ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

Minas Argentinas S.A.
Gualcamayo Mine

San Juan, Argentina

Submitted to:
The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

2022 Audit Cycle

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Mining Operation: Gualcamayo Mine

Mine Owner: Mineros S.A.

Mine Operator: Minas Argentinas, S.A. (MASA)

Name of Responsible Manager: John Cuervo, Executive Director

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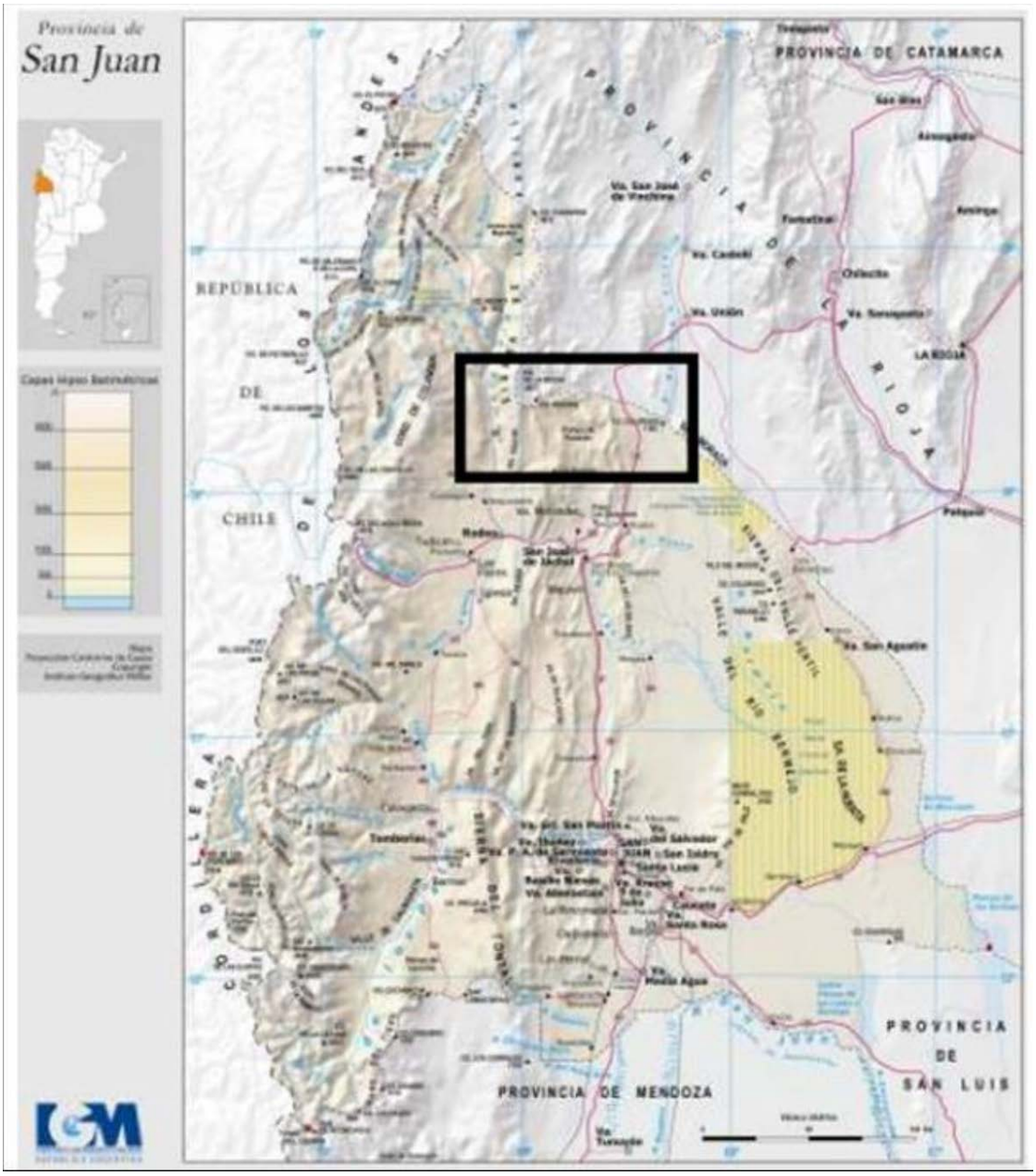
Location and description of the operation

The location of the Gualcamayo mine is presented in the picture below:



The Gualcamayo leaching project, operated by Minas Argentinas S.A., is located in the region of Jachal, in San Juan province, Argentina. The project uses heap leaching technology to retrieve gold from crushed ore which is placed in a pad where leaching takes place with cyanide solution.

The Leach project is composed of:

- Three-stage crushing circuit: primary, secondary and tertiary crushing.
- Transport, agglomeration and stacking of ore. Application of solution and recovery (leaching).
- Gold absorption in carbon.
- Desorption of gold from carbon.
- Electrowinning.
- Smelting.

The product extracted from the mine (ROM) is initially crushed in a primary crushing plant to reduce the size of the ore from 650 to 139 mm. After primary crushing, ore is even more crushed and sieved in secondary and tertiary crushing circuit to reduce the size of the ore by 80 percent, below 17.6 mm. Limestone is added to ensure the alkalinity of the ore during the leaching process and avoid the formation of hydrogen cyanide gas (HCN). Crushed ore is transported on surface conveyor to the stacking area, where the ore is stacked on the leaching field in panels of 86 m wide and 10 m high, passing through an agglomeration process depending on the type of ore. Cyanide solution is applied to leach gold and separate it from the ore as the solution passes through the stack. Pregnant Leach Solution (PLS) is collected in a network of pipes to a central point where it is pumped to the ADR (Absorption, Desorption and Recovery) plant to recover the gold.

Facilities to manage cyanide solution includes the leach tank, which contains pregnant solution, barren and recycled solution; and barren solution pumps, that pumps solution for distribution in the heap leach pad. Cyanide solution is applied through drip emitters. Cyanide in the barren solution dissolves the gold from the ore, resulting in a solution containing dissolved gold (pregnant solution). Pregnant solution is returned from the leach pad to the leaching solution tank and pumped to the carbon adsorption plant. Any excess solution that is accumulated in the PLS pond is pumped back to the process.

Pregnant solution enters the carbon adsorption system. The activated carbon in the carbon columns adsorb the gold from the pregnant solution. The barren solution is discharged from the carbon columns and is pumped back to the leach pad for use in the leaching process. Carbon containing adsorbed gold is pumped from the carbon columns to the carbon adsorption system (the process is also known as Elution or separation) for additional processing. Fresh and reactivated carbon is pumped from the reactivation system to the carbon columns to replace the carbon that had been sent to the adsorption circuit.

Carbon is washed with an acid solution to eliminate soluble deposits in acid that could cover the carbon and reduce its effectiveness. Once the carbon is washed it is transferred to the Elution

column. Exhausted acid solution is neutralized with caustic soda and is sent to the tank for use in the carbon columns.

The separation solution containing caustic soda and cyanide is pumped to the Elution column containing clean carbon. Gold is desorbed from the carbon and is added to this solution. This pregnant solution is sent to the electrowinning circuit for recovery of gold and silver.

The carbon where gold was extracted is sent to a high-temperature furnace. The organic material that is on the surface and in the pores of carbon is volatilized to restore the active zones on the carbon surface. Carbon is sieved before it is transferred to the leaching process. Carbon lost during the operation is collected, acid washed and calcined in a converter furnace for its later smelting. New carbon is added to the circuit in order of to replace the lost carbon.

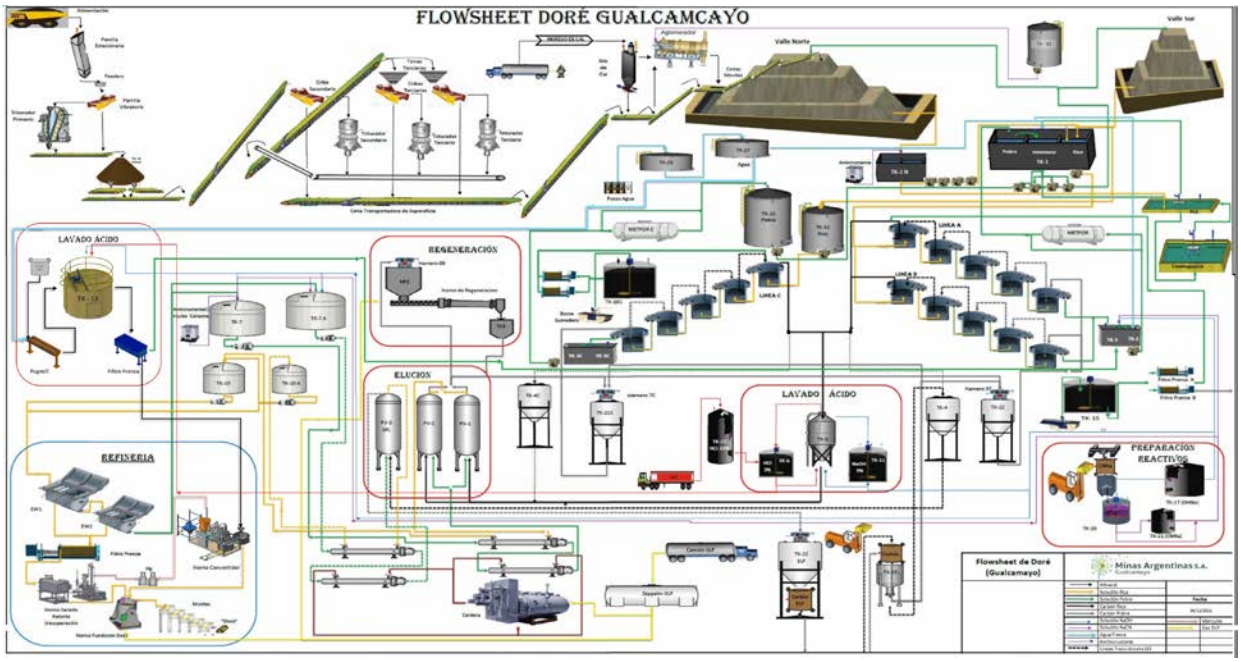
Solution from the carbon desorption circuit passes through electrowinning cells in which gold is recovered in the cathodes as mud. The mud is removed, filtered, dried and smelted to produce gold bars.

The scope of the recertification audit includes the following cyanide facilities: North and South Leach pads; one open Pregnant Leaching Solution pond (PLS pond) with two Leach Collection Recovery Systems (LCRS); one contingency pond, solution channels and pipelines between the leach pads and the process plant; a cyanide mixing area including cyanide mixing and storage tanks; the Absorption, Desorption and Recovery (ADR) plant; and a solid cyanide storage area. There are no tailings facilities nor cyanide destruction facilities at Gualcamayo.

New cyanide facilities constructed since the 2018 audit include a leach pad merger area between the North and South leach pads including an additional leach pad area with geomembrane; a cyanide mixing and storage tanks at the agglomeration plant; Derrick filters to separate fine carbon in the process solution; and a new cyanide mixing enclosure on top of the cyanide mixing tank at the ADR plant. All these new cyanide facilities were commissioned in 2021.

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

The Gualcamayo mine ore processing flowsheet is presented below:


FLOWSHEET DORÉ GUALCAMCAYO
LAVADO ACIDO
REGENERACION
ELUCION
LAVADO ÁCIDO
REFINERIA
PREPARACION REACTIVOS
Flowsheet de Doré (Gualcamayo)
Minas Argentinas s.a.

Auditor's Finding

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

This operation has not experienced any compliance issues during the previous three year audit cycle.

Gualcamayo has experienced zero significant cyanide incidents during this 3-year recertification audit cycle.

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

Auditor's Attestation

Audit Company:	SmartAccEss Socio Environmental Consulting, LLC
Lead Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Mining Technical Auditor:	Fernando Rodriguez
Date(s) of Audit:	March 29th – 31st, 2022

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

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

Gualcamayo Mine		March 31st, 2022
Name of Operations	Signature of Lead Auditor	Date

Minas Argentinas
Gualcamayo Mine

Signature of Lead Auditor

March 31st, 2022

SUMMARY AUDIT REPORT

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

Standard of Practice

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

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

Discuss the basis for this Finding/Deficiencies Identified:

Gualcamayo currently purchases Sodium Cyanide manufactured by Draslovka Mining Solutions Memphis Plant (Tennessee, USA), facility that is currently certified under the Code. Since December 2021, The Chemours Company has sold their mining solutions business to "Draslovka Mining Solutions". This plant achieved the original certification in 2005 and has maintained compliance and its ICMI certification since then. The latest recertification was on January 21st, 2020. Gualcamayo and Draslovka signed a contract effective January 1st, 2022.

In November 2021, Gualcamayo signed a mutual agreement with Veladero Mine for a lend lease of 80 tons (80 boxes) of sodium cyanide in briquettes manufactured by Tongsuh Petrochemical Corporation from South Korea. Tongsuh is a certified producer under the Cyanide Code. Then in December 2021, signed another lend lease agreement with Veladero to receive cyanide boxes, this time from Orica Australia (Yarwun Plant) which is also certified under the code. Certification status for these facilities was verified by reviewing the ICMI website and the latest summary audit report.

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

Standards of Practice

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 2.1

Discuss the basis for the Finding/Deficiencies Identified:

Gualcamayo has demonstrated that sodium cyanide is transported and delivered in a safe manner. The site maintains all records of the chain of custody documents from the producer, the maritime transporter and land transporters that handle the cyanide brought to its site, identifying all the parties in the supply chain. Gualcamayo has provided a letter (dated Nov 2021) indicating the complete Sodium Cyanide Supply Chain of Custody from Memphis Production Plant to Gualcamayo mine in Argentina.

All cyanide transporters involved in Gualcamayo Cyanide supply chain are currently Code certified companies.

- The Draslovka US/Canada Rail & Barge Supply Chain was certified as in full compliance against The Code on April 7th, 2022. The US/Canada Rail & Barge Supply Chain includes rail movements from the Memphis production plant to US ports of departure. For the case of Gualcamayo, the Jacksonville Port is used.
- Draslovka Global Marine Supply Chain was certified as in full compliance against The Code on April 7th, 2022. The operation's certification includes cyanide management at the Ports of Everglades, Jacksonville, Long Beach, Los Angeles/San Pedro, Miami, New Orleans, Savannah and Seattle in the US, ocean carriers American Presidents Line (APL), Hamburg Sued, Maersk Line, Mediterranean Shipping Co. (MSC), Seaboard Marine and Hapag Lloyd and finally ports in Argentina among other countries. For the case of Gualcamayo, Draslovka uses the port of Buenos Aires.
- Transportation from the port of Buenos Aires to Gualcamayo mine is done by road transportation in trucks convoy performed by Víctor Masson Transportes Cruz del Sur S.A., which obtained its latest recertification on March 10, 2020, being in full compliance.
- Victor Masson Transportes Cruz del Sur was also used for transporting cyanide boxes from Veladero to Gualcamayo in November-December 2021.

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

Standards of Practice

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 3.1

Discuss the basis for this Finding/Deficiencies Identified:

As stated in previous recertification audit reports, the Mining Authority approved the Environmental Impact Study (EIS) of Gualcamayo which was prepared by Knight Piésold Consulting in 2007. The cyanide facilities have been designed according with solid international engineering practices. The engineering company was HATCH. The ADR plant was designed and constructed according to HATCH engineering criteria and specifications. HATCH acquired the Adsorption, Desorption and Recovery (ADR) Plant from Scotia International of Nevada (SION), a qualified Utah based corporation. The assembly of the ADR plant was conducted by KAISER, a qualified engineering and construction company with activities in the oil and mining industry in Bolivia and Argentina. The detailed engineering of the leaching system was conducted by Vector Chile Ltda. Additionally, during construction, the company implemented QA/QC for the construction of cyanide facilities, including the cyanide mixing and storage area. Gualcamayo has retained as-built drawings for the cyanide and mixing storage area. In addition, Gualcamayo presented a certificate of inspection issued by the San Juan Province, dated September 2011, for the completion of construction of the solid cyanide storage area, including as-built drawings.

The facilities for unloading, storing and mixing cyanide at the ADR area remain substantially unchanged from the previous recertification audit. The solid cyanide loading dock and storage area comprises a platform next to a secured, covered, ventilated building and located over concrete hardstanding. The field component of the audit confirmed that the cyanide mixing area was located within the internal structure of the ADR plant on concrete hardstanding and maintained in good condition. Cyanide mixing and cyanide storage tanks were located within a containment concrete berm. The containment system of the cyanide mixing area is a stand-alone containment that will ultimately drain into the process area. The containment area have a sump pit with a dedicated pump that return collected solutions back into the process circuit. The storage and mixing areas are also subject to biweekly inspections to detect any obvious releases or failure in containment.

In 2021, Gualcamayo implemented cyanide mixing and storage tanks at the agglomeration plant area, where cyanide is added in the agglomeration process prior to placing the ore in the leach pad. Both tanks are located inside the leach pad area. Gualcamayo provided as-built drawings and quality assurance/quality control (QA/QC) records for the construction of the cyanide storage tank. The cyanide mixing tank is a mobile tank that was originally procured for use with lead

nitrate, but it was never used with that chemical, and was later on set up for cyanide use. Gualcamayo provided a report prepared by an external contractor which certified the use of this tank with cyanide solutions.

The facilities for unloading, storing and mixing cyanide remain substantially unchanged from the previous recertification audit. The solid cyanide storage area is located in a dedicated facility located on competent concrete hardstanding, which is located far away from communities or surface waters. The area is access controlled with the appropriate cyanide warning signage. The cyanide storage is secured from weather and has adequate ventilation vents along the four sidewalls. According to the operational procedure PADM-ABA-001 “Transfer, unloading and storage of sodium cyanide”, the cyanide unloading area needs to be maintained free of rain water prior to cyanide unloading. Any rain water present in the area is discharged to the PLS pond that stores cyanide solution coming from the leach pads. The process maintenance office, and the temporary container of a contractor are located close to the cyanide storage facility, approximately 15 meters away. Operational procedure POPE-PRO-028 “Activation of evacuation alarm” include audible alarms and evacuation scenarios related to HCN releases at the ADR plant site, and includes these two offices. In addition to this, Gualcamayo has installed two portable HCN gas monitors in fixed locations close to the maintenance office. After inspecting the good design and condition of the cyanide storage area, it is the professional opinion of the auditors that the risk to workers in this area is low and that the current controls in place are sufficient. The cyanide mixing area is located within the internal structure of the ADR plant, which is located far away from people and surface waters.

Gualcamayo has two preparation areas for cyanide, including in both cases a mixing tank and a cyanide storage tank. One is located at the ADR plant and the other one at the agglomeration area. At the ADR plant, there are level indicators and high-level alarms installed on both tanks. These levels are continuously monitored from the ADR control room. Arrangements remain unchanged since the previous recertification audit. There are both a Hi-level (88%) and Hi-Hi level alarm (93%) on the cyanide storage tank and a Hi-level (85%) and Hi-Hi level alarm (86%) on the cyanide mixing tank. The interlock valve from the mix tank to the storage tank shuts off automatically when the Hi-level indicator is reached. There are also level indicators at the tanks that are inspected visually during the cyanide mixing process. The level indicator in the mix tank is continuously monitored to ensure it is operational. The auditors observed screenshots in the control room showing that the level indicators were functioning correctly. The auditors reviewed biweekly preventive maintenance records for high level alarm sensors at the cyanide storage and mixing tanks by the ADR plant and found them to be complete for the recertification period, with a few records missing during 2020 due to COVID-19 pandemic restrictions. At the agglomeration plant, the cyanide mixing and storage tanks that were implemented in 2021 have visual level indicators and high level sensors (Hi-level at 85% and Hi-Hi level at 90%) to prevent overfilling of the tanks. These sensors are included in the preventive maintenance routes.

Cyanide mixing and storage tanks at the ADR plant are contained within concrete berms with good condition concrete flooring with epoxy sealing to avoid infiltration. Arrangements remain

unchanged since the previous recertification audit. This containment area is also connected with the larger ADR plant secondary containment which provides additional capacity to contain at least 110% volume of the largest tank. In addition, there is an automatic sump pump that maintains the secondary containments free of any fluids. The bermed containment areas have been confirmed both previously as part of engineering specification checks and during the field audit. During the field inspection, the containment area was noted to be in good condition, with no significant damage, spalling or cracking evident. The cyanide mixing and storage tank at the agglomeration plant are located inside the leach pad footprint, which would prevent any seepage to the subsurface. The cyanide mixing tank is a mobile tank that comes with a secondary containment around it. The cyanide storage tank has a concrete secondary containment with berms on two sides. In the event of a cyanide spill from any of the tanks, it will be initially contained in the individual secondary containments of each tank and, if that capacity is not enough, it will ultimately report inside the leach pad area that has a liner system to prevent seepage to the subsurface.

The solid cyanide storage area is located under a roof, secured from weather, off the ground and constructed over good condition concrete hardstanding. The risk of potential contact with meteoric water is very low. The solid cyanide storage area is located in a dedicated facility with ventilation vents present along the four sidewalls. The vents are designed and constructed in such a way that prevents inlet of water in the facility. As such, it provides adequate ventilation and build-up of hydrogen cyanide gas is unlikely to occur. The cyanide mixing and storage tanks at both the ADR plant and agglomeration area are located outdoors with natural ventilation which provides adequate ventilation to prevent build-up of hydrogen cyanide gas in the event that cyanide comes in contact with water. Access to the solid cyanide storage area is restricted, with the main access door locked when not in use and with no public access. The storage can only be opened with presence from both Logistics and Security personnel, carrying portable HCN monitors to verify that HCN gas concentration is within the safety concentration range before accessing the building. Appropriate warning signage is posted at access points. Access to the cyanide mixing area and cyanide storage tank at the ADR plant is also strictly controlled and has a lock in place. At the agglomeration area, access to the cyanide mixing and storage tanks is also restricted through means of a fence and a lock to prevent unauthorized access to the cyanide mixing area. The solid cyanide storage area is dedicated to sodium cyanide storage only, with no other materials permitted to be stored. No storage of other materials was observed during the field inspection. Cyanide mixing and storage tanks at the ADR plant are contained within concrete berms with good condition concrete flooring with epoxy sealing to avoid infiltration. Cyanide mixing and storage tanks at the agglomeration area are located within the leach pad footprint. Mixing with incompatible materials is unlikely to occur.

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

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

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Discuss the basis for this Finding/Deficiencies Identified:

Gualcamayo receives solid sodium cyanide briquettes in one ton “bag in box” intermediate bulk container (IBC) plywood boxes. Procedure PES 09-01-3.5-037 “Waste Management” specifies measures undertaken to ensure that cyanide packaging materials are managed in such a manner to prevent their use for any other purposes. The procedure specifies that wood, bags and plastic materials are temporarily stored in dedicated containers located next to the cyanide storage area and then are transported by an authorized contractor to the city of San Juan for incineration as final disposal. Afterwards, Gualcamayo receives a certified document indicating that the packaging material was properly incinerated.

Procedure POPE-PRO-011 “Cyanide Solution Preparation” requires that empty cyanide bags are rinsed three times with rinse water after the cyanide preparation is completed. Rinse water is then sent back to the process. The procedure also requires that a wipe test is conducted to the cyanide bags to ensure they are clean prior to being transported offsite for final disposal. This process was observed by the auditors during the field visit. Empty cyanide bags, once rinsed, are folded and placed temporarily, along with the wooden boxes, in dedicated containers located next to the solid cyanide storage area and then are transported to San Juan for final disposal. Gualcamayo keeps a register of cyanide bags and boxes sent offsite by external contractor Eco San Juan. The auditors reviewed the shipment manifests for the last 3 years and found them to be complete. Cyanide is not purchased in reusable containers and, as such, no packaging is returned to the supplier.

Gualcamayo has two procedures for cyanide mixing: POPE-PRO-011 “Cyanide Solution Preparation” for the ADR plant, and POPE-VAL-041 “Cyanide Solution Preparation at North Leach Pad” for the agglomeration area. Both procedures outlines the requirements for inspection, observation and mixing of cyanide solutions; as well as the operation and function of valves, pumps and various interlocks within the cyanide mixing process. It also includes instructions for the prefill of the cyanide mixing tank with fresh water and caustic solution. The procedures include a checklist for cyanide preparation that requires measuring pH levels, inspection of emergency showers and eye wash stations, among other requirements for safe cyanide management. Gualcamayo has procedure PADM-ABA-001 “Transfer, unloading and storage of sodium cyanide”; that provides instructions for the safe handling of sodium cyanide boxes including handling upon receipt and storage. The cyanide boxes in the solid cyanide storage area did not present any evidence of rupturing and puncturing. Procedures for cyanide

mixing: POPE-PRO-011 “Cyanide Solution Preparation” and POPE-VAL-041 “Cyanide Solution Preparation at North Leach Pad” include transport of cyanide boxes to and from both mixing areas (ADR and agglomeration). The procedures require the use of cones to isolate the area and to stop traffic on the road to the North Leach Pad area during the activity. Procedure PADM-ABA-001 limits stacking of cyanide containers to a maximum height of three per stack. This practice was also verified in the field.

Procedures POPE-PRO-011 “Cyanide Solution Preparation” and POPE-VAL-041 “Cyanide Solution Preparation at North Leach Pad” include a requirement for immediate clean-up of any spilled cyanide including flushing the secondary containment of the cyanide mixing area with fresh water. No spills related to cyanide mixing were reported for the recertification period. Procedures POPE-PRO-011 “Cyanide Solution Preparation” and POPE-VAL-041 “Cyanide Solution Preparation at North Leach Pad” require operators to use the appropriate PPE during mixing activities. These include steel-toed boots, rubber gloves, rubber boots, approved respirator, goggles or face shield, Tyvek coveralls with attached hood, hardhat, safety glasses and hearing protection. The procedures indicate that cyanide mixing activities can be performed by one worker with permanent observation from the control room through video cameras, or two workers if the closed circuit cameras are not operational. During cyanide mixing all accesses to the mixing area are cordoned off by means of a chain and warning signs. Mixing operations and cyanide alarms are also monitored remotely from the control room. The cyanide briquettes in the boxes already comes with red colorant dye. This was verified by the auditors during the field visit through interviews with process personnel.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The scope of the recertification audit includes the following cyanide facilities: North and South Leach pads; one open Pregnant Leaching Solution pond (PLS pond) with two Leach Collection Recovery Systems (LCRS); one contingency pond, solution channels and pipelines between the

leach pads and the process plant; a cyanide mixing area including cyanide mixing and storage tanks; the Absorption, Desorption and Recovery (ADR) plant; a solid cyanide storage area, a leach pad merger area between the North and South leach pads; and a cyanide mixing and storage tanks at the agglomeration plant. There are no tailings facilities nor cyanide destruction facilities at Gualcamayo. New cyanide facilities constructed since the 2018 audit include; and a new cyanide mixing enclosure on top of the cyanide mixing tank at the ADR plant. All these new cyanide facilities were commissioned in 2021

Gualcamayo has developed plans and procedures for the safe operation of cyanide facilities, including unloading, mixing and storage facilities, heap leach operations, and disposal. There are approximately 65 procedures for the ADR plant and 40 for heap leach operations. In addition, Gualcamayo has renewed ISO14001:2015 certification of its management systems in 2021. All procedures include a section related to PPE requirements, considerations of safety hazards and potential impacts on the environment. Procedures were reviewed and found to be sufficiently detailed to enable safe operation.

Gualcamayo has plans, operations manuals and procedures that include critical parameters for the safe operation of cyanide facilities. Procedure POPE-PRO-050 “Process operation and water balance according to PLS level” include the freeboard required at the PLS. This pond should operate maximum at 70% of the pond capacity. There are no discharges of treated water in Gualcamayo; as such, there is no limit for cyanide in water discharges. The report “Gualcamayo Water Balance Leaching System“, dated January 2022, prepared by Solutionart consultant includes the design storm event for process solution ponds (500 years, 24-hour storm event) which is used in the Gualcamayo water balance model. Procedure POPE-PRO-057 “Cyanide dosing in the plant” includes cyanide addition points in the process at three locations: TK7 and TK7A with barren solution from desorption process (free cyanide concentration of 2500 ppm); and TK2 with barren solution from the leach pad (free cyanide concentrations between 100 and 300 ppm). POPE-PRO-035 “pH regulation” indicates that pH levels in the process are to be maintained between 10 and 12 to avoid generation of HCN gases and to maximize recovery in the plant. Gualcamayo has not established a maximum level of cyanide concentrations in process solutions (i.e. PLS pond) or during leaching activities, as these concentrations largely depends on the operational needs. To protect birds and other wildlife from the adverse effects of cyanide process solutions, Gualcamayo has implemented controls in ponds that could have cyanide concentrations higher than 50 mg/l WAD (Weak Acid Dissociable) cyanide, such as netting, inspections, among others.

Gualcamayo has developed and implemented plans and operating procedures for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide unloading and mixing activities as well as for storage facilities, processing facilities, heap leach facilities and all associated piping and pumps as having contact with cyanide. Procedure POPE-PRO-050 “Process operation and water balance according to PLS level” includes maximum operating level for the PLS pond and how to operate it to retain the

designed storage capacity. The PLS pond levels are monitored online on a daily basis. This information is also included in the Gualcamayo water balance documents.

Gualcamayo has a standard procedure PES-00-3.5-005 “Management of Change” that is used throughout the company. The Management of Change (MoC) process includes a review of the proposed changes; analysis of the changes by a multidisciplinary team including health, safety and environmental aspects; and subsequent implementation of the changes. The process includes a format which is signed off by all areas that participated in the evaluation of the changes. The current MoC process include a formalized action plan for proper implementation and follow up of the changes. The change management process is used consistently across the process area. Examples of management of change processes were reviewed for the last 3 years, including changes related to cyanide management and facilities, such as the commissioning of the agglomeration plant; Elusion Low flow circuit; and a new cyanide mixing enclosure on top of the cyanide mixing tanks at the ADR plant.

Gualcamayo has implemented contingency procedures for heap leach facilities and the process plant to respond to upsets in the operational water balance, deviations from design conditions, problems identified by monitoring and inspections, and to address temporary closure or cessation of the facilities. Procedures include step-by-step measures for stopping and starting the plant facilities, events of a power outage, provide response measures for emergencies related to failures of cyanide equipment, and response plans to address upsets in the process water balance. Gualcamayo has cyanide management contingency procedures in place including POPE-PRO-054 “Evacuation of cyanide solution after failure of TK1Norte tank”; POPE-PRO-053 “Monitoring and control of releases in TK1Norte”; and POPE-PRO-050 “Process operation and water balance according to PLS level” that details actions to be taken in case the PLS pond overflows into the contingency pond. Gualcamayo has several plans and procedures for the safe operation of cyanide facilities. These documents include actions to be taken to regain control of the operation in case of upset conditions identified during cyanide facilities monitoring and inspections. In addition, Gualcamayo has a Plan for Operation, Monitoring, Maintenance and Control of Leaching System (POMMYC) dated January 2022 that includes actions to be taken in case of cyanide related contingencies including seepage from the leach pad or ponds, cyanide spills during unloading of cyanide boxes, failure of piping, valves or tanks, failure in slopes, runoff in diversion channels and general procedures in emergency situations. In relation to a temporary closure or cessation of operations scenario, page 45 of the POMMYC identifies critical activities and personnel required to maintain the water balance of the facilities and avoid potential overflow of cyanide solution. The POMMYC also considers that inspections of cyanide facilities and maintenance activities will continue being conducted to ensure safely cyanide management during such an event.

Gualcamayo has developed and implemented an inspection program for cyanide facilities with frequencies that varies from daily, weekly, biweekly and monthly. Daily inspections are conducted during cyanide mixing activities. Weekly inspections include emergency showers, eye wash stations, wildlife in the area and controls (e.g. condition of netting on PLS and TK1 Norte

and ponding on leach pads), and presence of cyanide salts. Biweekly inspections include cyanide storage, sampling stations, pipes and valves, tanks, secondary containments, level sensors, among others. Monthly inspections include extinguishers, Self Contained Breathing Apparatus (SCBA) equipment, and evacuation alarms. Records of inspections for the recertification period are retained and were verified by the auditors. In addition, biweekly inspections are conducted by Managers from different areas (Management planned inspections) to facilities across the entire mine operation, including cyanide facilities.

Tanks holding cyanide solutions are inspected on a biweekly basis according to the cyanide facilities inspection program. Inspection forms for the last 3 years were sampled and found them to be complete. The current inspection form for tanks include requirements to inspect the tanks for structural integrity, signs of corrosion and leakages. Nondestructive tests are conducted annually for tanks holding cyanide solutions including the cyanide mixing tank and cyanide storage tank. The auditors reviewed tests conducted for the recertification period and found them to be complete. Secondary containments are inspected on a biweekly basis for their integrity, permeability, the presence of fluids and their available capacity. None of the containment areas has any drains to the adjacent land surface. The heap leach pad and the PLS pond are inspected on a weekly basis including liner integrity, Leak Collection Recovery Systems (LCRS), ponding on the heap surface, pH levels in the leachate solution, levels at PLS pond, and the solution collection system. Examples of these inspection forms were reviewed for the last three years. There are two LCRSs in the PLS pond. Volumes of pumped fluids are recorded every week. Pipelines, pumps and valves in the ADR and heap leach areas are inspected on a biweekly basis. Inspection forms for the ADR plant and heap leach facilities were verified for the inclusion of items related to deterioration and leakage of pipes, pumps and valves and presence of salts. The auditors reviewed inspection forms for the last 3 years and found them to be complete. The heap leach pads and PLS pond are inspected on a weekly basis for critical aspects according with requirements of the POMMYC, including integrity of surface water diversions and available freeboard. Historical freeboard for the last 3 years at the PLS pond was reviewed by the auditors and verified that this pond was managed according to the design criteria. The auditors conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, water diversions, ponds freeboard and heap leach facilities. These inspections also included cyanide unloading, mixing and storage facilities. Records of the inspections conducted by Gualcamayo to cyanide facilities were reviewed by the auditors and found to be complete, with the exception of records missing for some months in 2020, 2021 and 2022 due to COVID-19 pandemic restrictions.

The Plan for Operation, Monitoring, Maintenance and Control of Leaching System (POMMYC) dated January 2022 include all the inspections, monitoring and maintenance requirements that needs to be conducted for the safe operation of cyanide facilities. The POMMYC requires for visual inspections, topographic inspections of slopes, groundwater monitoring, monitoring of seepages from the leach pad, monitoring of Leak Collection and Recovery Systems (LCRS), supervision of ore placement in leach pad, inspection and maintenance of surface water diversion channels, integrity of leach pad liners during ore placement, among others. Based on

the POMMYC requirements, Gualcamayo has developed and implemented an inspection program for cyanide facilities with frequencies that varies from daily, weekly, biweekly and monthly. Daily inspections are conducted during cyanide mixing activities. Weekly inspections include emergency showers, eye wash stations, wildlife in the area and controls (e.g. condition of netting on PLS and TK1 Norte and ponding on leach pads), and presence of cyanide salts. Biweekly inspections include cyanide storage, sampling stations, pipes and valves, tanks, secondary containments, level sensors, among others. Monthly inspections include extinguishers, Self Contained Breathing Apparatus (SCBA) equipment, and evacuation alarms. In addition, biweekly inspections are conducted by Managers from different areas (Management planned inspections) to cyanide facilities, which provides additional confidence that conditions that could generate impacts to health or the environment will be identified. The inspection program of cyanide facilities including unloading, mixing and storage activities and frequency of inspections were found to be sufficient to assure that the operation is safe and functioning within design parameters. The auditor reviewed inspections records for the last 3 years and verified that inspections are conducted on a consistent manner.

Records of inspections are retained and were reviewed by the auditors. The inspections are documented and include date of the inspection, the name of the inspector and observed deficiencies. The inspection program also include cyanide unloading, mixing and storage facilities. Gualcamayo has two mechanisms to document, track and close corrective actions identified during inspections: i) Corrective actions identified that are related to maintenance of equipment at the ADR plant or leach pad area are managed by the Maintenance area. These corrective actions are managed using SAP software, where work orders are tracked, prioritized, planned and closed. The auditors verified that corrective actions related to cyanide facilties were prioritized for prompt implementation. ii) All other corrective actions not related to maintenance of equipment that are identified through inspections conducted by Management (e.g. Management planned inspections) or Process areas are tracked by the Process area. There is a register to track deficiencies identified during inspections conducted by the Process chiefs, supervisors and operators. Gualcamayo has achieved ISO14001:2015 recertification of its environmental management system in 2021, which guarantee the retention of documents and records.

The Maintenance area has a preventive maintenance program for pumps, pipelines, valves, flow meters, level sensors, pH meters, sump pumps, tanks and cyanide facilities in general. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time it is needed to keep equipment and installations working properly. Gualcamayo develops a weekly plan for preventive maintenance using SAP software. Preventive maintenance plans are generated automatically for each week. Corrective maintenance occurs as a result of work orders based on inspections. Work orders generated from inspection forms are entered in the system, including assigned priority. The auditors observed examples of both preventive maintenance and corrective maintenance records for the last three years and found them to be complete.

Gualcamayo has two emergency power generators, One of 2 MW (MegaWatts) at the ADR plant for backup power; and one of 400 KW (Kilowatts) in TK1N to maintain the water balance and pump process solution to the heap leach pad. This emergency power system is connected to the critical equipment that needs to be running to prevent any release to the environment in case of a prolonged power outage. Gualcamayo provided examples of preventive maintenance records for the backup power generators for the last three years. A review of these records, confirmed that the generators are checked on a monthly basis for fuel level, lighting, heating and are also start tested. This inspection would trigger a corrective maintenance work order if required. Gualcamayo has a contract with the manufacturer of the 2MW power generator to conduct a monthly preventive maintenance program. Gualcamayo provided examples of preventive maintenance records for the 2 MW power generator for the last three years and found them to be complete.

In case of power outages, Gualcamayo has procedures POPE-PRO-003 “Start up after power outage” and POPE-MEM-018 “Start up and connection of emergency power generator” that details the steps to be taken to provide backup power when required.

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

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

Discuss the basis for this Finding/Deficiencies Identified:

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

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Gualcamayo has a net positive evaporation water balance, with annual precipitation that ranges between 200 - 300 mm. Considering these environmental conditions, Gualcamayo has developed an in-house probabilistic water balance using Microsoft Excel which is an updated version of the previous water balance that was developed by Vector in 2007. The model

considers the uncertainty and variability inherent in the prediction of precipitation patterns, by considering frequency and distribution of precipitation events along with extremes and seasonal variations. In 2021, Gualcamayo retained an external consultant (Solucionart) to review the water balance calculations including the leach pad merger area between the North and South leach pads which was commissioned in 2021. The conclusions and recommendations of Solucionart report were incorporated in the Excel water balance. The water balance includes the following factors: solution application rates; precipitation; evapotranspiration; evaporation from ponds; retention of water in the ore; and potential power outages. A description of the water balance model and calculation is described in the Gualcamayo Water Balance presentation dated March 2022.

The Gualcamayo Water Balance presentation dated March 2022 describes the solution rate applied to the leach pads, which is 10 liters/hour/m^2. The Water Balance considers a 500-year/24-hour storm event of 58 mm of rain. This design storm duration and storm return interval of 500 years provides a sufficient degree of probability that overtopping of the ponds can be prevented during the operational life of the facility. The Tamberias weather station is situated at the plant area and collects rainfall data and rainfall intensity since 2013. Data from this station and from other weather stations of the National Meteorological Service that are located in the vicinity of the mine operation (records since 1991) were analyzed for use in estimating the site design precipitation. The evaporation data is calculated using Penman Monteith Formula (FAO-56) that considers other parameters measured in the Tamberias weather station such as maximum and minimum temperature, relative humidity, dew temperature, relative humidity, wind speed, solar radiation, latitude and elevation. The heap leach facilities at Gualcamayo have a surface water control system for controlling and safely directing runoff generated from upgradient watersheds around the heap leach pad and ponds. As such, upstream precipitation is not considered in the model. There is no freezing potential at Gualcamayo and the amount of snow accumulation and thawing in the area is negligible. The water balance includes the following factors: solution application rates; precipitation, evapotranspiration; evaporation from ponds; retention of water in the ore; and potential power outages. The heap leach operation recirculate water from the PLS and includes addition of fresh water to maintain the required water balance for operations. There are no underdrain system below the leach pad facilities as there is no shallow groundwater in the area. Gualcamayo does not have water discharges to surface water. The water balance considers a 24-hour and 48-hour power outage contingency simulation. For both scenarios there is enough capacity between the PLS pond (17,200 m^3) and the contingency pond (70,000 m^3) to manage the drain down from the leach pads. These contingency scenarios could only occur in case the primary source of power (San Juan grid) and the emergency power generators were not in operation. The capacity of the ponds can actually manage more than 48 hours of drain-down prior to an overflow to the environment. Gualcamayo estimates that the probability of occurrence of such event is 0.6%.

Gualcamayo conducts biweekly inspections and monitoring activities to heap leach pad and ponds to ensure they are operated according to the design criteria and requirements of the POMMYC. This frequency is considered adequate considering the low rainfall and high

evaporation rates in the area. Inspections include liner integrity, LCRSs, ponding on the heap surface, pH levels in the leachate solution, solution levels at PLS pond, solution collection system and diversion channels around the heap leach facilities. Records of inspection forms for the last 3 years were reviewed and found to be complete. Freeboard and solution volumes in the PLS are monitored on a biweekly basis. The auditors reviewed freeboard data for the last 3 years and verified it was managed according to the design criteria.

Procedure POPE-PRO-050 “Process operation and water balance according to PLS level” indicate that the maximum solution level in the PLS pond is 70% and provide detailed actions to be implemented to lower the level of solution in the pond, such as ceasing leaching in active cells of the leach pad and pumping solution from the PLS pond to the ADR plant. Procedure POPE-PRO-002 “Control of tank levels” also indicate that the contingency pond should be maintained empty at all times. Inspection records for the heap leach facilities and ponds were reviewed for the last 3 years and found to be complete. Freeboard and solution volumes in the PLS pond are monitored online in real time from the control room. The auditors also reviewed monitoring data for the last 3 years and verified that the solution volumes at the PLS were managed at all times according to the design criteria.

The Tamberias weather station is situated at the plant and collects rainfall data and rainfall intensity since 2013. Data from this station and from other weather stations of the National Meteorological Service that are located in the vicinity of the mine operation (records since 1991) were analyzed for use in estimating the site design precipitation. This information is collected by the Environmental area and is included in the water balance model for calibration purposes. The auditors reviewed on-site meteorological monitoring data and found them to be complete.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Gualcamayo has implemented net coverings to restrict access of wildlife to open waters where WAD cyanide exceeds 50 mg/l, which is the case at the PLS pond, and TK1N and TK1 tanks at both the heap leach area and the plant area, respectively. The ADR plant is fenced to prevent access of livestock or terrestrial wildlife to the area. This fencing does not include the PLS pond or the heap leach drainage channels. However, in the case of the heap leach channels, Gualcamayo has covered the pipelines with plastic which prevent wildlife access to cyanide solutions that could be present. The process solution channels were free of process solution during the field audit. Procedure POPE-VAL-027 “Elimination of ponding on leaching cells”

requires daily inspections to check for ponding and the required steps to handle surface ponding, including manual or equipment excavation to aid drainage and improve infiltration. No wildlife mortalities associated to cyanide have been reported during the recertification period which is an indication that the current controls in place have been working properly.

WAD cyanide concentrations are usually above 50 mg/l in the PLS pond, as well as in TK1N and TK1 tanks, and in the leach pads. Cyanide concentrations are in average 200mg/l WAD cyanide. The entire process system was designed to avoid open water areas. The only pond that can contain cyanide solution above 50 mg/l WAD cyanide is the PLS pond, which is designed to have a netting to prevent wildlife mortalities. In addition, TK1N and TK1 tanks also have a netting to prevent access of wildlife.

Procedure POPE-VAL-027 “Elimination of ponding on leaching cells” requires daily inspections to check for ponding and the required steps to handle surface ponding, including manual or equipment excavation to aid drainage and improve infiltration. The procedure also indicate that the situation needs to be corrected immediately once observed in the field. During the site visit, no ponding was observed on the surface of the heap leach pad. Process personnel were interviewed by the auditors and verified that they were aware of the procedures to follow to identify and correct this type of situations conditions. In addition, procedure POPE-VAL-001 “Preparation of areas for leaching” indicates that leaching should occur with a gradient towards the center of the leach pad to avoid overspray of solution and/or saturation of leach material and potential slides outside the leach pad area.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The Gualcamayo mine operates with zero discharge of process solutions. It does not have direct discharges to surface water. Gualcamayo does not have indirect discharges to surface water. There is a monitoring system (15 groundwater monitoring wells) in place to verify presence of any seepage from the leach pad and PLS pond. Three additional monitoring wells were also installed in the vicinity of the ADR plant area. Monitoring activities are conducted according to the requirements set forth in the POMMYC. Review of groundwater monitoring data confirms no cyanide related impacts have occurred to surface or groundwater receptors. There is a gorge in the Colorados sector located downgradient of the leaching facilities and the PLS pond that has no water, and is permanently dry. In case of any indirect discharges from cyanide facilities, it would daylight in this gorge, which has been in dry condition during the last 3 years. As such, it

can be confirmed that Gualcamayo has no indirect discharges that could impact surface water. There are no indirect discharges that have caused cyanide in surface water to rise above levels protective of a designated beneficial use of aquatic life.

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

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 4.6

Discuss the basis for the Finding/Deficiencies Identified:

There is no designated down gradient beneficial use, nor any actual point of groundwater use, nor any applicable groundwater standard in the area surrounding the Gualcamayo operation. Regardless of that, Gualcamayo has taken measures to prevent seepage from cyanide facilities including a composite clay and geomembrane liners in the leach pads and PLS pond; leak detection recovery systems between liners of the PLS pond, secondary containments for cyanide facilities in the ADR plant, standard operating procedures for management of cyanide facilities, among others.

Gualcamayo has an extensive groundwater monitoring network that analyses for cyanide (free, WAD and total) concentration. Data collected since the beginning of the operation indicate no detection levels for cyanide species. There are 18 groundwater monitoring wells downgradient of the cyanide facilities. Fifteen around the leach pad and PLS pond and three around the ADR plant. These groundwater wells are monitored on a periodic basis and are reported as dry for this recertification period. In addition, Gualcamayo monitors nine additional regional monitoring wells located upgradient and downgradient of cyanide facilities. No cyanide presence has been detected in these monitoring wells. Gualcamayo does not have seepage that has caused cyanide concentration of groundwater to rise about levels protective of beneficial use.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Spill prevention and containment measures are provided for all cyanide unloading, storage, mixing and process solution tanks. Tanks located at the Adsorption lines A and B, Elution Low

Flow (ELF) line, Metpor area and TK007 and TK010 tanks are all within an interconnected concrete secondary containment which is in good condition and provides a large containment area. Secondary containments of tanks located at the Adsorption line C carbon line, TK1 and TK1S tank overflows to the PLS. The mixing and storage tanks, acid wash tanks and TK1N tank have stand-alone secondary containments with sufficient capacity to contain releases. The process areas are contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process. The sump pumps are included in the preventive maintenance routes. The secondary containment systems are inspected on a biweekly basis as part of the process facilities inspection system. At the agglomeration area, cyanide mixing and storage tanks are located within the footprint of the leach pad. Any cyanide spill occurring in the area will be contained in the leach pad.

Secondary containments for cyanide unloading, storage, mixing and process tanks are sized to hold a volume greater (110%) than that of the largest tanks. Some secondary containments are interconnected while other ones are stand-alone and other ones overflow into the PLS pond. The secondary containment volume calculations were reviewed and deemed as sufficient. Furthermore, those containment systems have remained unchanged since the last recertification audit. The process areas are contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process. The containment system of the cyanide mixing area is a stand-alone containment that will ultimately drain into the process area. Containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. The secondary containment areas are constructed of reinforced concrete. In some cases, polycarbonate containment walls are placed to account for pressurized stream of released solution that could shoot over the secondary containment boundary. At the agglomeration area, cyanide mixing and storage tanks have secondary containments and additional containment capacity is provided by the leach pad footprint. The auditors observed that the secondary containments were maintained empty, with no materials stored inside them. In addition, design drawings of secondary containments for cyanide storage, mixing and process tanks were reviewed by the auditors and were found in compliance.

All containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. There are no discharges from secondary containments to the environment. In some cases, the secondary containments from the process plant discharge into the PLS pond that has a capacity of 17,200 m^3 and could act as a large containment system for the whole plant. The pumps have automatic level sensors to keep the secondary containments free of water. These pumps are inspected on a biweekly basis and are included in the preventive maintenance program.

Cyanide pipelines at Gualcamayo are located within a secondary containment provided for at the process plant and leach pad area, including concrete and plastic lined channels as well as pipe-in-pipe containment. In some cases, polycarbonate containment walls are placed to account

for pressurized stream of released solution that could shoot over the secondary containment boundary. There are no buried pipelines in the plant area. Pipelines connecting the leach pads, process plant, PLS pond and contingency pond are lined with HDPE through all its extension to convey any leaks to larger containment areas. In addition, Gualcamayo has covered pipelines with plastic liners to prevent any high pressure releases outside of containment. Cyanide pipelines are inspected on a biweekly basis as part of the routine inspections by plant personnel and are also included in the preventive maintenance program.

No cyanide pipelines present a direct risk to surface water as there is no surface water body that requires special protection over and above the containment measures previously described. Pipelines remain unchanged and retain the same safety features identified in previous audits. All facilities are far away from areas that may require special protection. All cyanide mixing, storage and process tanks are constructed of coated carbon steel, stainless steel and concrete; solution pipelines are constructed of carbon coated steel, stainless steel or HDPE, which are compatible with high pH cyanide solutions.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Quality control and quality assurance (QA/QC) programs have been implemented during the construction of cyanide facilities at Gualcamayo. The mine maintains files with QA/QC reports for the facilities constructed before the last recertification audit in 2018, which was found in compliance with the Code requirements, and has implemented QA/QC programs for the new cyanide facilities built during this recertification period.

New cyanide facilities constructed since the 2018 audit include a leach pad merger area between the North and South leach pads including an additional leach pad area with geomembrane. This new leach pad area was built and tested following a quality control and quality assurance program conducted by Ausenco, and was commissioned in 2021. The auditors reviewed the QA/QC documentation for the leach pad foundation, geomembrane, pipelines and concrete structures, as well as as-built drawings properly stamped and signed off by the engineer of record. Other new cyanide facilities constructed during this recertification period include a cyanide mixing and storage tanks at the agglomeration plant; Derrick filters to separate fine carbon in the process solution; and a new cyanide mixing enclosure on top of the cyanide mixing tank at the ADR plant. All these new cyanide facilities were commissioned in 2021. The new facilities were built and tested following a quality control and quality assurance program. The

auditors reviewed the QA/QC documentation including concrete and materials, as well as as-built drawings.

Gualcamayo QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The mine maintains files with the QA/QC reports for its cyanide facilities. The QA/QC reports for the new facilities include soil compaction tests, subgrade and concrete testing, fabrication material certificates and technical specifications for HDPE drainage products, liners, piping, electrical and mechanical instrumentation. QA/QC reports also include non-destructive test logs, destructive test logs, vacuum tests, pre-weld tests, destructive sample tests, and repair controls. As mentioned in the previous recertification audit report, the QA/QC program and the records reviewed and verified during the audit demonstrate that the materials are according to design specifications, the compaction has been adequate, the foundations of the tanks are suitable, geomembranes are appropriate and have been placed according to design and assembly specifications.

QA/QC records for cyanide facilities are retained by Gualcamayo. For the new cyanide facilities built since 2018 (leach pad expansion, cyanide mixing and storage tanks at the agglomeration area, derrick filters and new cyanide mixing enclosure on top of the cyanide mixing tank at the ADR plant), the auditors reviewed several documents in hard copy and electronic versions. The auditors also verified that QA/QC records are retained for all other cyanide facilities including North leach pad Phases 1, 2A and 2B; South leach pad Phase 1; the ADR plant; and Absorption Line C.

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

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

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo has a written procedure PSSA-MAB-009 "Monitoring of surface and groundwater" for both surface water and groundwater monitoring activities. This procedure provides details

related to sampling techniques, duplicate and blank samples, sampling equipment, calibration of field equipment, preservation techniques, chain of custody procedures and cyanide species to be analyzed. Water sampling is conducted by Gualcamayo personnel and samples are sent to Induser lab in San Juan for analysis.

Qualified personnel of Gualcamayo environmental department prepared the monitoring procedure following Minas Argentinas S.A water sampling standards. The procedure was developed internally by environmental technicians and was reviewed and approved by the Health & Safety and Environmental manager, who is a chemistry engineer with more than 20 years of experience in environmental and health and safety management in mining activities. As mentioned in previous audit reports, sampling and analytical protocols were also communicated to the local Environmental Authority. Analytical protocols for environmental samples are provided by Induser lab in San Juan.

The monitoring procedure provides details related to sampling locations and frequency, preservation techniques, equipment calibration, quality control, chain of custody procedures, shipping instructions, and cyanide species to be analyzed. Water samples are sent for analysis to INDUSER lab in San Juan. The environmental monitoring program includes sampling frequencies for both surface and groundwater (that varies from weekly, monthly and quarterly) and maps showing the surface and groundwater monitoring locations with respect to cyanide facilities. Examples of completed chain-of-custody records for the recertification period showing proper use of the forms were reviewed by the auditors.

Gualcamayo field data sheets for surface and groundwater samples register in writing the weather conditions, livestock/wildlife activity, field parameters (i.e., conductivity, pH, and temperature) and groundwater levels. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered consistently. Samples are sent for analysis to INDUSER lab in San Juan. Cyanide species (WAD, free, total) are analyzed on monthly and quarterly samples. Records were available and reviewed by the auditors for all sampling and monitoring activities. The frequencies of the monitoring activities were deemed to be appropriate by the auditors.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo has an internal detailed closure plan dated November 2019, developed by Knight Piésold Consulting, and a memorandum update of December 2021 including new facilities such as the leach pad merger area between the North and South leach pads, refinery expansion and the agglomeration plant. Both documents include a section for decommissioning of cyanide facilities. Decommissioning activities include decontamination of equipment, removal of residual cyanide reagents, rinsing of heap leach pads with water and alkaline chlorination, and elimination of residual water through evaporation. Decommissioning activities include all the necessary steps to bring the facility's components to a safe, chemically stable condition, such that they do not present a risk to people, wildlife or the environment due to their cyanide content. At closure, once gold recovery ceases, all processing plant items and steel structures will be decontaminated and all concrete surfaces will be thoroughly washed down to remove any residual material. Gualcamayo indicated that this detailed closure plan will be updated and presented to the government authorities for approval 2 years prior to entering the closure phase.

The Gualcamayo detailed closure plan dated November 2019 includes a general implementation schedule. Decommissioning activities and final closure are scheduled to occur between 2028 and 2032, with progressive closure activities starting in 2025, and post closure activities are planned between 2032 and 2036. An updated implementation scheduled is also included in the December 2021 closure plan memorandum. This schedule will continue to be refined as Gualcamayo approaches the closure phase.

Gualcamayo conducts periodic reviews of its closure plan. The first conceptual closure plan was developed in 2010, and then it was updated in 2016. A detailed closure plan was developed in 2019, which was updated in December 2020 and then again in December 2021. Local regulations do not require mining companies to conduct a periodic review of their closure plans. Minas Argentinas S.A. has internally established to review its closure plan on a periodic basis to reflect changes. As mentioned above, the detailed closure plan will be updated with detailed engineering and presented to the government authorities for approval 2 years prior to cessation of operations. In addition, Minas Argentinas S.A. requires the Gualcamayo mine to review and update its Asset Retirement Obligation (ARO) cost estimation for the whole mine, including cyanide facilities decommissioning costs. These costs are reviewed and updated annually and submitted to the Corporate office, where it is audited by an external party.

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

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

Describe the basis for this Finding/Deficiencies Identified:

Gualcamayo develops and updates on an annual basis a closure cost estimate as part of Minas Argentinas S.A. asset retirement obligation (ARO). The 2021 closure plan memorandum update developed by Knight Piésold Consultants includes a total closure cost estimate of US$ 34 million (MM). The costs were estimated using third-party rates of local contractor companies. The closure plan includes a complete list of closure tasks with unit rates. The cost estimate considers the following decommissioning costs: heap leach pad rinsing (US$ 12.58 MM), and demolition of ADR plant and cyanide storage area (US$ 0.65MM). The closure plan indicates that decontamination costs of the ADR plant are not included in the closure cost estimates as this activity is considered as an operating cost once operation of the plant ceases.

According to Minas Argentinas S.A. requirements, Gualcamayo reviews and updates annually its closure costs as part of the Asset Retirement Obligation (ARO) cost estimation exercise. The December 2021 closure cost estimate is US$ 34MM, which is higher than the previous amount of US$ 26.7MM due to consideration of additional time to rinse the heap leach pad

As local and federal authorities have no requirements for financial assurance of closure activities, Gualcamayo has established self-insurance as a financial assurance mechanism for closure activities, which includes decommissioning of cyanide related facilities. The most recent closure cost estimate of US$ 34MM has been audited by a qualified external financial auditor (Estudio Contable Perez Villegas) on February 14th 2022. The auditors reviewed the statement from the financial auditor and confirmed that the insurance was calculated including the estimated decommissioning cost and that the operation has sufficient financial strength to fulfill the self-insurance obligation. The auditors also verified the professional certification of the financial auditor.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo has established operating procedures to ensure that worker exposure to cyanide is minimized and/or controlled when performing tasks as unloading, mixing, Absorption Desorption and Recovery (ADR) plant operations, agglomeration, heap leaching operations, entry into confined spaces, and equipment decontamination. These procedures provide detailed information on risks involved with each task. These also adequately describe safe work practices and include a section related to PPE requirements and considerations of safety hazards. Procedures were reviewed and found to be sufficiently detailed to enable a safe operation and to minimize worker exposure, providing a listing of required personal protective equipment (PPE) to prevent and/or minimize worker exposure to cyanide and/or cyanide containing solutions.

Procedures also call to conduct pre-work assessments and to obtain a pre-work permit for the most critical cyanide related tasks. Pre-start checklists for cyanide unloading, mixing and preparation was reviewed by the auditor, certifying that operators are required to identify whether they have the required PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures. Pre work inspections are completed at the beginning of every shift and continues to use a pre-work form called PEACE (Think, Understand the Hazard, Analyze the Risk, Control and Execute) and also to obtain a work permit (as verified in the Cyanide Solution Preparation procedure).

When conducting maintenance work in equipment in contact with cyanide solution, operators should perform a field risk assessment, they should also identify the eye wash stations, appropriate PPE, HCN portable sensor, cyanide response kits among others.

Workers at the operation are given the opportunity to provide input to procedures by the following mechanisms:

- Procedure PES-09-00-3.3-002 "Daily Safety Talks", where safety and occupational health matters are discussed.
- The Argentine legislation requires that the Hazard Identification and Risk evaluation for performing a job should be done with input from workers.
- The site also promotes a two-way communication between supervisors and operators during pre-work risk assessments.
- Participation of operational staff in the Integrated Management System (EHS) periodic meetings where changes and system improvements are discussed.

- Monthly Key Performance Indicators presented by the process management where they present operational results, safety and health performance, including workers suggestions.
- "SHE (Safety, Health and Environmental) Committee" where there is a worker's representation from operational areas, including ADR and Heap Leaching.
- Task Observation program is also applied at Gualcamayo where improvements to tasks, activities or behavioral aspects can be discussed.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo maintains adequate operating controls and monitoring activities in its facilities ensuring the protection of worker´s health and safety and also evaluating the effectiveness of these measures.

Gualcamayo has determined pH levels for cyanide solutions to prevent the generation of HCN gas during cyanide mixing and other production activities, requiring that any process solution with cyanide should be between a range of pH greater than 10 and to a maximum of 12. The auditor has verified HCN gas levels in the Cyanide Preparation area and ADR Plant below HCN levels 4.7 ppm for the recertification period.

Gualcamayo has established the following areas where workers may be in risk of exposure to HCN gas:

- CN Warehouse
- ADR Plant - Cyanide mixing/preparation area
- ADR Plant - Carbon in Columns trains (03)
- ADR Plant - Elution circuit
- Agglomeration Circuit - Leach Pad Valle Norte
- Heap Leach Pad active irrigation cells and pregnant solution ponds

Gualcamayo has determined appropriate controls including the use of appropriate PPE. Operating procedures, which specify the PPE required, have been developed and implemented in these areas. For example, for entering the warehouse, operators require a cartridge mask besides typical PPE. Cyanide preparation requires the use of type B suites, rubber gloves and cartridge masks to mention some of the PPE required.

Regarding HCN monitoring devices, Gualcamayo only uses personal (portable) HCN monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide. Gualcamayo does not use fixed HCN gas monitors. The portable devices used at Gualcamayo are mainly the Gas Badge Pro manufactured by Industrial Scientific. All operators in the warehouse, process plant and leach pad areas carry a portable device. The auditor observed warehouse operators, plant operators, agglomeration operators and emergency response personnel using portable monitors throughout the audit. Other sources of evidence were the procedures and portable devices inventory records. All Portable monitors are also maintained, calibrated, and tested on a regular basis and records are kept. Gualcamayo maintains a contract with the external company Noetec, which is a certified representative of Industrial Scientific and other monitoring devices in Argentina. Noetec conducts two visits per year to maintain and calibrate devices. Gualcamayo also conducts "testing" according to the manufacturer manual. The site has emergency procedures in place that if a HCN gas concentration exceeds 4.7 ppm in the portable device, the operator will immediately evacuate the zone to a ventilated area and will inform his supervisor and control room. If the concentration exceeds 10ppm all personnel in the area will immediately evacuate and communicate the event.

The auditor verified during the field inspection that appropriate signage is displayed at the Warehouse and ADR plant entrance and throughout the various facilities to alert personnel of the presence of cyanide, access restrictions and the required PPE for the area. In addition to identification of cyanide areas and PPE requirements, signage is also used to restrict eating, drinking, smoking and open flames.

High strength cyanide solution is dyed in red color for clear identification. Gualcamayo uses Sodium cyanide from Chemours (now Draslovka) since 2019. Draslovka send the dye mix inside the cyanide bags together with the cyanide briquettes so that during the mixing operation, the high strength (20-30%) cyanide solution turn into a red color solution. Bulk cyanide boxes from Orica and Tungsoh Petrochemical acquired after Gualcamayo signed a lending agreement with Veladero (in November-December 2021), have been already utilized, nevertheless the site indicated that those boxes also had the dye inserted in each box.

Gualcamayo has installed fixed safety showers and eyewash stations in the Cyanide Preparation Area, ADR Process Plant and Agglomeration Plant. The warehouse has recently installed a portable eyewash bottle station. Showers and eye wash stations inspections are recorded in a visible check list tag. The site undertakes monthly inspections of eyewash stations. Safety showers and eyewash stations are also checked as part of pre-work inspection checklists to ensure that they are operational and that water flows are adequate. There are Dry Powder ABC sodium bicarbonate extinguishers strategically located throughout the cyanide preparation area, the ADR plant, Agglomeration Plant, and Heap Leach Area. Fire extinguishers are inspected and tested monthly. Inspection records are kept visible with a check list tag attached to the extinguisher. All extinguishers observed were fitted with inspection tags, which documented monthly inspection checks.

Gualcamayo has established a color coding for concentrated cyanide solution and cyanide solution that was observed by the auditor in several entrance locations in the Cyanide Preparation Area and the ADR process plant. Pipes containing cyanide are painted following this protocol and marked as containing cyanide solution; flow direction is also indicated. The auditor verified that the color used to identify highly concentrated cyanide concentration is magenta. For low concentration solution (barren) the color is light brown (beige) with magenta stripes. Also, the pipelines connecting the Process Plant with the Leach Pad facility, in the recirculation area, in the PLS Pond and in the contingency pond are all adequately identified, including the label with flow direction. Tanks that contain cyanide or cyanide solution are also labeled to enable plant personnel to identity its content.

Gualcamayo maintains Safety Data Sheets (SDS) for sodium cyanide from manufacturers (Chemours) in hard copy and in Spanish in areas such as the Warehouse, Cyanide Preparation, and the ADR Process Plant. SDS were also found in the control room and the clinic. In addition to the SDS sheets, signage is available to alert personnel of chemicals and required emergency response requirements in the high-risk cyanide areas. All SDS are written in Spanish.

Gualcamayo has maintained an "Incident Reporting and Investigation Procedure" which describes the requirements for environmental, health and safety related incidents reporting and investigation to determine the basic causes of the incident, provide remedial actions to ensure that a similar incident does not reoccur. The procedure also call the need to prepare an incident report including a brief description of the immediate causes and the actions taken. Subsequently, the investigation of the incident is done ensuring that corrective actions are determined. Even though this procedure also applies to cyanide-related incidents, the auditor verified that during this Cyanide Code recertification cycle, the site has not experienced a cyanide-related incident that would have been reported and investigated.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Gualcamayo has maintained Emergency response plans, capabilities, and procedures to respond to worker explore to potential cyanide release unwanted events or scenarios.

Gualcamayo has made available oxygen, antidotes, resuscitators, radios, telephones, and alarms in critical areas. First aid kits are located in the ADR Process Plant Control room, ADR Plant laboratory and Refinery Area. As a result of the audit and considering the exposure risk of operators in the cyanide solution mixing tank at the Agglomeration Circuit - Leach Pad,

Gualcamayo has installed an extra first aid kit with antidotes in this area. The auditor verified that all antidote kits are stored at the correct temperature and that the antidotes have not expired. Ambulances have the following means of communication: radio and satellite phone. Oxygen resuscitator and trauma kits are kept within the ambulance and clinic. In addition, SCBA boxes are located in the process plant control room and in the Emergency Response Team vehicles. Verification was conducted by visual inspection of the cyanide antidote kits at each location including process plant, lab, and the medical center and also by interview with the on-site doctor.

Gualcamayo inspects its cyanide first aid equipment monthly. Cyanide kits are stored as directed by their manufacturer and replaced within schedule to ensure that they will be effective when needed and can be readily available for an emergency. The mine has monthly formal checklists conducted by the Emergency Brigade to first aid equipment in areas where cyanide is used, to ensure it is available and in working conditions if needed. The checklist includes the inspection of cyanide antidote kits (storage requirements and expiration dates), oxygen, resuscitators, SCBA, respirator, the ambulance equipment, among others. The medical staff also conducts monthly inspections of all first aid equipment at the medical center and ambulances.

Gualcamayo has maintained an Emergency Preparedness and Response Plan (EPRP) which describes emergency response guidelines to respond to cyanide exposures, including the scene assessment, safety aspects, evacuation procedures, first aid response, cyanide poisoning symptoms, use of antidotes by medical staff, recovery, and disposal. The EPRP includes several scenarios such as transportation incidents, releases during unloading, releases during fires and explosions in the CN storage area, confined spaces incidents, leach pad and process plant releases, and general cyanide gas intoxication. In addition to the EPRP, Gualcamayo has developed contingency procedures for pond overtopping emergency conditions and also power failures and the activation of generators for critical pumps in the ADR Process Plant and Heap Leach Pad facilities. The medical staff have developed a detailed procedure for attending a medical case of cyanide intoxication. This procedure describes the possible types and forms of intoxication, symptoms, exposure limits and treatment at different exposure levels.

Gualcamayo has its own onsite capability (infrastructure, equipment, and medical resources) to provide first aid and medical assistance to workers exposed to cyanide. It is called the “Micro Hospital” which consists of an emergency shock area, cardiac monitoring area, and advance patient treatment sector, observation rooms, evaluation room, and office, parking lots for ambulances and accommodation for medical staff. In terms of equipment at Micro Hospital, it has defibrillators equipment in the emergency shock area which is also equipped with cyanide antidote kits, oxygen, first aid kit, and resuscitators. The site has three ambulances ready to provide level 2 Life Support Service. The medical services at the clinic are managed by a third party company called ECCO and consists of an Occupational Health Doctor (Gualcamayo Staff that reports to the EHS Manager), two doctors on call, two permanent nurses and one Radiologist (also functions as Ambulance Driver).

Gualcamayo has determined that its medical facilities have qualified staff, adequate equipment, and expertise to respond effectively to a cyanide incident and to treat intoxicated workers. Nevertheless, the EPRP indicates that, in the event of a cyanide exposure where the victim, once stabilized, presents other complications that requires medical attention beyond the capabilities of the on-site Micro Hospital, the worker will be transported to the San Juan Medical Center. The auditor has verified this requirement through conducting a complete Micro Hospital inspection, by performing interviews with medical staff, by reviewing first aid treatment procedures and training records that confirms the site can adequately respond to the need of performing medical treatment to workers due to cyanide exposures.

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

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo has maintained an Emergency Preparedness and Response Plan (EPRP) that sets out emergency response procedures for the entire mine site including scenarios involving cyanide releases. Procedures for alerts, initial response, communication, evacuation, first aid and spill response, training and reporting are also provided in the EPRP.

The operation has also maintained a Plan of Operations for Contingency Maintenance and Monitoring (POMMYC) which outlines steps and measures that would apply to emergencies related to cyanide release during cyanide unloading, ADR Process plant cyanide release due to pipes, valves and tanks failure and Leach Pad cyanide release due to pipes and valves failure.

The EPRP and POMMYC considers the following cyanide release scenarios:

- Transportation incidents
- Releases during unloading and mixing
- Releases during fires and explosions in the CN storage area
- Pipe, valve, and tank ruptures
- Overtopping of ponds and impoundments
- Confined spaces incidents
- ADR Process Plant Releases

- Leach pad releases
- Cyanide gas intoxication
- Power outages and pump failures

Regarding emergency response planning for transportation-related emergencies, the sodium cyanide supplier for Gualcamayo during the recertification period has been Chemours (now Draslovka). Draslovka contracts Victor Masson Transportes Cruz del Sur for terrestrial cyanide transport. Both companies have been certified as fully compliant with the Code. Agreements between Draslovka and Cruz del Sur are in place, whereby these organizations and their transporters are responsible for shipping of cyanide to site. This responsibility extends to consideration of transport routes, storage and packaging, the condition of transport vehicles and response in the event of an emergency or release during transport. Gualcamayo keeps a copy of Cruz del Sur emergency response plan for cyanide transportation to the mine site. The plan addresses all Code requirements for the transportation of cyanide. In the event of an emergency or incident within the mine property fence (considering the access security gate), Gualcamayo would respond to such an incident that involve container rupture and cyanide briquette release, both onto dry land and into or near surface water and in the event of a truck fire. The Emergency brigade escorts the cyanide convoy in the only route within the mine entrance and the ADR plant (Cyanide Warehouse).

Gualcamayo´ s EPRP, POMMYC and contingency procedures describe the following emergency response actions:

- Evacuation and clearing of site personnel requirements. The site has established alarms and internal and external sirens for personnel evacuation.
- Initial response, first aid and the use of cyanide antidotes at ADR Plant, Agglomeration plant and Medical center by trained medical personnel.
- Control and mitigation measures of a cyanide related incidents like spills or leaks including ADR plant spills, Agglomeration plant, heap leach facilities and makes provision for initial response, first aid, and spill reporting control and cleanup.
- Containment measures are also covered under procedure “Sodium Cyanide Release Control”
- Assessment, investigation and prevention of future releases is covered under the Gualcamayo Incident Reporting and Investigation procedure, which required the identification of root causes including preventive actions to avoid future events.

7.2 Involve site personnel and stakeholders in the planning process.

The operation is: ■ in full compliance
□ in substantial compliance
□ not in compliance with Standard of Practice 7.2

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo solicits the input of its workforce in their emergency response planning documents. No outside stakeholders have been involved on the development of the EPRP, POMMYC and contingency procedures since they do not have designated responsibilities under the plan. The mechanisms used by Gualcamayo to involve workers are performed through Integrated Management System meetings, Safety Committee meetings, improvement feedback and lessons learned from emergency mock drills and Emergency response plan training.

Considering the location of the mine-site, the mitigation controls and recovery plan available, there is very low risk of any type of community impact; therefore, Gualcamayo considers that there is no need for nearby communities in the vicinity of the Operation or downstream of it, to be involved in emergency planning process and response. Nevertheless, Gualcamayo maintains communication mechanisms with communities regarding general emergency response actions.

The Operation communicates the risks of cyanide and how to act in case of an emergency by implementing the following initiatives:

- By sharing and distributing the “Gualcamayo Community Information Manual”, which includes description of possible emergency scenarios, risks, mitigating actions involving transportation, storage, and use of cyanide in Gualcamayo.
- Gualcamayo Monitoring Manual: which consists in a quick guide to the environmental monitoring plan of Gualcamayo.
- Power Point “The Management of Cyanide in Gold Extraction“.

Gualcamayo also has on-site capabilities and resources for dealing with all possible cyanide related incident scenarios and does not consider external entities having responsibilities or roles nor formally participation in emergency response planning process. The auditor also has verified that Gualcamayo has maintained sufficient medical resources, infrastructure and equipment that would not require to treat exposed patients to cyanide in medical facilities off-site.

Gualcamayo maintains a social engagement program (describe in principle 9) that allow communication and feedback between communities, stakeholders, and the mine. These include topics as the transportation and use of sodium cyanide and provides general emergency response written information.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo´ s EPRP provides contact details for the emergency committee which involves the general manager and staff. The GM has authority to ensure that sufficient and adequate resources are allocated to carry out the EPRP. The plan also indicates that the Emergency Brigade Lead member on shift will take responsibility of the emergency in absence of the Emergency Chief. The Emergency Brigade consists of a Chief/Commander, 2 Lead Brigade members and 23 Brigade members, which 19 are trained for Hazmat emergencies. The functions and responsibilities of the emergency committee, emergency chief, emergency lead and brigade members are detailed in the EPRP including specific duties, equipment, material and supplies, and communication teams.

The plan also details the training required for the Brigade Members and the Emergency Response Chief to ensure that training is provided and maintained. The Emergency Response Chief reports to the EHS Manager onsite. Training program was reviewed by the auditor for 2021, 2020 and 2019. The EPRP also includes emergency call-out procedures, a 24-hour contact information for the Brigade on duty which is distributed to all managers by e-mail every week.

Emergency response equipment including PPE´s is provided in the EPRP, which includes among others: clothing for fire intervention, equipment for rescue at heights, underground rescue, transportation and vehicle rescue, haz-mat, support equipment and also a list of all emergency vehicles. The cyanide emergency response equipment is checked monthly and records of checklists were verified for 2019, 2020 and 2021. Equipment is also inspected by the Brigade during training sessions on a weekly basis. Equipment that is already part of the Brigade vehicles is checked on a daily basis.

Gualcamayo does not use off-site responders for cyanide emergencies. However as noted in standard of practice 7.2, the site has identified off-site medical facilities in San Juan regarding the potential to evacuate patients (due to other medical complications) that have been stabilized due to cyanide exposure. Gualcamayo has demonstrated it keeps procedures to stabilize victims on-site prior to transferring to off-site facilities and that maintains adequate staff, equipment, and expertise to respond effectively to cyanide emergencies.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Regarding notification procedures as part of Gualcamayo´s Emergency Plan, the EPRP maintains an up-to-date list of management staff. The auditor verified that the list has the correct

contact names by verifying current positions in the organization chart. It also covers a notification plan and a diagram for external communications, including regulatory agencies, municipal and provincial authorities, cyanide supplier and transporter (Draslovka and Cruz del Sur), local police, off-site medical facilities, ambulance, helicopter service, the media, and other stakeholders. Gualcamayo also maintains a Crisis Management Plan that describes upper management responsibilities including communications. The auditor verified contact information for the community of Guandacol and the town of Jachal. Procedures for notifying enforcement agencies and the media are also provided in the EPRP. The auditor also reviewed the "Transportes Cruz del Sur" emergency response plan and found evidence of communication procedures in case of an event during cyanide transportation from the port of Buenos Aires to the mine site property entrance.

EPRP also includes a requirement to notify ICMI in case of major incident following the Cyanide Code guidance and terms. Gualcamayo has not experienced any significant cyanide related incident in this recertification period, therefore, did not trigger any notification to ICMI.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo´s EPRP provides measures in the event of cyanide release and addresses cyanide recovery and remediation if necessary. It requires that any cyanide containing solutions spilled from the warehouse, process plant and leach pad that breaches containment must be controlled, neutralized, absorbed, and affected soil removed, covering remediation cases for both liquid solutions and for solid cyanide. The process plant has also maintained a CN Spills Control procedure that describe contention and decontamination practices in more detail, using Sodium Hypochloride. Sodium Hypochloride is stored at an isolated tank located in the ADR plant and prepared to a 20% dilution concentration to be used as a neutralization agent for CN spills on soils, where there is no risk of contact with open waters. This procedure also describe soil recovery methods by using shovels to a 1 meter depth and taking samples for laboratory analysis, listing all parameters to be considered when analyzing any potential contingency. Gualcamayo has determined that soil samples below 500 mg/kg for total cyanide (Argentine Industrial Soil Standard) will be considered as reclaimed. In the case of spills in waters, concentration should be below 0.022 mg/l free cyanide. Liquid cyanide impacting natural soils should be controlled and solution can be pumped back to a contained area if necessary. Potentially impacted soil must be excavated to depth of impact and deposited into the leach pad. Contaminated soil and clean-up debris will be disposed in the Heap Leach Pad. Gualcamayo

uses bottled water for its mine site drinking water supply. There are no community or resident water supplies that would be at risk to potentially require an alternative water supply. Verification was by interview with environmental personnel.

Gualcamayo´s EPRP also prohibits the use of sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat surface waters or in conditions where the spill or treatment chemicals could reach surface waters, as it could be harmful to aquatic life.

The Environmental Department would manage the characterization, extent and remediation of a spill considered to be class C, and is responsible for reporting spills to the regulatory agencies. Gualcamayo Monitoring Plan includes surface water and groundwater sampling and regulatory reporting program that must be initiated if cyanide is detected downstream of process plant and leach pad facility.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo´ s EPRP is revised at least once every two years; however, some annexes are regularly reviewed (for example, the contact telephone numbers) or every time there are significant changes and new information, after the occurrence of an unwanted event, mock drills or changes in compliance requirements or regulations. The latest version of the EPRP is version # 27 dated February 2022.

Gualcamayo conducts annual mock drills based on likely release/exposure scenarios to test the response procedure, and incorporates lessons learned from the drills into its response planning. Records of these drills are kept with the Emergency Response Department and were reviewed as part of the evidence. The auditor reviewed mock drills conducted in January 2019, September 2021, December 2021, and March 2022. Documentation includes photos, strengths, weaknesses, lessons learned and corrective actions. Follow up correspondence verifying that identified corrective actions have been accomplished was also reviewed. The auditor verified that all improvement action plans generated from drill mocks have been closed.

The EPRP also states that a review session should be held after an unwanted event occurs, after mock drills or changes in compliance requirements or regulations. The latest review of the EPRP was in February 2022. No review of the Plan has been done due to a mock drill (improvement actions do not require changes in the plan) or a cyanide-related emergency in the recertification period as there has not been cyanide-related incidents.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

All personnel and contractors working for Gualcamayo should receive formal training on cyanide according to their position and tasks. Also, all visitors should attend the induction course which includes safe handling of cyanide.

New employees and contractors should receive the following category of training:

- Cyanide management applies to general site staff and contractors of approximately 1.5 hours (incluing evaluation) which covers cyanide risks, exposures, symptoms, environmental impacts, and an overview of the Code.
- Specific Training – It involves training on specific job procedures and work instructions in the Process Plant, Leach Pad, Maintenance and warehouse.

New workers at the mine that will work directly with cyanide or might encounter cyanide receive training in accordance with internal procedure “Cyanide hazard recognition and awareness training” when unloading, storage, handling, and disposal. Gualcamayo (Integrated Management System Department) maintains a register in excel with all training courses provided. It also has a training matrix in excel for employees that details which training should be received depending on their job description. The training matrix includes personnel from all departments.

Gualcamayo is currently conducting Cyanide Use refresher training every two years which includes chemical and physical properties of cyanide; cyanide health hazards; symptoms of cyanide exposure; emergency response; and first aid, including use of oxygen and amyl-nitrite. The training includes a written test. The auditor reviewed the excel training matrix for the “Safe Use of Cyanide” course and check registers for different workers that were interviewed during the audit and found refresher training for all of them.

Training records, including refreshers and Safe Use of Cyanide training courses has been retained in Gualcamayo for: supply chain, process plant, leach pad and maintenance. The Integrated Management System Coordinator maintains these records, which identify the trainer, trainee, topics covered, date and sign off sheet.

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

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

Describe the basis for the Finding/Deficiencies Identified:

All personnel in job positions including cyanide unloading, mixing, production and maintenance, receive training on how to perform their assigned tasks with minimum risk to worker health and safety. Prerequisite training includes an annual program that covers operational procedures in the warehouse, process plant and leach pad area, now also including the Agglomeration circuit. Aspects such as cyanide awareness, response, process information, hydrogen cyanide monitoring, and location of cyanide safety equipment are included. This training program was verified to cover key operating procedures: cyanide unloading and storage, cyanide mixing in the process plant, cyanide mixing in the agglomeration circuit, pH adjustment, leach pad irrigation cells placement and operation.

The auditor verified that Gualcamayo has maintained during this new recertification cycle, a comprehensive list of operating procedures for the process plant and leach pad operations that define the steps required to complete a task that involves cyanide handling in a safe manner. It also include procedures for the recently installed Agglomeration Process in the Leach Pad. Training schedules and modules are developed and maintained and were available for review by the auditor.

Gualcamayo has experienced personnel in cyanide processes conducting training to operators, which is provided directly by the area supervisors who have been in their position for several years and have helped to develop the Standard Operation Procedures; and they are supported by other experience employees. For this recertification period, Gualcamayo decided that having experienced supervisors conducting the training was more efficient than doing a “train-the trainers” course.

All personnel in job positions that involve the use of cyanide and cyanide management are required, prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety. Safe Use of Cyanide course training is a prerequisite for working in the plant. New trainees are assigned to work in one of the circuits under the supervision of a competent operator. These trainees are required to work under

direction of these competent operators until they demonstrate ability to work without direct supervision in a safe and responsible manner.

Gualcamayo requires and provides refresher training for safe use of cyanide, first aid for cyanide intoxication and cyanide emergency response to assure that employees and contractors continue to perform their jobs in a safe and environmentally protective manner. Training includes chemical and physical properties of cyanide; hazards of cyanide; symptoms of cyanide exposure; emergency response; and first aid, including use of oxygen and amyl-nitrite. The training includes a written test. Gualcamayo training matrix indicates that refresher training course should be taken every two years. Annual refresher applies for operational procedures.

To evaluate the effectiveness of training related to cyanide, tests are taken after a training session while planned task observations are conducted by the supervisor of the trainee after on-the-job training sessions. The supervisor is responsible of observing new employees and determining when they are ready to work independently.

Training records in Gualcamayo are retained in physical and electronic form. The Integrated Management System Coordinator also retains specific operational and task training records. Training records contains the name of the trainer, trainee, date, subject covered and is signed by both the trainer and trainee. Written and verbal tests are completed to demonstrate the employees understanding of the training materials. The auditor verified this requirement by randomly checking records of workers from supply chain operator that unloaded cyanide boxes during the audit observation, contractors working in the ADR Plant and plant operators that were conducting the CN preparation.

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

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

Describe the basis for the Finding/Deficiencies Identified:

The auditor verified that plant operators and maintenance personnel responsible for unloading, mixing, production, and maintenance are trained in general decontamination and first aid procedures for cyanide release incidents. Verification included review of training records conducted by Draslovka in 2022, training conducted by the Emergency Brigade in 2021 and interviews with cyanide operators. Gualcamayo has updated decontamination and first aid procedures in the EPRP in 2022, and has presented evidence of refresher training to operators that would have first aid response responsibilities in these areas. The auditors have also verified that first aid training has been included in the recently updated training program. Operators were

interviewed and demonstrated good awareness of what actions are to be taken in the event of cyanide release. Records of training attendance were reviewed by the auditors and found them complete.

The Emergency Brigade members at Gualcamayo are trained through participation in mock drill exercises as well as formal training programs conducted twice a week, usually on Thursdays to review procedures and on Sundays to perform practical exercises. The training program includes the use of necessary response equipment for hazmat and cyanide related incidents. The auditor also verified training performed by Chemours in 2019 and by Draslovka in 2022. The auditor also verified that Gualcamayo Emergency Brigade representatives participated in a National Emergency Response Seminar where emergency response best practices, training session and desk top exercises were conducted.

Gualcamayo has adequate staff, equipment, and expertise to respond effectively to emergencies, therefore, has not determined that external community members or responders as fire brigades will have a role as responders to a cyanide incident even during transportation. Gualcamayo and Draslovka have demonstrated that they maintain appropriate resources, medical response infrastructure and emergency plans to manage events of cyanide releases and exposures without the need of off-site responders.

Refresher training for cyanide events in Gualcamayo is conducted as part of the site training and emergency mock drills program. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required. Training topics include cyanide management, safe cyanide handling, first aid for cyanide intoxication, cyanide SDS, General Emergency Plan, Cyanide Code, equipment decontamination, among others.

Gualcamayo´ s Emergency Response training is conducted by internal and external parties. The auditor verified external training conducted by Chemours in 2019 and Draslovka in 2022. New hire and refresher internal training records are retained and kept current using Microsoft Excel with paper copies kept on file. Training records include 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. Verification was also performed through interview with emergency brigade and process personnel.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

During this recertification period, Gualcamayo continued using mechanisms to provide opportunities to stakeholders to communicate their concerns related to cyanide management, including engagement programs, meetings, and tours to the mine site. Gualcamayo has developed written and visual descriptions of how their activities are conducted and how cyanide is managed, and has made these available to communities and other stakeholders. These include:

- The Community Information Manual: the objective is to make available to the community, information on activities that pose risks to stakeholders, and describe the actions and controls to minimize those risks.
- Gualcamayo Monitoring Manual: which consists in a quick guide to the environmental monitoring plan of Gualcamayo.
- Power Point presentation: The Management of Cyanide in Gold Extraction

The community relations department maintains a community engagement plan, which includes a series of programs, which are the “Open Doors Program” based on visits from stakeholders, mainly community members to the mine site and the “Citizen Participation Program” designed to keep communities and stakeholders informed about new social programs and their status (both programs have been blended after the pandemic). Another is the “Partnership Program” which consists of seminars conducted within the communities surrounding the operations, and the “Participatory Monitoring program” that consists of water sampling, analytical results, and trend analysis review in strategic water source locations in the water streams in close proximity of the site that includes participation from community representatives. Gualcamayo also has a grievance mechanism in place to receive, review, manage and resolve written or verbal complaints and grievances in a timely and consistent manner. There have been no cyanide related concerns or complaints in the last 3 years.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Gualcamayo has developed written and visual descriptions of how their activities are conducted and how cyanide is managed, and has made these available to communities and other stakeholders as indicated in standard of practice 9.1. This information includes description of how cyanide is being used in mining and other industries, how it is transported to Gualcamayo, how it is used for leaching the gold content in the ore , environmental controls, monitoring, and main emergency actions. Material is also available at the office in Jachal.

Gualcamayo Communications and Community Relations staff stated that illiteracy is very low. Nonetheless, Gualcamayo provides information verbally and/or visually via meetings, slideshows, and videos described as part of the Open Doors and Citizen Participation programs.

Gualcamayo has not experienced incidents related with cyanide transport, storage, use or disposal during the recertification period. Nevertheless, the site Emergency Preparedness and Response Plan (External Communications section) includes a communication plan (including a press release template) , that in case of a cyanide release and exposure incident, the information will be available to the public.

Gualcamayo also maintains its Emergency Response and Communication systems up to date for any type of potential cyanide releases that could have significant adverse effects to health and environment. Gualcamayo has not reported any cyanide releases off the mine requiring response or that resulted in health or environmental impacts. The site is required to report severe incidents involving hospitalization or fatalities to the provincial authorities, which are also available to the public. The POMMYC document describes the different communication and reporting channels the mine will use to communicate incidents to authorities. Incident reporting is also made available to the public by the authorities. The plan indicates that the reporting criteria will describe the location and the nature of the incident, as well as immediate mitigation actions taken. The site has not experienced any cyanide releases that cause applicable limits for cyanide to be exceeded in the last 3 years.