responsibility during an emergency inside the plant site.

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 considers the following cyanide-related elements:

- a) The ERP describes the responsibilities and level of authority of the Emergency Response



- Chief and Leaders before, during, and after an emergency, and also includes responsibilities of the General Manager, Managers, Superintendents, supervisors, workers, and medical services. The ERP includes alternate emergency response leaders.
- b) The Emergency Response Team (ERT) is identified in the ERP. There is an updated list of team members including their names, shift, the areas where they work and contact information. Veta Dorada has 2 ERT shifts. In case of an emergency, communication will primarily be done by radio and cellphone.
 - c) Veta Dorada ERP requires the ERT must be trained to act in an emergency, know all emergency response procedures and attend the classroom and practical training of the emergency response program. The operation has an annual training program for the ERT members and includes routine training requirements and a training program for cyanide emergency responders. Verification was conducted through review of training records and certificates.
 - d) Procedure for ERT Call Out includes call-out procedures and updated 24-hour contact information for the ERT members, which is referenced in the ERP. The list of ERT members includes their names, shift, the areas where they work and contact information. In case of an emergency, communication will primarily be done by radio or cellphone.
 - e) The ERP describes the responsibilities and level of authority of the Emergency Response Chief and Leaders, before, during, and after an emergency, and also includes responsibilities of the General Manager, Managers, Superintendents, supervisors, workers, communications team, evacuation team, mining rescue team, medical services, crisis committee and external services.
 - f) The ERP includes a detailed list of the emergency response equipment located at the process plant, and at a dedicated warehouse for emergency response equipment. The list include emergency equipment for the process areas, the medical clinic, ambulances, cyanide antidote kits, HCN monitors, shower and eye wash stations, chemical protective suits, spill recovery equipment, extinguishers, among others.
 - g) The ERP includes inspection requirements for emergency equipment. Process personnel, ERT members and the medical staff inspect all emergency equipment and supplies on a weekly, biweekly, and monthly basis. Inspection records were reviewed by the auditor.
 - h) Veta Dorada ERP do not consider the participation of external responders or the communities during a cyanide emergency response on site, due to the geographical isolation from important cities of the plant site. The Plan only considers evacuating any victim to medical centers, to Nazca or Ica, depending on the magnitude of the emergency.

The medical centers above mentioned are made aware of the roles assigned to them in the Emergency Response Plan. Their participation function is limited to receiving, treating, and stabilizing the patients evacuated from process plant. The auditor reviewed records of meetings, confirmation that these entities were sent copies of the Emergency Response Plan, and interviews with on-site personnel.



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:

The Plan include procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency. It identifies the ERT members, and the team they belong to. The Security Control Center at the plant site maintains a detailed emergency contact list of all stakeholders. The Emergency response organization details the emergency response system organizational chart.

The Plan addresses notification to the public and communication with the media. The ERP states that communication to the authorities that would involve the emergency, will be made only by the President of the Crisis Committee in coordination with the Committee and General Management. It includes a Communication Diagram to the Authorities Involved. The Plan includes contact information for communicating with the media regarding cyanide incidents.

Veta Dorada ERP includes a requirement and details to notify ICMI of any significant cyanide incidents, as defined in ICMI’s *Definitions and Acronyms* document. Such incidents have not occurred during this certification period.

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:

The Plan describes specific remediation measures for the following scenarios, among others:

- a) Veta Dorada ERP includes written procedures to recovery and neutralization of liquid and solid cyanide spills. The procedure requires specific actions depending on the magnitude of the spill: minor, moderate, or catastrophic. For moderate spills, the procedure indicates to neutralize with sodium hypochlorite and then proceed to recover the contaminated



materials and disposal. For liquid spills, the solution will be pumped into suitable containers and disposed according to state in the plan. Anthe Waste Management Procedure. The ERP describes specific actions for different cyanide spills scenarios including solid cyanide and cyanide solution spills in dry and wet soils, among others. The sodium hypochlorite for neutralization purposes is stored in the emergency response warehouse in a pre-mixed 5% concentration solution.

- b) The ERP includes procedures to neutralize contaminated soils as necessary with sodium hypochlorite solution. It indicates the final cyanide concentration allowed in residual soil to be as required by local regulations in evidence that the release has been completely cleaned up.
- c) The ERP indicates that cyanide spill clean-up materials and debris are to be disposed of according to state in the ERP for waste management procedure, which indicates that hazardous materials should be disposed of in an external secured landfill.
- d) The nearest communities Chala and Chala Viejo are located approximately 7 km away each from the process plant site. As such, it is unlikely that the operation can adversely impact drinking water supplies for this community due to an uncontrolled seepage of process facilities or groundwater contamination. Veta Dorada personnel drink bottled water. This information was verified through discussions with ERT personnel.

There are no waterways in the area near Veta Dorada however, the ERP prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide that has been released into surface water or that has the potential to reach surface water.

The ERP requires that contaminated water and/or soils are monitored as necessary after a cyanide spill. The document describes procedures for soil sampling including methodologies, parameters and the final cyanide concentration that will be allowed in residual soils as evidence that the spill has been completely cleaned up.

Standard of Practice 7.6

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

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

Summarize the basis for this Finding/Deficiencies Identified:

As stated in the ERP, the plan is reviewed annually or updated as required to ensure that information is kept up-to-date and that the plan remains appropriate for the process facilities. The plan will also be reviewed following a mock drill or incident, as needed. The auditor



reviewed previous versions of the ERP and the current ERP document. In all cases, the changes made in the ERP were registered in a change log. The ERP information was current at the time of the audit.

Veta Dorada conducts periodically mock emergency drills according to an annual mock drill plan. The drills are related to cyanide and are based on cyanide release/exposure scenarios to test the response procedures, and incorporate lessons learned from the drills into its response planning.

Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Internal observers are included in the drill to evaluate the response. Veta Dorada evaluates the mock drills and identifies corrective actions. Corrective actions are tracked in an Excel spreadsheet until closed. A debrief is conducted after each drill to identify lessons learned from the drills and corrective actions to be taken. The auditor reviewed the mock drill reports and supporting documentation to verify that action items identified from the mock drills have been closed.

On August 7, 2023, they conducted a mock drill of cyanide exposition in the plant process area. With 15 participants: the hazardous materials brigade, the occupational health and environment (SSOMA) Manager, the Safety and Environmental Engineer, the operation's medical staff (first aids brigade), the rescue brigade and the control center. They had opportunities for improvement that were opportunely closed

On September 27, 2023, they simulated the tailings impoundment landslide (North side). The worker notifies the emergency control center at the tailings deposit. The rescue brigade finishes the signaling and delimitation of the emergency. A front-end loader and dump truck begin loading material to form the retaining wall. The Hazardous Materials Brigade and personnel from the tailing's disposal area also participated in the mock drill.

On 27 October 2023, they simulated a cyanide spill in the cyanide warehouse with the participation of the hazardous materials brigade, rescue brigade, first aid brigade, fire brigade and health, personnel from the area of safety, the SSOMA Department, and the warehouse totaling about 20 participants, also identified opportunities for improvement and closed them.

Records were available to demonstrate that emergency response drills were conducted, indicating the names of the people who participated in the drill, and the results of the drill. Verification was through review of records, photos and reports of mock cyanide drills performed during the certification period

The Emergency Response Plan itself calls for an evaluation of the Plan following emergency mock drills and any emergency that required its implementation. No such reviews of the plan were conducted following mock drills since after the emergency response drills, the corrective



actions and the improvement opportunities identified did not consider it necessary to modify the emergency response plan. No update of the Plan was performed due to cyanide incidents as no such emergencies requiring its activation occurred.



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.

✓ in full compliance with

The operation is in substantial compliance with Standard of Practice 8.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation has written training programs and training materials that provide all personnel who may encounter cyanide with training in recognizing the cyanide materials present at the operation, the health effects of cyanide, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure. The auditor reviewed the training materials and records and interviewed employees to verify that cyanide hazards are addressed and personnel who may encounter cyanide receive this training.

New workers at the process plant receive orientation training in accordance local regulations, the auditor reviewed workers assistance records and interviewed employees confirming they receive this training.

Verification was by interviews with process and training personnel, random interviews to operators and review of training materials and employee training records covering the certification audit period.

Records of refresher training in cyanide hazard recognition were reviewed. Annual refresher training in cyanide hazard recognition is provided to all employees. The Annual Training Program schedules annual refresher training to all personnel. The auditor verified that refresher training is being conducted by reviewing training materials and training records and interviewing personnel in the field.

The operation retains the training records pertaining to cyanide hazard recognition and was to demonstrate that personnel received both initial and refresher training in cyanide hazard recognition. The auditor reviewed training records for workers interviewed during the field audit. The records identify the trainer, trainee, topics covered, date and sign off sheet. This requirement was verified through review of a sample of records covering the certification period.



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.

✓ in full compliance with

The operation is in substantial compliance with Standard of Practice 8.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All personnel involved in the management of cyanide es trained in Veta Dorada to perform their assigned tasks in a safe and environmentally sound manner. Task training is focused to instruct new employees on how to accomplish their assigned tasks safely and ensuring that the tasks are accomplished in a manner that prevents exposures and releases.

Formal training in working procedures was reviewed for all cyanide-related tasks including cyanide unloading, mixing, production and maintenance. Individual training is provided for each specific cyanide management related task that an operator will perform and includes cyanide task procedures as needed.

The Auditor reviewed examples of training records related to loading and unloading of cyanide boxes, cyanide preparation, rinsing of cyanide bags; decontamination of cyanide piping and equipment, mill procedures, use of HCN monitors, instrumentation and process control.

The operation’s training program identifies the specific cyanide management elements that each employee must be trained in to properly perform the required tasks The training elements necessary for each job involving cyanide management are also identified in the work procedures. There is an identification list of the essential elements that must be conveyed to employees regarding how various cyanide-related tasks must be performed. The auditor reviewed training materials, tests and records of these training sessions which were found to be complete.

Task specific training to operators is provided by process supervisors and process chiefs who have several years of experience in the different process areas. Supervisors are considered qualified to provide training based on their experience.

All personnel in job positions that involve the use of cyanide and cyanide management receive training on how to perform their assigned tasks with minimum risk to themselves and their colleagues. According also to local regulations, all employees receive their task training before being allowed to work with cyanide in an unsupervised manner. This is a standard practice,



included in the plant’s Internal Work Regulations. Verification was by interview with field and supervisory personnel.

Task specific training is provided prior to working with cyanide independently. Individual training is provided for each specific cyanide related task that an operator will perform and includes cyanide task, as needed. This requirement was verified by interviews with training and process personnel and a review

By interviews with supervisory personnel, the auditor confirmed that refresher training on cyanide management is provided to ensure that employees continue to perform their jobs in a safe and environmentally manner. These are informal evaluations of how well employees perform their assigned tasks.

Verification was by interview with training, and process personnel and review of training records. Training records and testing are maintained and were found to be complete for the certification audit period.

The operation evaluates the effectiveness of their task training. Evaluation method is by observation of employees performing their tasks after initial training. The auditor verified such evaluations from interviews with site personnel. These are informal evaluations of how well employees perform their assigned tasks.

Training records are retained throughout employment history. The records identify the trainer, trainee, topics covered, date and sign off sheet. Verification was through interview with training and process personnel and review of training records.

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:

Cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released. The requirements of operational procedures including emergency response procedures are covered in the job specific training that includes topics such as oxygen therapy, treatment and first aid to intoxicated patients, and emergency response.

Employees working with cyanide receive specific training in the operational procedure for



Cyanide Emergencies and response to spills including neutralization, decontamination, first aid, cyanide antidotes and oxygen dosing. The Cyanide Emergencies procedure addresses several cyanide exposure scenarios such as cyanide transportation incidents, spills, and cyanide exposure (through inhalation, absorption, skin contact and ingestion). The decontamination procedures addresses decontamination of cyanide exposure victims, equipment and facilities.

Verification included review of training record and interviews with operators as well as process and training personnel. Operators and maintenance personnel in the different process areas were interviewed and demonstrated good awareness of what actions are to be taken in the event of a cyanide release

Veta Dorada's emergency response brigades are trained in the emergency procedures included in the Emergency Response Plan regarding cyanide and the use of the necessary response equipment. Verification of this requirement was through interviews with these personnel and review of their training records.

The plant has a medical center close to the areas in which cyanide is present. Physicians are on staff, and at least one is on-duty at all times. On their off-hours, the physicians sleep at the plant to ensure that medical assistance is available at the plant at all times. In addition, employees working with cyanide receive specific training in the operational procedure for Cyanide Emergencies and response to spills including neutralization, decontamination, first aid, cyanide antidotes and oxygen dosing.

Veta Dorada provides training to the ERT members on a regular basis, where some of the topics covered include decontamination of equipment and soil and cyanide spill response. The auditor reviewed records of these training sessions.

Veta Dorada has made emergency medical services from Nazca an Ica familiar with those elements of the Emergency Response Plan related to cyanide, with the purpose of informing them that they could eventually transfer intoxicated workers to their medical centers. The Plan do not consider the participation of any other external responders as fire brigades because they are far from the site. The operation has retained reports of meetings and emails with the emergency medical services for the review of the auditor.

All employees with designated roles and responsibilities working in areas where cyanide is present as unloading, storage, mixing, production and maintenance personnel, receive annual refresher training in rescue, decontamination of potential workers exposed to cyanide, and cyanide release scenarios to remind them of the required procedures, including communication to medical services. Verification was through interviews with these personnel and review of training records.



The operation retain all records of emergency response training including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials. This information provided the auditor evidence that the operation is providing initial and refresher training in response to cyanide exposures and releases for appropriate personnel, has made designated response personnel familiar with implementation of the Emergency Response Plan, and required designated responders to demonstrate their understanding of the training material.



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:

Veta Dorada provides stakeholders with information on its cyanide management practices. At Dynacor’s website, the Veta Dorada process plant owner, it’s published a report where in Section 6.6, ESG (Environmental Social and Governance) <https://dynacor.com/esg-data-espanol/>, provides information regarding Veta Dorada cyanide management from 2022. On Dynacor’s website in the ESG Environmental Safety Report, Governace, there is a bulletin describing the use of cyanide.

The operation provides the opportunity for stakeholders to communicate issues of concerns through dialogue opportunities and engagement with communities of the influence area. Veta Dorada also participates in public relations and economic development forums and events where stakeholders can have the opportunity to communicate issues of concern regarding cyanide management.

On October 26, 2023, Veta Dorada made a public call through social networks for a 2-hour workshop on the Responsible Use and Management of Cyanide held at the Hortencia Pardo school in the district of Chala, dictated by the Manager of the SSOMA (Safety, Occupational Health & and Environmental) Program, with the support of the Community Relations Area (RRCC) of Veta Dorada. Around 24 people participated from nearby communities of Chala Viejo, teachers, staff from other schools, university students, as well as political and social actors from the area. The auditor reviewed attendance records, training materials, photos of the event, and a report from Veta Dorada's Community Relations Officer.

During the workshop, the leaflet Responsible Use and Handling of Cyanide was distributed among the attendees, which includes contact information to communicate with Veta Dorada. The leaflet was also disseminated in electronic version through social networks to educational institutions in the area, to the environmental management of the municipality of Chala, to the president of Human Settlements, to the peasant community of Chala Viejo,



to the group of farmers, the board of water wells for population use and the health center of Chala, among others.

Veta Dorada also carries out participatory water quality monitoring in which volunteer residents participate, where they are previously trained at the plant for the task to be carried out and are informed about the plant's activities related to cyanide management, among others. This event takes place annually, with about 6 volunteers who are leaders in communications in the area.

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:

On Dynacor’s website in the ESG Environmental Safety Report, Governace, there is a bulletin describing the use of cyanide. Also, the leaflet Responsible Use and Handling of Cyanide was distributed among the plant nearby public, which includes contact information to communicate with Veta Dorada. The leaflet was also disseminated in electronic version through social networks to educational institutions in the area, among others.

Information is disseminated in verbal form during the Chala meeting and by social media in a massive way. According to the National Institute of Statistics and Informatics (INEI), to year 2017 The illiteracy rate was 2.4%.

In case of a cyanide release or exposure incidents, cyanide releases off the plant site requiring response or remediation and cyanide releases on or off the plant site resulting in significant adverse effects to health or the environment, Veta Dorada will have to notify governmental agencies of a release exceeding the applicable regulatory threshold, requiring response or remediation. In the same way, is required to report any cyanide exposure resulting in hospitalization or fatality, as part of applicable governmental reporting requirements. These reports are public information as they are published in the respective governmental agencies’ websites.

No such information has been publicly available as during this certification period no cyanide incident exposures or releases needing to report the authorities have occurred.

