INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Gold Mining Operations

Summary Audit Report

for

Equinox Gold Corporation's

Aurizona Mine, *Maranhão, Brazil*

2024

Prepared by Ferreira & Cerqueira Ltda.

SUMMARY AUDIT REPORT
FOR GOLD MINING OPERATIONS

Instructions

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

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

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

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

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

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

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

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

SUMMARY AUDIT REPORT

Operation General Information

Mine: Aurizona

Mine Owner: Equinox Gold

Mine Operator: Aurizona

Manager: Juliano Felix de Lima

Address: Av. Principal s/n

State / Province: Maranhão

Country: Brazil

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Operation Location Detail and Description

Mineração Aurizona S.A.'s properties are situated in the state of Maranhão, in northeastern Brazil, between the cities of São Luís and Belém. The area is approximately 320 km northwest of the state capital, São Luís. The primary activity conducted is open-pit mining to supply an ore beneficiation unit through a hydrometallurgical process with a capacity of 3 million tons/year of ROM ore.
The production process unfolds across three main areas: Open-pit mine, ore transport, and beneficiation. In the mine, ore is excavated and transported to the beneficiation plant's feed area. The technological route adopted for SABC ore processing commences with primary crushing followed by two-stage grinding: an SAG system operating in an open circuit, feeding a closed circuit ball mill system with hydrocyclones.
Forty percent of the classification underflow mass feeds into the centrifugal concentration-intensive leaching circuit for the recovery of free gold, totaling approximately 30%. The product of grinding (classification overflow) is thickened and pumped for cyanidation in tanks (CIL Process). The CIL rejects undergo a detoxification process to neutralize the cyanide before being pumped for final disposal in the tailings dam, in compliance with environmental legislation.
The loaded carbon, originating from the initial CIL tanks, is transferred to the elution area. The eluate and the intensive leaching liquor undergo the electrolytic gold extraction process, with the cathodes being washed and melted separately for bullion production.

Primary Crushing:

The blended ROM is fed into the feed hopper by articulated trucks or Cat 777D, equipped with a fixed grizzly with a 700 mm opening. An apron feeder removes the ore from the hopper at a mass flow rate of 420 t/h (dry basis) and feeds it to a vibrating grizzly with a 150 mm opening. The ore retained in the vibrating grizzly is discharged into the Metso C120 jaw crusher. The material passing through the vibrating grizzly and the crusher discharge is collected by a conveyor belt equipped with metal detectors, metal extractor, and scales. From there, the ore can be transported either to the crushed ore silo or to the crushed ore stockpile through a reversible conveyor belt and the crushed ore stockpile conveyor belt.

Grinding:

The grinding circuit is designed to receive the product from crushing and generate a granulometrically compatible product for the Carbon in Leach stage, with 80% passing at 0.105 mm (150 mesh). The retrieval of crushed ore for grinding, with a mass flow rate of about 390 t/h (dry basis) and a gold content of 1.35 g/t, is carried out by feeders and the conveyor belt equipped with an integrating scale. The crushed ore (fresh feed) feeds the semi-autogenous mill (SAG). The SAG trommel removes the pebbles from the discharge (material above 10mm), which returns to the SAG mill via the SAG feed conveyor belt. The material passing through the SAG trommel is collected in the discharge box where process water is added to adjust the solids percentage in the pulp (up to 50% solids) for feeding, by pumping, into the battery of classification hydrocyclones composed of 6 (six) hydrocyclones. The underflow from the hydrocyclones is collected in the distribution box, where 40% of the flow feeds two scalping screens by gravity, and the other part feeds the ball mill. The material passing through the ball mill trommel returns to the box, completing the circuit. The material retained in the trommel is collected and combined with the pebbles retained in the SAG mill trommel. The material retained in the scalping screen returns to the ball mill, constituting another part of the circulating load, while the passing material feeds the centrifugal concentration.
The centrifugal concentration aims to recover free and relatively coarse gold and send it to the intensive leaching area. The light fraction from the centrifugal concentration returns to the ball mill, constituting another part of the circulating load. In summary, the circulating load in the ball mill consists of the following flows: 60% of the cycloning underflow plus the scalping screen retention and the reject from the centrifugal concentration.
It is important to emphasize that no cyanide is added in the grinding area. Consequently, the grinding circuit is not considered a cyanide installation.

Thickening:

The cyclones' overflow is sampled to assess the particle size distribution, which should

achieve a passing percentage greater than 80% at 150 mesh. The material retained (trash) on the screen is collected in a box for disposal, while the passing pulp containing 32% solids, at a flow rate of 970.0 m³/h, is sampled and collected in the tank for gravity feeding to the high-performance thickener with a 50-meter diameter.
The thickener's overflow, water virtually free of solids, is collected and pumped to the mill's discharge box. The thickened pulp, at a flow rate of 657 m³/h containing 43.0% solids, is pumped for leaching.

Intensive Leaching:

Intensive leaching involves the processing of the gravity concentrate and is conducted in batches twice a day. In this process, while the gravity concentrate undergoes desliming and stratification, a solution of caustic soda and sodium cyanide is fills the reactor. Once both processes are completed, intensive leaching begins using a catalytic agent called "Leach aid." The resulting gold-bearing liquor is considered electrolyte and is pumped to the rich solution tank for the subsequent electrolysis step.

CIL (Carbon in Leach):

The thickening underflow, pulp containing 43.0% solids (390 t/h, dry basis), feeds the first stage of CIL (carbon in leaching) consisting of a total of 8 mechanically agitated tanks with a capacity of 1,408 m³, arranged in two parallel lines of 4 tanks each, and then proceeds to the second stage of CIL, consisting of 3 (three) tanks arranged in series, mechanically agitated, with a nominal capacity of 4,089 m³ each. The cyanidation in CIL is conducted at pH = 10.5 to 11.0, achieved by adding lime milk at a ratio of 3.9 kg/t of ore and sodium cyanide at a ratio of 0.75 kg/t of ore. Cyanide concentration in tanks is measured both by two titration based cyanide analyzers with integrated sampling system (TAC 1000) and by manual samplings.
The total residence time considered for cyanidation in the CIL tanks is 38 hours, resulting in the solubilization of 90% of the gold values contained in the solids. The CIL tanks are equipped with interstage screens to retain the carbon. Thus, in addition to the continuous pulp in a cascade, they contain a total of approximately 100 tons of activated carbon. The new or regenerated carbon after dewatering on a screen feeds, preferably, the last tanks of the CIL. The carbon operates in countercurrent, i.e., the new/regenerated carbon fed in the last tank, then the penultimate, and so on, until it reaches the first CIL tank, when it contains approximately 1 kg of gold per ton of carbon.
The pulp containing loaded carbon from the first tanks feeds the vibrating screen to retain the carbon, which is pumped to the acid wash area. The pulp passing through the carbon-free screen returns to the feed distributor, re-entering the CIL circuit. The overflow from the last tanks, CIL effluent, passes through the safety screen to remove any carbon particles that may have passed through the circuit. The passing material on the safety screen is pumped to the neutralization area, referred to as DETOX.

Detox:

The treatment of CIL rejects aims for environmental compliance for the discharge of industrial effluents and consists of the neutralization of cyanide, in concentrations of WAD cyanide in solutions classifying the waste as Class II-B waste (inert), as per NBR 10.004 classification. The pulp from the CIL feeds the DETOX circuit, which consists of 02 (two) mechanically agitated tanks. The following reagents are used in the process:
Sodium metabisulfite: for cyanide oxidation at a ratio of 1 kg per ton of solids.
Copper sulfate: as a reaction catalyst at a ratio of 0.07 kg per ton of solids.
The treated pulp in the DETOX system, at a flow rate of 704 m³/h containing 41% solids and a gold content of 0.13 g/t, is pumped for disposal in the tailings dam.

Acid Wash/Elution/Carbon Regeneration:

Acid Wash:
The acid wash begins when the acid wash column is full of loaded carbon. A diluted hydrochloric acid (HCl) solution is added to the column to allow soaking for the removal of alkaline earth ions (notably calcium carbonate) from the pores of the carbon, which impede gold adsorption/elution capacity. After soaking, the carbon is washed with water and caustic solution and transferred to the elution column. The washing step, as well as the entire elution area, will operate in cycles, with 1.3 cycles considered per day.

Elution:
Elution takes place in the elution column, by circulating a solution containing 2.0% NaOH and 3.0% NaCN by weight through the loaded carbon at a temperature of 130°C and a pressure of 3 to 3.5 atm. Elution involves the physical-chemical displacement of the gold adsorbed in the carbon (1 kg/t) to the poor electrolyte until it is depleted (<100 g/t), generating 102.0 m³ of electrolyte containing approximately 68 g of gold per m³ of solution, per cycle.
The electrolyte, after being cooled from 130 to 60°C by the heat exchanger, is stored in the rich solution tank from where it is pumped for the electrolytic gold extraction feed, and the eluted carbon is removed from the column and transferred by ejector for dewatering on the inclined vibrating screen. The extinguished carbon retained in the screen feeds the regeneration stage.

Carbon Regeneration:
The carbon retained in the screen is sent to the carbon silo and transferred by screw feeder to the rotary kiln, which operates at a temperature of 700°C, with an approximate residence time of 1 (one) hour, at a feed rate of 0.5 t/h. The regenerated carbon feeds the quench tank (quench) from where it is pumped to the regenerated carbon classification screen. The material retained in the screen goes to the CIL – carbon in leach. The

passing material through the carbon screens is collected in the fine carbon tanks.

Electrolysis/Fusion:

Eluate and elution liquor feed the electrolyte tank, which is pumped to the rich solution distributor that feeds, by gravity, the electrolytic cells. The cells operate with a potential difference between anode/cathode of 3 to 4 volts, sufficient to allow, by the action of the electric current, the reduction of gold to the elemental state and deposition on the cathode according to the cathodic reaction below:
$Au(CN)2- + e- = Au + 2\ CN$
The spent (poor) electrolyte is collected and pumped to the CIL tanks at the end of the electrolysis cycle. For the intensive leaching solution, the eluate feeds another electrolyte tank that transfers it to the electrolytic cell dedicated to this process. The spent (poor) electrolyte is collected and pumped to the leaching tank. The gold deposited on the cathodes, both from intensive leaching and elution, is removed by washing with high-pressure water jets. The slurry from the wash, along with process water, feeds by gravity into the slurry box that pumps the material to the slurry filter, which is operated manually. The filtered material returns to the rich solution tank, from where it returns to leaching. The material retained in the filters is then taken to the furnace to remove moisture, mixed with fluxes, and fed to the induction furnace for melting at 1250°C. The molten charge is poured into molds, forming bars for the production of bullion containing 85 to 93% gold.

MINING OPERATIONS SUMMARY AUDIT REPORT

Auditor's Finding

This operation is

☐ X in full compliance

☐ in substantial compliance *(see below)

☐ not in compliance

with the International Cyanide Management Code.

Auditor Information

Audit Company: *Ferreira & Cerqueira*

Lead Auditor: Luiz Eduardo Ferreira

Mining Technical Expert Auditor, Luiz Eduardo Ferreira

Lead Auditor Email: luizeferreira2015@gmail.com

Names and Signatures of Other Auditors: None

Dates of Audit August 14-18(on site), November, 16-17 2023 off site

Aurizona Mine — Mine Name

Lead Auditor Signature

May 13, 2024 — Date

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. 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 ina 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.

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA has been purchasing cyanide produced by Proquigel Química S.A. which is a Brazilian company that has two facilities located at Camaçari and Candeias cities both at the State of Bahia, Brazil which produce solid and liquid cyanide. The auditor compared the operation's purchase agreement and chain of custody documentation with the listing of certified cyanide production facilities on the Cyanide Code website to confirm that the cyanide was, in fact, produced by a certified operation and concluded that Proquigel (Camaçari Operation and Candeias Operation) are certified as being in compliance with the Code (see https://cyanidecode.org/sig-directory-type/proquigel-quimica-s-a-brazil/). Besides, during field audit, the auditor visited the cyanide warehouse finding that all cyanide stored was produced by Proquigel.

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 processfrom 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.

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

Summarize the basis for this Finding/Deficiencies Identified:

Yes. MASA maintains the chain of custody records identifying all transporters and supply chains responsible transporting cyanide from the producer to the operation. Evidenced that all containers used for shipping of cyanide are in accordance with the United Nations (UN) Dangerous Goods Act 1985 (DG Act) this means code 1689, classification 6 - toxic and marine pollutant. MASA only purchases solid form of cyanide. No liquid cyanide is transported. dates of departure, transportation and arriving duly established and maintained as stated. The contract between MASA as buyer and Proquigel defines that Proquigel shall use only use transporters that are certified as being in full compliance with the Code. Evidenced through pertinent records that cyanide was transported from Proquigel to MASA only by Concórdia (Concordia Transportes Rodoviarios Ltda.)) which is certified as being in compliance with the Code (see Chain of custody records were reviewed. Evidenced DANFE (Electronic Invoice Auxiliary Document) and NFe (Electronic Invoice)issued by Proquigel as well as DACTE (Electronic Bill of Lading Auxiliary Document)and CTe (Electronic Bill Of Lading)issued by the transporter clearly defining informations such as the seller, buyer, transporter name, transporter National Registry of Road Cargo Transporters (RNTRC) number, cyanide amount, cyanide type, cyanide ONU (United Nations Organization)number, cyanide risk class, truck identification, container identification, driver name,https://cyanidecode.org/sig-directory-type/concordia-transportes-rodoviarios-ltda-brazil/. Besides, reviewing the a.m. web site, it was noted that Concórdia certification has not been disrupted.

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.

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

Summarize the basis for this Finding/Deficiencies Identified:

Yes. Evidenced that MASA designed and constructed facilities for unloading and storing and mixing cyanide in accordance with cyanide producers' guidelines and Brazilian engineering requirements. Several project documentation such as drawings and data sheet specification were reviewed and showed that the facilities were designed and constructed as stated. Materials covered by this provision include pipes, valves, fittings, flanges and other components common to piping and specialties. Evidenced that the design and manufacture of subsidiary systems are in accordance with the relevant codes and standards from regulatory agencies and institutes such as: Brazilian Association of Technical Standards (ABNT); American National Standards Institute (ANSI); American Society of Mechanical Engineers (ASME), British Standard Institute (BSI); (ASTM) American Society for Testing and Materials; American Welding Society (AWA); International Organization for Standardization (ISO); Standardization of valve and fitting manufacturers; Pipe Manufacturing Institute (PFI); Underwriters Laboratories in Brazil (UL-BR); Canadian Standard Association (CSA). . MASA only uses solid cyanide as previously reported. During the field audit evidenced that unloading, mixing and storage area for solid cyanide areas located away from other people of the plant. Duriing the field audit evidended that *unloading, mixing and storage area* includes both the solid cyanide storage warehouse and the cyanide mixing and storage facilities (i.e., mixing and storage tanks. There is an area with restricted access that has a warehouse for storing unloaded cyanide boxes. In front of this warehouse, there are facilities for the preparation and distribution of cyanide. Although they are in a common area, they are arranged separately.The access to the process plant is controlled. All doors are locked.

The unloading, storage and preparation areas are far from surface waters. During the unloading, only authorized operators are allowed to circulate in these areas. MASA does not use liquid cyanide. It was evidenced, during the field audit, that MASA has systems in place to prevent overfilling of cyanide storage tanks such as automatic level indicators, high-level alarms, shut-down valves, pumps. Evidenced that MASA defined and documented procedures establishing methodology for testing, maintaining and calibrating equipment, instruments and systems (previously identified as critical) in order to ensure that they are available for the normal operations and this way preventing overfilling of cyanide storage tanks. Evidenced that as well as of identified critical equipment in case of occurrence an incident involving cyanide release in this area in which the product is recovered by using environmental kits. Evidenced that MASA has been testing, maintaining and calibrating them (where applicable) in accordance Brazilian regulations laws as well as MASA's Maintenance Plan and MASA' Calibration Plan. Evidenced, during the field audit that overfill protection equipment and instrumentation are properly functioning. For additional information please see Principle 4. During field audit it was not evidenced that overfilling of cyanide have been occurred. It was not evidenced occurrence of incident reports. Interviewed personnel provided evidences of adequate management of actions that effectively have been performed as well as are aware of this matter. Evidenced that above mentioned instruments are considered critical and have been tested, maintained and calibrated in accordance Maintenance and Calibration Plan. Reviewing pertinent documentation records such as drawings, construction and Quality Assurance/Quality Control (QA/QC) records, it was evidenced that cyanide mixing and storage tanks are located on a concrete area prevent seepage to the subsurface. During field audit it was evidenced that mixing and storage areas are in good condition. Reviewing pertinent documentation records such as design and construction and QA/QC records it was evidenced that secondary containments for cyanide storage and mixing tanks were constructed of materials that provide a competent barrier to leakage a as required by internal documented procedures. During the field audit it was evidenced that secondary containments. During the field audit it was evidenced that secondary containments for cyanide storage and mixing tanks are in good conditions free of cracks and other breeches that compromise their ability to effectively contain releases Evidenced that MASA

defined, documented, implemented and maintains an Inspection Plan for Secondary Containments for Cyanide Storage and Mixing tanks. Evidenced duly implemented. • Evidenced that Spill containment systems: storage areas for fuels and dangerous products are protected by containment basins and standardized in accordance with standard NBR 17505 –Sampled examples were: Field audit provided evidenced that the involved areas with is in good conditions. Sampled examples were check list of Preparation Mixture Basin; Distribution Tank Basin; Acacia Reactor Basin; Leach Tanks Basin. Evidenced that MASA defined and documented that cyanide shall be stored in buildings roofed, off the ground and enclosed structures to minimize the potential for contact of solid cyanide with water preventing contact with precipitation. During the field audit it was evidenced that MASA stores cyanide in their original boxes, over pallets, on concreted floor, under roof, brick walls and with adequate ventilation as evidenced during the field audit. Additionally during the field audit was noted that water systems for potable use, safety showers or and other purpose are not present in inside cyanide storage warehouse. So, they have been designed such that leaks or other potential releases will not come in contact with cyanide containers. Evidenced that MASA defined and documented that cyanide shall be stored with adequate ventilation to prevent the build-up of hydrogen cyanide gas. During the field audit, it was evidenced that MASA Stores cyanide with adequate ventilation to prevent the build-up of hydrogen cyanide gas. Evidenced that MASA defined and documented that cyanide shall be stored in a secure area where public access is prohibited. During the field audit, it was evidenced that MASA stores cyanide in a secure area where public access is prohibited which is located within its own fenced and locked area under controlled access. Evidenced that MASA defined and documented that cyanide shall be stored separately from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products with berms, bunds, walls or other appropriate barriers that will prevent mixing. During the field audit, it was evidenced that MASA does not store incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco in the same cyanide storage area. The cyanide warehouse and cyanide preparation areas are dedicated for cyanide storage and cyanide mixing operations and therefore cyanide is physically separate from areas where incompatible materials are stored. Signage posted at the entrance to the cyanide areas prohibits smoking, drinking, and eating within the above mentioned areas. During the field audit evidenced that the storage areas for both solid cyanide and cyanide solution (i.e., both the warehouse and the mixing and storage tanks) are provided with adequate ventilation to prevent the build-up of hydrogen cyanide gas and located in a secure area. The warehouse that contains the stored solid cyanide has an opening on the upper level for adequate ventilation, while the cyanide preparation

and distribution area is an open area, with no side barriers, ensuring adequate ventilation.

Aurizona Mine

Standard of Practice 3.2

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

	☐ X 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:

Evidenced that MASA defined and documented internal documented procedure PO-EQX-MASA-PLA-031-"Sodium cyanide preparation" item 5.3.10 which clearly defines that empty cyanide containers are prevented from being used for any purpose other than holding cyanide. During the field audit, evidenced that cyanide containers used only for holding cyanide. Evidenced duly implemented. It was noted that all operators involved with cyanide preparation have been trained as previously planned. For additional information please see Principle 8. Field Interviewed personnel showed to be aware of this matter. Evidenced that MASA defined, documented, implemented and maintains PO-EQX-MASA-PLA-031- Sodium cyanide preparation item 5.3.10 which clearly defines that contaminated big bags and liners are inserted into a package (new big bag) as well as the contaminated PPE (Personnel Protective Equipment) must also be included and, then, this container must be sealed. Then, these sealed packages are placed in a wooden box for return to Proquigel (Camaçari and Candeias plants, Bahia) certified as being in compliance with the Code (see https://cyanidecode.org/sig-directory-type/proquigel-quimica-s-a-brazil/) which will carry out the appropriated disposal in accordance with Brazilian environmental laws.The used packaging material placed for transport are the same wooden crates in which the cyanide is packaged when delivered to the operation.It was noted that all operators involved with cyanide preparation were trained as previously planned. Sampled examples were: Record of training of Cleiton Azevedo, Luis Rodrigues, Vadson Silva, Solano Torres, Jefferson Reis, Edson Silva, Adão Alves, Robson Pereira, Carlos Soares, Isaias

Costa, Armino Silva, Cleiton Azevedo, Francy Carlos, Isaias Costa, Danielly Souza and Robson Pereira in PO-EQX-MASA-PLA-031. The a.m. contaminated materials are transported to Proquigel by Concordia which is certified as being in compliance with the Code

(see https://cyanidecode.org/sig-directory-type/concordia-transportes-rodoviarios-ltda-brazil/. The a.m.(above mentioned) methodology was reviewed by Proquigel and Concórdia being dully approved by them. There is no rising, discarding or burning at MASA. Interviewed personnel showed to be aware of this matter. MASA does not use cyanide drums. Evidenced that MASA defined and documented internal documented procedure PO-EQX-MASA-PLA-031-“Sodium cyanide preparation” item 5.5 during the cyanide handling process is important to clean any cyanide residue. from the exterior of cyanide containers that are returned to the supplier (Proquigel) and close them securely for shipment, including any peripheral items used in this process. MASA has written procedures for timely cleanup of solid and/or liquid cyanide spills during mixing of solid cyanide, such as a spill or release onto secondary containment. Reviewing Internal documented internal procedure PO-EQX-MASA-PLA-031-R09-Sodium Cyanide Preparation evidenced that it defines in item 5.3.10 the requirement to clean any traces of cyanide in the facilities in the cyanide preparation area at each preparation event.

It was noted that all operators involved with cyanide preparation were trained as previously planned. For additional information please see Principle 8. Field Interviewed personnel showed to be aware of this matter. Since MASA does not use liquid cyanide, use of hose connections or couplings on tanker truckers and isotainers are not applicable. Evidenced that internal documented procedure PO-EQX-MASA-PLA-031-“Sodium cyanide preparation” establishes methodology to prevent exposures and releases during cyanide unloading and mixing activities such as operation and maintenance of all hoses, valves and couplings for mixing solid cyanide. During field audit was evidenced that a.m. procedure is duly implemented. MASA does not use liquid cyanide Evidenced that all involved personnel were trained as previously required. Evidenced duly implemented. It was noted that all operators involved with cyanide preparation have been trained as previously planned. For additional information please see Principle 8. Field Interviewed personnel showed to be aware of this matter. Evidenced that internal documented procedure PO-EQX-MASA-PLA-031-“Sodium cyanide preparation” establishes methodology to prevent exposures and releases during cyanide unloading and mixing activities such as for handling cyanide containers without

rupturing or puncturing since it defines tools to be used in specific activities, such as a hammer; lever; crowbar; alpha knife and how to use them. During field audit was evidenced that a.m. procedure is duly implemented.It was noted that all operators involved with cyanide preparation have been trained as previously planned. For additional information please see Principle 8. Field Interviewed personnel showed to be aware of this matter.

Besides, it was evidenced that MASA defined, documented, established, implemented and maintains methodology for, prior the use, inspecting and

maintaining materials and equipment that are used for handling cyanide containers. Evidenced pertinent inspections and preventive maintenance records duly maintained as stated. Sampled examples were: Fork-lift and mechanical hoist. Reviewing incidents reports and during the field audit, visiting MASA's warehouse as well as MASA's unloading and mixing areas it was not observed that have been occurred rupturing or puncturing during handling cyanide containers. Evidenced that internal documented procedure PO-EQX-MASA-PLA-031-"Sodium cyanide preparation" establishes methodology to prevent exposures and releases during cyanide unloading and mixing activities such as for limiting the height of stacking of cyanide containers since it defines that the stacking of boxes must respect the maximum limit of 03 (three) boxes. During field audit, it was evidenced that a.m. procedure is duly implemented since visiting MASA's cyanide warehouse noted that all stored cyanide are respecting the defined limiting the height of stacking of cyanide containers. Evidenced that all involved personnel were trained as previously required. For additional information please see Principle 8. Interviewed personnel showed to be aware of this matter. Timely cleanup of any spills of cyanide during mixing and transfer of liquid cyanide from tanker trucks and isotainers is not applicable since MASA does not use liquid cyanide. Evidenced that internal documented procedure PO-EQX-MASA-PLA-031-"Sodium cyanide preparation" establishes methodology to prevent exposures and releases during cyanide unloading and manual mixing activities of solid cyanide by requiring the appropriate use of PPE and having a second individual observe from a safe area, or observe remotely by video. It is clearly defined the PPEs to be used as well as the needing the prior inspection of them. During the field audit, it was evidenced that operators performing manual mixing of solid cyanide using the appropriated PPE as stated as well as they issued pre work records as required such as: Sampled examples were: PVC (Polyvinyl chloride)boots; protective goggles; helmet with jugular; panoramic

mask with gas filter; shell-type noise damper; *Long-length PVC gloves,* cowhide glove; nitrile rubber glove; tyvek or tychem coverall, radio communication, Pocket Preliminary Analysis Task (APT) and Work Permit (PT) reports. Reviewing PPE inspection records it was not that they have been inspected before the use as previously stated. MASA does not use liquid cyanide. Besides, during the field audit it was evidenced a second MASA's individual operator observing the activity being performed from a safe area. During field audit was evidenced that a.m. procedure is duly implemented. Reviewing training records evidenced that all involved personnel were trained as previously required. Sampled examples were: Records of training of involved personnel operators in PO-EQX-MASA-PLA-031.For additional information please see Principle 8. Field interviews showed that involved personnel are aware of this matter. Evidenced that internal

documented procedure PO-EQX-MASA-PLA-031-"Sodium cyanide preparation" establishes methodology to prevent exposures and releases during cyanide unloading and mixing activities such as for addition of colorant dye to solid cyanide at the point of mixing into solution since it clearly defines at items 5.3 and 5.4 of a.m. procedure all step by step for adding the artificial coloring Carmoisine Chemical Abstract Service (CAS) # 3567-69-9. During field audit it was evidenced that a.m. procedure is duly implemented, as required. Reviewing training records evidenced that all involved personnel were trained as previously required. Sampled examples were: Records of training of involved personnel operators in PO-EQX-MASA-PLA-031.For additional information please see Principle 8. Interviewed involved personnel showed to be aware of this matter.

Principle 4 | OPERATIONS

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

Standard of Practice 4.1

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

The operation is ☐ X in full compliance with Standard of Practice 4.1

☐ in substantial compliance with

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA defined, documented, established, implemented and maintains several documented included unloading, mixing and storage facilities, process plants, heap leach operations, tailings impoundments, and cyanide treatment, regeneration and disposal systems when applicable. Sampled examples were: PO-EQX-MASA-PLA-031 - Sodium cyanide preparation; PO-EQX-MASA-SUP-001 - Unloading Cyanide in Briquettes; RE-EQX-MASA-SSMAC-05 - Check List / Commissioning Forklift; RE-EQX-MASA-SEPAT-001 - Cyanide Cart Receipt Check List; RE-EQX-MASA-SUP-001 - Cyanide Discharge Inspection Checklist; PD-EQX-MASA-MAN-002 – Preventive Maintenance; PD-EQX-MASA-MAN-003 - Preventive Building Maintenance; RE-EQX-MASA-MAN-003 - Building Inspection Verification Form; POP-MASA-EL-007 - Maintenance on Flow Meters; POP-IT- MASA-IN-002 - Maintenance and Calibration of pH meters;

RE-EQX-MASA-MAN-001 - QA/QC for Maintenance area; RE-EQX-MASA-MAN-002 – Feed Back on Maintenance Area; RE-EQX-MASA-SSMAC-04 - APRT: Preliminary task risk analysis; RE-EQX-MASA-PLA-002 - Cyanide boxes dispatch form; POP-MASA-EL-001 - Blocking of Energy Sources;POP-MASA-EL-002 (Electrical Work). Reviewing the a.m. documented procedures it was observed that that they address the safe operation of all cyanide facilities. Evidenced that PO-EQX-MASA-PLA-031- “Sodium cyanide preparation” which aims to standardize and clearly detail the methodology to be followed and criteria for unloading, handling, storage of cyanide, preparation of the concentrated solution of this chemical product, as well as clearly guiding users regarding health and safety and environmental providing mitigating measures inherent to each activity of these operations. Additionally, MASA defined and implemented the necessary operational controls for operating MASA’s cyanide facilities related to its environmental aspects and impacts and hazards and risks to occupational health and safety. MASA identified those tasks that, if not performed properly, have the potential to cause cyanide exposures or releases and defined measures to mitigate and control them. Reviewing inspection records it was evidenced the effective implementation of operational documented procedures as stated. Reviewing training records evidenced that involved personnel have been training as stated. For additional information please see Principle 8. Inspections, maintenance and calibration activities have been established and performed as stated. During field audit, evidenced that operators are performing their cyanide activities in such way

that they are protecting human health and the environment. Interviewing field personnel showed that they aware of this matter. Evidenced that MASA established, implemented and maintains internal documented procedures which identify and account for the assumptions and parameters on which the facility design was based and any applicable regulatory requirements. These documents apply to unit operations such as: Cyanide reception; Cyanide Handling, Cyanide Storage, Cyanide solution preparation; Crushing, Milling; Clarification; Thickening; Intensive Leaching; CIL: Filtration; Detox; Acid Wash; Elution; Carbon Regeneration; Electrolysis; Fusion. Evidenced That MASA's plans and procedures clearly identify the assumptions and parameters on which the facility design was based and specify operating

requirements to prevent cyanide releases. The Variable Control Operation provides guidance by filling out the forms in the a.am. operational control areas as well as identifying deviations in the measured variables regarding performance indicators and carrying out continuous monitoring and correction are APT, PT, Pre Use Check list, Operational Inspection records; Maintenance Inspection Records. Evidenced that documented procedures clearly define parameters such as the design and required freeboard for the dam, the concentration of cyanide discharged to and allowed in

surface water, the concentration of Weak Acid Dissociable (WAD) cyanide in open water as well as the designed storm events for process solution. Tailings dam were reviewed and showed that they are in accordance International and Brazilian regulations. Reviewing MASA's documentation it was evidenced that they incorporate and reference the assumptions and parameters on which design was based. During field audit and reviewing MASA's documented procedures and records assessed provided evidences that procedures were in place, they include design parameters and that are effective to prevent cyanide releases and exposures consistent with applicable requirements .Additionally, it was noted that interviewed personnel showed to be aware of theirs activities. Evidenced that MASA defined and documented procedures that describe the standard practices necessary for the safe and environmentally sound operation including the specific measures needed for compliance with the Code, such as water management, inspections and preventive maintenance activities.

Reviewing internal documented procedure PD-EQX-MASA-MAN-002 Preventive Maintenance which establishes guidelines for MASA's preventive maintenance program to increase the availability of the asset management system, reduce equipment downtime and improve spare parts inventory management, thereby preventing equipment failure before it actually occurs, preserving and increasing equipment

reliability, replacing their components before they fail. Preventive maintenance activities include inspections, equipment checks, partial or complete overhauls at previously specified periods. Reviewing MASA's documentation defined, documented and implemented Maintenance Service Order (OS) Evidenced that MASA established, documented, implemented and maintains internal documented procedure PO-EQX-MASA-PLA-049 revision 2 to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures, and incorporate any measures necessary to protect worker health and safety and the environment. The a.m. procedure aims to establish guidelines to ensure that the necessary changes are evaluated before their implementation and that control measures are defined, implemented in order to reduce to a tolerated level the potential impacts or damage to safety and occupational health people, the environment, the quality of product and property. Its field of application is in all areas of the unit, covering direct or contracted employees. It is defined as change any change that may occur in the process, in the acquisition of machinery and equipment, products, materials, services, project, physical installations, tasks or activities, which alters or may alter the risk profile. Levels of responsibilities and authorities are defined and documented. Examples sampled are: General Management, Safety Coordination, Health Coordination, Environmental Coordination, Responsible for the area where the change will occur as well as the area proposing the change. It is defined a Change Management Team which It must be composed of at least the following members: Change Requester, Change Executor, Environmental Representative, Safety Representative, Community representative (when applicable), Engineering

Representative (changes in processes, physical installations, tasks), Representative of the Process/Operation areas (changes in processes, activities). It establishes the pertinent Process Flowchart. As general provisions are defined that: The change assessment process must ensure that all risks for environmental, safety and occupational health are identified and that the control mechanisms related to it can be defined; A planning and implementation assessment must be carried out and formalized, checking all items of the Change Management Form, RE-EQX-MASA-PLA-004; If necessary, inspections, pre-acceptance tests on new equipment and projects are required to ensure that all safety, health and environmental requirements are met. It was evidenced that MASA has a management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases, such as: an upset in the operational water balance that presents a risk of exceeding the design containment capacity; problems identified by facility monitoring or inspection; and temporary closure or cessation of operations due to situations such as work stoppages,

lack of ore or other essential materials, economics, civil unrest, or legal or regulatory actions. Sampled examples were: Emergency Action Plan for Mining Dam Metallurgical Plant Decommissioning; MASA Emergency Action Plan. Evidenced that procedures consider the temporary closure or cessation of operations. Reviewing pertinent MASA's documentation it was evidenced that MASA have been addressed effectively planned responses to the potential issues. Evidenced that MASA defined, documented, established, implemented and maintains methodology for inspecting the required by Principles 4.1.6 "a" to "e" at unloading, storage, mixing and process areas, asapplicable to the site. Reviewing inspections forms it was evidenced that they direct the inspector to evaluate specific items. Reviewing MASA's documentation it was evidenced that OS clearly define the named 5W1H for inspection activities. Sampled examples were: Cyanide Solutions Storage Tanks Inspection; Cyanide Solutions Pumps, Valves and Pipelines Inspection; Containment Basins Inspection; Leak detection and collection systems Inspection. Reviewing inspections records it was evidenced that MASA has been inspected cyanide facilities on an established frequency, according internal documented procedures, sufficient to assure and document that they are functioning within design parameters criteria. Additionally, reviewing internal documented procedure that establishes methodology for inspection in containment basins, it was noted that it defines that monthly inspection must be carried and duly recorded as well as that in the case of detecting anomalies in the pipes, pump: drain, suction and discharge and sealing water; checking physical conditions of the basin: concreting, painting, presence of vegetation, presence of animals and accesses, checking the internal condition of the basin: solids level and water level, checking main drain for damage or presence of foreign body (basin overflow) these and others types of anomalies eventually detected shall be clearly described. Besides, annual technical inspections must also be carried out for the cyanide containment basins, the issuance of a conclusive report and

certificates of conformity, according to the Technical Inspection Schedule for Cyanide Containment Basins. Evidenced Cyanide Containment Basins Inspections for the period from 2021 to nowdays (2023) properly implemented. . Reviewing MASA's DAM Operational Manual evidenced that it requires a routine inspection covering the physical integrity of any surface water diversions in order to maintain water balance. Evidenced check list identifying responsibilities for the inspection, items to be inspected clearly defining how to perform the inspection as well as the acceptance criteria. Evidenced duly implemented. During the audit, the auditor reviewed MASA's internal documented procedures which clearly define methodology for cyanide facilities inspections incorporating the through the named 5W1H and defining the pertinent established frequencies to be followed, reviewed

several inspection records of cyanide facilities and, as already mentioned, during the field audit, the auditor performed its own inspection on MASA's facilities in which proved that cyanide facilities are in good order. In accordance with my professional judgment I conclude that inspection and monitoring programs currently in place by MASA as well as the established frequencies are adequate to ensure and document that they are functioning within design parameters that cyanide facilities ensure and document that cyanide facilities are functioning within design parameters. As already mentioned, OS and others internal documented procedures identify specific items to be observed. Reviewing inspection records it was evidenced that they include date of the inspection, the name of the inspector, and any observed deficiencies as well as the nature and date of corrective actions documented, and are records retained. Evidenced that MASA defined, documented, implemented and maintains preventive maintenance programs and activities to ensure that equipment and devices function as necessary for safe cyanide management. It is defined and documented that shall be determinate for each equipment and devices its criticality classified based on parameters such as: Occupational Hazards and Risks to workers; Significant Environmental Aspectos and Impacts; Applicable Legal Requirements; Demands; to the Maintenance indicator called Mean Time Between Failures (MTBF); to the Maintenance indicator called to the Maintenance indicator called Mean Time To Repair (MTTR). For each parameter it is defined four classifications. Regarding specifically to the requirements on health, safety and the environment, there are four levels (from 1 to 4) of classification as follows: Little or no risk to the safety of people, assets or the environment; A lower risk to people, assets or the environment; Increased risk to people resulting from a lost-time accident, significant damage to the asset or the environment, which requires notification to the competent authorities and Catastrophic, resulting in loss of life, or destruction of the asset and/or significant discharges to the environment resulting in the removal of the operating license. It is defined that for cyanide related equipment, if the Safety and Environment factor classification is maximum (4), the equipment will automatically has critical A. Depending if the equipment and device if it is critical or not Maintenance Plans are defined and documented such as: Sensitive Inspection Plan, Lubrication Plan, Preventive Maintenance Plan and Predictive Maintenance Plan, which can be carried

out by MASA's own personnel as well as by previously qualified service provider. Reviewing the a.m. Plans it was they are consistent with aiming of protect occupational health and safety of workers as well as protecting environmental media. Reviewing maintenance records it was evidenced that MASA has been performing and recording maintenance results in accordance with previously planned in the respective Plans (Sensitive Inspection, Lubrication, Preventive Maintenance and Predictive

Maintenance). Interviewing maintenance personnel it was clearly noted that they clearly know how performing inspection and maintenance activity, the specific items to be verified, the respective acceptance criteria as well as what they have to do if anomalies are detected. During field audit, the auditor verified the cyanide facilities are in good conditions. Based on all the a.m. factors it was evidenced that MASA has been adequately performing maintenance activities as stated. Evidenced during field audit that MASA have necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. Sampled examples were Generators # 490-GE-01; # 490-GE-02 and # 490-GE-03. Reviewing MASA's Inspection Plan as well as MASA"s Preventive Maintenance Plan that generators are included in the a.m. Plans. Reviewing inspection records and preventiva maintenance records it was evidenced that MASA's has been inspecting and performing preventive maintenance of its generators as stated.

Standard of Practice 4.2

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

	☐ X 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:

. Reviewing pertinent records evidenced taht the Masa's process team carries out leaching tests weekly in the laboratory, analyzing the main leaching parameters, including cyanide, in order to optimize its specific consumption. In addition, a manual analysis of the cyanide concentration is carried out, which does not present moisture waste, optimizing dosage. Sampled records demonstrated that the cyanide dosage has few changes, since over time the characteristics of the ore have been displayed practically constant.

Standard of Practice 4.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA defined, documented, implemented and maintains internal documented procedure PO-EQX-MASA-PLA-050 revision 0 – Water Balance Control which establishes guidelines to ensure that the water balance model makes it possible to identify and quantify the uses, sources and consumption of water in a standardized and traceable way, reducing potential impacts of disturbances in the operational balance. This procedure applies to the operation, processes of the metallurgical plant, dam and environmental, safety and occupational health areas. Responsibilities and authorities are defined, documented and communicated. Sampled examples were: From the general manager: Provide the necessary resources, whether human (own as well as hiring external services) and material resources; From environmental technicians and analysts - Provide daily report by email of rainfall and evaporation ratio; From engineers and analysts in the dam area: - Hire an external bathymetry service with a minimum annual frequency to enable verification of estimates made in the water balance and - Provide metallurgical plant process engineers with updates on constants or parameters used whenever new studies of the dam are carried out; From engineers and analysts at metallurgical plant: - Update data daily - Compare the bathymetry results with the estimates made in the water balance and call a meeting with the three areas involved for investigation if the difference in the water estimate in the reservoir (dam) is greater than 10%, - Publicize the changes made to the controls of the three areas involved, - Present the results of water estimates in the reservoir to general management on a daily basis. When this is not possible, a substitute must be appointed to carry it out, and a process technician will be suggested. During the audit evidenced that MASA carries out models with different levels of water variation and provides conservative and extreme plans, not just making estimates with average values in such way that make it probabilistic

All analyzed parameters, as well as the respective water balance results, are recorded in a spreadsheet identified as spreadsheet RE-EQX-MASA-PLA-006 – Water Balance. Noted that above-mentioned procedures include aspects related to: a) Pluviometry: measurement of the amount of rain that falls in a given area during a specific period of time. It is expressed in millimeters (mm); b) Evaporation: is Is the process by which water on the earth's surface turns into water vapor and is released into the atmosphere. This

occurs due to the exposure of water to thermal energy from the environment, such as

sunlight and c) Infiltration: refers to the process by which water penetrates the soil through the dam structure.

Evidenced that above-mentioned documented procedure clarify the operational conditions such as: Fill in the water balance control form, RE-EQX-MASA-PLA-006 - Water Balance, daily, with rainfall and evaporation data received by email sent by the environmental team in the “Measurements” tab. Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. reviewing the Spreadsheet RE-EQX-MASA-PLA-006 – Water Balance, it was evidenced that the water balance considers the following in a reasonable and appropriate manner for the facilities and the environment considering: a) A projected duration of the storm and a storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be avoided during the operational life of the installation c) The quality of existing precipitation and evaporation data in representing actual site conditions d)The amount of precipitation entering a pond or impoundment resulting from surface run- on from any upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground. . h) . i) Others aspects of facility design that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility. MASA does not have leach pads Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. as already mentioned evidenced that the water balance considers the solution addition in the system and the effluent rate at Vené tailings dam. Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. evidenced that the water balance considers a design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility. Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. mentioned evidenced that the water balance considers the quality of existing precipitation and evaporation data in representing actual site conditions

There are five rain gauges and one automatic weather station, with daily record of precipitation. Data obtained are compared to Brazilian reference (INMET) - Instituto Nacional de Meteorologia. Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. evidenced that the water balance considers the amount of precipitation entering a pond or impoundment resulting from surface run- on from any upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground. Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. The dam spillway was designed for rainfall with a return/recurrence

time of 10,000 years or Maximum Probable Flood. Effects of potential freezing and thawing conditions on the accumulation of precipitationwithin the facility and any upgradient watershed is not applicable since there is no potential of freezing. Evidenced that the water balance considers solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface, and allowable discharges to surface water. Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. the water balance considers the effects of potential power outages or pump and other equipment failures on the draindown from a leach pad or the emergency removal of water from a facility. Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. as already mentioned evidenced that the water balance considers where solution is discharged to surface waters, the capacity and on-line availability of necessary cyanide treatment, destruction or regeneration systems. Reviewing several records of RE-EQX-MASA-PLA-006 - Water Balance, it was evidenced that they are duly implemented. The water balance considers other aspects of facility design that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility. Evidenced the ponds and impoundments designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations. There are inspections in place to ensure the control of all parameters.The results were reviewed and showed to be in accordance Brazilian regulation laws. Evidenced that MASA implements operating procedures that incorporate inspection and monitoring activities to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment; Inspection and monitoring records as well as check list dam safety, geotechnical inspection dams were reviewed and demonstrated that the results are in accordance with Brazilian regulation laws. The dam's current instrumentation includes INA's (Water Level Indicators), Casagrande and Vibrant Rope piezometers, Surface Landmarks and Flow Meters. Monitoring wells are also located around the dam and in other locations on site, to monitor the water quality. MASA measures the precipitation and compare the results to design assumptions. Records “reviewed showed be implemented as stated

Standard of Practice 4.4

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

	☐ X 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:

Reviewing WAD cyanide monitoring for open waters records it was evidenced that MASA does not present open water with WAD cyanide exceeding 50mg/l. Special measure (fencing) was implemented to restrict access by wildlife as well as metal blocking siding, walls in concrete structures in the access to administrative areas (central entrance), fence in the environmental complex and in the metallurgical plant, in addition to barbed wire fence throughout the other areas as measures used to restrict access to wild animals and cattle in all open waters of the development

Additionally, MASA has been defined, documented, maintained and implemented a General Biodiversity Plan. *Evidenced MASA's Fauna Self-Monitoring Program in compliance with agrees # 01107 and 01108 firmed with (SEMA) – Secretaria de Meio Ambiente do Maranhão with the aim of carrying out fauna diagnosis in the area of influence of the Piraucáua pond overflow, Vila Aurizona, Maranhão. Evidenced campaign report issued by Otinga Engenharia dated on August, 2022 Aurizona that contains data about to ichthyofauna, aquatic biota (benthos, phyctoplankton, zooplankton), avifauna, herpectofauna, maustofana and avifauna.*

MASA defined a Wildlife Scaring and Rescue Program. Evidenced duly implemented. Sampled example was Execution of the Wild Fauna Scaring and Rescue Program report issued by Instituto Ecos de Gaia dated on January, 2021. Evidenced that technical team that performed this activity is duly qualified in accordance with Brazilian regulations. MASA's operational procedure defined, documented, implemented and maintains methodology clearly establishes that all

water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not; Water or spillage collected in the cyanide preparation area is returned to the Cyanide Mixing Tank Water collected in the Carbon-In-Leach area sump is pumped to the Carbon-in-Leach tanks; Water from sumps in collected in the (ADR) - Adsorption, Desorption, and Regeneration Area are pumped to the Carbon-In-Leach tanks; Water from the sump located in

the acid containment area is pumped to detox/neutralization tanks and Disposal in the tailings dam is only carried out after passing through the neutralization area with the application of sodium metabisulfite and copper sulphate.MASA's surface waters are defined by the applicable Brazilian legislation (Resolution (CONAMA) - National Environmental Council 357 of March 17, 2005 at article 15) as Class II water - which provides for the classification of water bodies and environmental guidelines for its framework, as well as establishing the conditions and standards for effluent discharge. Evidenced that MASA defined, documented, implemented and maintains internal documented procedure PO-EQX-MASA-SSMAC-001-Environmental Monitoring as well as Environmental Monitoring Plan that includes monitoring of surface water, groundwater and effluents, water potability, air quality, noise and soil characterization. Evidenced that above mentioned documentation clearly define the localizations points for monitoring surface waters quality, groundwater and effluents. Reviewing above mentioned documentation that it is in accordance with Resolução CONAMA 357. It was evidenced that the distribution of sampling points was made depending on the intermittent water sources, where gold exploration activities are located. The location of the sampling points with their specific objectives, the physicochemical parameters (including types of cyanides such as WAD, total and free), the bacteriological parameters as well as the respective periodicity were defined as required by (SEMA)- Secretariat of the State of Maranhão for the Environment and Natural Resources.

The monitoring points of surface waters are named as ASP01, ASP02, ASPCX01, ASPCX02, ASPJF01, ASPJF02, PSUP03, PSUP04, PSUP05, PSUP06, ASPAU01 and ASPAU02. All monitoring analysis are performed by Cientifíca Ciência e Tecnologia / Controle de Análises de Água e Efluentes Ltda. Assessing the site http://www.inmetro.gov.br/laboratorios/rble/ noted that the above mentioned laboratory is ISO 17025 certified since November 17, 2016 accredited by National Institute of Metrology, Quality and Technology (INMETRO) the Brazilian body responsible for establishing conformity assessment programs under (CRL #) 1190 where (CRL #) means Registration Number in the Brazilian Network of Testing

Laboratories. Reviewing pertinent monitoring surface water records it was evidenced that (WAD) Weak Acid Dissociable cyanide is below 50 mg/l. There is no register of wildlife mortality caused by cyanide intoxication. Evidenced that MASA defined, documented and implemented internal documented procedure PO-EQX-MASA-SSMAC-001- Environmental Monitoring as well as Environmental Monitoring Plan that includes monitoring of surface water, groundwater and effluents, water potability, air quality, noise and soil characterization. .Evidenced that above mentioned documentation clearly define the localizations points for monitoring surface waters quality, groundwater and effluents. It is clearly defined the methodology for monitoring of cyanide in the waters contained in the tailings dam,

the forms of cyanide that are analyzed and defines the monitoring points of industrial effluents that are collected in this dam. Effluents points are named as EFL 01, EFL 02, EFL 03, EFL 04 and EFL 05. 09. Records reviewed showed WAD cyanide concentration less than 50 mg/l. Additionally MASA defined a daily inspection in Vené Dam performed by Vené Dam Team. It includes several items to be inspected and one of them is verifying the existence of some wild mortality. Reviewing record named Daily DAM Inspections duly implemented and the results do not indicate wildlife mortality caused by cyanide intoxication. It was evidenced that MASA's Biodiversity Management Plan establishes that wildlife sightings or mortalities found in mine ownership shall be recorded, communicated and analyzed. Besides, as already mentionned there is a daily inspection performed by Environmental Team to record wildlife and fauna in and around the mine. Reviewing pertinent records, interviewing related personnel and during field audit noted that no cyanide-related mortality has been reported. Apply leach solutions in a manner designed to avoid significant pondingon the heap surface and limit overspray of solution off the heap leach pad liner is not applicable, because MASA does not have leach pads.

Standard of Practice 4.5

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

The operation is ☐ X 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:

MASA does not have a direct discharge to surface water . MASA's operational procedure defined, documented, implemented and maintains methodology clearly establishes that all water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not; Water or spillage collected in the cyanide preparation area is returned to the Cyanide Mixing Tank Water collected in the Carbon-In-Leach area sump is pumped to the Carbon-in-Leach tanks; Water from sumps in collected in the (ADR) - Adsorption, Desorption, and Regeneration Area are pumped to the Carbon-In-Leach tanks; Water from the sump located in the acid containment area is pumped to detox/neutralization tanks and Disposal in the tailings dam is only carried out after passing through the neutralization area with the application of sodium metabisulfite and copper sulphate. Evidenced that

MASA defined, documented and implemented internal documented procedure PO-EQX-MASA-SSMAC-001- Environmental Monitoring as well as Environmental Monitoring Plan that includes monitoring of surface water, groundwater and effluents, water potability, air quality, noise and soil characterization.. As already mentioned MASA does not release directly into surface waters, using recirculated water from the dam for its operation. However, the existing surface water on site is still monitored through sampling, in which are not observed values greater than 0.5 mg/L of WAD cyanide or 0.022 mg/L of free cyanide . Evidenced that above mentioned documentation clearly define the localizations points for monitoring surface waters quality. Reviewing above mentioned documentation that it is in accordance with Resolução CONAMA 357.It was evidenced that the distribution of sampling points was made depending on the intermittent water sources, where gold exploration activities are located. The location of the sampling points with their specific objectives, the physicochemical parameters (including types of cyanides such as WAD, total and free), the bacteriological parameters as well as the respective periodicity were defined as required by SEMA- (Secretariat of the State of Maranhão for the Environment and Natural Resources). The monitoring points of surface waters are named as ASP01, ASP02, ASPCX01, ASPCX02, ASPJF01, ASPJF02, PSUP03, PSUP04, PSUP05, PSUP06, ASPAU01 and ASPAU02. All monitoring analysis are performed by Cientifíca Ciência e Tecnologia / Controle de Análises de Água e Efluentes Ltda. Reviewing pertinent monitoring surface water records it was evidenced that

(WAD) Weak Acid Dissociable cyanide is below 50 mg/l. Evidenced that MASA defined, documented, implemented and maintains internal documented procedure PO-EQX-MASA-SSMAC-001- Environmental Monitoring as well as Environmental Monitoring Plan that includes monitoring of surface water. Evidenced that above mentioned documentation clearly define the localizations points for monitoring surface waters quality. Reviewing above mentioned documentation that it is in accordance with Resolução CONAMA 357. It was evidenced that the distribution of sampling points was made depending on the intermittent water sources, where gold exploration activities are located. The location of the sampling points with their specific objectives, the physicochemical parameters (including types of cyanides such as WAD, total and free), the bacteriological parameters as well as the respective periodicity were defined as required by (SEMA)- Secretariat of the State of Maranhão for the Environment and Natural Resources. Evidenced the above mentioned documentation is duly implemented. Evidenced that MASA does not have any direct discharge of solutions containing cyanide to surface water. Evidenced that MASA defined, documented, implemented and maintains internal documented procedure PO-EQX-MASA-SSMAC-001- Environmental

Monitoring as well as Environmental Monitoring Plan that includes monitoring of surface water Reviewing pertinent monitoring surface water records it was evidenced that MASA has been monitoring for cyanide in surface water and that results demonstrate there are no indirect discharges to surface water. MASA does not have any record of indirect discharge to surface water. There is no record of indirect discharge to surface water

Standard of Practice 4.6

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA defined, documented, implemented and maintains internal documented procedure PO-EQX-MASA-PLA-050 revision 0 – Water Balance Control in order to implement water management system as well seepage control systems to protect groundwater Reviewing pertinent records it was evidenced that PO-EQX-MASA-PLA-050 is duly implemented. The cyanide warehouse, cyanide preparation area, Carbon-In-Column (CIC) and Adsorption, Desorption, and Regeneration (ADR) plants are constructed with reinforced concrete floors with containment berms which provide containment against seepage. All cyanide solution pipelines are located within the containment areas and there are no cyanide buried pipelines. Collection drains and sumps are used to capture precipitation and any spillage and direct it to the process. The cyanide solution tanks are in areas provided of an impermeable barrier. The facilities are inspected and maintained to ensure the integrity these containment systems and prevent potential seepage. Evidenced that the secondary containments are covered by a HDPE, and all pipelines are within areas with secondary containment. Field audit provided evidenced that the involved areas with is in good conditions conditions. Sampled examples were check list of Preparation Mixture Basin; Distribution Tank Basin; Acacia Reactor Basin; Leach Tanks Basin. MASA's ground waters are defined by the applicable Brazilian legislation Resolution National Council for the Environment (CONAMA) 396 of August 7, 2009, which provides for the classification of water bodies and environmental guidelines for their classification, as well as conditions and provisions. Standards. Evidenced that MASA defined, documented, implemented and maintains internal documented procedure

PO-EQX-MASA-SSMAC-001- Environmental Monitoring as well as Environmental Monitoring Plan that includes monitoring of surface water, groundwater and effluents, water potability, air quality, noise and soil characterization. Evidenced that above mentioned documentation clearly define the localizations points for monitoring groundwater waters quality. The monitoring points of ground waters are named as PM01, PM02, PM03, PM04, PM05 and PM13. Yes. Evidenced that the monitoring performed by MASA indicates that there is not any contamination of groundwater caused by cyanide. Sampled examples of groundwater monitoring records provided evidences that both free cyanide as well as total cyanide are bellow below levels that are protective of identified beneficial uses of the groundwater. MASA does not use mill tailings as underground backfill, have the potential impacts to worker health and groundwater been evaluated and have measures been implemented asnecessary to address them and is considered not applicable, because MASA does not have underground operations. Evidenced that there is no record of seepage from the

operation that has caused cyanide concentrations of ground water to rise above levels protective of beneficial use. There is no use of the groundwater beneath and/or immediately downgradient of the operation's cyanide facilities

Standard of Practice 4.7

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

	☐ X 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:

As already mentioned MASA only uses solid cyanide. During the field audit it was evidenced that all the cyanide mixing, concentrated solution and process solution tanks and vessels with 0.5 mg/l or greater WAD cyanide concentrations are provided with spill prevention and containment measures, such as secondary containment and impermeable varnish. Field audit provided evidenced that the involved areas with is in excellent conditions conditions. Sampled examples were check list of Preparation Mixture Basin; Distribution Tank Basin; Acacia Reactor Basin; Leach Tanks Basin. Reviewing design documentations including design drawings, data on tanks and vessels, containment's available volume calculations accounting for the volume occupied by the tanks as well as observations from the field audit it was evidenced that all cyanide storage, mixing and process tanks and vessels with 0.5 mg/l or greater (WAD) weak acid dissociable contain secondary containment sized to hold a

volume greater than that of the largest tank within the containment in accordance with Brazilian regulations and by Code's Standard Practice of 4.7 as well as any piping draining back to the tank, and with additional capacity for the design storm event. All cyanide tanks are located within containment. The mixing and holding tanks have volumes, and are located within the cyanide preparation concrete containment area. Theirs containments have more than sufficient to retain a 110% of the larger tank and a maximum design storm event. The CIC and ADR areas are constructed with reinforced concrete floors with containment berms which provide more than adequate capacity to hold the greater than that of the largest tank within the containment and any piping draining back to the tank .Evidenced that MASA has been established, documented and maintained internal documented procedure defining methodology for inspecting secondary containments for cyanide unloading, storage, mixing and process tanks and vessels with 0.5 mg/l or greater WAD cyanide. The frequency used

for this inspection was analyzed and are appropriated. Evidenced duly implemented. Sampled examples were: Field audit provided evidenced that the involved areas with is in good conditions. Besides, reviewing pertinent check list used for this inspection, it was noted that it contains all requirements related to Code's Standard Practice of 4.7. During the audit, evidences were obtained from the construction design of the facilities, including engineering specifications, as built drawings that all tanks have an impermeable barrier between the bottom of the tanks and the ground. Besides, interviewed pertinent personnel showed to be aware that the Cyanide Code requires that all tanks constructed after MASA becomes a signatory to the Code to have an impermeable barrier between the tank bottom and the ground, including tanks on ring beams. Results recorded in the check list demonstrated that secondary containments are as stated. Sampled examples were check list of Preparation Mixture Basin; Distribution Tank Basin; Acacia Reactor Basin; Leach Tanks Basin. During field audit, it was verified through visual observation that there are no materials stored within the above mentioned containments that compromise the necessary defined capacity. MASA has been defined, documented, maintained internal documented procedures to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. Reviewing designed documents was evidenced that the system to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water has been designed with sumps and dedicated pumps and piping to return all such water to the production process. Reviewing operational documented procedures it was noted that it establishes all necessary steps to avoid discharge of cyanide solution into the environment in cases of spillage as clearly defines that no water collected in containment shall be discharged to the environment since all water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not . It is clearly defined and documented that: Water or spillage collected in the cyanide preparation area is returned to the Cyanide Mixing Tank Water collected in the Carbon-In-Leach area sump is pumped to the Carbon-in-Leach tanks; Water from sumps in collected in the (ADR) - Adsorption, Desorption, and Regeneration Area are pumped to the Carbon-In-Leach tanks; Water from the sump located in the acid containment area is pumped to

detox/neutralization tanks and Disposal in the tailings dam is only carried out after passing through the neutralization area with the application of sodium metabisulfite and copper sulfate. Interviewed personnel showed to be aware of this matter. Records assessed provided evidences that inspection and preventive maintenance of sumps, dedicated pumps and piping to return all such water to the production process were duly implemented. Tanks without secondary containment, are there procedures for remediation of any contaminated soil such that adverse impacts on surface or groundwater are prevented is not applicable, because MASA does not have process tanks without secondary containment. Besides, all

cyanide tanks are installed on concrete impermeable barrier between the tank bottom and the ground. The cyanide solution pipes for dosing have a geomembrane coating as a barrier to mitigate leaks. The pulp pipes have a polypropylene system on the flanges to contain leaks. The waste pipe is subjected to a previously defined inspection plan to prevent leaks, in addition to preventive maintenance.. During the field audit evidenced that all cyanide process solution pipelines are provided with spill prevention to collect leaks and prevent releases to the environment. During the field audit evidenced none areas where cyanide pipelines present a risk to surface water and requiring special risks. All pipelines are within controlled areas, by secondary containments. MASA defined and documented internal documented procedure 2034-01-4000-SPE-P-0001 revision 2 Trek Mining Inc for Aurizona Gold Project Treatment Plant – Specification Piping. Materials covered by this provision include pipes, valves, fittings, flanges and other components common to piping and specialties. Items Specific specifications are indicated in data sheets and/or other specifications. This is a general reference document for project development, planning, preparation of flowcharts, specifications, data sheets, project memories and other documents necessary for the execution of the project. The design and manufacture of subsidiary systems will be in accordance with the relevant codes and standards from regulatory agencies and institutes such as: (ABNT) Brazilian Association of Technical Standards; (ANSI) American National Standards Institute; (ASME) American Society of Mechanical Engineers.

Standard Practice 4.8

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

	☐ Xin full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 4.8
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA conducted quality control and quality assurance programs for new and existing cyanide facilities and modifications to existing facilities, including cyanide unloading, storage, mixing facilities and other cyanide facilities in accordance with is defined in the Code's *Definitions and Acronyms* Evidenced several documents for QA/QC management system which includes several requirements including detailed design requirements; technical specifications; legal requirements; materials quality specifications; testing and certification; visual inspections and testing of construction work; inspection of offsite fabrication work; (EPC) - Engineering, Procurement and Construction contractors; documents,

drawings and records control system, commissioning consultancy; review of material specifications (steel quality specifications and tests, inspections/testing of rebar and concrete for foundations, weld inspections and tests of steel works, and paint bonding tests for tanks and piping. Evidenced that MASA has as quality control and quality assurance programs addressed the suitability of materials and adequacy of soil compaction for earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used, and forconstruction of cyanide storage and process tanks. Specialized contractors were hired to carry out quality control for controlling the implementation of the activities required by Cyanide Code. Reviewing pertinent documents and records it was evidenced that MASA has been maintained quality control and quality assurance records for cyanide facilities. Quality control and quality assurance documentation define a systematic for inspection of facilities records as defined by orders that are automatically generated by the Datasul system. Evidenced that records demonstrate that MASA has been retained quality control and quality assurance records in accordance with the orders generated by Datasul system. Evidenced that appropriately qualified personnel reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved. Verified that engineering personnel involved with the above mentioned activity are appropriately qualified person based on their education, training, expertise and experience. MASA has available quality control and quality assurance documentation. Additionally, during the audit evidenced that MASA defined and implemented quality assurance and quality control (QA/QC) programs during construction of the tailings impoundment and related ancillary facilities and update each protocol question under Standard of Practice 4.8, accordingly. MASA performed QA and QC services with online support from KP (Knight Piésold Consulting). Evidenced that the following tests were carried out during construction: • Moisture content, • Particle size analysis, • Sedimentation analysis, • Moisture-density relationship (sand jar method, minimum and maximum density and Proctor standard); • Specific mass; • Permeability with constant hydraulic load and • Atterberg Limits.

Quality Assurance was maintained and project objectives achieved were implemented specific testing requirements for all landfill materials. The tests were divided into two categories: • Control tests: Material tests completed before launching and compaction. The material was selected from loan sources and stock piles with intended frequency in compliance with the Technical Specifications (KP, 2021a). The test was conducted in the laboratory to evaluate the theoretical density of the material for comparison with the registry tests. • Registration tests: Completed for materials prior to release and compaction. The material was selected from active construction areas in the TSF with the intended frequency in accordance with as Technical Specifications (KP, 2021a).

Control and recording tests were carried out on samples of sand, laterite and sterile material filters during the construction. For all tests carried out, reports of the results obtained were duly issued. and storaged in the field office. They were also sent for scientific review of the results of the rehearsals for the representative of the Engineering Manager in the Work Area. The QC team was present in the work area during all critical construction activities, carrying out daily inspections to check the quality of work done and materials used, direction quality sampling and testing, providing effective communication of all findings related in daily, weekly and monthly reports. The engineering manager representative in the work area determined, when applicable, the need for additional tests.

Standard of Practice 4.9

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA has been defined, documented, implemented and maintains internal documented procedure PO-EQX-MASA-SSMAC-007 - Scaring away and rescuing wildlife whose general objective is to promote the scaring away, rescue and relocation of wild fauna whenever necessary in the event of incidents involving cyanide, within MASA's premises or in cases of specific occurrences in the various areas of direct and indirect influence of MASA. The specific objectives consist of: a) Promote the scaring away of fauna with greater capacity to move from the incident area, directing them to vegetated areas in the region surrounding the intervention, which include the same type of habitat; b) Active translocation of the area covered by cyanide contamination, through capture, of animals that have restricted locomotion capacity or slow location; c) Prevent individuals of species that live in groups from becoming permanently isolated or moving in the face of dangerous conditions; d) identify areas of trophic-reproductive use within the perimeter of the intervention area for

possible relocation; e) Release individuals in contiguous areas or areas selected for that purpose; f) Drive away fauna to adjacent areas; g) Maintain and preserve the physical integrity of rescued individuals; h) Promote the reintroduction of rescued individuals in similar environments; i) Preserve, as much as possible, faunal communities. This procedure is applicable to MASA and all contracted and subcontracted companies, regardless of sector or area. Reviewing PO-EQX-MASA-SSMAC-007 it was evidence that it is in accordance with Brazilian legislation which includes Federal Law No. 5,197 of January 3, 1967 that "Discusses the protection of wild fauna"; CONAMA nº 001 of January 23, 1986 that "Establishes the definitions, responsibilities, basic criteria and general guidelines for use in implementing the Environmental Impact Assessment as one of the instruments of the National Environment Agency". Evidenced that MASA established, defined, documented and implemented internal written standard procedures for monitoring plans orprocedures for wildlife and water quality in order *to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality*. Sampled examples were PO-EQX-MASA-SSMAC-001-Environmental Monitoring revision 3 dated on June 13, 2023, Environmental Monitoring Plan revision 9 dated on April 30, 2023 as well as Biodiversity Monitoring Plan which clearly define methodology for monitoring the quality of surface water, groundwater, liquid effluents, potability, air quality, noise and soil characterization and for monitoring of fauna and flora Evidenced that they clearly define applicable legal requirements, sampling techniques, sampling points, parameters to be monitoring, frequency of analysis, analytical procedures, necessary resources (human and material), preliminary technical analysis of analytical results and dissemination of results. MASA defined that only uses (ISO) – International Organization for Standardization (NBR) – Norma Brasileira Registrada 17025 certified laboratories to perform environmental analysis. Evidenced that all sampling and analytical protocols have been developed by MASA's chemicals lab in accordance with (AWWA) - Standards Methods for the Examination of Water and Wastewater, of the National Guide for the Collection and Preservation of Samples of the (ANA) National Water Agency and the (CETESB) – São Paulo State Environmental Company, and of the (ABNT) – Associação Brasileira de Normas Técnicas (NBR) – Norma Brasileira Registrada such as NBR 9897/87 - Sampling planning of liquid effluents and receiving bodies; NBR 9898/87 - Preservation and sampling techniques for liquid effluents and receptors; NBR 13895 - Construction of monitoring wells and monitoring of groundwater. Evidenced that MASA's analytical protocols

have been developed by an appropriately qualified person as defined in Code's *Definitions and Acronyms. Sampled example was the Environmental, Health and Safety Manager Claudemir Fonseca Gomes Filho. Reviewing pertinent records including his (CV) - Curriculum vitae and registration at CREA (Regional Engineering Council) nº 15266D PA (State of Pará) well as interviewing him was evidenced that has a high* a degree in an appropriate scientific discipline and experience with sampling and analytical techniques as required. The auditor concluded that *Claudemir Fonseca Gomes Filho is considered appropriately qualified personnel based on his education, expertise, training and experience.* Evidenced that MASA established, documented and implemented internal documented procedure Environmental Monitoring Plan revision 9 dated on April 30, 2023 item 5.2.1 pages 6 to 14 as well as PO-EQX-MASA-SSMAC-001-Environmental Monitoring items 5, 5.1, 5.2, 5.2.1, 5.2.2 7 and 7 dated on June 13, 2023 pages 2 to 4, and 6 to 20 specify how and where samples should be taken, sample preservation techniques, chain of custody, shipping instructions, cyanide species to be analyzed as well as quality assurance and quality control requirements for cyanide analyses. Reviewing pertinent records it was noted that sampling have been developed in accordance with (AWWA) - Standards Methods for the Examination of Water and Wastewater, of the National Guide for the Collection and Preservation of Samples of the (ANA) National Water Agency and the (CETESB) – São Paulo State Environmental Company, and of the (ABNT) – Associação Brasileira de Normas Técnicas (NBR) – Norma Brasileira Registrada such as NBR 9897/87 - Sampling planning of liquid effluents and receiving bodies; NBR 9898/87 - Preservation and sampling techniques for liquid effluents and receptors; NBR 13895. Interviewing personnel involved with sampling activities was evidenced that the procedures are in accordance with ICMC(International Cyanide Management Code) requirements and have been duly implemented and that interviewed personnel showed to be aware of. Reviewing the sampling and sample handling procedures evidenced that above mentioned procedures include information identified in this question. The cyanide species that have been analyzed are clearly identified. Sampled examples were: (WAD) - Weak Acid Dissociable Cyanide, Total Cyanide and Free Cyanide. Evidenced duly implemented. Reviewing pertinent records at environmental area it was evidenced that all chain of custody records are duly established and maintained. Evidenced that sampling conditions (weather, livestock/wildlife activity, anthropogenic influences) and procedures documented by MASA in accordance with Environmental

Monitoring Plan, Biodiversity Monitoring Plan and PO-EQX-MASA-SSMAC-001-Environmental Monitoring. It is defined that monitoring results reports shall include recording all sampling conditions that may affect the analysis. Reviewing pertinent records it was verified that MASA actually records sampling conditions. Evidenced duly implemented as stated. Evidenced that the monitoring is conducted at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. The monitoring frequencies are defined by the (SEMA - MA) - State Secretariat for the Environment and Natural Resources of the State of Maranhão as well as Federal Brazilian legislation. My professional judgment to evaluate the adequacy of MASA's monitoring frequencies I conclude that the defined monitoring frequencies are adequate to characterize the medium being monitored and to identify changes in a timely manner based on amount of existing data, the stability of the parameters being monitored, and for groundwater, the depth to groundwater

Principle 5 | DECOMMISSIONING

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

Standard of Practice 5.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Yes. MASA defined, documented, implemented and maintains documented procedures for decommissioning cyanide utilities to protect human health, wildlife, livestock and the environment such as STE-MZ002-PFM-INT-TXT001-F1 - MASA's Mine Closure Plan issued dated on April, 2022. Evidenced that it contains the following macro items: Introduction; Contextualization; Methodology; Mining Rights; Characterization of the MASA

Mine ((Location and Access, Physical Environment, Biotic Environment, Socioeconomic Environment); (History of the Project, Inventory of Structures, Vené Dam, Future Life Expectancy); Cyanide Use Procedures; Future Use (Criteria for Selecting Future Use alternatives, Contractual Conditions Relating to the Concession of Land Use, Identification and Description of Alternatives); Identification of Environmental Impacts in the Closing Phase (Impacts on the Physical Environment, Impacts on the Biotic Environment, Expected impacts on the Socio-Economic Environment); Decommissioning Actions (Bases and Assumptions for Closure, Decommissioning of Mine Structures and Facilities; Conceptual Project for Physical and Chemical Stabilization of Remaining Structures; Conceptual Plan for Biological Stabilization of Remaining Structures; Measures to Prevent Unauthorized Access to Mining Enterprise Facilities and for the Interdiction of Access to Dangerous Areas; Post Closure Actions (Progressive Recovery Actions, Biotic Environment Monitoring Actions); Closing Cost Estimates; Risk Assessment and Bibliographic References. Reviewing MASA Mine Closure Plan verified that it defines that in the closure process the area must be subject to rehabilitation through its future integration into the local environment, during and after reserves depletion, as well as that the preparation of said document was based on guiding clauses of Resolution ANM (National Mining Agency) No. 68/2021, which provides for the rules relating to the Plan of Mine Closure, regulates issues relating to the Mine Closure Plan (mainly in relation to the documents and information that must comprise it and the deadlines and hypotheses for its updating, as well as brings specific provisions for each phase of the enterprise and for those who have tailings dams). This document presents the closure projects, the specific agents, the measures to be taken to achieve closure goals and also presents the requirement for future use of the area enterprise. Proper planning can protect shareholders, governments, suppliers, local communities and future generations from the socioeconomic impacts arising from the closure, as well as reducing environmental liabilities, recovering degraded environments and resulting in a balance positive for the region where the mine is located. Evidenced that in the MASA decommissioning process clearly defines the demand for the decontamination of part of the equipment, tanks, pipes and waste pipeline that had direct contact with products containing cyanides. There are several processes for treating, removing and decontaminating waste with cyanide, which may be used in the decommissioning phase, and must be adjusted depending on the characteristics of the locations and equipment to be decontaminated and operational conditions. These processes can be categorized as biodegradation; adsorption on activated carbon; chemical, electrochemical or photochemical oxidation processes; chemical precipitation; ultrasonic waves; ion exchange resins; extraction; photocatalysis using titanium catalyst i; volatilization and absorption by NaOH (sodium hydroxide). The adequacy of one of the processes for a given effluent or equipment containing cyanide depends on the effluent flow rate, cyanide concentration, associated chemical species, the level of cyanide allowed in the effluent after treatment, the technical level of the company's employees and the

economics and finances of the process. Another process that has been frequently adopted, proving to be quite effective, are biological treatment processes, relatively new in the industrial sector. Although selecting an appropriate cyanide treatment process involves consideration of many factors, the process possibilities for a given application can generally be reduced after characterizing the properties of the extinction to be treated. In this way, the choice of the most appropriate process will depend on certain factors, such as: a) Concentration and composition of the effluent to be treated; b) Desired final quality of dumping and local environmental legislation; c) Location of the treatment unit, availability and prices of reagents and inputs, topography, area available for implementing the unit, etc.; d) Type of process that generated the effluent; e) Scale of operation of the effluent generating unit; f) Capital and operating costs of the treatment unit. Evidenced that MASA's Mine Closing Plan - STE-MZ002-PFM-INT-TXT001-F1 clearly define a schedule for carrying out its proposed activities; this schedule show the order in which the planned activities will be conducted. Evidenced that the schedules presented are updated, current and protocolled with the pertinent environmental organism. For the closure and rehabilitation of the mine, three stages were identified as: planning, active transport and passive treatment, with a) Planning – during the operational life of the mine, a rehabilitation plan and integrated, as soon as possible, into mining and environmental management plans, with periodic updates; b) Active treatment – immediately after the end of operations in the area under study for the closure of the mining complex, the active treatment program comes into action, promoting immediate closure of a waste pile or the complete closure of the mine; and c) Passive treatment – is the period in which the monitoring program is implemented to demonstrate that the active treatment achieved the desired success and the objective of non-intervention in the area was obtained. MASA's Mine Closure Plan foresees that in the decommissioning phase, the deactivation and removal of structures will occur in stages and always in the direction of the flow of the processing process. Starting deactivation and removal through the sodium cyanide collection and storage areas, passing through the alkaline cyanide solution preparation area, then following the flow of the processing process, waste treatment and neutralization system to the pumping and spiking system of tailings in the dam. During the removal of waste and inputs containing cyanide, the following structures must be maintained until the end of the neutralization process, chemistry and decontamination of the structures remain: Cyanide sensors, meters and analyzers: must be retained at the site of deactivation of structures containing cyanide for detection when cleaning and removing this substance and to measure concentrations there is no air and water; Fire-fighting tanks, pumps and water network: will be used to combat fires in facilities and for emergency dilution with water in tanks and dikes containment contain high concentrations of cyanide under conditions that cause HCN emission; Tanks, pumps and industrial water network: will be used to prepare the neutralization, treatment and cleaning solutions with water in tanks and containment dikes for the reduction and elimination of cyanide in conditions that cause the emission of HCN; Tanks, pumps and

drinking water network: will be used to sanitize PPE and employees involved in decontaminating structures and removing possible contact with inputs and waste containing cyanide; Containment dikes and rainwater network: must be interrupted until decontamination and total removal of contaminated structures, being the place where all water and effluent treated with the elimination of cyanide must be pumped to a tailings dam; the Detox (neutralization of waste with metabisulfite) System, dam and waste pumping system: these will be the last structures to be deactivated. They are responsible for the final treatment of all waste, wastewater and treated effluents. During the removal of waste and inputs containing cyanide, the following structures must be maintained until the end of the neutralization process, chemistry and decontamination of structures remain: Cyanide sensors, meters and analyzers: must be retained at the site of deactivation of structures containing cyanide for detection during cleaning and removal of this substance and to measure concentrations there is no air and water; Fire-fighting tanks, pumps and water network: will be used to fight fires in facilities and for emergency dilution with water in tanks and dikes containment contain high concentrations of cyanide under conditions that cause HCN issuance; Tanks, pumps and industrial water network: will be used to prepare the neutralization, treatment and cleaning solutions with water in tanks and containment dikes to reduce and eliminate cyanide in conditions that cause HCN emissions; Tanks, pumps and drinking water network: will be used to sanitize PPE and employees involved in decontaminating structures and removing possible contact with inputs and waste containing cyanide; Containment dikes and rainwater network: must be interrupted until decontamination and total removal of contaminated structures, being the location In the cyanide solution preparation area, in the processing structures and in the treatment area structures in contact with cyanide, such as; parts, pipes, connections and other Structures will be separated into smaller and cleaned parts, starting with the removal of excess material deposited (encrusted) and then carry out cleaning with the application of a neutralizing solution on all material, in order to guarantee the parameters recommended and described in the International Code of Cyanide and in accordance with environmental and occupational safety legislation. This application will be Experiment with neutralization solutions and with application of removal solution pumped from the inside of ducts, pumps and connections. It is defined that the following steps: a) • Sodium cyanide storage area - The cyanide elimination process is initiated in the sodium cyanide storage areas in briquettes, as an input packaged inside bigbags and wooden boxes and in empty packaging containing leftover sodium cyanide that will be returned to the input supplier as per foreseen in the contract. This entire process of returning or transferring sodium cyanide between production units must be preceded by the consent of the Ministry of the Army; b) • Cyanide preparation area - The cyanide preparation structures will be washed with raw water and alkaline hydroxide solution, disassembled and separated sodium to be immersed in a tank containing oxygen peroxide solution. c) • Mineral processing area - Mineral processing structures will be washed with raw water and alkaline hydroxide solution of sodium in

process tanks. The process tanks, after removing all encrusted material, do not bottom of the tank will be carried out the same washing process with water containing hydrogen peroxide solution . The coal contained in the leaching tanks and used in the last leaching operation will be treated to eliminate the pulp, without gold, and directed to the neutralization circuit (DETOX) where the Residual cyanide contained in the wastewater will be neutralized with sodium metabisulfite reagent, The charcoal after washing with sodium metabisulfite reagent and then with raw water will be placed for drying in bigbags and with a discount inside the containments if the levels of cyanide are below the limits indicated by current legislation. If the cyanide levels if still above the limit, they should be treated with hydrogen peroxide solution; d) • Waste treatment area (Detox and dam) - The waste segregated on the label goes to the neutralization tanks and subsequently to the tailings dam. The treatment of waste from the leaching tanks will be carried out in the Detox tanks which aims to achieve environmental compliance for the release of industrial effluents and consists of destruction of cyanide, at WAD cyanide concentrations in solutions greater than 100 ppm to lower than 1 ppm. The residual cyanide concentration will be eliminated after adding sodium metabisulfite and lime solution with oxidative action of the effluent, which is eliminated after disposal in the dam of waste in concentrations lower than 0.001 mg/L of free cyanide. The dam effluent in this condition may be discarded as treated effluent to the receiving body if it is in compliance with environmental legislation. All wastewater from the processing plant, the water contained in the containment dikes and of the water contained in the rainwater network will be cleaned using a hydrogen peroxide solution undergoing environmental monitoring and pumped to the neutralization tank of the Detoxication. After cleaning and releasing the entire processing plant, chemical plant and rainwater network with authorized cyanide there is the deactivation and demobilization of the Detox system and the pumping of tailings for the dam. The Detox system consists of two tanks and a containment dam that will be econtaminated using raw water and hydrogen peroxide. The parts and components of the structure of the Detox system and waste pumping must be treatments as defined. At this stage it may be necessary initially the use of water jets with pH (Hydrogen Potential) > 9 to disintegrate or reject embedded in the structures existing. With the removal of cyanide from all metallic structures in the processes described previously It will be up to the entrepreneur to carry out the elimination of cyanide and the chemical stabilization of the dam. using the following methods: a) To neutralize the residual cyanide contained in the dam reservoir: application of hydrogen peroxide or sodium peroxide solution; b) Natural degradation with the action of solar radiation photolysis): residual hydrocyanic acid (HCN) present in the dam reservoir will be degraded by reactions with hydroxyl radicals photochemically produced. These are the reactions of homogeneous systems to manipulation of cyanide in an alkaline environment. Upon completion of this stage of neutralization and elimination of cyanide from the entire enterprise, it must be decommissioning was carried out as presented. t is defined that the cyanide decontamination process for the purpose of using metal parts must follow the following

steps (step-by-step): Environmental monitoring and activation of HCN detectors; Assessment of health, safety and environmental risks; Selection of Collective and Individual Protection Equipment; Disassembly and separation of structures into smaller parts; Internal transport and provision of parts to the neutralization area; Isolation of the area and cleaning of parts with removal of encrusted residue; Collection of waste removed to a neutralization tank; Transport of parts to the chemical treatment tank; Pre-filling the chemical treatment tank with water; Application of hydrogen peroxide solution for neutralization; Monitoring cyanide concentrations for solution exchange; Carrying out an exchange of the hydrogen peroxide solution until the cyanide levels within the legal disposal standards; Application of three washing cycles with water inlet from above and waste water outlet from below and in the opposite position (on the other side of the tank); After authorization for disposal and pumping of wastewater to the dam of tailings; Parts under water permit will be transported to the waste yard; All cyanide-free metal parts and parts will be stored in the waste yard and destined for the sales process to steel or chemical industries. These operations must be carried out on a day with sunlight to facilitate safe execution of activities and to accelerate the cyanide manufacturing process through photolysis. And the waste water from the washing tanks must be directed to the Detox system before deactivation operations (Tails Treatment Area). The following basic activities are planned for the decharacterization of the dam: Draining the lake, in order to remove all water accumulated in the reservoirs; Spillway adequacy; Regularization of the reservoir surface and release of drainage layer, clayey and of the surface layer of soil in the reservoir area; Soil preparation and revegetation with herbaceous species; Implementation of a drainage system; ; Carry out closing, monitoring and replanting in the areas where the germination was not adequate. Reviewing pertinent documentation it was evidenced that MASA updates its plans with sufficient frequency to reflect changes in the operation as they affect decommissioning, as well as changes in planned decommissioning techniques and measures

Yes. It is defined that, due to the dynamic nature of mining activity, this conceptual closure plan must be reviewed or updated throughout the useful life of the mine, preferably every five years, in order to refine and confirm the closure actions that by chance were carried out during this period (recovery actions concomitant with the operation), as well as reevaluating the other initial proposals for the closure/demobilization of the structures, considering the update scenario compared to that initially proposed for future use. Therefore, it is possible to periodically update this conceptual closure plan, which must always consider the substantial changes that may occur in the project during its operations or in the conditions and aspects related to business stakeholders. In the revisions or updates to the plan must be incorporated into developments in knowledge about the area of the mine and its socio-environmental context, as well as applicable scientific and technological innovations, existing, from the moment of its conception. It is clear that the main steps of Mine Closure Planning are presented in accordance with ICMM

(International Council on Mining and Metals Guidance Manual 2019. (additional informations at web site https://guidance.miningwithprinciples.com/integrated-mine-closure-good-practice-guide/. Evidenced that all obligations imposed in the MASA Mine Closure Plan are in compliance with legal requirements, government regulatory bodies, and conditional good practices by national and international non-governmental bodies, such as Resolution ANM (National Mining Agency) 68/2021, the good practices recommended by the following guidelines: Planning for Integrated Mine Closure; Tool kit. International Council on Mining and Metals; ICMM, 2008. Version translated by IBRAM (Brazilian Mining Institute); Integrated Mine Closure, Good Practice Guide, 2nd Edition; ICMM, 2019 and by Financial Concepts for Mine Closure, ICMM, 2019 which are in line with the environmental and sustainability policy practiced by EquinoxGold. It was evidenced that for the preparation and progressive execution of the Mine Closure, a Target audience for the actions was defined, in this case made up of the local community, the group of MASA employees and contracted service providers. In the future, after the executive detailing of the closure program, a MASA team must be trained in its application and organization, and will assume specific responsibilities for its adequate management. The external public, surrounding residents and users of the area in question, will also deserve special attention so that they are not harmed, as they are part of the main sustainable interest group of the mine closure. Therefore, it was defined that, in the closing phase of activities, the target audience will essentially consist of: a) Municipal and state authorities and representatives of mineral control bodies, especially the ANM (National Mining Agency) and environmental bodies, who will monitor and inspect it; b) Residents of surrounding communities and owners or users of land close to works, which may be affected in some way by them; c) Company employees involved, directly or indirectly, with the operation and decommissioning of the Mine Closure Plan; d) All workers from contracted or subcontracted companies, responsible for dismantling equipment and installations, demolishing buildings and structures, closing and rehabilitation works and environmental monitoring; e) Specific employees of companies managing and supervising decommissioning.

Standard Practice 5.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA' Mine Closing Plan defines that asset demobilization cost estimates are updated and reviewed annually, considering the evolution of operations and possible changes in projected project information of proven and probable reserves as well as and when revisions to the decommissioning plan are made that effect cyanide-related decommissioning activities. Evidenced duly implemented. Sampled examples were: Consolidated Cost Estimate Closure of the Aurizona Mine - 2022; Consolidated Cost Estimate Closing the Aurizona Mine – 2021. It was evidenced t that MASA's Mine Closure Plan presents in Figure 18 the approximate distribution by phase of mine closure, and in Figure 19 it shows the distribution by structure to be deactivated and in Table 12, the estimated Physical – Financial Schedule for the process of decommissioning of the MASA had its first closure estimate carried out in January 2019 by the company Golder Associates Ltda and had a new update in April 2022 carried out by the company Sete Soluções e Tecnologia Ambiental Ltda. It prepared the Mineração Aurizona Mine Closure Plan (STE document -MZ002 -PFM-INT-PDF001-FF). MASA has a contract to update the Mine Closure Plan and the closure forecast through No. CT 3518, effective until 01/13/2024. This service is being carried out according to the evidenced measurement bulletin. Provision for environmental recovery its main objective is the formation of long-term values, for financial use in the future, when the asset's use ends. The provisions taken by the Company basically refer to the closure of the mine, with the completion of mining activities and the deactivation of assets linked to the mine. The Company confirms an obligation to demobilize assets in the year in which it is estimated that this will occur. The Company considers accounting estimates related to the recovery of degraded areas and the costs of closing a mine as a critical accounting practice, as they involve significant amounts of provision and because they are estimates that involve several aspects, such as interest rates, inflation and useful life of the asset, considering the current combustion stage and projected combustion data for each mine. Financial audits have been carried out in accordance Brazilian and International auditing standards by a third independent of MASA, in accordance with the relevant ethical principle set out and in the Accountant's Code of Professional Ethics and in the Federal Accounting Council, complying with other ethical responsibilities, in accordance with the standards. The audited financial projections for December31, 2021 and December 31, 2022 were provided as objective evidence.

Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Standard of Practice 6.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA defined, established, documented, implemented and maintains internal documented procedures which clearly defines methodology for unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance in such manner that minimize worker exposure. Sampled examples were: PO-EQX-MASA-PLA-031- "Sodium cyanide preparation; PAP-06-EQX-MASA- SSMAC - Entry Into Confined Spaces; PRO-EQX- MASA-SSMAC-022 - Hot Works; PO-EQX-MASA-SUP-001- Unloading Cyanide in Briquettes at Warehouse; RE- EQX-MASA-SSMAC-05 - Forklift Inspection; RE-EQX-MASA-SEPAT-001 - Cyanide Truck Inspection Check List; RE-EQX-MASA-SUP-001 - Cyanide Discharge Inspection Checklist; PD-EQX-MASA-MAN-002 - Preventive Maintenance; PD-EQX-MASA-MAN-003 - Preventive Building Maintenance; RE-EQX-MASA-MAN-003 - Building Inspection Verification Check List; PO-EQX-MASA-MAN-001- Preventive Maintenance 2; PO-EQX-MASA-MAN-001 - Maintenance of Flow Meters; RE-EQX-MASA-MAN-001 - QA/QC in Maintenance; RE-EQX-MASA-MAN-002 - Maintenance Feedback. Reviewing above mentioned procedures it was clearly evidenced that they not only focused on operations but they also describe cyanide-related safe work practices. Evidenced that a.m. pertinent record contains specific questions about what and how items shall be inspected as well as the pertinent acceptance criteria. Evidenced duly implemented. Evidenced that MASA established, documented, implemented and maintains internal documented procedures, which clearly define the use of PPE- Personal Protective Equipment and address pre-work inspections. Reviewing MASA's documentation it was noted that all the documented operational procedures have a specific item which clearly identifies the required personnel protective equipment (PPE) as well as the respective pre-work inspections. Besides, MASA defined and documented that before performing all activities shall be implemented and maintained records of using significant tolls for identifying potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them such as: Pocket Task Preliminary Analysis *(PEACE) and Preliminary Risk Analysis of the Task (APRT). Reviewing PEACE and APRT records during the field audit it was evidenced pre work inspections have been duly implemented and recorded.*

Furthermore, during field audits, it was evidenced that workers cyanide involved carry out their day-to-day activities, using the necessaries PPE such as PVC boots; Long-

length PVC gloves protective goggles; helmet with jugular; : Panoramic face mask with gas filter against organic gases; Shell-type noise damper; Leather glove; Nitrile rubber glove; Tyvek or Tychem coverall; Communication radio; Portable HCN detector previously calibrated as stated and in accordance previously defined in the respective operational procedures. Evidenced that MASA defined and documented methodology for PPE's Pre Work Inspection as well as it establishes that results shall be recorded at form RE-EQX-MASA-SSMAC 01 – Check List for Emergency equipment items related to activities involved in cyanide". Reviewing pertinent records it was evidenced duly implemented. Sampled examples were: Monthly Inspection of RE-Check-List of Fire Extinguishers, Visual inspection, monthly, Hydrostatic Test 5 years and annual recharge; Fortnightly Inspection • RE-Check-List of the 5L oxygen cylinder - ICU Ambulance; • RE-Check-List of the 5L oxygen cylinder - Reagent area container; • RE-Check-List of 15L oxygen cylinder – Emergency room; • Emergency Shower RE-Check-List; • Autonomous Panoramic Mask RE-Check-List; Weekly Inspection • First Aid Kit RE-Check-List - Antidote and Diphoterine Kit; Daily Inspection• RE-Check-List of ICU ambulance health materials. Reviewing pertinent PPE's inspections records it was noted that MASA has been implemented an adequate methodology for pre inspection their PPEs before using in order to assure they are functioning in perfect physical *conditions and acting as required by legal requirements. Evidenced duly implemented.* MASA has been solicited as well as considered worker input in developing and evaluating health and safety procedures. Observed that MASA established implemented and maintains procedures to review proposed process and operational changes and modifications for their potential impacts on worker health and safety, by several ways such as formal safety meetings, informal pre-work safety sessions for instance during the named Daily Safety Dialogue (DDS), which is carried out daily before work begins he suggestion boxes and incorporate the necessary worker protection measures, that were developed by the work force (operators & supervisors) and approved by the responsible manager. All operators and supervisors have been trained in the pertinent operational procedures and, at least, annually (as refreshment), the work forces review the risk profile, the operational procedures and, when necessary, these ones are updated. Planned job observations are also part of the operation management system. Interviewed operators and supervisors personnel reported they have been solicited by MASA's management personnel to give suggestions and comments in order to improve health and safety procedures. Evidenced duly implemented.

Standard of Practice 6.2

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

☐ Xin full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 6.2

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

MASA defined, documented, established, implemented and maintains Internal documented procedure PO-EQX-MASA-PLA-014 - Operation of CIL I and CIL II which aims to standardize and detail the step-by-step steps and criteria for the operation of CIL I and CIL II, as well as guide users of the operational standard regarding health, safety and environmental risks, providing mitigating measures inherent to each activity of this operation. Reviewing PO-EQX-MASA-PLA-014 it was evidenced that it mentions in item 5.3.3 the leaching operating range with a minimum pH value of 9.8. During the field audit and reviewing pertinent process records it was evidenced that the pH have been effectively controlled and monitored (through calibrated pH meter) in the operation. Alarm systems are in place. The pH is controlled through the online addition of soda solution using a calibrated flow meter. Interviewed field and control room operator and supervisors showed to be aware of this matter. Besides, MASA defined, documented, established, implemented and maintains Internal documented procedure PO-EQX-MASA-PLA-031 – Sodium Cyanide Preparation which aims standardize and detail the step-by-step steps and criteria for Preparation of Sodium Cyanide, as well as guide users of the operational standard regarding the health, safety and environmental risks available from the mitigating measures underlying each activity of this operation. Reviewing PO-EQX-MASA-PLA-031 it was evidenced that it mentions in item 5.3.6 that during the preparation of cyanide, caustic soda must be added to provide a solution with a pH greater than 12.5. There is a dosage of lime in the grinding, significantly increasing the risks of feeding leaching with low pH. In addition, there is a new addition of lime at the beginning of the CIL, where pH meters are installed for online measurement, as well as manual measurement is carried out every hour. Interviewed field and control room operator and supervisors showed to be aware of these matters. MASA has been identified areas and activities where workers may be exposed to hydrogen cyanide gas or cyanide dust in excess of 10 parts per million (ppm) (11 mg/m^3) onan instantaneous basis and 4.7 ppm (5 mg/m^3) continuously over an 8-hour period, as cyanide, and require use of appropriate personal protective equipment in these areas or when performing these activities. MASA defined, documented and clearly communicated to all employees and contractors that it does not allow the employees and contractors to be exposed to cyanide concentrations. The storage, mixing, distribution and dosage areas are monitored by fixed HCN gas meter. In case of a

chemical reaction unleashing the formation of HCN exist several resources such as autonomous respirators, mobile and fixed HCN detectors, Reviewing pertinent records evidence that the parameters have been maintained as stated (below exposition limits). In the event of alarm situation, the operators are ordered to leave the area, only returning when allowed by the supervision, after technical checking. Besides noted that internal documented procedure PO-EQX-MASA-PLA-031 – Cyanide Preparation in item

5.3.1 – Operation of CIL I Evacuate the area when the HCN detector siren sound: HCN concentration ≥ 4.7 ppm after 15 consecutive minutes will trigger the fall siren in the supervisory unit; Concentration ≥ 10 ppm will instantly trigger the alarm and siren for evacuation. MASA uses monitoring devices in process areas and for activities involving management of cyanide to confirm that workers are not exposed to hydrogen cyanide gasor cyanide dust exceeding 10 ppm on an instantaneous basis or 4.7 ppm continuously overan 8-hour period, as cyanide. Sampled examples were: 4514-AIT-004 WAD Free Cyanide Detox; 4514-AIT-003 Cyanide Detector; 4632-AIT-001 Cyanide Detector; 4410-AIT-001 Cyanide Area; HCN Meter 4510-AIT-001 CIL 1 HCN Meter and 4510-AIT-002 CIL 2 HCN Meter. During the field audit it was evidenced that they are well working. MASA's defined, documented, established, implemented and maintains methodology for maintenance, testing and calibrating hydrogen cyanide monitoring equipment (fixed and personnel HCN gas detector) as well as retaining related records for at least three years. Reviewing pertinent documentation it was noted that a.m. procedure is in accordance with manufacturer instructions. Sampled examples were: Process Analytical System - TAC1000 Manual (cyanide analyzer brand) and Gas Badge Manual (brand of HCN) portable detectors. Evidenced calibration and maintenance records of HCN detectors duly established and retained. Sampled examples were: 4514-AIT-004 WAD Free Cyanide Detox; 4514-AIT-003 Cyanide Detector; 4632-AIT-001 Cyanide Detector; 4410-AIT-001 Cyanide Area; HCN Meter 4510-AIT-001 CIL 1 HCN Meter and 4510-AIT-002 CIL 2 HCN Meter. MASA defined and documented that warning signs shall be where cyanide is used advising workers that cyanide ispresent, of any necessary personal protective equipment that must be worn, and that smoking, open flames and eating and drinking are not allowed. Evidenced during the field audit that the signage is effective, covering the presence of cyanide, that eating, drinking and smoking is not allowed and also open flames are prohibited as well as the needed PPE in all cyanide areas are indicated The operation places cyanide warning signs on storage tanks, distribution tank, pipelines, dam. During the field audit evidenced duly established and maintained. Evidenced that MASA defined, documented, implemented and maintains internal documented procedure PO-EQX-MASA-PLA-031 Preparation of Sodium Cyanide at item 5.3.2 that shall be added the carmoisine dye during the sodium cyanide preparation. Reviewing this procedure verified that the carmoisine

addition is clearly identified. Reviewing training records it was noted that operators have been trained in the a.m. procedure. Additionally, interviewed personnel showed to be aware of this matter and the reason to do this addition. During the field cyanide it was evidenced duly implemented. During the field audit, it was evidenced that MASA has showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi- carbonate fire extinguishers located at strategic locations throughout the operation and are they maintained, inspected and tested on a regular basis. . Evidenced that MASA's Inspection Testing and Maintenance Plans defines and documents that MASA's showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi- carbonate fire extinguishers shall be inspected, tested and maintained in accordance Brazilian regulations laws such as NBR 16291:2014. Reviewing pertinent records it evidenced that MASA implemented specific check list for recording inspection results of showers, low-pressure eyewash stations inspection results containing specific question such as: Is the equipment obstructed?, 2 Is the equipment in good physical condition (no rust or damage to the structure)? 3 Highly visible signage? 4 Is the water flow activated in 1 second? 5 Valves open (hands-free operation)? 6 Eye wash nozzles protected from contaminants? 7 Is the minimum flow rate for eye/facial washing 1.5 l/minute? 8 Is the minimum height of the water jet for washing eyes/face 20 cm? 9 Does the emergency shower have a flow rate of 75 l/minute? 10 Does the shower and eye/face wash have easily accessible means of operation? 11 Do the shower and eyewash operate simultaneously? 12 Is the water temperature adequate? (16°C and 38°C).13 Is the water the right color (transparent)? Evidenced that showers, low-pressure eyewash stations have been submitted to weekly and monthly inspections as stated. During field audit, it was evidenced that storage, mixing and process tanks and piping containing cyanide solution have been identified to alert workers of their contents, as well as the direction of cyanide flow in pipes designated. Besides, MASA also labels the tailings delivery and return pipelines to alert workers of cyanide, including the direction of flow. the waste pipe has labels indicating flow direction and presence of cyanide.. Sampled examples were: 4410-TQ-04 – Mixing Tank; 4410-TQ-09 – Distribution Tank; 4510-TQ-01 CIL Tank1; 4510-TQ-02 CIL Tank2; 4510-TQ-03 CIL Tank3; 4510-TQ-08 CIL Tank8; 5411-TQ17 Leach Tank 17; ; 5411-TQ187 Leach Tank 18, ; 5411-TQ19 Leach Tank 19. Evidenced that MASA defined, documented, implemented and maintains an emergency program inside the plant where all cyanide related information is available in Portuguese. It contains information on health, safety, environment, chemistry and physics related to cyanide such as Chemical Product Safety Data Sheet (FISPQ) issued by Proquigel (cyanide producer) revision 11 dated on April 12, 20221 In compliance with NBR 14725:2014 for solid cyanide. Evidenced that MASA defined internal documented procedure PO-EQX-MASA-SSMAC-41 - Operating procedure related to situations with Cyanide. As reported by MASA this procedure was

developed based on the MASA's PAE(Emergency Action Plan) and PEBM(Emergency Mine Brigade Plan)regarding potential operational risks mapped by the company within the scope of application and relevant to Cyanide. This project results from an interpretation of the MASA's operational risks with the best crisis prevention and management practices in compliance with the requirements of the International Cyanide Code. It is defined that actions to combat and control emergencies will have priority over other activities of MASA while the situation continues emergency. The combat and control of emergencies in a cooperative manner are carried out full-time and with exclusive dedication. Any related accident to cyanide, which is harmful to the environment, must be immediately communicated to municipal authorities, municipal environmental control bodies and state (SEMA), Civil Defense and communities in the area of influence of the enterprise. During field audit, it was not evidenced through analyzing actual physical conditions of MASA's plant that had been occurred any cyanide related incident/ accident Interviewed several personnel all of them reported that no cyanide-related incidents or lost time / near-miss incidents occurred since MASA have been started its operation. showed to be aware of this matter. Any cyanide related incident/ accident has recorded

Standard of Practice 6.3

Develop and implement emergency response plans and procedures to respond to workerexposure to cyanide.

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

Summarize the basis for this Finding/Deficiencies Identified:

During the field audit it was evidenced that MASA has a Health Care Center fully equipped with emergency shower, potable water, ambulances, resuscitator, oxygen, antidote kits, ambulances, telephone, cell phone, radio channel, specific care center and e-mail. During the field audit evidenced an alarm system readily available for use at cyanide unloading, storage, mixing locations and elsewhere in the plant. The antidote used are sodium nitrite and sodium thiosulphate.

Evidenced that MASA defined, documented, established, implemented and maintains methodology for inspect its first aid equipment regularly to ensure that they are available when needed, and that materials such as cyanide antidotes stored and tested as directed bytheir manufacturer and replaced on a schedule to ensure that they will be effective when needed. Reviewing MASA's Health Area documentation it was noted they clearly define the 5W1H related to first aid equipment inspection It is defined that for Visual Inspection through checking whether the packaging is intact, with no signs of damage, moisture or tampering and confirming that all items on the checklist are present, with validity data, conservation status. It was evidenced that MASA defined, documented, implemented and maintains internal documented procedure PO-EQX-MASA-PASE-007 - Emergency actions - Leakage and Cyanide Poisoning which aims define the procedures to be observed and extended in eventual emergency situations with Sodium Cyanide, preserving worker health and safety as well the environmental media and reestablishing operational normality in order to eliminate/minimize possible damages including transport and operations at MASA. Sodium Cyanide Emergency Team is made up of Brigades, Brigade leader and Brigade coordinator and Emergency Response Team is made up of the emergency driver, Occupational nursing technician, Occupational and nursing nurse and Occupational Doctor. Responsibilities and authorities are clearly defined and documented. Samples examples were: PAE Coordinator: • Participate in the preliminary and final analysis of the occurrence; • Assume general direction of all actions linked to combating emergencies and controlling their effects; • Activate the crisis committee (Potential Crises). Potential crises include natural disasters, fraud, embezzlement, theft, accidents such as fire, explosion, terrorist attack, acts of violence in the workplace, loss of power or system failure; • After controlling the emergency, you must execute and analyze the actions taken in order to verify the effectiveness of the control; • Assess the

need for communication with external bodies: Fire Department, Military Police, Public Prosecutor's Office, Ministry of Labor and Hospitals, whenever own resources prove insufficient; • Request the hiring of professionals, equipment and machinery from specialized companies, if applicable; • Participate in meetings to evaluate actions in emergency situations;

• Coordinate the communication of incidents to the competent bodies, when necessary; • Issue reports on the occurrence and results of emergency actions, with the participation of the brigade coordination; For the Leader and Components of Medical Care Services: a) Before occurrence of the emergency: • Leave the emergency room prepared for various types of care, • Provide and maintain all necessary equipment and materials in working order;• Maintain up-to-date contact with Clinics and Hospitals that may receive accidents depending on the characteristics of the injury;• Know the company's emergency plan;• Participate in training and simulations. b) During the emergency: • Carry out scene analysis, identify the dangers of the location and what caused the injury to the victim.• Request activation of the rescue team if necessary, signaling the location; • Use PPE; • Perform first aid; • Remove the victim from the scene of the incident and call an ambulance/rescue team; • Make the MSDS(Material Safety Data Sheet) of the chemical available in case of exposure to take with the victim to the emergency room; • Stay with the victim in the emergency room until the arrival of family members or medical authorization. C) After the emergency: • Evaluate treatments and help with the post-emergency action plan with the teams; • Open a Work Accident Record according to what happened and send it to the Human Resource and Health and Safety Areas;• Participate in the preliminary and final analysis of the occurrence and • Prepare service report for accident analysis. It is clear that item 8 of a.m.procedure defines the step-by-step procedure for providing first aid for each case of possible occurrence. During field audit it was evidenced that MASA have its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide. It has an emergency facility, fully equipped with antidotes, first aids drugs and materials, oxygen, ressucitator, oxygen as well as the existence of adequate human resources to provide first aid and medical assistance to workers exposed to cyanide. Evidenced That MASA’s Health Care is located in the Plant with Installation in containers composed of infirmary beds, dressing room, archive room, storage of materials and medicines, occupational administrative room, reception and medical office. The First aid kit contain: • 5L portable oxygen, • Attachable oxygen catheter,• High concentration mask with reservoir,• Ambu Resuscitator Full Manual Adult Resuscitator • Sodium thiosulphate 25%, • Sodium nitrite 3%, • Difphoterin (LPMD Individual eye wash, 500ml),• Diphoterin 500ml (Spray, 200 ml). It defines the Occupational medicine's role in emergency situations such as: • Advise the teams involved in the emergency as well as provide medical care to victims; • Go to the Hospitals or Clinics where

accident victims were sent in order to monitor their hospitalization and the evolution of the victims' condition, until they are discharged; • Provide guidance to clinics/hospitals on special care, in particular, on chemical products; • Monitor and register victims who were admitted to hospital establishments, informing the Field Coordinator of their number and status; • After the emergency, make a protected record of the incident with details relating to the victims and hospital medical care. • Communicate with family members of workers who are victims of emergency accidents. Evidenced MASA defined an internal documented procedure for the use of diphotenin including handling, storage, preservation, inspection and the adequate way of using. Reviewing, in the Resources Human Area, qualification records it was noted that all Health Care Area Members are duly qualified as required by Brazilian legislation. Sampled examples were: MD (Medicine Doctor) Occupational Doctor, Occupational Nurse and Nursing Technicians. Evidenced in item 27.1 of PAE it is defined the Escape Routes from the Metallurgical Plant areas and support area. The escape route was defined by NBR 9050/2004 as a continuous, properly protected path, provided by doors, corridors, external and internal passages, balconies, stairs, ramps or other exit devices or connections thereto. In cases of fire, this route must provide safety to the user from any point in the building until reaching the meeting point, as per item 27.2. Concentration points are pre-established open areas intended for the meeting of all personnel who eventually leave a sector, a building or the entire industrial area of the company. It must be located with sufficient distance from risk areas. It was evidenced that PAE in item clearly establishes methodology for land transporting from site to hospital. According to the need and degree of urgency, the responsible doctor will direct the victim to reference hospitals. Thus, the Emergency team will transport the victim from the location to the city of Carutapera – Maranhão, to access the approved landing strip. After medical evaluation, define the means of transport. it was evidenced that MASA qualified two Companies for performing air transportation such as Asa Fixa Taxi Aéreo and Asa Móvel Taxi Aéreo. The take-off point will be in the city of Carutapera - MA, destined for the airports of São Luís – Maranhão State or airports of Belém – Pará State. It was evidenced the existence of a formalized arrangement between MASA and Carutapera Hospital in which the a.m. hospital is aware of the potential needs may be asked to treat a victim of cyanide poisoning. Evidenced that Carutapera Hospital's Medical Staff received training provided by Dr. Alexandre Rodrigues (operation expert MD in chemical intoxication) and Medicine Doctor of Proquigel (cyanide producer) about treatment due to all types contamination with cyanide. Besides, MASA's Health Team visited Carutapera Hospital and attested has adequate and qualified staff, equipment and expertiseto provide treatment for cyanide exposure.

The antidotes used are sodium nitrite and sodium thiosulfate. Sodium thiosulphate is administered when the degree of poisoning is moderate

(headache, nausea, vomiting and cardiac arrhythmias), along with the administration of 100% oxygen. In cases of severe poisoning (consciousness disturbances, seizures, and hot flashes), 100% oxygen, sodium nitrite and sodium thiosulfate are administered. According the procedure that addresses the topic of first aid, PO-EQX-MASA-SSMAC-05, while 100%oxygen can be administered by brigade members, nursing technicians, nurses and occupational doctors. Sodium nitrite and sodium thiosulfate can only be applid by nurse nursing technicians, nurses and occupational doctors.

Principle 7 | EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency responsestrategies and capabilities.

Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

Yes. Evidenced that MASA defined, documented, implemented and maintains several documents for Emergency Response Plans to address potential accidental releases of cyanide and cyanide exposure incidents such as: PO-EQX-MASA-SSMAC-41-Procedure for emergency actions (Crisis Plan); PAE-EQX-MASA-SSMAC-001-MASA's Emergency Response Plan (PAE); PO-EQX-MASA-SSMAC-PASE 07-Leakage and Cyanide Poisoning (PAEC); PE-EQX-MASA-SSMAC-ANX01- Emergency Brigade Plan (PBE) and– issued by Foontes Geotécnica dated on July, 2022 - Mining Dam Emergency Action Plan (PAEBM) for Vené I Tailings Dam; Noted that they are in accordance with Brazilian regulations such as NBR (Norma Brasileira Registrada)15480 - Road transport of hazardous products-Action plan for emergencies in accident assistance; NBR 15219 - Fire Emergency Plan; NBR 14561-Vehicles for medical emergencies and rescue –Requirements; NBR 14276 - Fire Brigade – Requirements; NBR 14064 - Road transport of hazardous products - Guidelines for emergency care; NBR 13860 - Glossary of terms related to fire safety; NBR 13716 - Respiratory protective equipment - Autonomous air mask Open circuit tablet; NBR 12693 - Fire extinguisher protection systems; NBR 12615;

CONAMA Resolution 398/08; NR-23 Fire protection; NR-22 Occupational Health and Safety in Mining, Ordinance 2048/00; NRM -08 Fire, Explosion and Flood Prevention; NBR 10004 – Solid waste, Technical Standard 006/14 Fire Brigade – Military Fire Department of the State of Maranhão; Manual for Emergency Response with Dangerous Products – Associação Brasileira da Indústria Química (ABIQUIM); Risk Management Program (PGR); • NBR 13434 - Fire and Panic Safety Signs – Part 1: Design Principles; • NBR 13434 - Fire and Panic Safety Signs – Part 2: Symbols and their shapes, dimensions and colours; Fire and Panic Safety Code of Maranhão State and NBR 16877 – Civil Firefighter Professional Qualification – Requirements and Procedures. Evidenced that PO-EQX-MASA-SSMAC-PASE 07 - PAEC describe specifically the response for all cyanide related emergencies (requirements 7.1.2 a to 7.1.2 j). Reviewing the above mentioned documented procedures PO-EQX-MASA-SSMAC-PASE 07 - Leakage and Cyanide Poisoning (PAEC) as well as Mining Dam Emergency Action Plan (PAEBM it was evidenced that they are specific for MASA'site. Theirs scope is all areas of MASA that work directly and indirectly, as well as in internal and external emergencies with cyanide. Evidenced that for each scenario mentioned at 7.1.2a to 7.1.2j it is clearly the step by step that shall be implemented describing what to do, why to do it, how to do it, who should do it, where to do it, when to do it (the so-called 5W 1H). Responsibilities and authorities are defined and documented such as Sodium Cyanide Emergency Team is made up of Brigades, Brigade leader, Brigade coordinator, Emergency Response Team, Emergency driver, Occupational nursing technician, Occupational nurse and Medicine Doctor. Noted that all involved personnel have theirs activities before, during and after emergencies clearly documented. During the field audit they were interviewed and showed to be aware of. The Protective Personnel Equipment (PPE) to be used are defined. Sampled examples were: Tychem jumpsuit; Latex Gloves; Mask with filter against HCN gas; Portable Gas Detector (Sampling and continuous monitoring of exposed employees). Interviewed personnel reported that PPE must be put on first before any action, especially approaching and checking for leaks as stated. It was evidenced that the emergency scenarios contemplated in the PAE and PAEBM are consistent with the risk analysis, which is based on surveys of environmental aspects and impacts as well as hazards and risks to occupational safety and health and considering significant impacts to its workers, community and environment. Evidenced that planning for response to transportation-related emergencies has been considering , transportationroute(s), physical and chemical form of the cyanide, method of transport (e.g., rail, truck), the condition of the road or railway, and the design of the transport vehicle (e.g., single or double walled, top or bottom unloading). MASA's Emergency Response Plan which establishes at item #29 methodology for evacuation of employees and contractors from the MASA site for emergency reasons. The escape routes were defined as established in accordance with NBR 9050:2004. For emergencies situations that can affect

potentially affect communities (Barão de Pirucaua, Vila Aurizona, São José and Godofredo Viana) noted that PAEBM defines the methodology for communities' evacuation. Interviewed personnel showed to be aware of. Evidenced that MASA defined, documented, established and maintains internal documented procedure MASA's PAE which defines at item # 16.2 the flowchart of medical care protocol in case of cyanide emergency situation, at item 17 establishes the removal and emergency logistics and at item 22 **the c**ontingency actions in emergency scenarios. Additionally, it defines at item 8 first aid procedures. Reviewing the above mentioned noted that it is it is specific for MASA' operations. Besides, evidenced that MASA's PASE include step by step for first aid measures. MASA defined, documented, implemented and maintains several procedures in order to assure a control of releases at their source. During the field audit it was evidenced the very good conditions of the MASA' site. MASA did not have cyanide releases but in case of occurrence there are specific documented procedures and personnel duly qualified to implement the necessary actions for containment, assessment, mitigation and future prevention of releases. As already mentioned, during the field audit it was evidenced the very good conditions of the MASA' site. Interviewed personnel showed to be aware of.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

	☐ X 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:

Interviewing personnel of several areas and reviewing meeting records it was evidenced that MASA has been involved the operation involved its workforce such as areas of: process, engineering, production, maintenance, social responsibility, environmental, health and safety occupational safety, dam and design personnel as well as external stakeholders, including potentially affected communities, in the cyanide emergency response planning process. Evidenced health authorities (public and private hospitals and clinics) were duly involved in MASA's cyanide emergency. Sampled examples was: Hospital Regional de Carutapera. It was evidenced others support and services during emergencies have been involved in the cyanide emergency response planning process. Sampled examples were: Firefighting Department; Civil Defense, SEMA, National Mining Agency (ANM); Emergency

Medical and Ambulance Services (SAMU); Aero Vida Táxi Aéreo (for air transport of injured personnel). **F**or emergency during cyanide transportation please see Principle 7.1.4 for additional information. Evidenced potentially affected communities duly involved in the cyanide emergency response planning process. Yes. MASA has been made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions. For additional information see Principle 9. MASA has been identified external entities having emergency response roles, and involved those entities in the cyanide emergency response planning process. Sampled examples were: Military Firefighter (CB); SAMU; SEMA; Aero Vida Táxi Aéreo; Centro Médico Maranhense, *UDI Hospital,* Hospital Regional de Carutapera, Federal Police, Military Police, National Secretariat for Civil Protection and Defense (SEDEC); National Mining Agency (ANM); Brazilian Institute of the Environment and Natural Resources (IBAMA); National Center for Risk and Disaster Management (CENAD), Federal Public Ministry (MPF), State Public Ministry (MPE); State Civil Defense, (DC - MA); Regional Superintendence of Labor and Employment of the State of Maranhão (SRTE - MA), Godofredo Viana City Hall. Evidenced that MASA engages in consultation (where applicable) and communication with stakeholders to keep PAEBM and PAE currents. Sampled examples were: Proquigel (the cyanide producer), Concórdia (the cyanide transportation company), and Ambipar (for accident prevention, response to emergencies disinfection of environments, waste management and recovery and waste collection), MASA engages security and health authorities, emergency response suppliers, and community representatives. MASA invites specific stakeholders to participate mock emergency drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan.

Standard of Practice 7.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that MASA's PAE defined and documented primary and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the Plan. In this way, reviewing MASA's PAE,

the auditor verified the appointment of Heraldo Silva as Primary PAE Coordinator and Edilson Ferreira Coutinho as Alternate PAE Coordinator. Besides, it was evidenced that MASA's PAEBM defined and alternate emergency response coordinators who have explicitauthority to commit the resources necessary to implement the Plan. In this way, reviewing MASA's PAEBM, the auditor verified the appointment of Alessandro Pacheco as Primary PAEBM Coordinator and Elmer Shikama as Alternate PAEBM Coordinator. Interviewing pertinent personnel showed to be aware of this matter. It was evidenced that MASA's PAEBM has been identified and documented Emergency Response Teams related to PAEBM Sampled examples were: PAEBM Primary Coordinator - Alessandro Pacheco; PAEBM Substitute Coordinator - Elmer Shikama; PAEBM Technical assistance – Thiago Garcia and Hugo Rocha; PAEBM Vené I Dam Safety – Alessandro Pacheco; PAEBM Operation - Elmer Shikama; PAEBM Brigade – Claudemir Filho; PAEBM Safety – Silvano Ruas; PAEBM Administative – André Rogério Cardoso; Mine Operation – Danilo Santos; Dam Operation – Gersom Barbosa; Environmetal Area – Jacob Monteiro; Dam Maintenance – Euclides Mesquita; General Infrastructure – Manuel Gomes de Lima; Plant Operation – Samuel Viana; Dam Geotechnics – Marisônia Santos. Reviewing PAE and PAEBM the auditor evidenced that they include call-out procedures for initiating a response to a response to cyanide-related emergency.

Evidenced that MASA defined, documented and implemented and maintains internal documented procedure MASA's PAE which defines that MASA periodically promote training and simulated exercises involving all sectors that, directly and indirectly, may be involved in combating emergencies. After each training, a critical evaluation of its results will be carried out. Every simulation exercise must have an objective, organizer-members of the simulation, type of accident, responsible for observation, responsible for photographs, rescue time, positive points, negative points, occurrences, conclusion, action plan with schedule, data from the next simulation to check the effectiveness of negative points. Additionally it was evidenced that MASA defined, documented and implemented and maintains internal documented procedure MASA's PAEBM which defines that MASA in accordance with its PAEBM Training Plan Mineração Aurizona must maintain a team that is part of the PAEBM permanently trained. This training is defined as essential for the identification and proper assessment of emergency at all levels of responsibility, as well as to enable a team always be ready to provide emergency response actions with the agility and quality required, as it allows greater familiarization of involved with its elements and attributions derived from the PAEBM, concluding by operational evolution of the aforementioned Plan. All people from Mineração Aurizona mentioned in the Notification Flowchart of this PAEBM announces prior training and must undergo new training after each carrying out document review. All training on PAEBM content that have been carried out must

be registered in accordance with the model Previously established and stored on In accordance PAEBM Training Plan. It defines that it is necessary to plan the participation of the public body with civil defense functions and other bodies that are deemed necessary in training related to PAEBM for scenarios that alter this interrelationship. The importance of involving external agents (such as observers) in Emergency Drills associated with the rupture hypothetical dam. Interviewed personnel is aware of that training is important to ensure that everyone involved understands clearly the responsibilities and functions defined in the PAEBM and can act in a effective at the time of emergency. In addition to identifying flaws in the procedures highlighted by PAEBM and increase the rapport and trust of the teams involved. PAEBM defines that The Mining Dams Emergency Action Plan should not only be tested in a real situation. Therefore, internal training must be provided, involving all members of Mineração Aurizona considered in the Notification Flowchart of this PAEBM, in accordance with the procedures described in this Plan. As indicated in art. 47 of ANM Resolution No. 95/2022, internal training must be carried out by the Organization, at most every 6 (six) months, with the participation of the external team hired to carry out the Conformity and Operationality Assessment (ACO) and issue a Declaration of Compliance and Operationality (DCO). Internal training must consist of: a) Internal expository exercises: expository presentations in training rooms, where the procedures described in the PAEBM are explained; b) Internal notification flow exercises: prolonged exercises by the entrepreneur with the aim of testing the internal notification procedures presented in the PAEBM; c) Internal simulated exercises: ▪ Hypothetical: it is a hypothetical and playful test of the effectiveness and operability of the PAEBM carried out in a training room, with time situations close to the expected real time. It is done to assess the entrepreneur's capacity and response time in the event of an emergency; and ▪ Practical: comprises field exercises simulating an emergency situation involving the activation and mobilization of international emergency operation centers, personnel and available resources, including internal evacuation procedures. In accordance with art. 47 of ANM Resolution No. 95/2022 internal simulated exercises must be performed opting for the hypothetical or practical, and the practical must be carried out at least once during the calendar year for the composition of the ACO. Evidenced that PAE and PAEBM include call-out procedures and 24-hour contact information for coordinators and response team members. They include not only internal personnel but with external agents in emergency. Evidenced that MASA’s PAE clearly specifies duties and responsibilities of the coordinators and team members. Sampled examples were: PAE Coordinator and Team Members. Evidenced that PAE and PAEBM list emergency response equipment, including personal protection gear, available on-site. Sampled examples were: • Five water trucks (20,000 L); • Firefighting system water tanks (180,000 L); • Fire extinguishers; • Communication radios (band 01); •

One semi-UTI ambulance, equipped with stretcher, 15l oxygen cylinder, immobilization and rescue splints, five attachable nasal oxygen catheters, two high-concentration masks with reservoir, one adult full manual resuscitator ambu, medicine bag and First aid kits; • One UTI ambulance, class D, equipped with 1 stretcher, two 15L oxygen cylinders and 5L oxygen cylinder, immobilization and rescue splints, 1ten attachable nasal oxygen catheters, five high concentration masks with reservoir, one Pocket mask, one adult full manual resuscitator ambu, one automatic sternal defibrillator (DEA), one cardioverter, one laryngoscope, one MICROTAK 920 pulmonary ventilator and accessories, one nebulizer, one infusion pump, medicine bag and first aid kit; • Emergency alarm system with buttons and siren, installed at strategic points in industrial areas and accommodation; • Logistical support in order to provide resources such as: drinking water, food, fuel, operational machines, consumable material supplies (PPE, firefighter recharge, radio batteries, mobile telephone devices, sampling containers, etc.). Evidenced that MASA's PAE at item 15 documented methodologies for periodic inspections of emergency response equipment. Periodic inspections are carried out objectively which aims detect possible failures in the system, ensuring the performance of emergency tools/structures, when necessary. Evidenced that a.m. Plan includes a flowchart which clearly indicates the step by step inspection procedures using the tool %W1H. Informations about items to be inspected, how to perform the inspections, the frequencies of each inspection and the acceptance criteria are clearly defined. Evidenced that inspectors has been qualified in accordance with qualification criteria previously defined and documented. Reviewing training records it was evidenced that inspectors have been trained in pertinent MASA's inspection procedures. Reviewing pertinent inspections records it was evidenced that emergency response equipment has been in accordance with Brazilian regulation laws and MASA's procedures. Interviewd inspectors showed to be aware of this matter. Reviewing PAE, PAEBM and Crisis Plan it was evidenced that all of them clearly define the responsibilities and authorities for external responders, medical facilities and communities. As already mentioned MASA during the preparation and revision of a.m. documented plans involves all interested parties. After formalization of MASA's Emergency Plan, a controlled copy of MASA's Emergency Plan is provided to each external stakeholder including environmental, security and health authorities, public authorities, emergency response suppliers, community representatives and medical facilities, the cyanide producer and the cyanide transporter. This system is carried out at each review of the plan in such a way that they are perfectly knowledgeable and aware of how they should act in the event of cyanide emergencies. Reviewing meeting records evidenced another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. Reviewing Mock Emergency Drill evidenced the participation of external responders (when

applicable) duly implemented. Evidenced that the emergency response plans were reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers, community representatives. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. ANM; SEMA; Firefighting Department; Civil Defense; Aero Vida Táxi Aéreo; Communities (Barão de Pirucaua, Vila Aurizona, São José and Godofredo Viana) Carutapera Municipal Hospital

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA's PAEBM, MASA's PAE as well as MASA's Crisis Plan clearly include procedures and contact information for notifying management,regulatory agencies, external response providers and medical facilities of the cyanide emergency. During the field audit, it was evidenced the existence of an available list containing the above mentioned informations. Reviewing this List it was noted that it contains the necessary contact information and that is updated. which includes for instance the following phone numbers: PAEBM members, PAE members, Brigade Emergency Members, Crisis Plan members leaders, managers, general manager, public authorities, hospitals, cyanide supplier (Proquigel), cyanide transporter (Concórdia) regulatory agencies (SEMA, and DRT (Regional Police Work), CENAD. Evidenced that the emergency response plans were reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers(Ambipar) , community representatives. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan). The emergency communication loop is clearly flow is clearly defined, tested and implemented as required. Besides, reviewing the mentioned Plans it was evidenced that for external responders, the Plan it is clearly provided contact information for those responders with designated responsibilities to implement the Plan. Evidenced that MASA's PAEBM, MASA's PAE as well as MASA's Crisis Plan include procedures and contact information for notifying potentially affected communities of the cyanide related

incident and any necessary response measures, and forcommunication with the media. During the field audit, it was evidenced the existence of an available list containing the above mentioned informations. Reviewing this List it was noted that it contains the necessary contact information related to the communities of Godofredo Viana, Barão de Pirucaua, São José e Vila Aurizona as well as noted that it is updated. Evidenced that MASA defined, documented internal documented procedure PO-EQX-MASA-SSMAC-41 - Crisis Plan establishes at item 8 - "Assessment of operational occurrences with cyanide" methodology for events related to “significant cyanide incidents”, as defined in the ICMI Definitions and Acronyms document, which require notification to ICMI. Reviewing the a.m. procedure verified that it requires that n incidents involving sodium cyanide whose consequences are serious in terms of the environment, occupational safety, health or which affect directly interested parties, it will be up to Mineração Aurizona through its crisis committee communicated to ICMI - International Cyanide Management Institute.

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.

	☐ X 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:

Evidenced that PAE and PAEBM Emergencies Plan describe Recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media, management and/or disposal of spill clean-up debris as well as provision of an alternate drinking water supply. MASA’s operational procedure defined, documented, methodology clearly establishes that all water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not; Water or spillage collected in the cyanide preparation area is returned to the Cyanide Mixing Tank Water collected in the Carbon-In-Leach area sump is pumped to the Carbon-in-Leach tanks; Water from sumps in collected in the (ADR) - Adsorption, Desorption, and Regeneration Area are pumped to the Carbon-In-Leach tanks; Water from the sump located in the acid containment area is pumped to detox/neutralization tanks and Disposal in the tailings dam is only carried out after passing through the neutralization area with the application of sodium metabisulfite and copper sulphate. Ferrous sulphate and sodium hypochlorite are two neutralizing agents selected for use and form part of the spill response kit. Sodium Hypochlorite may also be used but is recommended only for residual trace

cyanide concentrations and for washing equipment and PPE. As already mentioned, PAE and PAEBM clearly state that use of sodium hypochlorite and ferrous sulphate for cyanide neutralization is strictly prohibited where there has been a release into a natural surface water body due to the toxic nature of those chemicals to aquatic life. PAE and PAEBM determine that MASA ensures to supply mineral water and other sources of potable water for domestic consumption or similar. Evidenced that PAE defines methodology for control measures for spills or leaks. The use of chemical products in the treatment of cyanide leaks in surface waters, such as: sodium hypochlorite, ferrous sulfate and hydrogen peroxide, is not permitted. Besides, it was evidenced that Ambipar has acopy of the MASA's procedure prohibiting use of these chemicals in surface waters, as well as it includes this prohibition in its own procedures. During the field audit interviewed personnel showed to be aware of this matter. It was evidenced that PAE, PAEBM as well as PMA address needs for environmental to identify the extent of a cyanide release. Related to sampling methodologies, parameters where practical, possible sampling locations reviewing a.m. plans was noted that they clearly defines all kind of informations about sampling such as the sampling locations, sampling frequency, sampling quantity, sample preservation, and cyanide reference values in order to identify the extent and effects of cyanide release. A)Planning aims to define the collection, preservation, appropriate and transport activities of samples, in order to guarantee the delivery of all necessary information in the most accurate way. B) Sample collection and field procedure B1) Sample Collection: A checklist must be carried out before starting to collect samples.This procedure is necessary to prevent the team responsible for collection from being unable to carry out the collection due to a lack of equipment or material. Check list - List of Equipment and Materials contains the following items to be verified: PMA, Area maps / Global Positioning System (GPS)/ Camera/Field notebook / Collection sheet/ Pens / Collection bottle Field meters (pH, conductivity, salinity) Glove box / Sunscreen Magic marker or identification tags and PPE. Collection bottles must be resistant, made of borosilicate glass, amber, borosilicate glass or polyethylene. They must be chemically inert and allow perfect adaptation. The bottles should preferably be wide-mouthed, to facilitate collection. Do not touch the inside of the bottles and collection material (such as lids), nor leave them exposed to dust, smoke and other impurities, such as gasoline, oil and vehicle exhaust fumes, which can be major sources of sample contamination. Ash and cigarette smoke can mainly contaminate samples of heavy metals and phosphates, among other substances. Collectors are recommended to sanitize their hands with 70°GL alcohol, and not to smoke, speak or eat during the sample collection procedure. The use of PPE (gloves, apron, mask, etc.) must also be adopted to protect the sample and the collector itself in the case of water suspected of contamination. A pair of procedure gloves must be used for each collection point, in the case of physical-chemical analyses, as the gloves must not be lubricated with

talcum powder. If samples are used for field analysis, they should not be sent to the laboratory. Collection bottles must remain open only for the time necessary to fill them and must be closed away from the sun. The reagents used in collection must be for analysis degree. This avoids contamination of samples by low-quality reagents. For Field Analysis: Whenever necessary, pH and temperature determinations must be carried out during collection and in the case of residual chlorine supply networks. Field determinations must be carried out in containers separate from those that will be sent to the laboratory, thus avoiding possible contamination. To determine free and total residual chlorine, preferably digital colorimetric equipment or quantitative indicator papers with reading values compatible with those provided for in drinking water legislation should be used. To determine pH, when possible, a portable pH meter should be used; if this is not possible, you can use good quality pH paper. Temperature determination must follow the same pattern. In addition to the determinations already mentioned, the following analyzes can also be carried out, if possible: Salinity; Conductivity; Dissolved oxygen. All equipment used must be calibrated and have a specification certificate issued by the competent team. Interviewed sampling operators showed to be aware of the pertinent procedures.

Standard of Practice 7.6

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

X in full compliance with

in substantial compliance with Standard of Practice 7.6

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA review and evaluate the cyanide related elements of its EmergencyResponse Plan for adequacy on a regular basis.. Sampled examples were: PAE, PAEBM and Crisis Plan. The above-mentioned emergency response plans have been reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers, community representatives. As already reported information such as the names and contact information for Emergency Response Coordinators and Emergency Response Team members have been updated by MASA as needed to ensure its accuracy. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Besides, periodic meetings are performed with stakeholders, in order to discuss and updated (if necessary) the emergency response plans. The emergency communication loop is clearly defined and contact information is available in the plan. Evidenced that MASA reviewed and evaluated the cyanide related elements of its Emergency response Plan at least annually as foreseen in the plans

themselves.Interviewed personnel showed to be aware of this matter. Evidenced that MASA's program for conducting cyanide emergency drills includes items such as field drills are conducted at least annually(each calendar year), define that drills are field exercises (i.e., not tabletop exercises) that closely simulate actual cyanide release and exposure incidents and are designed to test the adequacy of the Emergency Response Plan and the operation's response capabilities and preparation, including training and equipment availability.address cyanide exposure scenarios in addition to release scenarios appropriate for its operations, and involve on-site and external personnel that may be expected to respond to cyanide incidents. MASA defines that during the three-year period drills include a variety of potential release scenarios such as release of hydrogen cyanide gas, liquid cyanide, or solid cyanide, as well as include a variety of worker exposure scenarios, such as inhalation, ingestion, and dermal exposure as applicable to the operation. Besides, MASA establishes avoid testing the same release and exposure scenarios from year to year. Evidenced that MASA have been conducting mock emergency drills periodically as previously planned. Evidenced that MASA defined, documented and maintains PAE-EQX-MASA-SSMAC-ANX03 – Tri Annual Mock Emergency Drill Plan. Evidenced 2022 to 2024. Evidenced that it includes scenarios such as: Catastrophic release of hydrogen cyanide from storage, process or regeneration facilities; Transportation accidents occurring on site or in close proximity to the operation; Cyanide releases during unloading and mixing; Cyanide releases during fires and explosions; Pipe, valve and tank ruptures; Overtopping of ponds and impoundments; Power outages and pump failures; Uncontrolled seepage; Failure of cyanide treatment, destruction or recovery systems and Failure of tailings impoundments, heap leach facilities and other cyanide facilities. . Evidenced that the Mock Emergency Drill Plan is in accordance with Brazilian Regulation Laws and ICMI requirements. Evidenced dully implemented.Sampled examples were: May 26, 2023; September 04, 2023. Evidenced that MASA has been evaluating after each emergency drill, the drill results. They are reviewed and discussed among the participants and when necessary, the opportunities of improvement raise-up during the drill are considered as corrective or preventive actions and managed adequately. Reports related to the drills and their reviewed were found in place. Evidenced that the sampled records of the simulated were duly evaluated and the pertinent actions to be done were defined, documented and implemented. Sampled examples were: May 26, 2023; September 04, 2023

Principle 8 | TRAINING

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

Standard of Practice 8.1

Train workers to understand the hazards associated with cyanide use.

MINING OPERATIONS SUMMARY AUDIT REPORT TEMPLATE

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA has been trained all personnel who may encounter cyanide in cyanide hazard recognition. Evidenced that MASA established, documented, implemented and maintains procedure PG-EQX-MASA-SGI-001 – Training Management that defines methodology for planning, performing, recording and evaluating effectiveness of training for all personnel who may encounter cyanide in cyanide hazard recognition the cyanide materials present at the operation, the health effects of cyanide, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure. Reviewing training materials it was evidenced that they all items described above. It was noted that MASA has been used his own materials as well as also used materials supplied by Proquigel (cyanide producer).Training records assessed provided evidencies that it is duly implemented. It is defined that annually the Human Resources Area must identify the Training Needs for the following year. Evidenced duly implemented. Sampled examples were 2023 Training Needs, 2024Training Needs. Evidenced that MASA internal documented procedure PG-EQX-MASA-SGI-001 – Training Management establishes that cyanide recognition refresher training shall be performed at least yearly for all employees and contractors who may encounter cyanide. Interviewed personnel showed to be aware of.

Internal documented procedure PAE-EQX-MASA-SSMAC-ANX02 - Emergency Brigade Periodic Training Schedule establishes the pertinent schedule for refreshing training for Emergency Brigade. Reviewing pertinent records noted thay it was duly implemented. Reviewing training materials as well as training records that it is duly implemented. Evidenced that cyanide training records have been retained as stated. Evidenced that MASA internal documented procedure PG-EQX-MASA-SGI-001 – Training Management establishes that all trainings shall be recorded through using the form RE-EQX-MASA-RH-002 - Training Attendance List. Reviewing RE-EQX-MASA-RH-002 training records records MASA demonstrated that personnel received both initial and refresher training in cyanide hazard recognition. The trainings have been performed in accordance with MASA's 2023 Training Plan.

Standard of Practice 8.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA has been trained workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Evidenced that internal documented procedure PG-EQX-MASA-SGI-001 – Training Management establishes methodology for Identification of Training Needs as well as recording at the form RE-EQX-MASA-RH-001. Reviewing the mentioned form it was evidenced that it clearly defines for each employee and contractor the required training including for example legal trainings, training in internal documented operational procedures, in PAE, in PAEBM which means the necessary trainings to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Reviewing training materials as well as during the field audit interviewing pertinent personnel it was duly implemented. As required by MASA's internal documented procedure PG-EQX-MASA-SGI-001 – Training Management it was evidenced that MASA's training program clearly identifies the specific cyanide management elements that each employee must be trained in to properly perform the required tasks. As already mentioned at the form RE-EQX-MASA-RH-001 it is identified for each worker the necessary training in the respective operational procedures. Employees and contractors are trained during the admission period (introductory) and in refresher training held annually. In the general training matrix, there are tabs with the positions and the specific technical training, in which it is possible to see that for all positions the cyanide training is mandatory. During the field audit reviewing training records and interviewing pertinent personnel it was evidenced duly implemented. Evidenced that task training related to cyanide management activities have been provided by an appropriately qualified person. Evidenced that MASA's internal documented procedure PG-EQX-MASA-SGI-001-Training Management establishes that training personnel should be familiar with the practices and procedures for which the training is given and experienced in effective communication techniques as required by the document Definitions and Acronyms for The International Cyanide Management Code dated on June, 2021. Furthermore, the aforementioned procedure defines the criteria to demonstrate the adequate qualification of training personnel so that they are considered qualified as such. Evidenced duly established. Evidenced that internal documented procedures establishes that all employees shall be trained prior to work with

cyanide. Reviewing training records and through interviews during field audit evidenced that employees have been trained prior to working with cyanide are aware of performing theirs tasks including where cyanide can be present. There is refresher training on cyanide management provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner in accordance with internal documented procedure PG-EQX-MASA-SGI-001 – Training Management establishes that refresher training on cyanide management shall be performed at least yearly. Evidenced duly implemented. MASA"s internal documented procedure PG-EQX-MASA-SGI-001 – Training Management establishes methodology for evaluating the effectiveness of cyanide training by testing and observation. Besides it defines that the result of effectivess evaluation shall be recorded at the Form RE-EQX-MASA-RH-004 - Training Effectiveness Assessment Record. Evidenced records of evaluation of the effectiveness of cyanide training by testing. MASA's internal documented procedure PG-EQX-MASA-SGI-001 – Training Management establishes that training records shall be retained throughout an individual's employment documenting the training they receive as well shall include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials. During the field audit the auditor reviewed training records as well as interviewed related personnel with the trainings performed. It was noted that workers have received initial task training; the task training addressed the critical elements of safe performance of tasks; qualified personnel provided the training; personnel were trained prior to working with cyanide in an unsupervised manner; and that MASA evaluated the effectiveness of task training.

Standard of Practice 8.3

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

The operation is ☐ X in full compliance with Standard of Practice 8.3

☐ in substantial compliance with

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that all cyanide unloading, mixing, production and maintenance personnel have been trained in theprocedures to be followed if cyanide is released, including decontamination and first aid procedures as required by internal documented procedure PG-EQX-MASA-SGI-001 – Training Management. Evidenced that plant operators and maintenance employees have collaborated to elaborate the pertinent

operational procedures as well as the procedures related to emergencies involving cyanide and when applicable PAE and PAEBM. Records of training were reviewed and noted that the operation and maintenance personnel have been trained in the pertinent internal documented procedures which clearly define the actions to be followed if cyanide is released (all have been trained in the operation's response procedures as required). During the field audit interviewing field personnel as well as reviewing MASA's training records, MASA's 2023 Training Plan, MASA's Quality, Environmental, Safety and Occupational Health Policy, PAE, PAEBM, Training procedures, Operational Procedures it was clearly evidenced MASA's how MASA has been structured its response program is structured as well as that personnel involved in unloading and mixing cyanide, cyanidation processes, and maintenance of cyanide facilities have received training regarding roles in response to cyanide releases and exposures it was noted that it is implemented as stated by The Code. Besides noted that field personnel are aware of such procedures. Reviewing pertinent training records as well as interviewing Emergency Response Coordinators and members of the Emergency Response Team it was evidenced that Emergency Response Coordinators and members of the Emergency Response Team have been trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment as well as interviewed personnel showed to be aware of this matter. Evidenced that MASA clearly identify training needs for Emergency Response Team.Evidenced duly implemented. Sampled example was: Fire Brigade Training Course Program: Brigade candidate candidates must attend a course with a minimum workload of 16 hours, covering theoretical and practical aspects, focusing mainly on the risks inherent to the occupation group. Evidenced that internal documented procedures PG-EQX-MASA-SGI-001 – Training Management establishes that MASA shall made external responders, to the extent that they are designated with specific duties or responsibilities in the Emergency Response Plan, such as local fire brigades and emergency medical services familiar with those elements of the Emergency Response Plan related tocyanide. As well as it is defined that MASA shall retain as an appropriate records notes of meetings and/or correspondence with external responders. Reviewing pertinent records it was evidenced that it is duly implemented. Sampled examples were: Note of meetings with: ANM; SEMA; Firefighting Department; Civil Defense; Aero Vida Táxi Aéreo; Communities (Barão de Pirucaua, Vila Aurizona, São José and Godofredo Viana and Carutapera Municipal Hospital. Evidenced that internal documented procedures PG-EQX-MASA-SGI-001 – Training Management establishes that MASA shall provide to all employees with designated roles or responsibilities in the eventof a cyanide exposure or release refresher training for response to cyanide exposures and releases regularly conducted. During the audit through reviewing refresher training records of related to employees with designated roles or responsibilities in the event of a cyanide exposure and releases it was noted that MASA have been conducted refresher training

annually as stated. Besides, interviewing pertinent personnel it was noted that they are aware of this matter. Evidenced that internal documented procedures PG-EQX-MASA-SGI-001 – Training Management establishes that MASA shall retain training records documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials. Evidenced duly implemented.

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.

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA has been providing stakeholders with information on its cyanide management practices and engage with them regarding their concerns.

During the audit it was reviewed PO-EQX-MASA-SSMAC- 42 - Procedure for dialogue with the community about Cyanide whose objective are is to establish communication mechanisms and processes to clearly describe the cyanide management procedures and responsibly identify topics of interest to the external public: communities in the environment and public authorities, as well as making available to interested parties as operational and environmental information related to cyanide. Mechanisms for dialogue with the community are developed by the Social Responsibility Area with the support of the Technical Area that manages the cyanide in the company. The Technical Area is directed to the channels of access to the community and public authorities, as well as the best process ducts to establish clear and objective communication related to cyanide. The Social Responsibility Area is the mean of connection between external audiences and the representatives of the Technical Area, who are responsible for carrying out the dialogue with clarifications, investigation of concerns and openness for discussion about the subject. Several communication mechanisms are available such as: Booklet; Banners; Poster; Podcast Sounds Cars, WhatsApp; Meetings. Evidenced the creation and communication of a booklet with information on applications and Cyanide materials, with information written in a simple way and with a layout playful, which prioritizes graphic images that are easy to assimilate. Informations consolidated

in the booklet serve as the basis for the other process. The material is printed with a circulation of between two and three thousand copies, in addition to make a version available to be read online or in an easy-to-use PDF file to share. Banner and poster with short and objective information on emergency procedures with cyanide. The printed product is intended for MASA employees, but the digital material can be disseminated with the external public. Information in car sound in order to enable greater coverage of people reached by communicating procedures, messages bases relating to the application of cyanide are adapted to circulate clearly and accessibly in car sound reports in areas with large concentration of people in the regions surrounding the company. In Podcasts, audio material with more extensive content, but with direct information, produced based on information already consolidated in the booklet. The podcast audios are divided into chapters and shared via the Social Responsibility area's phone number in the companies, communities' WhatsApp groups' in weekly episode format. In addition to community groups, the material is disseminated to public authorities, such as councilors, mayors and municipal departments, also through electronic messenger. Communication channel: in all the communication processes mentioned above, there is a communication channel, which works through a telephone number, which provides the WhatsApp messenger. The contact is from the Social Responsibility area and any questions that arise on the topic are directed to the technical area so that an assertive answer to the question can be given. With the process and consolidated messages in hand, the Social Responsibility Area at the municipal education department provides physical space and time in schools in the region to give lectures on cyanide management procedures. The organization of these meetings includes a schedule with times, data and availability of classes at the school, previously aligned by the area of Social Responsibility with the management of each school. The schedule is finally approved with the technical area. The technical area is responsible for giving the lectures, which last a maximum of half an hour in each school and must provide space for questions and resolution of doubts. Printed letters are also handed out during lectures. The target audiences for these meetings are 8th grade, 9th grade and high school students, in addition to teachers, who are free to interfere in the topic and resolve any doubts. The Social Responsibility Area appears at meetings with a frequency list and devices for photographic recording of actions. A list of attendance is noted by everyone who attended the action. Reports of all actions performed are made up of evidence photographs of the lectures, evidence of images of the shooting of the reports in the WhatsApp groups, evidence of lecture frequency lists and evidence of images of the circulation of sound cars on the community's roads. Evidenced duly implemented as required.

Standard of Practice 9.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MASA have been established, documented implemented and maintains written descriptions, in Portuguese language, how their activities are conducted, how cyanide is managed as well as how these written descriptions are available to communities and other stakeholders. Reviewing the material that was has been used it was evidenced that the information materials such as brochures, newsletters, WhatsApp's, Sound's car, Booklet, internal and external meetings, local government offices, on websites etc (please for additional information see 9.1). Evidenced that MASA established, documented, implemented and maintains internal documented procedure PO-EQX-MASA-SSMAC-41- Crisis Plan which was developed based on MASA's PAEC regarding potential operational risks mapped by the company within the scope of application and relevant to Cyanide. This project results from an interpretation of the Company's operational risks with the best crisis prevention and management practices in compliance with the steps of the International Cyanide Code. Evidenced that above documented procedures defines the creation of the crisis committee what is made up of permanent members and floating members and areas that become part of the committee according to the type of crisis. Part of Committee has executive functions, and partly consultative functions. According to nature crisis, roles can and should be updated. In the Crisis Committee of MASA the areas of the company integrate to act together, there is no hierarchical prevalence - except for the functions of General Manager responsible for final validation of actions and communications to the public. The responsibilities and authorities of Crisis Committee participants are clearly defined and documented. Sampled examples were: Communication and Social Responsibility Area; General Management; Spokesperson; Human Resources and Administration; Legal; Processing Plant - Technical area linked to the crisis. There is no significant percentage of illiterate people in Aurizona. Anyway visits of MASA public relationship representatives to communities are recorded. In these visits, information like cyanide management and hazards were distributed as stated. Additionally, Sounds Cars are used as one communications channels. Although no incident involving cyanide has been occurred, evidenced that, through its public relations process and stakeholders engagement policies and procedures, have specific communication channels to provide information, as required, related to cyanide related incidents such as:a) Cyanide exposure resulting in hospitalization or fatality - In the event of such incident, the operation shall communicate the DRT MA (Regional Labor Office of Maranhão)

b) Cyanide releases off the mine site requiring response or remediation -In the event of such incident, the operation shall communicate with SEMA – Maranhão, Civil Defense and involved communities.
c) Cyanide releases on or off the mine site resulting in significant adverse effects to healthor the environment - In the event of such incident, the operation shall communicate with SEMA, Civil Defense, DRT MA and involved communities.
d) Cyanide releases on or off the mine site requiring reporting under applicable regulations - In the event of such incident, the operation shall communicate with SEMA and DRT MA.

e) Releases cause applicable limits for cyanide to be exceeded - In the event of such incident; the operation shall communicate with SEMA and DRT MA.

The information reported to the noted regulatory agencies, regarding confirmed cyanide release and exposure incidents, is made available to the public by those agencies (DRT MA, SEMA, Civil Defense).