

# **ICMI Cyanide Code Gold Mining Recertification Audit**

## **Corrective Action Plan**

**San Andres Mine  
Aura Minerals Inc.**

**La Unión, Copán, Honduras**

**Submitted to:  
The International Cyanide Management Institute  
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***2024 Audit Cycle***



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# CORRECTIVE ACTION PLAN FOR SAN ANDRES MINE

## 1. Introduction

One of the components of the International Cyanide Management Institute (ICMI) is the development of a Corrective Action Plan (CAP) for those parts of the audit findings that have been found to be in substantial compliance or non-compliance and require focused responses to take the site to full compliance.

ICMI requirements indicate that there is no time limit for implementation of a Corrective Action Plan developed to correct a finding of non-compliance, as is the case of the San Andres mine.

The sections below detail the corrective actions, agreed by San Andres Mine and the Lead Auditor, necessary to bring San Andres into full compliance, as indicated in the Detailed Audit Findings Report (DAFR) and the Summary Audit Report (SAR).

## 2. Corrective Action Plan

**Standard of Practice 4.3:** Implement a comprehensive water management program to protect against unintentional releases.

This Standard of Practice was found to be non-compliant for San Andres Mine.

- **4.3(3) Are ponds and impoundments designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations?**

### **Deficiency**

There is a Corrective Action Plan (CAP) related to this Standard of Practice 4.3 that was generated during the previous recertification audit in 2021 and has not been closed by San Andres at the time of the 2024 recertification audit.

As part of the 2021 CAP, San Andres retained external water balance consultants Kappes, Cassidy and Associates to review their current water balance model and provide a level of certainty that water balance practices can prevent overtopping of the ponds during the operational life of the facility. The document "Minosa Heap Leach Water Balance & Solution Management" dated July 27th, 2023, indicates that 250,000 m<sup>3</sup> of additional pond capacity is needed to contain the 100-yr/24-hour

precipitation event and prevent overflow of process solutions. San Andres indicated in the Q2 CAP report that the plan to achieve this additional pond capacity includes increasing capacity of ponds #2, #3 and #4, construction of a new pond of 82,513 m<sup>3</sup> capacity, and to reduce the catchment area of heap leach pad. A CAP is required to fully address this deficiency and achieve full ICMI certification.

### **Corrective Action**

San Andres needs to complete expansion of current pond capacities, complete construction of the new pond and reduction of leach pad catchment area to achieve the required 250,000 m<sup>3</sup> of additional pond capacity needed to contain the 100-yr/24-hour precipitation event and prevent overflow of process solutions. San Andres needs to send the following information as evidence that the corrective action has been completed:

- Photographic evidence of completion of the expansion of ponds #2,#3 and #4.
- Photographic evidence of completion of the construction of the new pond (Pond V).
- Photographic evidence of reduction of effective catchment area of the leach pad
- Photographic evidence that the ponds #2, #3, #4 and V are being operated and screenshots indicating that these ponds are included in the Goldsim water balance model.
- Results of Goldsim simulations demonstrating that the site has enough pond capacity to contain the 100-yr/24-hour storm event.