ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

AngloGold Ashanti, Cerro Vanguardia Mine

Santa Cruz, Argentina

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

2024 Audit Cycle

15929 Avenida Venusto, Apt. 225,
San Diego,
CA, 92128, USA
www.smartaccess.us

Table of Contents

Mining Operation: Cerro Vanguardia Mine

Mine Owner: AngloGold Ashanti

Mine Operator: Cerro Vanguardia S.A. (CVSA)

Name of Responsible Manager: Francisco Lopez, General Manager

Address and Contact Information:
Avenida San Martín 1032, 9310,
Puerto San Julián
Santa Cruz, Argentina
Tel: +54-2962-496152
flopez@cvanguardia.com.ar

Location and description of the operation

The Cerro Vanguardia mine (CVSA) location is presented in the picture below:

Cerro Vanguardia deposit is a series of veins and mined using open pit techniques. There are around 15 open pits with variable contents of gold, silver and base metals. Ore is mined at a rate of 1 million tons per year with an average gold grade of 9.5 grams per tons (g/t) and of silver 111 g/t. The Cerro Vanguardia mineral processing plant has a capacity of approximately 3,000 tons per day. The process involves the following steps:

High grade ore:
- Three stages of crushing
- Stockpiling and blending
- Grinding in a ball mill

Low grade ore:
- Heap leach facility (HLF)
- Pregnant leach solution (PLS) pond
- Barren tank
- Emergency pond
- Cyanide leaching in tanks (CIC)
- Washing and thickening in Counter-Current Decant (CCD) units
- Leach solution clarification
- Carbon in leach (CIL)
- Elution
- Precipitation of gold and silver using zinc powder (Merrill Crowe process)
- Smelting to form metal doré
- Cyanide recovery using volatilization (Cyanisorb)
- Cyanide destruction using hydrogen peroxide
- Deposition of tailings in a tailings storage facility (TSF)

The Production Process
The ore that arrives from the mine to the profit plant is reduced in size through three crushing stages: a primary jaw crusher, a secondary cone crusher and a tertiary cone crusher, respectively, in this way a 9 mm product is obtained to collect in the dome.

Under an aluminum dome of 70 m in diameter by 21 m in height, is the system of mixing, collecting and recovery of crushed ore. The dome can store between 14 and 15 thousand tons. This serves as a lung to feed the mill when there are maintenance tasks in the crushing area. Once deposited the ore enters through a hopper and is transported by a belt to the ball mill.

Milling
At this stage water is added to the mineral to obtain a pulp and inside the mill begins grinding. Three-inch steel balls collide with the ore at high speed and by cataract effect grinding occurs. The ball mill works in closed circuit with a battery of cyclones. Fresh ore, process solution and

reagents are added to the mill. Among the reagents are lime and cyanide. In this way the process of leaching gold and silver begins.

The process solution transports the leached metals and finely ground ore to the grinding thickener. In this thicker the pregnant solution in the overflow is obtained, which feeds the clarification cones and a pulp with a high percentage of solid by the underflow, which feeds the leaching circuit. The underflow of the grinding thickener feeds the stirring leach ponds. Stirring leaching is performed in six tanks equipped with double agitators with shaft aeration and diffuser at the end. The tanks of 900 m3 capacity each, are equipped with baffles and feeding drawers. Pipes are available to adjust the concentration of cyanide in the leach tanks.

Leaching
The pulp from the leach agitation tanks is pumped into the washing thickener. The thickener that receives pulp from the agitation leaching circuit is called No. 1 Thickener. The underflow of Thickener No. 1 is pumped into the feeder to the CIL (Carbon in Leach) circuit underflow of the thickener thanks to the dilution caused in the feed to the thickener by the addition of barren solution. The metals dissolved in the agitation leaching circuit are transported from the overflow of No. 1 Thickener to the process tank and from there to the ball mill, via the process solution. Flocculants are added to these thickeners to help separate the liquid from the solid. The solution that comes out of the top, and has higher metal content, is called pregnant solution.

The Carbon Leaching circuit (CIL) consists of seven tanks with a capacity of 380 m3 each. The pulp flows by gravity from Tank No. 1 to Tank No. 7. The tanks are equipped with double agitators with aeration by a shaft and meshes that allow the passage of the pulp, preventing the passage of activated carbon. The meshes are of the Kambalda type. From time to time a certain amount of coal is removed from the first tank to begin a process called desorption or elution, to recover gold and silver from activated carbon. The pregnant elution solution is sent to the clarification circuit. The pulp discharge from the CIL circuit goes to the CCD2 thickener, where it is diluted in order to decrease the concentration of cyanide, the overflow will feed the Cyanisorb plant, while the underflow will go to the tail thickener or tailings, in order to produce a wash of the cyanide in pulp and finally be sent to the tailings dam.

Pregnant Solution
The pregnant solution comes from two circuits: the overflow of the grinding thickener and the elution circuit containing gold and silver, but they differ in that while the grinding circuit is a very large flow with low concentrations; the elution circuit is a very low flow with high concentrations. The clarification is done in two cones of 1,250 cubic meters of capacity. The solution passes through the center of the cone, which has a filter bed - like a sponge- and retains fine particles. Then, it passes to a second stage of filtration, which consists of plate filters (Metpor), where the solution passes through them, the solids are retained in the fabrics and on the other side the clean solution is coming out. The pregnant solution, clarified and filtered, is pumped into the deaeration circuit, where the clean solution is forced to pass through a tower where oxygen is extracted

Precipitation with Zinc
The goal of precipitation is to obtain the solid and then melt it. The form of precipitation used at Cerro Vanguardia for gold and silver is a method called metal zinc precipitation or Merril Crowe process. As the solution enters, it is added metallic zinc and begins to precipitate, leaving the poor solution with practically no gold / silver and containing all the concentrate in filter presses. The filtrate (poor solution) is transferred to the sterile solution tank, from where it is pumped into thickener No. 2.

Periodically, the smelting personnel enter the area, open the filters, remove this concentrate and take it to smelting to produce the doré. The precipitate is dried in stoves, weighed and dosed with fluxes to proceed with the loading of the smelting furnace. The doré metal casting is emptied into molds.

Cyanide Recovery Plant (Cyanisorb)
The overflow from CCD2 feeds the cyanide regeneration plant, before being sent to the washing thickener. The objective of the cyanide regeneration circuit is to be able to discharge the pulp to the dam with the least amount of cyanide and thus operate within the parameters set by the mining authority and the International Cyanide Management Code requirements. The pulp is washed, and the overflow of the thickener is sent to the Cyanisorb plant, whereby a purely chemical process the cyanide is recovered from the solution.

Detoxification
In CVSA the Cyanide Oxidation Circuit consists of a matrix of reagent composed of peroxide and alkaline chlorination. The reagents are dosed in a tank specifically designed for giving enough residence time so the reagents can achieve the desired detoxication before entering the three stage final tails slurry pump system. The detoxification system work in a complementary way to the AVR (Cyanisorb Plant) to guarantee that tails to the TSF has WAD (Weak Acid Dissociable) cyanide levels always below 50 ppm.

Heap Leaching
The low-grade ore from the mine is crushed in the crusher circuit for the Heap Leach Material. This is typical three stage closed crusher circuit consisting of a jaw rusher, and two cone crushers. This crushing circuit is known as the Sandvik plant. While there is a second circuit known as the Metso circuit which is a two-stage closed circuit with a lower throughput than the Sandvik plant. Both circuits can achieve 2.1 Million Tn of dry ore per year. The crushed materials from the Sandvik and the Metso plants are both combined and agglomerated in one rotating drum. The agglomerated material is hauled to the pad using Cat 777 trucks.

The ore is crushed from a ROM size to a size of 55% passing # 3/8. This crushed ore is then hauled and stacked in the heap leach pad. The stacked ore is then sequentially put into leaching for 90 days using an irrigation rate of 10 liters/hour/m2. The average height of the stacking is 6 meters, but this can fluctuate depending on the geometry of the pad.

The solution used for the leaching process in the heap leach pad comes from the plant, which is the barren solution of the plant. This barren solution comes from the Merrill Crowe process. The solution balance between the PLS / barren flow is 550 m3/h. The PLS solution collected from the pad travels by gravity to the PLS pond and from there by means of a pumping system is returned to the plant to the CCD thickeners circuit. The overflow of the CCD goes to the clarification Circuit, while the CCD slurry goes to the CIL circuit. There is no cyanide nor water makeup in the solution circuit in HLF, the makeup of solution is produced in the solution that goes to the heap leach pad from the ADR (Adsorption-Desorption-Recovery) plant.

Tailings Storage Facility
The slurry from the Tailing high-rate thickener is deposited in a TSF using a three-stage pumping system to achieve the distance from the plant to the current location of the TSF. The slurry is pumped with a 50% solid content.

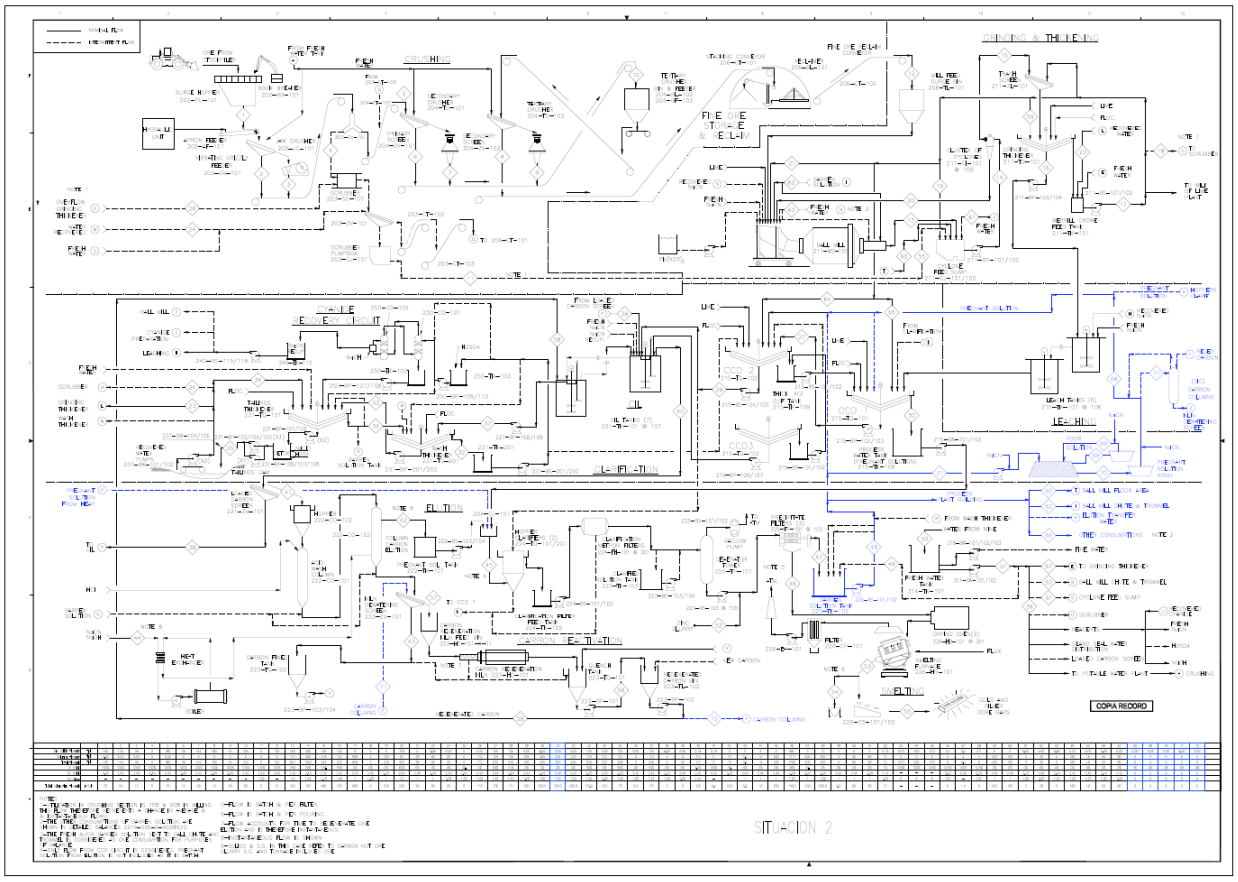
The TSF is a wall raise construction using a combination of downstream and center line method along its perimeter. The distribution of the slurry is achieved by 49 spigots discharge points along the perimeter of the wall crest. There is also a recovery water system to pump back to the plant the clear solution from the pond TSF. The pond location must remain far away from the walls, so for achieving this requirement the spigots are cycled in such way to maintain the pond centered. It is also important to keep a controlled size and shape in the pond. There is also a circular seepage collection that runs with a circular path along the perimeter of the TSF at the bottom of each wall raise system.

The scope of the recertification audit at Cerro Vanguardia S.A. (CVSA) comprises the process plant facilities including the ball mill, CIL tanks, CCD tanks, CIC tanks, barren tank, cyanide mixing and storage facilities, the cyanide recovery system (Cyanisorb), and the hydrogen peroxide cyanide destruction system. The scope also includes the tailings pipeline corridor, the Tailings Storage Facility (TSF) and seepage collection system, the Heap Leach Facility (HLF) including the leach pad (phases 1 and 2), the pregnant leach solution (PLS) pond, and the emergency pond. There are no treated cyanide water discharges to the environment at CVSA.

CVSA 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. Cyanide is stored in cyanide tanks before it is distributed for use in the production facilities.

New facilities constructed and operated since the 2021 recertification audit includes raise of the TSF dam (6th raise) and Leach Pad expansion Phase 2.

The CVSA process flowsheet is presented below:


GRINDING & THICKENING
COPIA RECORD
SITUACION 2

Auditor's Finding

The International Cyanide Management Institute (ICMI) approved Audit Team verified that the Cerro Vanguardia mine 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.

The Cerro Vanguardia mine 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 Email:fernando@rdzconsulting.com
Date(s) of Audit:	October 8th – 11th, 2024

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.

Cerro Vanguardia Mine		March 3rd, 2025
Name of Operations	Signature of Lead Auditor	Date

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:

Sodium cyanide purchased by CVSA during the recertification period was manufactured by Australian Gold Reagents (AGR) at their plant located within a fertilizer and chemicals complex at Kwinana, some 40 km south of Perth within the state of Western Australia. This facility is currently certified under the Code, achieving the original certification in 2007 and has maintained compliance and its ICMI certification since then. The latest recertification was on August 28th, 2023. CVSA has a sales agreement to purchase sodium cyanide from AGR. The fully executed agreement between AGR and CVSA was reviewed and is valid until December 2024, and it requires the facility to be certified against the Code. Throughout the recertification period (December 7, 2021, to date), CVSA has purchased certified cyanide from AGR. The auditors verified (bills of lading, purchase orders and commercial invoices) that no other sodium cyanide from a different manufacturer has been used in CVSA during the recertification period.

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:

The auditors verified through the ICMI´s website, that all cyanide transporters involved in CVSA cyanide supply chain during the recertification period are Code certified companies: AGR Australian Supply Chain - November 09, 2022; AGR Ocean Freight Supply Chain – July 06, 2023; AGR Central and South America Supply Chain – October 23, 2023; Transportes Cruz del Sur – December 27, 2023; Transportes Vesprini – April 17, 2023.

CVSA has provided shipping papers documenting chain of custody from the point that the trailer is filled in Australia through offload at the mine site entrance gate. It also has written agreements with AGR to transport sodium cyanide from the production plant complex at Kwinana, Western Australia, to Puerto Deseado Port in Argentina, designating responsibilities for cyanide management in the supply chain. From this port the Argentinian transporter Víctor Masson Transportes Cruz del Sur S.A. (Cruz del Sur) was responsible of terrestrial transport to the mine site since December 2021 until February 2024, which was the final transportation service. Since that date, CVSA decided to sign a new agreement with transporter "Transportes Vesprini"; since then, Vesprini has conducted four shipments of sodium cyanide to CVSA starting in April 2024. AGR´s transport of sodium cyanide within Western Australia is undertaken by rail and/or road along recognized dangerous goods transport routes classified by the relevant authorities. The transport network includes contracted transporters servicing Fremantle Port for export. AGR's Australia Supply Chain was last recertified in full compliance with the Code on November 09, 2022. AGR´s marine transportation constitutes the Ocean Freight Supply Chain and it is a consolidation of all marine carriers used by AGR to distribute their solid cyanide from Fremantle Port in Western Australia to their global customers. The supply chain forms the marine link between the certified Australian Supply Chain and the certified supply chain or certified transporter relevant to the customer site. Main routes used by the carriers include Argentinian port Puerto Deseado. The Ocean Freight Supply Chain was last ICMI certified on July 06, 2023. AGR has also the ICMI certified Central and South America Supply Chain which was found in compliance with the Code on October 23, 2023. CVSA contract with AGR includes cyanide transport including Argentinian ports, in this case they are using Puerto Deseado port. From this point the mine takes control of the cyanide for terrestrial transport until the mine site. A truck convoy is used to road transport cyanide products from Puerto Deseado to the mine site. The current transport service agreement is with Translogistica Vesprini S.R.L. (Transportes Vesprini). CVSA personnel organize the off-loading of the product once the transport convoy has reached the mine site. The written agreements between CVSA, the cyanide producer and the transporters

designate responsibility for all the Code requirements. The contracts with AGR, Cruz del Sur and Transportes Vesprini were reviewed to verify their responsibilities in writing. Bills of Lading for cyanide deliveries show that the cyanide was produced by AGR and transported to the Puerto Deseado Port. Safety and maintenance of the means of transportation throughout transport to the Argentinian port is the seller's responsibility, as well as task and safety training and emergency response for the seller's transporters throughout the process. Purchase orders from Transportes Vesprini were reviewed since April 2024, including transportation practices, emergency response plan and the route risk assessment from Puerto Deseado to the mine site gate. Transportes Vesprini has been ICMI certified on April 17, 2023.

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:

CVSA has constructed a solid cyanide warehouse next to the mine general warehouse. The solid cyanide warehouse is accessed by a gated alleyway between the two buildings. The warehouse consists of a gated and locked area with two roofed and walled (on three sides) storage areas with a central access way open to the air, and concrete floor. CVSA receives solid sodium cyanide briquettes in one ton "bag in box" intermediate bulk container (IBC) plywood boxes. The auditors inspected the solid cyanide unloading area and warehouse. Cyanide boxes are unloaded from sea containers in an open area next to the cyanide warehouse and transported inside the warehouse using a forklift. The warehouse remains locked, except when cyanide is unloaded and stored in the facility or removed for cyanide mixing purposes. CVSA has a cyanide mixing and storage facility that was designed and constructed in accordance with sound and accepted engineering practices. This was verified during the initial certification audit for CVSA. No changes or modifications have been made since the initial audit and subsequent recertification audits. As indicated in previous recertification audit reports, the cyanide mixing and storage facility has three tanks: A mixing tank, a storage tank, and a second storage tank for cyanide pumped back from the cyanisorb system. Design and drawings for the solid cyanide warehouse and the cyanide mixing system have been retained from the initial certification audit

and were available for review by the auditors. As built drawings including the design drawings of the cyanide mixing and cyanide distribution systems were found properly stamped by a certified professional engineer. The solid cyanide warehouse and the cyanide mixing facilities were designed and constructed by consulting firm Fluor Daniel. The field component of the audit confirms that the cyanide mixing and storage tanks were built on concrete hardstanding maintained in good condition. Cyanide tanks are located within containment concrete berms, which are sized to contain at least 110% volume of the tank. The cyanide tanks area is also subject to periodic inspections to detect any obvious releases or failure in containment

The solid cyanide warehouse and the cyanide mixing facilities are located within the process plant area and far away from communities and surface waters. CVSA is located in an arid area and there are no perennial watercourses in the vicinity. These facilities remain substantially unchanged since the initial certification audit and subsequent recertification audits. These facilities are not located near any offices or places where workers might congregate. Fixed HCN monitors are installed at the cyanide mixing and storage area. Portable HCN monitors are used in the solid cyanide warehouse. All personnel with access to the cyanide mixing and storage facilities, including contractors, receive site specific health and safety training. All these measures minimize the potential for human exposure. Appropriate warning signage is placed at these facilities to alert operators of cyanide presence and hazards associated with it. The solid cyanide warehouse is in a secured compound with a locked gate and keys controlled by warehouse staff. The solid cyanide warehouse and the cyanide mixing and storage facilities are located within their own fenced areas, where public access is controlled. The cyanide mixing area drains inside the secondary containment of the plant. Any release from the cyanide tanks will be contained within the secondary containment and pumped back to the system.

The cyanide mixing and the two storage tanks have ultrasonic level indicators, as well as high and high-high level alarms installed. These levels are continuously monitored from the control room. Arrangements remain unchanged since the previous recertification audit. The cyanide mixing standard operating procedure (SOP or procedure) is designed to prevent overfilling the tanks. The operators verify that the tank levels are low enough prior to preparing cyanide. Cyanide is not mixed if the tank has an initial volume higher than 60%. There is a high-level alarm and high-high level alarm on each cyanide tank, which are set at 85% and 90%, respectively; and are monitored from the control room. There are also displays of level indicators in the cyanide mixing area with visible alarms that are inspected visually during the cyanide mixing process. The level indicators in the cyanide tanks are continuously monitored to ensure they are operational. From the SCADA system (software control system), visual and audible alarms would be activated, and pumps will automatically shut down if pre-set intervention levels were exceeded. CVSA provided records showing that the level sensors in these tanks had been maintained and calibrated annually throughout the recertification period. The auditors observed screenshots in the control room showing that the level indicators were functioning correctly. In addition, the cyanide mixing SOP and the spill control plan for hazardous materials address inspection, identification and response for the cleanup or recovery of leakage.

The cyanide mixing and storage tank area remain substantially unchanged since the initial certification audit and subsequent recertification audits. Cyanide mixing and storage tanks are secured to solid, reinforced concrete pedestal-type foundations and are contained within concrete berms with concrete flooring that are an adequate barrier to prevent seepage to the subsurface. The tanks, berms and containment areas are subject to periodic inspections at the beginning of each 14-days shift. The auditors observed that the concrete containment systems were in good condition. The bermed containment area of the tanks is sized to contain 110% of the largest tank volume and has been confirmed previously as part of engineering specification checks. This secondary containment is equipped with a sump, pump, and automatic controls to return liquids to the process circuits.

Cyanide storage facility arrangements remain substantially unchanged since the initial certification audit and subsequent recertification audits. The solid cyanide warehouse is located in a dedicated facility that has a central access way with roofed storage areas open to the air on both sides, which provides adequate ventilation and build-up of hydrogen cyanide gas is unlikely to occur. The cyanide storage tanks are located within the plant building that has ventilation fans. The tanks have air extractors that vent outside the building. Cyanide is stored with adequate ventilation to prevent the build-up of HCN gas. The cyanide boxes in the warehouse are stored under a roof, secured from weather, and on wooden pallets (part of the box) that raise the boxes above the concrete floor of the warehouse. No solid cyanide is stored within the plant building. The risk of potential contact with meteoric water is very low. The solid cyanide warehouse is located within its own fenced area with restricted access. The main access door is locked when not in use and there is no public access. Warehouse personnel keep the key to access the cyanide warehouse. Appropriate warning signage is posted at access points. The cyanide storage tanks are located within the plant building inside its own fenced area. The area is accessed through a locked man-gate and truck-gate, both activated by key cards that limit access to authorized operators only. As such, public access is prohibited. The cyanide warehouse is dedicated to solid sodium cyanide storage only, with no other materials permitted to be stored. No storage of other materials was observed during the field inspection. Only high-strength cyanide solution is stored in the cyanide preparation area within the plant. The preparation area has a dedicated sump and pump such that there is no potential for mixing with incompatible materials along drainage pathways. No acids, strong oxidizers, explosives, food, tobacco, or animal feeds are stored at both the warehouse and the preparation area.

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:

Procedures for managing empty cyanide containers are described in SOP “Preparation, distribution and storage of cyanide”. The auditors observed a cyanide mixing process and disposal of cyanide containers and verified that the procedure was followed at all times. CVSA receives solid sodium cyanide briquettes in one ton “bag in box” intermediate bulk container (IBC) plywood boxes. Procedure “Preparation, distribution and storage of cyanide” specifies measures undertaken to ensure that cyanide packaging materials are managed in such a manner to prevent their use for any other purposes. Procedure “Preparation, distribution and storage of cyanide” requires that cyanide bags are washed with a 5% sodium hydroxide solution for 12 hours to dissolve any residual cyanide. The bags are then washed three times with fresh water. This wash water is then sampled and analyzed by the internal laboratory to verify that the concentration of free cyanide is less than 10 ppm. The auditors reviewed randomly selected laboratory results from throughout the recertification period to verify compliance in a spreadsheet of laboratory data for free cyanide from bag rinse samples. Water from rinsing activities is added into the cyanidation process. This practice was observed by the auditors during the field visit. Procedure “Preparation, distribution and storage of cyanide” indicates that decontaminated cyanide bags are pressed and placed in empty cyanide boxes for transport to the Hazardous Storage area of the mine, where it is then sent for final disposal in an offsite facility in Santa Fe province. CVSA provided example of shipping manifests and disposal certificates covering this recertification period. Cyanide is not purchased in reusable containers and, as such, no packaging is returned to the supplier.

CVSA has procedure “Preparation, distribution and storage of cyanide” that outlines the requirements for inspection, observation and mixing of cyanide solutions; as well as the operation, maintenance, 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 barren and sodium hydroxide. There is an inspection form that is completed at the beginning of each day that acts as a checklist for cyanide preparation and requires measuring pH levels, inspection of emergency showers and eye wash stations, tank level, emergency response equipment, among other requirements for safe cyanide management. Procedures “Reception and storage of sodium cyanide” and “Sodium cyanide dispatch to the plant” indicate the requirements to safely unload cyanide boxes from the sea container, place them in the cyanide warehouse and transport them to the mixing area. The procedures also describe unloading and handling requirements to prevent rupture or puncture of the boxes. Procedure “Preparation, distribution and storage of cyanide” describes the steps for safe lifting of the boxes to the cyanide mixing platform to prevent rupture or puncture. Procedure “Reception and storage of sodium cyanide” requires that the boxes be stored to a maximum height of three per stack. The auditors verified this during the field inspection. Plan “Management of hazardous chemical spills” address spills of both solid and liquid cyanide. No spills related to cyanide mixing were reported for the recertification period. Procedure “Preparation, distribution and storage of cyanide” requires operators to use the appropriate PPE during mixing activities. These include rubber gloves, rubber boots, full face shield with approved respirator, Tychem coveralls with attached hood,

hardhat, hearing protection, and personal HCN detector. The procedure requires video observation from the control room. During the field audit two workers conducted the mixing activity. One operator was stationed at the floor level who hooked the cyanide bag in the overhead crane, and then the other operator, working from an elevated deck near the top of the mixing tank, proceeds to elevate the bag, break it and introduce the content into the mixing tank. Cyanide-specific first aid and emergency response equipment are available outside the plant building, including medical oxygen. The cyanide briquettes in the boxes already come with red colorant dye. This was verified in the field by the auditors. A cyanide mixing event was observed during the audit. The review indicated that CVSA has appropriate SOPs and practices to handle and mix cyanide solutions in a safe manner.

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 at CVSA comprises the process plant facilities including the ball mill, CIL tanks, CCD tanks, CIC tanks, barren tank, cyanide mixing and storage facilities, the cyanide recovery system (cyanisorb), and the hydrogen peroxide cyanide destruction system. The scope also includes the tailings pipeline corridor, the Tailings Storage Facility (TSF) and seepage collection system, the Heap Leach Facility (HLF) including the leach pad (phases 1 and 2), the pregnant leach solution (PLS) pond, and the emergency pond. There are no treated cyanide water discharges to the environment at CVSA. CVSA has developed several manuals, plans, and standard operational procedures (SOP) for the safe operation of cyanide facilities, including unloading, mixing and storage facilities, heap leach operations, process plant operations, cyanide recovery, cyanide detoxification and tailings management. In May 2024, CVSA has renewed ISO14001:2015 and ISO:45001 certifications of its environmental and safety management systems, respectively, and are valid for three years, which ensures document control practices. All procedures include considerations of safety hazards, a description of the tasks to be performed, and a section related to PPE (Personal Protective Equipment) requirements. Procedures are reviewed and updated as needed to ensure they reflect current

practices. Procedures are stored in a centralized location in SharePoint for easy access by all users. The auditors reviewed the procedures and found them to be sufficiently detailed to enable safe operation.

CVSA has manuals, plans, and procedures in place that include critical assumptions and parameters for the safe operation of cyanide facilities. The TSF OMS (Operation, Maintenance, and Surveillance) Manual indicates a minimum freeboard of 0.5 meters for the facility to accommodate the 100-year/24-hour storm event, which has been estimated at 122 mm (millimeters). A report from SRK consultant on the TSF dam includes the 100-year/24-hour storm event, which has been estimated at 122 mm and a 10,000 year/24-hour storm event, which is estimated at 220 mm. Similar storm events are also applicable to the Heap Leach Facility (HLF). Procedure “Control of the emergency pond level” includes the maximum operation level of the PLS pond, which has been defined at 4,000 m3 (65% of the pond volume). CVSA has established a WAD (Weak Acid Dissociable) cyanide target of 50 mg/l in tailings discharges at the spigot. If WAD cyanide concentrations are above 50 mg/l, the addition of hydrogen peroxide should be increased. The operational target for the cyanide destruction system is 30 - 35 mg/l WAD cyanide at the spigot, however, this value is not documented in operational procedures. There is no specific limit for WAD cyanide concentrations for open waters in the PLS, as the resulting cyanide concentration in the pond depends on production and recovery needs; however, the operation has controls in place such as birdballs to prevent access of wildlife to these waters. CVSA does not discharge any solution containing cyanide to the environment, including surface water. Procedure “Preparation, distribution and storage of cyanide” requires that pH values are at 11.0 standard units for cyanide mixing.

CVSA has developed and implemented standard operating procedures (SOPs) 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 mixing as well as for processing facilities, the TSF, HLF and all associated piping and pumps as having contact with cyanide. The Operation, Maintenance, and Surveillance (OMS) Manual for the TSF includes a list of critical aspects and areas to be inspected and inspection frequencies, as well as water management procedures to retain storage capacity during operations. CVSA has implemented an inspection program with frequencies that vary from daily, weekly, bimonthly, and quarterly for the process plant, CIC, CIL, CCD, cyanisorb, detox, TSF facilities and HLF. Inspections are conducted by Process personnel. The inspections are documented using forms that include the name of the inspector, date, and a comments section where deficiencies are noted. Deficiency notifications are sent to maintenance planners where they schedule corrective maintenance via work orders. The inspection program is sufficient to assure and document that the systems are operating within design parameters. Workplace inspections conducted by Process operators include safety equipment (including showers and eyewash stations), piping, process equipment, cyanide mixing area, CIL, CIC and CCD areas, tailings impoundment, tailings pipeline, heap leach facilities, and Leak Collection Recovery Systems (LCRS). CVSA also monitors pH levels and cyanide concentrations according to operational parameters. Wildlife inspections at the heap

leach pad and the TSF are conducted on a daily and weekly basis. Identified deficiencies are noted and corrected or reported to supervision for corrective action. The auditors sampled inspection records for the last 3 years and found them to be complete.

CVSA has procedure “Management of Change” (MoC) to manage changes in the operation of cyanide facilities that includes the identification and review of the proposed changes; identification of relevant stakeholders for the proposed change, analysis and evaluation of the proposed changes by a multidisciplinary team including health, safety and environmental aspects; sign off by all areas that participated in the evaluation, approval, and implementation of the change with action plans. Examples of completed management of change records were reviewed for the last 3 years, including the 6th raise of the TSF dam, the construction of phase 2 of the heap leach pad, and other operational changes. The completed forms were signed off by operations, environmental and safety staff. The action plans were followed up until closure. The MoC process is being used consistently at CVSA.

CVSA has implemented contingency procedures for the process plant, HLF and the TSF 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 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. Procedure “Control of the emergency pond level” defines actions to be followed to maintain the water level of the PLS and emergency ponds to ensure that the capacity to contain a large storm event is not compromised. The TSF OMS Manual also includes actions to ensure the designed freeboard is maintained during operation of the facility. As mentioned above, CVSA has several manuals, plans and procedures for the safe operation of cyanide facilities. These procedures include actions to be taken to regain control of the operation in case of upset conditions identified during cyanide facilities monitoring and inspections. CVSA has incorporated contingency scenarios into various standard operating procedures and management plans at the operation. In relation to a temporary closure or cessation of operations scenario, Section 10 of the Closure Plan describes in a general sense the activities to be conducted under such scenario; and a document called Care & Maintenance includes critical activities such as water management, a process shutdown sequence, HLF rinsing and detoxification, cyanide mixing plant detox sequence, cyanisorb washing and detox process, TSF stabilization process, barren carbon removal from CIL and CIC circuits, conducting regular inspections, maintenance and environmental monitoring activities, and manpower needed to conduct these activities.

Tanks holding cyanide solutions are inspected every 6 months by the maintenance area. Inspection forms of the routine inspection conducted by Process personnel include items such structural integrity, signs of corrosion and leakage of tanks. CVSA has a 5-year program to conduct nondestructive tests (NDT) for all tanks holding cyanide solutions including cyanide mixing and storage tanks, barren, CIL tanks, among others. The 5-year program is implemented annually. These nondestructive tests are included in SAP as part of the preventive maintenance

program. The auditors reviewed evidence of these NDT tests for the last three years and found them to be complete. Secondary containments configuration remains substantially unchanged from the previous recertification audits. None of the containment areas has any drains to the adjacent land surface. During the field visit, the secondary containments were observed to be generally free of any fluids or materials stored within them. Inspection forms used by Process personnel include conditions of pipelines, sumps, and valves, and conditions of secondary containments (integrity, presence of fluids, available capacity). The HLF is inspected weekly including leach pad areas, the PLS and the emergency pond. The LCRS from the PLS pond has automatic pumps that runs daily, and records pumped volumes. Cyanide samples are taken monthly when water is present at the time of sampling. Pipelines, pumps and valves at the process plant, TSF and HLF are inspected by process operators and by the Maintenance area as part of their preventive maintenance program. Inspection frequencies vary between daily and bimonthly. Inspection forms include items related to deterioration and leakage of pipes, pumps, and valves. The TSF is inspected daily for critical aspects including available freeboard. The heap leach pad and process ponds are inspected weekly for critical aspects including available freeboard; however, CVSA does not conduct inspections to surface water diversion channels. During preparation of this report, CVSA sent evidence that diversion channels are being inspected every two weeks. No further action was needed to meet Code requirements. Historical freeboard for the last 3 years at both the TSF and the PLS pond were reviewed and verified that they were generally managed according to their 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, tailings freeboard and heap leach facilities. These inspections also included cyanide mixing and storage facilities. The auditors reviewed inspections records and verified that inspections to cyanide facilities are conducted in a consistent manner.

It is the professional opinion of the auditors that the inspection program of cyanide facilities, including mixing and storage activities, and the frequency of inspections are sufficient to assure and document that the operation is safe and functioning within design parameters. The auditors reviewed inspections records and verified that they are conducted in a consistent manner.

Records of inspections are retained and were reviewed by the auditors. The inspections are documented and include the date of the inspection, the name of the inspector and observed deficiencies. Inspection forms are reviewed by the supervisor to ensure good quality of inspections. The inspection program also includes cyanide mixing and storage facilities. Corrective actions identified that are related to maintenance of equipment at the process plant, the HLF and the TSF are managed by the Maintenance area. These corrective actions are managed using the SAP maintenance management system, where work orders are tracked, prioritized, planned, executed, and closed. The auditors verified that corrective actions related to cyanide facilities were prioritized for prompt implementation. The auditors reviewed examples of items identified during inspections and records of the implementation of the corrective actions until they were closed. All other corrective actions not related to maintenance of equipment that

are identified through inspections conducted by Process personnel are actioned and followed up on a daily basis until closure.

The Maintenance area has a preventive maintenance program for pumps, pipelines, valves, flow meters, gauges, pH meters, sump pumps, filters, HCN sensors, 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 facilities working properly. CVSA uses the SAP maintenance management system for identifying, assigning responsibility, scheduling, and tracking the completion of the preventive maintenance activities. Preventive maintenance plans are generated automatically. Work orders generated from inspection forms are entered in the system, including assigned priority.

CVSA has a power plant including a total of 6 generators (5 powered by gas and 1 by diesel) that provides power for all the mine site. CVSA facilities require 12 MW (Megawatts) to operate at 100% capacity, and the 6 generators can provide up to 14.8 MW. In addition, each critical area has backup diesel powered emergency generators with adequate capacity to power pumps and other equipment necessary to prevent unintentional cyanide releases and exposures if primary power is interrupted. There is a 630 kV (Kilovolts) generator at cyanisorb, one 800 kV generator at the TSF (to run the seepage collection systems and reclaim water), and three 800 kV generators at the HLF. In the event of a power outage, these generators would start up automatically. A maintenance program is in place to maintain backup power availability in case of a power failure. The emergency generators are inspected and tested as part of the self-managed preventative maintenance program. CVSA has developed written procedures for testing and using these generators. CVSA provided examples of preventive maintenance records for the emergency power generator for the last three years. A review of these records confirmed that the generators are inspected every two weeks for fuel level, lighting, heating and are also start tested. This inspection would trigger a corrective maintenance work order if 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:

CVSA has implemented a strategy to control its cyanide addition. Results from the daily cyanide concentration analyses are a continuous strategy to control cyanide addition. The results are reviewed and if changes are needed then they are communicated to the process operator. The

metallurgy team periodically performs bottle roll tests to optimize cyanide addition rates. The ore comes from a number of open pit mines and an underground mine. CVSA has conducted bottle roll testing during the recertification period to confirm the established dosing curve as a function of silver content. Manual titration is performed every 4 hours at three points in the plant to control cyanide addition: at the ball mill, at CIL Tank #1, and at CIL Tank #6. CVSA has developed a table that indicates that 1000 mg/l free cyanide is to be added constantly at the ball mill, while cyanide addition at CIL Tank #1 will vary depending on the silver content that is present in the ore that is fed to the ball mill. The cyanide addition target is 1100 mg/l free cyanide, and it can increase up to 1500 m/l free cyanide if silver content increases. Samples are also taken at CIL tank #6 to verify cyanide concentrations at the end of the leaching process. The auditors reviewed data and verified that CVSA is managing cyanide according to the defined targets.

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:

CVSA developed and used water balance models in Excel spreadsheets for both the TSF and HLF until Q1 2024, and started using a comprehensive, probabilistic water balance using Goldsim software platform for both facilities. Both water balances are comprehensive in that they include the appropriate facilities and physical processes. Both are probabilistic in that they consider extreme events and uses distributions to reflect the variability in key parameters. The water balance is updated quarterly by using real precipitation and evaporation data, tailings deposition and ore placed in leach pads. The water balances were last updated in October 2024. The water balances are recalibrated when there are major changes to the facilities, otherwise they are updated with real data on a quarterly basis. CVSA water balances include the following factors: tailings production; tailings deposition rates; ore placement on leach pad; precipitation, evaporation (measured), seepage rates; and freshwater input for the HLF water balance. Potential power outages are not included in the water balances as the operation has emergency power generators at both the TSF and HLF. CVSA has zero process water discharges to surface waters. The water balance models and calculations are described in the “TSF water balance” dated October 2024 developed by SRK, and in the “Water balance modeling” for the HLF dated February 2023 develop by Forte Dynamics.

The HLF water balance model describes the solution rates applied to the leach pad through the heap leach pumping rates (8 liters/m2-hour). The TSF water balance model considers the tailings deposition rates that varies between 3,400 and 3,700 tons per day. Bathymetric surveys of the TSF supernatant pond are conducted three times per year to evaluate consolidation of the

tailings and are included in the updates of the model. The auditors reviewed the bathymetric surveys conducted in 2023 and 2024. The water balances define a minimum freeboard of 0.5 meters for the TSF supernatant pond, and 1 meter for the PLS and emergency pond. In addition, the water balance documents include the 100-year/24-hour storm events for process solution ponds, which has been estimated at 141.5 mm, and 122 mm for the HLF and TSF, respectively. There is one weather station at CVSA, which is used for both TSF and HLF water balances. This weather station collects data since 1997 for rainfall, temperature, relative humidity, wind speed and direction. This data is available online. In addition, evaporation data is collected at the TSF since 2001 using an evaporation pan. Environmental personnel interviewed indicated that the weather station is planned to be calibrated in December 2024. The HLF has a surface water control system for controlling and safely directing runoff generated from upgradient watersheds around it. The TSF and HLF only receive water through rainfall and snow that falls directly in these facilities. This water input is included in the model. Water entering these facilities from upgradient run-on is considered negligible. Impacts of freezing and thawing are not considered in the water balances as there is no build-up of snow and ice over prolonged periods of time in the region, and there is no large catchment for the TSF dam. Therefore, the impact of freezing and thawing is negligible. Both water balances consider evaporation losses. The evaporation rate is 10 times the precipitation rate. The TSF water balance also includes a seepage collection system below the dam to collect and return seepage back to the process circuit. In the case of the HLF, the pad has a synthetic liner and does not have an underdrain system to collect seepage from the heap leach pad or solution ponds. Potential power outages are included in the water balance model. The operation has back up power generators for critical areas. As mentioned in 4.1, each critical area has backup diesel powered emergency generators with adequate capacity to power pumps and other equipment necessary to prevent unintentional cyanide releases and exposures if primary power is interrupted. There is a 630 kV (Kilovolts) generator at cyanisorb, one 800 kV generator at the TSF (to run the seepage collection systems and reclaim water), and three 800 kV generators at the HLF. In the event of a power outage, these generators would start up automatically. CVSA does not discharge any solution containing cyanide to the environment, including surface water. As such, this component is not considered in the water balance. CVSA monitors the depth to water in the groundwater wells around the TSF and HLF. CVSA staff stated that the water table is approximately 100 meters below ground surface and does not affect the water balance.

CVSA conducts frequent inspections of the TSF and HLF and daily monitoring activities to ensure these facilities are operated according to the design criteria. Process operators conduct daily and weekly inspections to the TSF and HLF, respectively. The auditors reviewed inspections records and verified that the TSF and HLF are inspected in a consistent manner. For the recertification period, CVSA provided evidence that the operation has maintained at all times enough freeboard capacity at the TSF (freeboard of 0.5 meters for the supernatant pond) to contain the 100-yr/24-hr storm event. For the TSF, CVSA simulated in the Goldsim model different rainfall scenarios (for dry, normal and wet years), plus the occurrence of the 100-year/24-hour storm event and a power outage scenario of 7 days without pumping capabilities. The auditors reviewed the TSF freeboard for the recertification period and verified that the TSF

had enough free volume at all times to contain this worst-case scenario. A bathymetric survey is conducted three times per year at the supernatant pond to evaluate consolidation of the tailings. The engineer of record also conducts periodic inspections of the TSF. In the case of the HLF, for the recertification period, CVSA has maintained 99% of the time enough freeboard capacity (freeboard of 1 meter for the PLS and emergency pond) to contain the 100-yr, 24-hr storm event. For the HLF, Forte Dynamics simulated in the Goldsim model similar rainfall scenarios (for dry, normal and wet years), considering an operational volume of 4,000 m3 in the PLS plus the occurrence of the 100-year/24-hour storm event and a power outage scenario with 8 hours draindown. The results of the model indicate that 5,000 m3 of additional pond capacity is needed to safely contain the 100-year/24-hour precipitation event, and always maintain a freeboard of 1 meter. CVSA presented calculations indicating that if the freeboard is temporarily reduced to 0.6 meter, the ponds could hold up to an additional volume of 13,000 m3 plus 16 hours of draindown, which is sufficient to contain the 5,000 m3 of additional capacity that is needed. Moreover, to manage such scenario, CVSA has redundant pumping capacity at the PLS and leach pad, with 2 pumps at the PLS and 3 pumps for recirculation purposes (only one of each pumps are needed for normal operations) and has a backup generator to maintain the water balance.

CVSA incorporates inspection and monitoring activities into their procedures to implement the water balance and prevent the overtopping of the TSF and HLF solution ponds. CVSA tailings dam is being constructed in stages and the current stage elevation is above the required storage level for storing supernatant, impounded tailings, and storm events. The current freeboard at the time of the field audit is 0.5 meters in certain sections of the TSF. The tailing operators conduct daily inspections of the seepage collection systems and the impoundment area. A bathymetric survey is conducted three times per year the TSF supernatant pond to evaluate consolidation of the tailings. The HLF, including solution ponds levels, are monitored online on a daily basis. The PLS and emergency ponds are equipped with ultrasonic level sensors that report to the control room for real-time monitoring of pond levels.

CVSA measures precipitation and evaporation daily and the data is uploaded into the water balance models. The water balances are updated quarterly by using real precipitation and evaporation data, tailings deposition and ore placed in leach pads. The water balances were last updated in October 2024. The water balances are recalibrated when there are major changes to the facilities, otherwise it is updated with real data on a quarterly basis. CVSA staff stated that to date the operational parameters for the TSF and HLF have not been modified because the model have not indicated significant differences to the design parameters. The auditors reviewed on-site meteorological monitoring data, which is collected online via the intranet. CVSA maintains the information in an Excel spreadsheet, which is then uploaded into Goldsim. The records are 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:

CVSA aims to operate ponds and impoundments of open waters with WAD cyanide concentrations below 50 mg/l. The TSF supernatant pond is maintained below 50 mg/l WAD cyanide by running a cyanide destruction system prior to pumping the tails into the TSF. The PLS pond has free cyanide values in the order of 450 – 500 ppm (which is above 50 mg/l WAD cyanide). CVSA has implemented the following physical measures to restrict wildlife and livestock access to open waters: Chain link fence around the TSF perimeter; cyanide destruction system for tailings; chain link fence around the process plant; chain link fence around the pad, PLS and emergency pond; birdballs covering the entire surface of the PLS pond. In addition to the physical restrictions listed above, the operation also uses mobile propane cannons and scarecrows around the perimeter of the TSF, PLS and emergency ponds for temporary hazing, as needed. The auditors observed these measures to be in good condition.

CVSA presented evidence that WAD cyanide concentrations in open waters was less than 50 ppm, or that physical restrictions are in place for open waters with WAD cyanide concentrations greater than 50 ppm. In the case of the TSF, CVSA has established a WAD cyanide target of 50 mg/l in tailings discharges at the spigot. The site uses hydrogen peroxide to destroy cyanide in the tailings before discharge to the tailings impoundment. WAD cyanide concentrations measured at the discharge spigots to the TSF were generally below 50 mg/l for the recertification period, with a few isolated exceptions, where CVSA regained control of the upset conditions promptly. There were no events that exceeded WAD cyanide concentrations above 50 mg/l in the supernatant pond during the recertification period. A review of monitoring results of the supernatant pond for the last three years reported values well below 50 mg/l WAD cyanide. A review of monitoring results of the PLS pond for the last three years indicated that WAD cyanide concentrations were exceeding 50 mg/l for the recertification period. The PLS pond has bird balls that cover the entire surface of the ponds to limit access of wildlife to open waters. Cyanide concentration of the solution applied at the HLF is above 50 mg/l WAD cyanide. During the site visit, no ponding was observed on the surface of the heap leach pad.

During the last 3 years, CVSA has been successful at preventing wildlife mortalities related to cyanide facilities. Both the TSF and HLF are inspected daily/weekly for wildlife mortalities. There have been no wildlife mortalities related to cyanide management for the recertification period. The WAD cyanide values at the TSF supernatant ponds are well below the recommended value of 50 mg/l. The PLS pond has bird balls to limit access of wildlife to open waters. In 2024, CVSA implemented a register to keep track of wildlife mortalities. Any wildlife mortalities identified at

the mine site are recorded as environmental incidents and investigations are conducted to ascertain the cause in accordance with procedure “Methods for treatment of samples for toxicological examinations”. The auditors reviewed the wildlife mortalities register and there were no mortalities related to cyanide for the recertification period. CVSA Environmental staff stated that if there had been suspected cyanide-related mortalities, tissue samples would have been collected for toxicological analysis according to the written procedure to determine whether cyanide exposure was involved.

CVSA applies leach solutions to the HLF with 550 ppm of free cyanide via buried drip emitters, about 30 cm depth, thus eliminating the potential for significant ponding on the heap surface, as well as the potential for overspray. The auditors did not observe any ponding during the site visit. The operators conduct daily inspections where ponding, if present, would be noted and mitigated. In addition, procedure “Drainage and repair of hoses in the heap leach” includes actions to be taken in case of ponding such as adjust drip emitter locations, lower application of leach solution, stop leaching in the area, among others. If ponding persists after these measures, the procedure indicates to rip the surface with equipment to improve percolation.

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:

Not applicable to CVSA, as it does not have direct discharges of any solution containing cyanide to surface water. The site operates with zero discharge of process solutions. The mine is located in an arid climate with no perennial surface water bodies on the properties or within close proximity, other than seasonal small lakes. However, there are indirect discharges of water from the TSF. Thirteen seepages from the TSF are collected and pumped back to the TSF through 3 pumping stations: MH13, MH9 and MHX. Water quality data from these 3 seepage collection systems are monitored monthly to detect the presence of cyanide. WAD cyanide values reported for the recertification period had maximum values of 6.7mg/l for MH13, 7.5 mg/l for MH9, and <1 mg/l for MHX.

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 CVSA operation. Main facilities that may contribute to seepage to groundwater are the TSF and HLF, including solution ponds. CVSA employs several specific water management and control measures to protect groundwater. These facilities remain substantially unchanged since the initial certification audits and subsequent recertification audits, except for the completion of TSF 6th raise construction and leach pad phase 2. CVSA has implemented the following measures to protect groundwater below and downgradient of the operation: Single geomembrane liner under heap leach pads; double geomembrane liners with leak detection and collection systems for the PLS pond; single geomembrane liner for the emergency pond; geomembrane-lined secondary containment ditches or pipe-in-pipe containment for cyanide-bearing pipelines; cyanide destruct circuit for tailings; TSF dam walls lined with High-Density Polyethylene (HDPE) geomembrane; TSF fault zone lined with HDPE geomembrane; TSF beach length maximized and TSF supernatant pond size minimized; TSF seepage collection and return system around the dam perimeter; TSF tailings and decant return pipelines with secondary containment; all cyanide tanks and pipes have been designed with secondary containments such as concrete or lined containments. CVSA conducts regular inspections of the seepage collection systems to ensure that the facilities are functioning as designed and protective of the environment. Additionally, CVSA has installed several monitoring wells immediately downgradient of the cyanide process facilities to monitor groundwater. The auditors reviewed completed inspection forms the seepage collection systems, and a figure showing groundwater monitoring locations to verify compliance.

CVSA continued monitoring groundwater wells around the process area, TSF and HLF. Phreatic levels in the mine site area are deep (approximately 100 meters). For the TSF, there are 9 groundwater monitoring stations (P7, P11, P10, P8', P4, P13, P14, PopB91, and PoPB93) located around the facility. Quarterly monitoring results for the recertification period showed no detectable WAD cyanide values (<0.02 mg/l). In the case of the HLF, there are 3 groundwater monitoring stations (PM1a, PM2a, PM3a) that were installed in 2024 for the leach pad phase 2 which are located downgradient of the facility. Monitoring wells reported in previous recertification audit reports were decommissioned and covered by the leach pad expansion. Quarterly monitoring for the recertification period at these stations showed no detectable WAD cyanide values in groundwater.

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:

CVSA has implemented spill prevention and containment measures for processing facilities. These facilities remain unchanged since the initial certification audit and the previous recertification audits. All tanks containing cyanide have level indicators and secondary containments including the cyanide mixing and storage tanks, CIL tanks, CIC tanks, barren tank, among others. The containments are constructed of cast-in-place reinforced concrete. There are automated pumps within the containments to pump collected solutions back into the process circuit. Automated sump pumps are included in the preventive maintenance program. Secondary containments concrete slabs and walls have been painted with epoxy material that improve impermeability to the containment system. In addition, epoxy paint has been used for joints and small cracks on the concrete slabs. At the cyanide mixing area, the secondary containment has been covered with polyurea. The auditors observed that the concrete containment systems were generally in good condition at the time of the audit.

As stated in the last recertification audit report, secondary containments for cyanide mixing, storage, and process tanks are sized to hold a volume at least 110% of the largest tank within the containment and piping draining back to the tank with additional capacity for the design storm event. The secondary containment volume calculations were reviewed and deemed as sufficient. Furthermore, those containments have remained unchanged since the last recertification audit. The entire process area is 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 mixing area is inside the mill building. The containment area has a sump pit with dedicated pumps that return collected fluids back into the process circuit. The secondary containment area is constructed of reinforced concrete. The auditors observed that the secondary containments were maintained empty, with no materials stored inside them.

CVSA has several procedures, plans and manuals in place which are implemented to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment. All tanks and cyanide facilities are located inside concrete secondary containment systems with dedicated pumps that remove solutions and return them to the process circuit. The pumps have automatic level sensors to keep the secondary containments free of any fluids. The automatic pumps are included in the preventive maintenance program. There is no discharge of cyanide-containing water from the secondary containment areas as the secondary containments are not designed to discharge into the environment. As stated in the Code, no specific written procedures are necessary as the containment systems have sumps and dedicated pumps and piping to return solutions to the production process.

CVSA has spill prevention and containment measures for cyanide process solution pipelines. These facilities remain largely unchanged since the initial certification audit and the previous

recertification audits. CVSA has constructed all pipelines with spill prevention and/or containment measures to collect leaks and prevent releases. Pipelines have been constructed either as pipe-in-pipe configuration or within lined ditches and pipelines between separate processing buildings are connected with HDPE pipelines above concrete platforms. Cyanide pipelines are inspected using an inspection checklist. Inspection frequencies vary between daily and bimonthly. The tailings delivery and reclaim water pipelines between the process area and the TSF are located above ground. The tailings slurry and reclaim water pipeline are located inside a rectangular metal conduit. In case of failure of the tailings or reclaim water pipelines, the tails/water spilled will be collected in the TSF contingency pond that has a geomembrane liner, which is located at the lowest point in the pipeline profile between the plant and TSF. This contingency pond has been properly sized to contain the volume of reclaim water / slurry that would report to this pond. Flow meters are provided in the tailings line with an alarm in the plant control room signaling flow disparity if measurements are outside of expected parameters. Additionally, the tailings line contains pressure sensing equipment to signal a change or a loss in line pressure. Pipelines between the process plant and the HLF are contained in a HDPE-lined ditch. The barren pipelines to the HLF are equipped with both pressure and flow monitoring systems that report to the control room. The pregnant lines from the HLF are equipped with flow monitoring devices.

As mentioned in previous audit reports, no cyanide pipelines present a direct risk to surface water. There are no perennial surface water bodies in the vicinity of CVSA requiring special protection for pipelines. All outside pipelines have secondary containment: pipe-in-pipe, concrete ditch, or pipe within a lined channel. Pipelines to and from the TSF and HLF remain unchanged and retain the same safety features identified in previous audits. All facilities are far away from areas that may require special protection.

As stated in previous audit reports, all cyanide storage and process tanks are constructed of coated carbon steel placed on concrete foundations, except for the cyanide mixing tank that is constructed of fiber glass; liquid cyanide pipelines are constructed of carbon steel; cyanide solution pipelines are constructed of carbon steel, HDPE or yellow mine (inside the pad). All these materials are compatible with high pH cyanide solutions. All tanks and pipes were well supported and in good condition.

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 assurance and quality control (QA/QC) programs have been implemented during the construction of cyanide facilities at CVSA. The site maintains files with QA/QC reports for the facilities constructed before the last recertification audit in 2021, 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. For this recertification audit, the auditors confirmed records of the QA/QC programs are maintained in electronic versions and in hard copies at the process plant. New facilities constructed and operated since the 2021 recertification audit includes 6th raise of the TSF dam, and Leach Pad expansion Phase 2. The TSF raise was commissioned in 2022 and includes a raise of the entire crest of the dam. The auditors reviewed the record of construction report for this facility, which was developed by SRK, dated February 2022 and includes appendices with pictures and daily reports of the construction, QA/QC records, and as-built drawings. The construction was conducted in accordance with accepted engineering standards and specifications. Leach Pad Phase 2 was commissioned in late 2023. The auditors reviewed the record of construction report, which was developed by Anddes, dated December 2023 and includes appendices with pictures and daily reports of the construction, QA/QC records, and as-built drawings.

All QA/QC programs at CVSA address 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 include suitability of materials and adequacy of soil compaction for earthworks including tank foundations, subgrade and concrete testing, fabrication material certificates and technical specifications for HDPE drainage products, geo-synthetic, liners, piping, electrical and mechanical instrumentation. For the 6th raise of the TSF impoundment, the auditors verified that QA/QC activities were conducted for placement of random fill to form the embankment raise, extension of face drain collection pipes, placement of face drain collection pipe bedding material, and placement of face drain material on the upstream of the embankment, installation and welding of geomembrane in the inner wall of the dam, installation of piezometers, among others. As-built drawings are also included in the QA/QC reports. QA/QC reports also include non-destructive test logs, destructive test logs, vacuum tests, pre-weld tests, destructive sample tests, and repair controls. For the Leach pad Phase 2, the auditors verified that QA/QC activities were conducted for foundation preparation, soil liner placement, plastic liner installation and welding, over liner placement, pipelines installation and welding, among others.

QA/QC records for cyanide facilities are retained by CVSA. For the cyanide facilities built since the last recertification audit, the auditors reviewed the following document in electronic version: Record of Construction TSF 6th raise, developed by SRK, dated February 2022; and Quality Control Service for Leach Pad Expansion, developed by Anddes, dated December 2023. The auditors also verified that QA/QC records are retained for all other cyanide facilities including previous stages of the TSF (raises 1-5), tailings pipeline, the process plant, and heap leach pad phase 1 including the PLS and emergency pond. Records of the QA/QC programs are maintained in electronic versions and in hard copies at the process plant.

As reported in the previous ICMI certification audit reports and found in compliance, QA/QC records have sign-offs from appropriate personnel including qualified engineers and/or operations personnel attesting the viability of the design, construction and as-built materials. These sign-offs and reviews are documented and maintained as part of the QA/QC documentation. Qualified engineering companies performed the QA/QC inspections and reviews during construction of the cyanide facilities at CVSA 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. QA/QC reports are signed by qualified personnel from reputable engineering companies and provided documentation that the facilities were built as designed.

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:

Procedure “Extraction and management of water samples for analysis”, dated September 2024, addresses monitoring requirements related to surface water and groundwater. The procedure describes the requirements for preparation for sampling, sampling schedule, cyanide species to be analyzed (Total, WAD and free cyanide), field water quality parameters, groundwater well sampling, surface water sampling, sample documentation, field data collection, collection and preservation of samples, chain of custody, and transportation. CVSA also has a map with monitoring locations for surface and groundwater. The 2024 Environmental Monitoring Program also includes the cyanide species and other parameters to be analyzed, as well as frequency and sampling locations. Water monitoring activities were conducted by Environmental department personnel until late 2023. Starting 2024, water sampling activities are conducted by Argentaguas SRL, an analytical lab based in Buenos Aires, Argentina, where the samples are shipped for analyses. Additionally, procedure “Methods for treatment of samples for toxicological examinations”. covers the monitoring activities for the evaluation of possible effects from cyanide use on wildlife, surface water and ground water.

Sampling protocols for the site have been developed, reviewed and implemented with input from qualified internal and external personnel. These protocols are based upon regulatory, corporate and other requirements with an aim to implementing international best practices. Qualified personnel of CVSA environmental department prepare and update the “Extraction and management of water samples for analysis” procedure as needed. Staff in charge of preparing the plan are suitably qualified, with many years of experience in environmental management and

mining activities. The plan is updated by environmental technicians with guidance and peer review, and it is ultimately revised and approved by the Environmental chief, who has more than 15 years of experience in environmental management. The sampling procedure is reviewed and updated every 3 years, or when there have been significant changes in the operations. Analytical protocols for environmental samples are provided by Argentaguas SRL lab in Buenos Aires, Argentina, which has ISO 17025 certification and is also certified by the Argentinian authorities. The auditors reviewed letters of certification and website documentation to verify compliance.

The “Extraction and management of water samples for analysis” procedure describes the process to request sampling bottles with preservatives and materials to Argentaguas lab, surface and groundwater sampling procedures including purging of groundwater wells, measurement of field parameters, field data sheets, parameters to be analyzed including cyanide species (Total, WAD and free cyanide), quality assurance and quality control requirements (QA/QC) for sampling activities (e.g. duplicate samples, blanks), chain of custody procedures and shipping instructions. The samples are analyzed at Argentaguas SRL lab located in Buenos Aires, Argentina. The analytical protocols have been selected using standard methods to achieve the desired detection limits. The 2024 Environmental Monitoring Program also includes the cyanide species and other parameters to be analyzed, as well as frequency and sampling locations. Examples of completed chain-of-custody forms showing proper use of the forms were reviewed. Maps showing the monitoring locations with respect to cyanide facilities were also reviewed by the auditors.

CVSA documents sampling conditions on field sheets that accompany each sample. The field sheet includes the date and time, the sampler, weather conditions, sampling station, field parameters (i.e. conductivity, pH, temperature) and sample preservation. A comments section is used to document abnormal sampling conditions as well as wildlife activity and anthropogenic influences. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered consistently.

CVSA conducts monitoring at frequencies adequate to characterize surface water, groundwater and identify wildlife mortalities. Groundwater samples are collected and analyzed on frequencies that range from monthly, quarterly and biannually. Wildlife monitoring is continuous while employees are in the field and during daily inspections. Surface water quality is also monitored weekly when water is present, though this sampling is not related to cyanide facilities. Records were available and reviewed by the auditors for 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:

CVSA has a conceptual closure plan (5th version) developed by Golder which was presented to the local authorities in September 2021 and is still under review and waiting to be approved. Since 2021 the regulations require that closure plans are approved by local authorities with the expectation to establish financial guarantees for mine closure activities. The conceptual closure plan includes a section for decommissioning of cyanide facilities such as the process plant, refinery, crusher, agglomeration area, HLF, TSF and the cyanisorb plant. Decommissioning activities include decontamination of equipment with sodium hypochlorite and demolition; decontamination of heap leach pads with sodium hypochlorite, rinsing with fresh water and removal of residual process solutions through evaporation in the PLS and emergency ponds; and removal of residual cyanide reagents back to the cyanide producer. Seepages from the TSF will be monitored and pumped to a nearby lake for removal through evaporation. No water treatment needs for cyanide facilities are considered for the post closure phase. In addition, the closure plan addresses disposal of buildings, equipment, piping, scrap, reagents, equipment, and materials. 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.

The 2021 Closure Plan for CVSA includes a conceptual implementation schedule for decommissioning activities, including the sequence and duration of facilities closure. Current life of Mine (LOM) of CVSA extends until 2028. The closure schedule includes activities to be conducted starting with the process plant and TSF (2028 - 2030), the HLF (2028 - 2035) and ancillary facilities (2035 - 2036). This schedule will continue being refined as CVSA approaches the closure period.

Since 2021, Argentinian regulations require that mining companies conduct a periodic review of their closure plans every 2 years. The most recent version of CVSA that was submitted for approval to local authorities is dated September 2021. Once the plan is approved, CVSA will be required to update the plan every 2 years to reflect concurrent reclamation of certain areas of the mine, the addition of new mining areas and updated closure costs. The previous version of CVSA closure plan was developed in 2018. In addition, Anglo Gold Ashanti corporate office requires its operations, including CVSA, to review and update its reclamation cost liabilities for the mine, including cyanide facilities decommissioning costs. These costs are reviewed every

quarter and updated annually by WSP consultants and submitted to the corporate office, where it is audited financially 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:

The conceptual 2021 Closure plan outlines the cost for full implementation of the site-wide closure and reclamation plan for existing facilities, including all cyanide facilities. The total closure cost, including concurrent reclamation, final reclamation and post closure activities, has been estimated at US$ 83.8 MM (millions), including a 25% contingency factor. The 2021 Closure Plan assumes that the heap leach pad will be decontaminated with sodium hypochlorite and then rinsed with water for chemical stability and that solution (draindown from heap leach and rinsate water from decontamination of equipment) will be evaporated. The decommissioning and cyanide decontamination estimates provided by CVSA were generated as a function of the full fund third-party implementation costs. The costs were estimated using third-party rates from local contractor companies used by CVSA for earthworks, concrete, infrastructures and dismantling activities. Decommissioning and closure costs for cyanide facilities (including costs for maintenance and monitoring activities) make up approximately 45% of the total closure cost. These facilities include the process plant, heap leach facilities, process ponds, and the tailings impoundment.

Recent Argentinian regulations require that mining companies conduct a periodic review of their reclamation plans and associated costs every 2 years to reflect concurrent reclamation of certain areas of the mine and the addition of new mining areas. Once the 2021 Closure plan is approved by local authorities, CVSA will need to follow this requirement. As mentioned in the previous recertification audit report, the fourth update of the Closure plan was developed by Golder Associates in 2018. Additionally, according to Anglo Gold Ashanti requirements, CVSA reviews and updates its reclamation cost liabilities on an annual basis, including decommissioning for cyanide facilities. The most recent reclamation cost liabilities estimate for 2023 is US$110 MM, which is higher than the previous 2022 amount of US$98 MM. The 2023 reclamation cost estimate includes decommissioning measures for the TSF, process buildings and equipment, the HLF and process ponds, pipeline removal, disposal of wastes, and associated overhead and administrative costs.

As CVSA has not yet established closure guarantees until approval of the 2021 Closure plan by local authorities, the operation has established self-insurance as a financial assurance

mechanism for closure activities, which includes decommissioning of cyanide related facilities. The 2023 reclamation cost estimate was reviewed by a professional financial auditor registered with the CPCE (Professional Council of Economics of the Province of Santa Cruz). The auditors reviewed a certified statement (Certification of Financial Ratios) from the financial auditor dated Oct 15th, 2024, for the review of CVSA Financial Statements as of December 31st, 2023, that includes closure and reclamation costs, verifying its conformance with the financial tests for a self-guaranteed mechanism to cover the estimated costs for cyanide-related decommissioning activities. Financial evaluation methodology used by the external financial auditor includes the assessment of the reclamation cost liability in the period it was incurred. The liability equals the present value of the expected cost of retirement/remediation. An asset equal to the initial liability is added to the Balance Sheet, and depreciated over the life of the asset. The result is an increase in both the assets and the liabilities. The auditors reviewed the statement from the financial auditor and confirmed that the self-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:

CVSA has developed a series of standard operating procedures, as well as manuals and plans that describe the management and operation of cyanide-related facilities to help minimize the possibility of worker exposure to cyanide. Procedures, plans and manuals have been developed for cyanide unloading, storage and delivery to the process plant. Site has also developed safe work procedures at the process plant facilities including the ball mill, CIL tanks, CCD tanks, CIC tanks, barren tank, cyanide mixing and storage facilities, the cyanide recovery system (cyanisorb), and the cyanide destruction system. It also includes the tailings pipeline corridor, the Tailings Storage Facility (TSF) and seepage collection system, the Heap Leach Facility (HLF), the pregnant leach solution (PLS) pond, and the emergency pond. Emergency response procedures consider the scenario of entering confined spaces. Procedures for maintenance

activities and equipment decontamination were also reviewed, which includes cleaning pumps, pipes and accessories prior to maintenance. Procedures provide detailed information for the risks involved with each task (including unloading, plant operations, entry into confined spaces, and equipment decontamination), also it describes the critical controls for each task and safe work practices and required personal protective equipment (PPE). Field Level Risk Assessments and Job Hazard Assessments are also used prior to beginning certain tasks if these are not covered by a specific procedure. Procedures are reviewed and updated according to a yearly schedule presented in the Safety Pack or “Paquete de Seguridad”, or when there are significant changes in the tasks, to ensure they reflect current practices.

All procedures verified during the recertification audit at CVSA require the use of personal protective equipment (PPE) and critical cyanide-related tasks also indicate the need to conduct pre-work inspections. In addition to the use of general PPE, such as hard-hat, steel toes boots, hearing protection, high visibility clothing, and safety glasses throughout the operating area, areas and/or tasks where personnel may come into contact with cyanide may have additional PPE requirements. In addition to these procedures, signage and task safety training is used to provide awareness to personnel of the requisite minimum PPE requirements for an area. Pre-work inspections are completed each shift prior to beginning work in an area and recorded using an inspection form and operators are required to identify whether they have the appropriate PPE to perform the task at hand and/or identity any upset conditions which may require additional precautionary measures.

CVSA has developed a process to consider input from the workers when developing and evaluating the procedures. The Safety Pack or “Paquete de Seguridad” used at the process plant and maintenance department, considers a monthly schedule of procedures that are required to be reviewed by operators together with their supervisor. If changes or improvements to the current procedure are identified, the supervisor communicates this to the area trainer, who officially tags the procedure as “in review” to make the necessary adjustments and after that to get the area manager and the safety and health department approval and ensure a controlled version is uploaded back in the system for re-training and dissemination. Each supervisor has the obligation to review a minimum of four procedures per month with the collaboration of the area trainer and the Health and Safety department.

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:

CVSA has determined that a pH between 11 and 11.5 through lime addition is required to limit the evolution of HCN gas during mixing and production activities. CVSA has also established the same pH levels in the preparation, distribution and storage of cyanide procedure. CVSA has maintained this pH using the SCADA system, managed at the process plant control room, that automates the pH circuit and detects the pH levels by electronic process logic control (PLC) monitoring and, if necessary, adds lime to the solution in the correct amount. The pH readings are monitored in the control system, as well as by the operator during their shift. Sodium cyanide is added in the ball mill area, the cyanide leaching tanks and the heap leaching circuit.

HCN levels in areas where workers may be exposed to HCN gas are monitored through fixed position gas monitors. These sensors are mounted in strategic locations where HCN exposures are possible. CVSA also uses portable HCN monitors in areas as the cyanide storage, cyanide mix, discharge to the ball mill and cyclone, leach tanks #1 and 2, carbon screen and upper levels of the detox area. Handhelds are available at the warehouse, laboratory, maintenance area, environment, cyanosorb plant, cyanide mixing, and two extras in charge of the safety and health department. Signage, procedures and training developed by the process plant help to ensure that workers understand the high-risk areas and the alarm responses requirements. Process plant personnel are responsible for ensuring that adequate levels of signage and alarms are maintained throughout the plant to protect against HCN exposure. A Total of 13 Fixed monitors at CVSA are located throughout the process plants and at the cyanide offload areas. These sensors are mounted in strategic locations where HCN exposures are possible. The units are fitted with a visual alarm comprising green, amber and red strobes and an audible alarm. Equipment is set for pre-alarm activation at 3 ppm which is communicated to the process plant control room as a preventive measure to review pH values in the circuit, but no further actions are taken. If ambient HCN concentrations above 4.7 ppm are detected, the amber light is activated, and personnel should leave the specific area and coordinate with control room to evaluate potential causes, take action and return values to normal. The red strobe signals if HCN levels exceed 10 ppm and the audible alarm is also triggered, indicating all personnel in the area should evacuate immediately. At the Cyanisorb area, monitors are set to evacuate at 4.7 ppm. HCN levels are displayed locally at each entrance of the process plant and at the cyanosorb area.

Hydrogen cyanide fixed monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained. The Electrical and Instrumentation (E&I) group is responsible for the calibration of the fixed HCN monitors. Local equipment inspection and maintenance is conducted monthly. External maintenance and calibration are conducted every six months. The site's preventative maintenance program automatically generates a work order for the calibration reminder. The calibration and maintenance schedule are considered to meet the manufacturer's recommendation for maintenance of these units.

The site has developed a maintenance and calibration procedure that includes the bump test and has installed a docking station with the standard gas bottle to perform the bump tests at the

process plant office. Evidence of training in the new procedure has been provided. The site industrial hygienist will review the use of the procedure during periodic inspections.

Warning signs are posted in all areas where cyanide is present advising workers that cyanide is present and that smoking, open flames and eating and drinking are not allowed. These areas included the entrance to the process plant, cyanide storage, cyanide mixing area, cyanosorb plant as well as the tailings storage facility and the heap leach facility, to alert personnel to the presence and/or possible presence of cyanide, access restrictions and the requisite PPE for the area. Warning signs are posted in Spanish, the language of the workforce.

CVSA receives cyanide from AGR. The cyanide solution is delivered to the sites with dye already added. The concentrated cyanide solution used on site has a red color for clear identification.

CVSA has maintained showers, eye wash stations and fire extinguishers at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. The processing plant is equipped with several fixed safety showers/eyewashes to provide emergency rinsing in the event of chemical exposure, installed at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide. Locations as heap leaching and Tailings Facility have portable eyewash stations. Safety showers and eyewashes are inspected and tested as part of daily inspection checklists to ensure that they are operational, and that water streams and flows are adequate. In addition to the daily checks, there is a procedure of the EHS integrated system which requires inspection and test on the showers/eyewashes to be completed bimonthly (every two months). To protect against fire, dry chemical powder fire extinguishers are used in the plant to prevent generation of HCN gas whilst extinguishing a fire. These extinguishers are checked as part of the daily inspections by the area operators. During the field inspection shower/eyewashes stations and extinguishers do not carry visible inspection tags, however evidence of the tests and checks, and the record of annual inspections and maintenance was provided by reviewing CVSA inspection and testing records for showers, eye wash stations and fire extinguishers and records of annual fire extinguishers inspections and maintenance during the re-certification period (2022, 2023 and 2024).

CVSA has identified all tanks and pipes that contain cyanide solution to alert workers of their contents. Pipes containing cyanide are marked as containing cyanide solution and flow direction is now indicated. All cyanide-related pipes are identified by a color code, which is purple with three orange stripes. Cyanide storage and process tanks are marked as containing cyanide. Verification was by visual inspection. The auditors followed the cyanide solution circuit from the cyanide storage areas to the heap leach pad facilities to the process plant, cyanosorb, detox system and tailings facilities, where cyanide is present.

CVSA has available Safety Data Sheets (SDS) and first aid procedures in all areas where cyanide is managed. Hard copy documents and/or permanent stands are maintained locally for bulk chemical storage areas such as the cyanide offloading and storage areas. AII information relating to cyanide management including SDS information, operating procedures and

emergency response plans are provided in Spanish, the workforce language at the site. SDS are also accessible by using the online portal for which all staff have access. In addition to the SDS sheets, signage and labels are available to alert personnel to chemicals and required emergency response requirements in the high-risk cyanide areas. Also, the information on the SDS is used in cyanide specific training provided to all employees who may be exposed to cyanide.

CVSA has maintained procedures to report, investigate and evaluate incidents of cyanide exposure. A procedure as part of the integrated EHS system called “Incident Management” is now used for classification of incidents related to hygiene, safety, and environment for CVSA staff and contractors. Incidents must be reported immediately and then the investigation report if necessary. Any incident related to cyanide is critical according to the classification. CV Safety continues to be the electronic platform system where all incidents must be reported. The auditors reviewed the CV Safety incident report system and found three minor incidents related to cyanide during the recertification period. The investigation procedures were implemented, as required, for these events. No other cyanide related incident was reported during this certification period.

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:

CVSA has made available water, oxygen, radios, telephones, and alarms in the process plant. Antidote kits are stored in the clinic. The reason why CVSA has the antidote kits at the clinic is because only a medical doctor can administer the Cyanokit (hydroxocobalamin). The plant is 2 minutes away from the medical clinic. Oxygen bottles, Artificial Manual Breathing Units (AMBU) and masks (as part of an emergency kit bag), automated external defibrillators (AEDs) and water are located in the ambulances. Oxygen bottles, along with additional PPE, are also located in the control room, buildings near the offload areas, and in the first aid room. Operators are required to carry a radio while performing their tasks. The emergency procedure dictates the communication in the event of an emergency by radio and the control room has access to a telephone line. All fixed HCN monitors are equipped and set with an alarm system. The alarm systems for all the HCN monitors and showers are visual and sound alarm and are hard wired to the control room. The control room is staffed 24 hours per day. Ten-minute air escape packs are located at key plant areas to provide emergency air supply to a single area occupant (cyanide mixing area and control room). Self-Contained Breathing Apparatus (SCBA) equipment is maintained in the process plant access area, at the emergency cabinet and at the emergency brigade station.

Emergency response equipment in CVSA is regularly checked by emergency response, medical staff and health and safety personnel, including the emergency brigade. This includes inspections of cyanide antidote kits (Cyanokit) and first aid stations. The eye wash stations, emergency showers and escape respirator packs are inspected each shift by the area operator. Inspections include checks of expiration dates of cyanide antidote kits and ensuring that the kits are stored per the manufacturer's recommendations. Mine Rescue personnel inspect the emergency response vehicle every shift change, including oxygen bottles, resuscitators, hazmat response equipment, SCBA and also ambulance equipment. Cyanide antidote kits have expiry date information located within small refrigerators fitted with thermometers to ensure that the kit is stored within a regulated temperature range.

CVSA has developed and maintained an emergency response plan and related procedures to respond to cyanide exposures. These documents include communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories, first aid response, medical response, use of antidotes and medical care. Sections within the emergency response plan specifically address emergency response procedures related to cyanide releases and cyanide exposures. It also covers the emergency response procedures to address exposure to cyanide through ingestion, inhalation, or absorption through the skin or eyes. Also, these plans and procedures have been developed for multiple scenarios including transportation incidents, releases during unloading, releases during fires and explosions, pipe, valve and tank ruptures, overtopping of ponds, power outages and pump failures and failure of tailings impoundments.

CVSA has its own onsite capability to provide first aid and medical assistance to workers exposed to cyanide, by maintaining a fully equipped medical clinic and ambulances. The medical team is made up of a Medical Chief, doctors covering different shifts, paramedics, nurses and ambulance drivers. In terms of infrastructure, the clinic has three rooms for medical attention, emergency entrance and room, shock trauma room, x-ray room, bathrooms, and a recovery area. In the medical center, there are beds, oxygen cylinders, resuscitators, and other equipment for the care of critical patients. A stock of Cyanokits is preserved at controlled temperature at the medical center. This antidote is for administration only by medical services. CVSA has two ambulances which are equipped with oxygen cylinders and resuscitators. The mine has an emergency brigade (EB), with two full-time EB coordinators and team members that cover the different operating crews. Training for the EB is provided and includes medical/trauma response, as well as specialized training in HAZMAT. Given the remote location and capabilities of local hospitals, CVSA has determined that personnel are best treated at the on-site clinic with its trained staff and equipment. The doctors, nurses, paramedics and emergency brigade are qualified to provide medical/emergency assistance.

CVSA has developed and updated written plans to respond to cyanide exposures involving transport to offsite medical facilities (Work Plan in Emergencies with Cyanide and Transfer of a critical patient). Procedures indicate that CVSA will give first aid and medical attention to victims of cyanide in a state of intoxication and once the patient is stabilized in the site clinic, doctors will

evaluate the patient's state of health and decide if it will be transported to the hospital in Puerto San Julián via one of the ambulances maintained at the site. CVSA always has two dedicated ambulances at the site. In the event of an emergency, the ERT will stabilize the scene, perform rescue operations to recover the patient and assist the doctors in stabilizing the patient.

CVSA procedure indicates that any victim will be treated for cyanide onsite initially, and once they have been decontaminated, treated and stabilize, the doctor in charge will decide if transfer to San Julian Hospital or Puerto Deseado Hospital is required to provide additional medical care. CVSA is also confident that the San Julian and Puerto Deseado medical facilities have adequate equipment, qualified staff, and expertise to respond to cyanide exposures due to the fact that the CVSA medical team has signed an agreement acknowledging their willingness and capability to assist in treatment of cyanide exposures. CVSA has included in its external medical response training, including hospitals, police, and fire departments. Training is carried out annually.

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:

CVSA has maintained the Sodium Cyanide Management Plan updated, to address potential accidental releases of cyanide. This document, together with the General Emergency Plan and its appendixes, outlines the various credible event scenarios for the operation and the responsibilities, actions, and notifications required to ensure an effective and efficient response. In addition to these plans, associated documents assist with emergency preparedness and response scenarios related to cyanide incidents to deal with possible cyanide spills and many are scenario or exposure specific, addressing solid cyanide and cyanide solutions, transport of cyanide, spills, exposure to cyanide (by inhalation, absorption, skin contact and ingestion), failure of the tailings impoundment, heap leach incidents, evacuation procedures, emergency contact information, remediation measures, etc. These documents include communication roles and responsibilities, evacuation procedures, required notifications, reporting procedures, incident categories and risk assessment. The Operations, Maintenance and Surveillance Plan on the tailings facility has an emergency response section that specifically covers emergencies related to this facility. It covers communication procedures and outline steps to be taken for event

detection and identify the level of severity and relevant actions to be taken. The duties of the emergency brigade and requirements for internal and external resources are also provided.

CVSA plans for emergency response and its annexes, listing the various credible event scenarios for the site inclusive of cyanide incidents such as cyanide spills, exposures, and transportation accidents. Emergency procedures identify incidents applicable to release scenarios at the site, including release of hydrogen cyanide in the cyanide storage, process areas and cyanosorb plant; these three areas have been identified as critical facilities which requires establishment of critical controls. Onsite transportation incidents are described in the ERP (Emergency Response Plan). Transportes Vesprini has responsibility until the entrance gate, and from that point the emergency brigade also provides support to the convoy. The specific plan for transportation outside the operation was also reviewed (Transportes Vesprini). The spill monitoring procedure and cyanide preparation indicates the actions that must be taken in case of spill incidents of sodium cyanide during unloading and mixing. Emergency response scenarios included in the plan indicate that in case of fires and explosions involving cyanide, the emergency brigade members are responsible for providing appropriate firefighting measures. CVSA has identified a specific procedure related with process spills at the process plant cyanosorb plant, describing measures to take for spills generated from pipe brakeage, valve or tank ruptures. The general emergency plan and the tailings facility plan addresses overtopping of ponds in the heap leach area and also the tailings impoundment, it includes communication, evacuation, crisis activation, reporting to authorities, and temporary controls to be taken. In case of power outage, there are emergency generators on site that would allow to continue operating critical pumps at the plant heap leach and tailings facility. The emergency plan and annexes describe possible scenarios of uncontrolled seepage and monitoring to determine the impact. Seepage from the heap leach pad, and tailings facility are discussed. Cyanide destruction is covered by a Detox plant operating procedure, which includes critical controls. Hydrogen Peroxide and Sodium Hypochlorite are added to the tails to reduce cyanide concentrations to less than 50 ppm. The site also maintains a procedure for emergency stoppage at the Cyanisorb circuit. CVSA General Emergency Response, the Cyanide Management Plan, the Tailings OMS and all related annexes and documents describe procedures for tailings dam failure, heap leach pad failure, and large cyanide spills on the facility, including plans for evacuation, containment and cleanup, and required notifications.

Under the agreement between CVSA and AGR as the supplier, AGR and Vesprini (as transporter in Argentina) are responsible for shipping of cyanide to site. This responsibility extends to consideration of transport routes, storage and packaging of sodium cyanide solution, the condition of transport vehicles and response in the event of an emergency or release during transport. In the event of a cyanide emergency or incident within the mine property, the emergency brigade would respond. Should an incident occur during offsite transportation activities to the sites, the response will fall upon the transporter (Vesprini) and supplier (AGR). The auditors have reviewed Transporters Vesprini Cyanide Emergency Plan during transport, which has been developed by a specialized third-party company to respond to such incidents

(HAZMAT S.A.). The third-party company is also part of each convoy and in case of a cyanide incident, they will be the first responders on route.

Documentation related to emergency response at CVSA describes specific response actions to be undertaken in an emergency. In the event of an emergency involving cyanide release, the emergency response plan, specific procedures for cyanide and the Tailings Operation, Maintenance and Surveillance Plan provide for specific actions to be undertaken in the event of a release scenario. The General Emergency Plan and associate annexes and procedures cover a range of credible event scenarios, and the immediate and longer-term actions required to control the event. They describe in detail the procedures for clearing site personnel from the areas of exposure, first aid in case of cyanide exposure, control and containment of releases at their source, assessment of the emergency and mitigation of future prevention of releases. It also specifically addresses the treatment procedures with cyanide antidotes for personnel who may have been exposed to cyanide and plant and site evacuation, if necessary. The Plan defines the crisis and brigade team member responsibilities, communication procedures for notifying outside emergency response resources, government agencies, the community, other stakeholders and the press. Detailed emergency responses (i.e. critical valves, switches, pumps) for reagent strength cyanide are found in the specific individual work procedures. Although CVSA closest community is more than 150 kms and any incident at the site (including the tailings impoundment) will not directly affect them, any potential emergency will trigger the notification requirements outlined in the Crisis Management Plan and ERP. The site will establish and follow the Incident Crisis Command System and the appropriate designated team member will notify all necessary parties, as required. Assigned personnel will contact emergency services, if necessary, and will inform potentially affected communities and parties. A detailed list of contact information for relevant parties is contained within the Crisis Management Plan.

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:

CVSA involves its workforce in cyanide emergency response planning. During training of the emergency brigade and after emergency mock drills, the workforce has the opportunity to provide feedback. Since all employees who work around cyanide are also trained in basic cyanide emergency response, those employees can also provide input in the process. External stakeholders do not have a direct involvement in Emergency Preparedness and Response Planning; however, the Social Responsibility team maintains contact with community figures and utilizes community liaison officers to share relevant information with affected peoples regarding emergency response planning and address their comments and feedback. The auditors verified

that CVSA maintains sufficient medical resources, infrastructure, and equipment to provide initial treatment and stabilization for patients exposed to cyanide prior to transfer to offsite medical facilities, if required. It is expected that any victim will be treated for cyanide on-site and transported to the San Julian Hospital to provide additional medical care.

Although potentially affected communities do not play a direct role in emergency response planning, CVSA has informed communities about cyanide, its use at the mine and the nature of the risks associated with accidental cyanide releases. This also includes formal communications with local governmental institutions and other relevant entities such as communities, police, and local health providers, among others, during meetings.

The site emergency plan and other related documents do not explicitly designate responsibilities to offsite responders. Due to the location and response capacities of local agencies, CVSA would maintain responsibility for emergency response activities within the communities when required. Although site has demonstrated that maintains training has been carried out in Puerto San Julián, Rio Gallego, and Puerto Deseado with emergency response groups (police, firefighters, hospitals, among others). Attendance lists for the trainings taught with the subject referred to "Emergency Plan in the Transportation of Cyanide" in San Julian were provided.

CVSA has not designated specific responsibilities to off-site responders or communities except for the hospital agreements for treating patients that have been exposed to cyanide, after they have been stabilized at the site clinic.

CVSA emergency response plan states it shall be updated and reviewed every three years or when there is a significant change, shift, risk or expansion within the operation as outlined in the scope of this plan. Most recent revision was conducted in May 2024, and involves responsible operators from all areas in the revision process.

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:

The emergency brigade at CVSA has formally designated two full time coordinators (in different shifts and overlap one day every two weeks) which provides primary and alternate designation of responsibilities for the management of an emergency. Currently the emergency brigade has 27 volunteer members. The auditors verified the letters of designation and their job description. An emergency brigade roster, which is available with the management team, security, and as

part of the Crisis Management Plan, lists all members, department/crew, phone numbers, and radio channel. Contact telephone numbers are provided for the emergency brigade coordinators and security control room, who would be responsible for mobilizing the rest. The emergency response manual outlines the training that must be undertaken by the emergency brigade, and it is the responsibility of the Emergency Response Coordinators to ensure that training is provided and maintained. Every Saturday, both shifts (day and night) get together and practice simulated rescue scenarios, which includes Hazmat. Training records reviewed during the audit indicate that brigade members received training, as required, during the recertification period. CVSA Security Operations Center maintains contact information, including call-out procedures and 24-hour contact information for the brigade coordinators and members. The emergency communication/activation procedure issues a call for resources over the radio, contacting personnel who are already onsite. Contact information for external resources are listed in the emergency response binder at the crisis command office. The functions and responsibilities of brigade personnel in an emergency are detailed in the emergency response annex which also includes a complete list of the equipment and materials available to be used for on-site emergency response. The cyanide emergency response equipment is checked every 14 days (during overlap and change of shifts) and records are retained for the last 3 years. Equipment is also inspected on a regular basis as it is used during training sessions. The stie medical staff inspect the ambulance and associated equipment, as well as the antidote kits and oxygen tanks. CVSA has not assigned specific responsibilities for internal emergency response to outside agencies.

Although CVSA has not assigned specific responsibilities for internal emergency response to outside entities, outside entities that may participate in emergency response scenarios include local agencies (police, fire department, hospitals) as well as community service contractors working for CVSA. These personnel will work with and under the direction of CVSA personnel as requested to assist with mobilization of people. CVSA has confirmed that outside agencies are aware of their role in case of need their involvement.

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:

The Crisis Management Plan includes a communication section which provides the communication and notification process and procedures in the event of an emergency level 2 and level 3. The Plan documents the notification requirements for both internal management personnel and external agencies. The Plan includes procedures and contact information for notifying corporate and CVSA management, regulatory agencies and the hospital in Puerto San

Julián. The Plan has a communications flow chart for emergency situations. Among other responsibilities, the General Manager oversees all operations at the facility during an emergency and is responsible for briefing other team members and notifying corporate personnel and determining whether activation of the crisis management team is warranted. The Corporate Affairs VP with support from the Communications Coordinator (located at the San Julian office) will respond to media enquiries in case of an emergency; the EHS Manager advises when reporting to government agencies is required and requests mutual aid assistance if required. The Environmental Coordinator provides technical expertise related to emergencies which may impact on the environment. The emergency manual, annexes and related documents provide contact information for the relevant regulatory agencies, outside responders and medical facilities. A complete set of contact lists has been updated and is now included in a binder in the Crisis Command room.

The general emergency response plan contains procedures for communications and includes emergency response contact information. The Plan provides clear lines of responsibility and contact information for relevant provincial and local community authorities to contact and notify community members of emergency situations. The Plan includes contact information and measures for communicating with the media regarding cyanide-related emergencies.

During the audit and when reviewing the emergency plan and the communications section, the auditors found a general requirement to notify the ICMI, however the indication was to report it only level 3 emergency crisis and not indicating all 7 significant incident notification criteria that are defined as part of ICMIs definition and acronyms manual. During the audit period at site and before closing out, CVSA provided evidence that the requirement for contacting ICMI for any significant cyanide incident has been added to the plan. CVSA has not reported any significant cyanide related incident during this recertification period.

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:

The emergency plan annexes, and related documents provide procedures in the event of cyanide release and addresses cyanide recovery and remediation if necessary. Procedures requires that any cyanide containing solution spilled in the process area but outside of a contained area at the mill, tailings, heap leach pad or any other area in natural soil, should be recovered and neutralized before disposal. Any spills of cyanide solution within containment will be returned to the process circuit by the area floor sumps. CVSA soil decontamination procedure and spill

monitoring procedure describes the use of dissolved sodium hypochlorite by applying it to the decontaminated soil causing the neutralization of cyanide compounds possibly present on the surface of the residue. According to the ICMI Guidance for Use of the Mining Operations Verification Protocol, CVSA has several locations with flasks containing sodium hypochlorite, stored with appropriate identification and signage. The procedure also covers the chemical concentration required. Once this is done, the environmental team oversees conducting monitoring and soil analysis to determine any residual cyanide. The environmental team has also procedures on how the sample should be taken. If analytical results of < 0.5 ppm of free cyanide are obtained, the decontamination task will be considered completed and released for final disposal. The spill monitoring procedure describes how to manage clean-up debris. According to the procedure, all spills in liquid stage will be recovered in a special container truck for hazardous waste, and for soils a hopper truck (described in ESTR-SGSSMA-SMA-11) will be used. In both cases, the final disposal will be at the tailings storage facility.

Regarding alternative drinking water supply, bottled drinking water is provided on site.

During review of the emergency plan, it explicitly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat any cyanide that would have been released into surface water. Although, there are no surface waters within the vicinity of the operation that would be reasonably expected to be impacted through a release of cyanide based on geographic and dessert climate conditions at CVSA, the site has well documented this code requirement.

The emergency response plan outline procedures for responding to a cyanide release, as well as the cleanup methods and sampling requirements. CVSA spill monitoring procedure describes the use of dissolved sodium hypochlorite by applying it to the decontaminated soil causing the neutralization of cyanide compounds possibly present on the surface of the residue. Guidance for assessing the area of impact is provided. A spill report is then generated indicating the type and location of spill/discharge, the cause and the total area affected. Once this is done, the environmental team takes samples, and these are provided to the laboratory for analysis. The Environmental Department would manage the characterization and remediation of any larger spills and is responsible for reporting spills to the regulatory agencies. In the unlikely event that cyanide was to be identified downstream of the tailings dam, the Environmental Department would plan a detailed sampling and monitoring program to investigate the extent of potential impact. There is no surface water present in the areas that would be impacted by a spill.

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:

CVSA reviews the emergency response plans every three years, or as changes are made impacting the plan, as a result of mock drill evaluations or changes in the operation. The time the site has been in operation coupled with minimal cyanide related incidents are indications that cyanide is being properly managed, and the plan is working as required. The emergency brigade routinely tests and reviews the adequacy of Emergency Response Procedures with drills and exercises. The Plan updates and reviews are conducted by multiple parties, including the EHS manager, safety and health superintendent, emergency response brigade coordinators, process operations manager among other departments. No cyanide-related incidents or releases have occurred since during the recertification period that would require an update of the plan.

CVSA performs cyanide emergency mock drills at least once per year and holds regular training sessions for the brigade. All site personnel, including the emergency brigade, also undergo annual training in cyanide management and emergency response. Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Drills are developed in advance and risk assessed to minimize potential impact of event unpreparedness. Where necessary, deficiencies are identified and improvements to the emergency response training or procedures are made. Observations made are documented, including both positive elements of the response and opportunities for improvement. The auditors found evidence of two drills conducted in 2024 (HCN values over limit with personnel exposure at the cyanide feed in the ball mill and a cyanide solution spill from tailings pipeline) and one in 2023 (acute cyanide intoxication by process operator). Emergency brigade training exercises and mock drills were debriefed to identify and document improvement opportunities. All these drills involved field exercises testing the entire cyanide emergency response process.

The emergency response plan is reviewed and updated every three years, at a minimum, or as necessary if changes are required or if events warrant review and update. During the recertification period, the plan has been reviewed and as required. No cyanide related incidents or releases have occurred during the recertification period that would require implementation of the plan.

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 new hires, contractors and visitors at CVSA receive an initial general induction training on health, safety and environmental matters before they can start working or enter the mine. This induction includes cyanide hazards present on site. Access to the site will not be granted if the induction has not been taken and the system requires that a test has been passed. In addition to the general site induction, a Process Plant and Maintenance specific induction is required for all personnel that will be granted access to the process plant prior to beginning work. This training provides a plant overview and includes standards and safe operating procedures for working inside the plant area inclusive of cyanide risks, operating practices, maintenance practices and emergency response actions. Process operations and maintenance personnel and those who are more likely to be exposed to cyanide, such as the emergency brigade members, receive additional cyanide specific training. Some of the key aspects covered in the cyanide training include the locations where cyanide is present, critical controls, alarm operations and response, PPE requirements, safe handling and management guidelines, decontamination, exposure limits, symptoms of exposure, cyanide first aid and emergency response. The Maintenance and the Process plant team have a full-time trainer on site that has the responsibility to develop a training program, conduct the cyanide specific training and to maintain records. The cyanide awareness training also includes a test administered to each employee to demonstrate an understanding of the training content. Interviews with employees that conducted the cyanide preparation, control room personnel, heap leach and emergency brigade members were conducted, with personnel demonstrating knowledge on cyanide management.

Annual refresher training including cyanide awareness are provided and completed according to a training program which is part of the Safety Package o “Paquete de Seguridad”, reviewed during this audit for the Warehouse, Process and Maintenance departments. The refresher training includes cyanide properties, hazards, symptoms of cyanide exposure, emergency response, and first aid. The Process trainer and Maintenance trainer retain copies of the most recent cyanide-related training records as part of the safety package, and completion is being tracked monthly. Evidence of training is recorded in a training register form with signatures by both trainer and trainee. Emergency response refresher training records are maintained by the emergency brigade coordinator.

Induction training records, including cyanide hazards and response for all employees who may be exposed to cyanide are retained by the HR (Human Resources), Training and Development department (throughout the workers’ employment) using an electronic database system. The auditors verified the induction training records for three plant operators interviewed during the audit, verifying that the records in the database were completed. The completion report considers course title, course name, date, time, location, who provided the training, area, information of

trainee and indicates if trainee has passed the test. Regarding specific cyanide training, each department maintains files with training records on specific cyanide awareness courses. Records kept include trainee and trainer name, training type, course, date of completion and test scores. The auditors was able to review both electronic and hard copy records, including records for those employees that were interviewed during the site visit. Employee training requirements and completion records are maintained and managed by the full-time trainer, verified at the Process and Maintenance departments. The administrative service area retains training records for all other employees, including cyanide training schedules and records.

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:

New mill employees and any worker with cyanide related tasks receive specific training on operating procedures that apply to their job position. This training is provided by the Process trainer, the Maintenance trainer and employee supervisors on operating procedures including both general procedures applicable to all site areas as well as those specific to a task. The procedure itself is used as a record of training and is signed by both the trainer (supervisor) and the trainee (employee). Operators are also instructed how to conduct job task analysis, field level risk assessments, and area inspections, which are carried out within work areas. Training records in each department are retained in a training file every month called “Safety Package”. Supervisors coordinate with the trainer to aid in operator training and advancement based on a monthly schedule. Specific procedures associated with each area are utilized to aid in the training. Operators review the procedure with their supervisor during the training session, and after three months (approximately) following a Task Observation Program, the supervisor ensures a proper understanding of the process or task and demonstrate competency to the trainer or supervisor. The plant operators that participated in field interviews during the audit (Cyanide mixing) were selected for a random review of training records. In all cases the auditors found evidence of training records.

Standard operating procedures define the steps required to complete a task and are provided as training material for employees performing those tasks, with sign off required from both the trainer (supervisor or process trainer) and the trainee. The Process Trainer and Maintenance Trainer maintain records of the training requirements for each circuit and retains signed training records for each employee. This is done monthly and included in the “safety Package” that among other items, it keeps track of completion and all records of training in operating procedures. Operating and maintenance procedures training schedule for the year is required

for a work area and is maintained by the process trainer and maintenance trainer, along with all signed training records. These work procedures include the objective of the procedures, photos of the task/activity to be conducted, required PPE, risks associated with the task, critical controls associated with each task, decontamination requirements, contingency plans and the individual task specific steps. All information was found to be completed, and training records were available for the recertification period (2022, 2023 and 2024 training records).

CVSA has developed a comprehensive list of procedures for the mill, Heap Leach pad, CIL, CIC, Merrill Crowe and Cyanosorb plant that define the steps required to complete a task that involves cyanide handling in a safe manner. Procedures include a section of acknowledgement of the training received, which is signed off by the trainee and trainer (supervisor) that ensures the person is qualified to conduct the task.Training on specific tasks included in procedures is generally provided by the supervisors with support from the Process trainer and Maintenance Trainer. Supervisors are considered qualified to provide training based on several years of experience.

AII new employees that will be working within the cyanide warehouse, the mill, cyanosorb plant, heap leach pad, Merrill Crowe and tailings facility, specific training and refresher training on relevant procedures for the job duties that they will perform is mandatory before being allowed to work alone. After approximately three months after conducting the procedures training, the supervisor should conduct a task observation process with the employee. Also, after the classroom training, the employee spends time in the field performing duties with a competent and experienced operator. These trainees are required to work under the direction of these competent operators until they demonstrate the ability to work without direct supervision in a safe and responsible manner.

Refresher training is provided by CVSA based on a yearly training plan/schedule which is prepared by the department trainer and validated by the manager. The refresher does not include all existing procedures; however, it follows a prioritization process based on risks, including cyanide exposure. Approximately in a two-to-three-year cycle, all procedures are covered. The Department Trainer retains records. Also, the site performs a “procedure review” plan every year, which provides the opportunity for workers to comment on opportunities to improve the tasks of a procedure. To ensure that personnel maintain proper work procedures and performance levels, supervisors routinely and randomly conduct Planned Task Observations (PTOs) of various activities for each crew. Feedback from the PTO is then provided to each employee to correct and/or improve work/task behaviors.Yearly refresher training on cyanide management is mandatory, covering physical and chemical characteristics of cyanide, cyanide handling, monitoring, control of pH levels, exposure limits, exposure symptoms, PPE, treatment, rescue equipment, safety showers, emergency warning systems, evacuation, disposal and spill procedures.

To evaluate the effectiveness of task specific training related to cyanide, tests are usually taken after a classroom training session while planned task observations are conducted by the

supervisor of the trainee after on-the-job training sessions. Training programs include an assessment component to ensure that personnel understand the training concepts that they have completed. Testing can be done either via a written exam or practical assessment by a qualified Process Plant and Maintenance Plant Trainer.

Induction training records and cyanide general awareness records are retained by the HR and Development Department. Specific task/procedures training records are retained by the Process trainer for all activities conducted in the processing circuit, and by the Maintenance Trainer for all maintenance tasks. Training records for each employee, covering all training they receive, contain the date, subject covered and are signed by both the trainer and trainee. Written, practical tests and task observations are completed to demonstrate the employees' understanding of the training materials. Training records and testing results were reviewed and were found to be complete. Verification was by interview with HR, Process Trainer, Maintenance Trainer and process personnel, and review of training records.

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:

New employees, contractors and visitors at CVSA are required to receive induction training which discusses the response requirements for cyanide releases including first aid measures. All operators within the cyanide warehouse, heap leach facilities, the process plant, which includes cyanide mixing, cyanide leaching in tanks, CIL, Cyanosorb cyanide regeneration plant, Merrill Crowe Plant and maintenance personnel, are provided with site-specific cyanide awareness training. This training includes pH controls, hydrogen cyanide monitoring, emergency response, recognition of cyanide exposure symptoms, cyanide exposure first response, the role and operation of rescue equipment, emergency brigade, the use of oxygen and antidotes by medical personnel, decontamination, and actions to be taken in the event of a cyanide spill including sampling. Training also covers spill reporting, spill cleanup and disposal. Management and response. All personnel complete regular training drills in accordance with the emergency plan. Site response personnel, including emergency brigade members, operations and maintenance personnel, take part in routine drills to test and improve their response skills. Some of the drills reviewed included scenarios of HCN gas exposure, sodium cyanide solution exposure. After action reports document the lessons learned, including action items, which are tracked and followed up until closure.

CVSA has an Emergency Brigade (EB) on site, which is made up of personnel from different areas of the mine, and two full-time coordinators (per shift) in charge of managing the team. EB members are trained through participation in mock drill exercises as well as formal training programs. Formal training plans are in place for fire, first aid/medical, hazmat response, confined spaces, vehicle extrication and ropes rescue. Emergency responders are available on all shifts, including the full-time physicians at the clinic. Depending on their shift schedule, however most members share a common practice on Saturdays for 4-5 hours. Mock scenarios and drills are usually undertaken on Saturdays to test the effectiveness of the EB. The auditors verified that cyanide exposure scenarios are covered as training sessions include the use and inspection of response equipment.

CVSA has communicated emergency response planning (with a focus on cyanide) with police, firefighters and hospital in Puerto San Julián. At least a yearly communication and training session is conducted at San Julian Hospital, during which cyanide emergency and medical response actions are discussed, including decontamination and transport procedures, the treatment protocol for cyanide exposure, and the onsite cyanide antidote kits. In the event of a medical evacuation from site once a patient has been stabilized, transportation is by road to Puerto San Julian Hospital using the site ambulance. The auditors verified that CVSA maintains sufficient medical resources, infrastructure and equipment for initial response to a cyanide emergency and that systems and process are in place to facilitate transfer to San Julian Hospital for further treatment. The auditors reviewed yearly training records and communications informing the community about the transfer of cyanide, safety measures and training of medical personnel.

Annual refresher training is provided at CVSA as part of the yearly training plan for each department, which is tracked by the Safety Pack or “Paquete de Seguridad”, that includes general training on aspects as emergency response, cyanide exposure incidents, response to releases and medical response. These records also include training results that indicate how the trainee demonstrated and understanding of the training materials. Also, the EB conducts refresher training sessions according to a yearly plan, including recognition of cyanide exposure, treatment and first aid. EB practices every Saturday and it covers cyanide incidents and response scenarios. Medical staff at the clinic also presented records of refresher training on Cyanide intoxication and response, use of antidotes and first response to cyanide releases in the field. Cyanide response mock drills are also conducted at least once per year and involve operations and maintenance personnel, management, and the EB.

The emergency brigade completes monthly training sessions including recognition of cyanide exposure, treatment and first aid. The EB coordinator retains records for EB members and documents the training topic(s), participants, and instructor(s) on training sign-in sheets. The auditors reviewed training records during the recertification cycle to verify compliance. Also, personnel interviewed showed a good level of awareness of emergency response procedures in the event of cyanide exposure or release. The auditors also visited the clinic and found records

of training for the recertification period, following the same training record template as observed in other areas.

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:

CVSA uses a variety of mechanisms to provide information to stakeholders related to cyanide management, including reports, meetings, and tours to the mine site. In addition, there is an open-door policy that allows stakeholders to engage with the site and voice any concerns, some examples of these programs include a community information office, routine face-to-face meetings/engagements, complaints and grievances, site tours, company website, media relations team and communications. The program provides stakeholders with the opportunity to share and discuss cyanide concerns. Based on a stakeholder map and the cyanide transport route, CVSA has identified the town of Puerto San Julian as the main community to focus their communication campaigns and maintains aa CVSA Office, open from Monday to Friday (8am to 5 pm) which provides information about the mine operation, including information about cyanide transportation, uses and emergency preparedness. A Cyanide Management Manual is available for visitors in the office. A Cyanide Safe Handling Seminar conducted on a yearly basis, providing information on safe transportation, use, disposal and emergency preparedness, with participation of key mine site staff. Invitations are communicated to stakeholders a month prior to the meeting, held at the town convention Centre. CVSA also conducts Cyanide health and exposure medical response talks to health personnel form San Juan Hospital, conducted by the medical staff from CVSA. Site also promotes a "Participatory Monitoring" program, where community members can participate in a water monitoring campaign, understanding the protocols used, the analysis conducted and how results are obtained and reported. A grievance mechanism procedure is available to the public, to receive, process, manage and resolve written or verbal complaints and grievances in a timely and consistent manner. There have been no cyanide-related complaints or requests for information in the last 3 years. CVSA maintains the Internet website with access to a Cyanide Code section which provides access to the "Participatory Monitoring" program and also provides a video describing the operation, including

ICMI certification. This website also has telephone contacts for the mine and CVSA offices in Puerto San Julian and Buenos Aires, as well as the ability to share the content via Twitter, Facebook, and Google Plus. Other sources of communication are the "WhatsApp Cerro Vanguardia" for mobile phones where each of the interested parties receives general information about CVSA and can respond with questions or input, and a "Radio and print media" through local radio stations in the community of Puerto San Julian, and graphic media from Puerto San Julián.

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:

CVSA has developed and updated written and visual descriptions of how their activities are conducted and how cyanide is managed and has made them available to communities and other stakeholders, which is provided in the local language (Spanish). These include Safety training for all visitors, which addresses how cyanide is used and identifies appropriate health and safety precautions, a “Cyanide Management Manual” which is a written document available at the San Julian office and accessible on the internet. CVSA also shares information with communities about the company's responsible management practices and offers an overview of the cyanide facilities and programs during site tours.The annual Sustainability Report is available to the public. The information mentioned above can be made available and distributed in different engagement opportunities including a yearly Safe Cyanide Handling seminar, presentations, community meetings, and job fairs, among others. Social media and the website offer additional sources of information for stakeholders.

CVSA has not disseminated information on cyanide only in verbal form because there are no widespread literacy issues in communities around the mine.

The mine has not experienced cyanide exposures or incidents resulting in hospitalization or fatality that have occurred prior to or since the mine was first certified. If an event were to occur, communication to the public would be made per the site´s Crisis Communication Plan. Forms of public communications may include press releases, interviews and regulatory reporting. In the case of regulatory reporting, the authorities will also make the incident information available to the public. No cyanide releases off the mine site requiring response or remediation have occurred in the last 3 years. There is a procedure in place to respond to such a scenario. If an event were to occur, communication to the public would be made per the Crisis Communication Plan. Forms of public communications may include press releases, interviews and regulatory reporting. No

cyanide releases on or off the mine site have occurred in the last 3 years resulting in significant adverse effects to the environment, that cause applicable limits for cyanide to be exceeded nor reporting to province authorities. If an event were to occur, communication to the public and local authorities would be made per the Crisis Communication Plan. Forms of public communications may include press releases, interviews and regulatory reporting.