ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

San Andres Mine
Aura Minerals Inc.

La Unión, Copán, Honduras

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

2024 Audit Cycle

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Mining Operation: San Andres Mine

Mine Owner: Aura Minerals Inc

Mine Operator: Minerales de Occidente S.A. de C.V. (MINOSA).

Name of Responsible Manager: Wilton Muricy, General Manager

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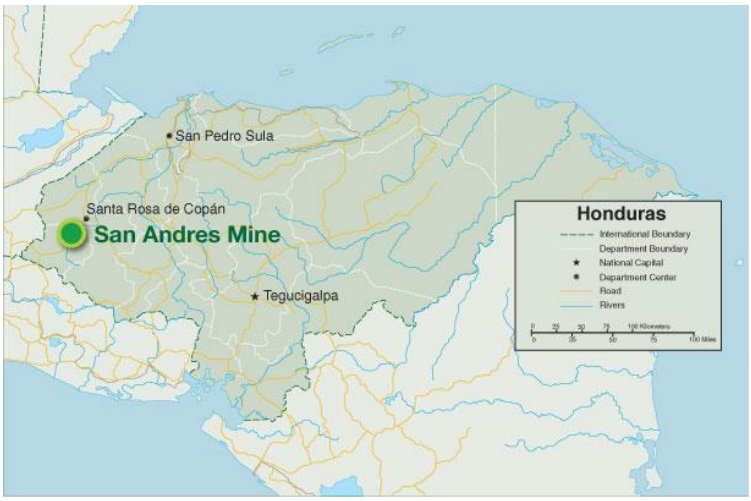
Location and description of the operation

The location of the San Andres mine is presented in the picture below:



The San Andres Mine is an open-pit heap leach gold mine located in the highlands of western Honduras, in the municipality of La Union, Department of Copan, Honduras, approximately 300 kilometers northwest of the country's capital city, Tegucigalpa, and covers 399 hectares. The mine has been in production since 1983 and has well-developed infrastructure, which includes power and water supply, warehouses, maintenance facilities, assay laboratory, and on-site camp facilities.

After acquiring the mine in August 2009, Aura Minerals completed an expansion project, consisting of a new primary crusher-conveyor system and a new stacking system. The new crusher-conveyor system has significantly reduced mine ore haulage distances and provides an opportunity to increase throughput. The new stacking system has increased the rate of ore stacked on the leach pad, thereby increasing throughput.

The mine is a heap leach operation with two stages of crushing. Mining at the San Andres Mine is currently carried out by a national contactor using conventional earth-moving equipment. Current production is approximately 6.5 million tons of ore per annum with an additional 4.2 million tons of waste moved annually.

Open-pit mining at the San Andres Mine commenced at the Water Tank Hill deposit. This pit was depleted by early 2003 and is currently in the reclamation process. Mining began in the East Ledge pit in early 2003. Mining at the East Ledge pit is currently shut down and will resume once the expansion plan implementation is underway. Present production at the San Andres Mine is

entirely from the “Ampliación Falla A” open-pit operation. Waste rock from the Twin Hills pit is currently being used to fill and reclaim the side of the Twin Hills pit.

From 1998 to 2011, the San Andres Mine treated approximately 39 million tons of material at an average grade of 0.86 g/t Au. Currently, the mine produces approximately 541,000 tons of ore per month. Since acquiring the mine in August 2009, a new primary crusher-conveyor system has been installed and has significantly reduced haulage distances and improved efficiency of the system. During the second half of 2022 a new mine contractor with a proven track record was commissioned to take over the mining operations.

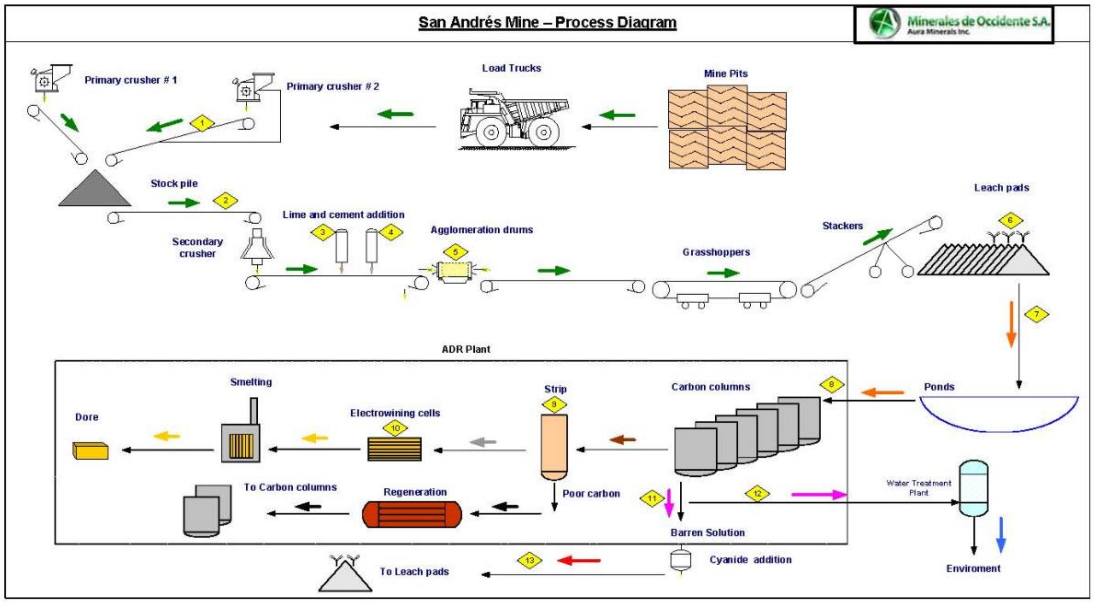
The crushing circuit consists of a primary jaw crusher and secondary cone crushers, which reduces the ore size to a nominal 80% passing three inches for leaching. The ore is friable so a significant amount of fines is produced during the crushing stage. These fines are agglomerated using a combination of cement and lime. The crushed and agglomerated product is transferred to a series of conveyors to distribute the material on to the leach pads in 6-meter lifts for leaching. A conventional carbon absorption facility (ADR Plant) is used to recover the gold from the process solutions, in the adsorption process there are 3 points where cyanide is added in the trains that keeps the copper in solution and prevents it from being adsorbed by the embers, with which recover the gold from the process solutions and produce a final gold dore product.

The scope of the recertification audit includes the following cyanide facilities: Leach pad including Phases 1 - 6; six process solution ponds #1 - #6, Leach Collection Recovery Systems (LCRS) at ponds #1 - #4; six underdrains below the leach pad; a booster pond; a booster tank and a cyanide storage tank within the leach pad area; solution channels and pipelines between the leach pad, ponds and the plant, the Adsorption, Desorption and Recovery (ADR) plant with 7 process trains, a cyanide mixing area including a cyanide mixing tank, a solid cyanide storage area; and the agglomeration plant. Excess water is treated in ponds #5 and #6 and discharged at one location (DP6). There are no tailings facilities at San Andres.

New facilities constructed since the 2021 recertification audit include the implementation of a booster tank at the leach pad area, which was commissioned in 2022.

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

The San Andres mine ore processing flowsheet is presented below:


San Andrés Mine – Process Diagram
Minerales de Occidente S.A.
Aura Minerals Inc.
Primary crusher # 1
Primary crusher # 2
Load Trucks
Mine Pits
Stock pile
Secondary crusher
Lime and cement addition
Agglomeration drums
Grasshoppers
Stackers
Leach pads
ADR Plant
Smelting
Dore
Electrowining cells
Strip
Carbon columns
Ponds
To Carbon columns
Regeneration
Poor carbon
Barren Solution
Water Treatment Plant
Cyanide addition
To Leach pads
Enviroment

Auditor's Finding

The International Cyanide Management Institute (ICMI) approved Audit Team verified that San Andres operation is in **NON-COMPLIANCE** with ICMI Cyanide Code requirements for Gold Mining operations.

This operation was found in non-compliance with the Cyanide Code based on the audit findings discussed in this report under the following Standard of Practice: 4.3

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

This operation was determined to be in NON-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:	Bruno Pizzorni E-mail: bpizzorni73@gmail.com
Date(s) of Audit:	May 28th – 31st, 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.

San Andres Mine		December 9th, 2024
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:

San Andres (Minerales de Occidente S.A. de C.V. - MINOSA) purchases solid sodium cyanide manufactured at facilities certified as being in compliance with the Code. Since year 2023 the mine purchases cyanide from CyPlus Idesa S.A.P.I. de C.V. (Cyplus Idesa), an ICMI certified production plant located in Coatzacoalcos, Veracruz, México. This plant was first certified in 2016; current certification is from September 2023. The mine also purchases cyanide since 2023 from Hebei Chengxin Co., Ltd (Hebei), an ICMI certified cyanide production plant located in Shijiazhuang, China. This plant was first certified in 2012; current certification is from April 2023. Both contracts for cyanide supply with Cyplus and Hebei, are INCOTERM CIF (International Commercial Terms Cost, Insurance, and Freight) at Puerto Cortés, Honduras. Cyanide is packaged by both cyanide producers in a polypropylene maxi-bag with approx. 1 Ton of cyanide within a polyethylene liner, then placed in a wooden box. Prior to shipping in sea containers with twenty boxes, the manufacturer seals the container with a numbered seal at the production facility to prevent a breach in the chain of custody. The container remains sealed until delivery and discharge at the mine´s storage facility. The auditors reviewed the bills of lading confirming that San Andres, during this recertification period between January 2021 and May 2024, only received cyanide from ICMI certified cyanide manufacturers. During their inspection in the cyanide warehouse, the auditors saw that only Cyplus and Hebei cyanide was stored. The certification status of these facilities was verified by reviewing the ICMI website and the latest summary audit reports. San Andrés also purchased cyanide from Cyanco International, LLC - Houston Production Plant (Cyanco), located in Alvin, Texas, until year 2023. Cyanco plant's current certification is from April 2023. In addition, the mine purchased cyanide from Draslovka US Production and Packaging Operations (Draslovka) during the year 2023. Draslovka plant is located in Memphis, USA. This plant was first certified in 2006; current certification is from May 2023.

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

Discuss the basis for the Finding/Deficiencies Identified:

San Andres maintains delivery records for cyanide shipments to the mine. These records identify all transporters of the supply chain. The mine provided documentation with chain of custody evidence from the point that containers are loaded until delivery at the mine. The chain of custody records, bill of ladens and delivery records for the cyanide shipments from the cyanide manufacturers to San Andres mine were reviewed for this recertification audit period. These documents identify all transporters and supply chains responsible for transporting cyanide from the producer to the operation. Cyplus Idesa delivers the cyanide for San Andres until Puerto Cortés in Honduras, by mean of its Cyplus Idesa Mexican Supply Chain. Hebei sends the cyanide to Puerto Cortés through its Hebei Chengxin Transport Co., Ltd. And Hebei Chengxin Transport Global Ocean Supply Chain. Cyanco has its Cyanco Global Ocean Supply Chain and Draslovka by means of its Draslovka Global Ocean Supply Chain. From Puerto Cortés to the mine site, cyanide is transported by the trucking company Comercializadora Aguilar Galo S de RL.

All supply chains involved in cyanide transportation and the individual transporters identified within this supply chains are in compliance with the Code.. Hebei Chengxin Transport Co., Ltd. initial Code certification was in 2013; current certification is from April 2023. Hebei Chengxin Transport Global Ocean Supply Chain first certification was in 2017; current certification is from October 2023. Cyanco Global Ocean Supply Chain first Code certification was in 2013; current certification is from July 2022. Draslovka Global Ocean Supply Chain first Code certification was in 2010; current certification is from April 2022. Cyplus Idesa Mexican Supply Chain first Code certification was in 2013; current certification is from November 2022. Puerto Cortés was added to the CyPlus Idesa Mexican Supply Chain on 8 July 2024. Comercializadora Aguilar Galo S de RL (Aguilar Galo) the current trucking company transporting sodium cyanide in 20 foot sea containers from Puerto Cortez to the mine site, was certified to the Code on 24 October 2024,

as indicated on the Cyanide Code website. Before Aguilar Galo, Texas Bunkering trucking company, also certified at the time with the Code, transported the cyanide to the operation from Puerto Cortés during this recertification period prior to Aguilar Galo's certification.

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:

The cyanide mixing and storage area was designed and constructed with solid international engineering practices, as determined by the initial certification audit in 2014, and has remained substantially unchanged since that time. As indicated in previous recertification audit reports, facilities for unloading, storing and mixing cyanide have been designed and constructed in accordance with generally accepted engineering practices for these types of facilities. The auditors reviewed a document from the Principal Project Metallurgist of Aura Minerals (Persio Rosario, P. Eng., PhD) who completed a review of the unloading, mixing and storage facilities at San Andres in July 2013 and stated in a documented report that the facility inspected was adequate for cyanide storage. During this recertification period, San Andres retained GM Ingenieria consultants to conduct a similar review of these facilities in May 2024. The auditors reviewed this new report that concludes that the facilities inspected are adequate for cyanide mixing and storage. San Andres receives solid sodium cyanide briquettes in one ton "bag in box" intermediate bulk container (IBC) plywood boxes. The auditors inspected the cyanide unloading and storage area. Cyanide boxes are unloaded from sea containers in an open area next to the cyanide storage area and transported inside the storage area using a telehandler. The storage area has sheet metal roofing and meshed walls for ventilation purposes and concrete floor. The storage facility remains locked, except when cyanide is unloaded and stored in the facility or removed for cyanide mixing purposes. The field component of the audit confirmed that the cyanide mixing area is located within the internal structure of the ADR plant on concrete hardstanding and maintained in good condition. The cyanide mixing tank is located within containment concrete berms that drain toward a central collection ditch inside the ADR secondary containment area, which ultimately drains to process pond #1.

The unloading area for solid cyanide is located within the fenced ADR Plant facility area that is immediately adjacent to the cyanide storage area. The solid cyanide storage area is located in a dedicated facility located on competent concrete hardstanding, which is located far away from communities or surface waters. The storage area is access-controlled with the appropriate cyanide warning signage, is secured from weather and has adequate ventilation along the four sidewalls. There are no offices located in the proximity of the cyanide storage area or areas where workers may congregate. The cyanide storage area has perimeter drains that collect and convey meteoric water by gravity towards process pond #1. The cyanide mixing tank is located in the ADR plant area within concrete berms that drain toward a central collection ditch inside the ADR secondary containment area, which ultimately drains to process pond #1. This pond acts as the ultimate containment for the ADR plant and cyanide pipelines located in the area. Reagent cyanide is pumped from the cyanide mixing tank to the cyanide storage tank located on top of the leach pad, next to the booster pond. There are two fixed HCN monitors with visual and audible alarms to detect any HCN gases and evacuate the area if HCN concentrations reaches 4.7 ppm. One of them is located by the solid cyanide storage area and the other one by the cyanide mixing area at the ADR plant.

San Andres has a cyanide preparation area that includes only a mixing tank, as the cyanide storage tank is located at the leach pad area. The cyanide mixing tank has a visual level indicator with no high-level alarm. This level indicator is inspected before any cyanide mixing event to ensure there is enough capacity in the tank and prevent overfilling. Cyanide is not mixed if the tank has a volume higher than 25%. In addition, the cyanide mixing tank has an overflow line to the ADR Plant secondary containment system that would divert any flow back into the process.

The cyanide mixing tank is located inside the ADR Plant and is contained within concrete berms with concrete flooring that prevents seepage to the subsurface. The bermed containment area is connected with the larger ADR secondary containment which provides additional capacity and ultimately drains into process pond #1. Arrangements remain unchanged since the previous recertification audit. As mentioned above, the cyanide storage tank is located next to the booster pond on top of the leach pad area. Any potential seepage or spill will ultimately be contained within the leach pad area.

The cyanide mixing tank is located within impermeable concrete berms to prevent leakage, which was observed to be of sound integrity and considered suitable for containment in the event of a release or tank failure. The berms and containment area are subject to weekly inspections. Arrangements remain unchanged since the previous recertification audit. As an additional containment control, the drainage system from cyanide mixing area is connected with the larger ADR secondary containment which provides additional capacity and ultimately drains by gravity into process pond #1. The ADR secondary containment and drainage system appeared to be in relatively good condition and appropriate for the operation.

Cyanide storage facility arrangements remain unchanged since the previous recertification audit. The solid cyanide storage area is located in a dedicated facility with proper ventilation along the four sidewalls and provides adequate ventilation and build-up of hydrogen cyanide gas is unlikely to occur. In addition, there is an HCN fixed monitor at the entrance of the cyanide storage area. The cyanide storage tank is located next to the booster pond on top of the leach pad area and is separated from any incompatible materials. Access to this area is restricted. The solid cyanide storage area is located under a roof, secured from weather, off the ground and constructed over good condition concrete hardstanding. It also has drainage ditches to direct any meteoric water away from the facility. The risk of potential contact with meteoric water is very low. Cyanide solution is stored in the mixing tank, which is located outdoors with adequate ventilation to prevent the build-up of hydrogen cyanide gas. There is a fixed HCN monitor and a windsock to indicate wind direction. Build-up of hydrogen cyanide gas is unlikely to occur. The solid cyanide storage area is located within the fenced, secure area of the ADR plant with entry restricted at the ADR Plant gate. Access to the storage area is restricted, with the main access door locked when not in use and with no public access. Appropriate warning signage is posted at access points. The storage area 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. Cyanide solution is stored in the mixing tank, which is located within a secondary containment that is connected to the larger ADR plant secondary containment and is separated from incompatible materials, with appropriate barriers, as necessary, to prevent mixing in the event of a release.

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

Discuss the basis for this Finding/Deficiencies Identified:

Procedures for managing empty cyanide containers are described in Standard Operating Procedure (SOP) “Rinsing of cyanide residues”. The auditors observed a cyanide mixing process and disposal of cyanide containers and verified that the procedure was followed at all times. San Andres receives solid sodium cyanide briquettes in one ton “bag in box” intermediate bulk container (IBC) plywood boxes. Procedure “Rinsing of cyanide residues” specifies measures undertaken to ensure that cyanide packaging materials are managed in such a manner to prevent their use for any other purposes. The procedure specifies that bags, plastic materials and empty wooden boxes are placed in a basket and then are transported to a dedicated flushing area located within the ADR plant, where the basket is submerged for 15 minutes inside a concrete pond containing water and calcium hypochlorite. Decontaminated materials are then

placed in a concrete platform inside the ADR plant area and sent to the incinerator area for final disposal. Procedure “Internal Transport of Cyanide and Preparation of Cyanide Solution” requires that empty cyanide bags are rinsed three times with rinse water prior to removing the cyanide bag from the cyanide preparation chamber. Water from rinsing activities is added into the cyanidation process. This practice was observed by the auditors during the field visit. In addition, cyanide bags, plastic and wood boxes are then decontaminated with a calcium hypochlorite solution prior to being sent for incineration. Procedure “Rinsing of cyanide residues” indicates that empty cyanide bags, plastic and wooden boxes once decontaminated are incinerated as final disposal. Cyanide is not purchased in reusable containers and, as such, no packaging is returned to the supplier.

San Andres has procedure “Internal Transport of Cyanide and Preparation of Cyanide Solution” 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 caustic solution. There is a checklist for cyanide preparation that requires measuring pH levels, inspection of emergency showers and eye wash stations, first aid kit, tank level, among other requirements for safe cyanide management. Procedure “Unloading and Storage of Cyanide” indicates that one box can be transported from the sea container to the solid cyanide storage area, Procedure “Internal Transport of Cyanide and Preparation of Cyanide Solution” provides instructions for the safe handling of sodium cyanide boxes including transport to the mixing area. This procedure requires the use of cones to isolate the area during the activity. The auditors observed during the field inspection that cyanide boxes are stored limiting stacking of cyanide containers to a maximum height of three per stack. Procedure “Internal Transport of Cyanide and Preparation of Cyanide Solution” include a requirement for inspection and clean-up of any spilled cyanide during mixing. No spills related to cyanide mixing were reported for the recertification period. Procedure “Internal Transport of Cyanide and Preparation of Cyanide Solution” requires operators to use the appropriate PPE during mixing activities. These include rubber gloves, rubber boots, approved respirator, face shield, Tychem coveralls with attached hood, hardhat, hearing protection, and personal HCN detector. The procedure also requires that two workers are present during the mixing activity. One operator is stationed at floor level observing the other operator who hooks the cyanide bag in the overhead crane, and then works from an elevated deck near the top of the mixing tank, to break the bag and introduce the content into the mixing tank. Cyanide-specific first aid and emergency response equipment are available within the ADR Plant, including medical oxygen. The cyanide briquettes in the boxes from both cyanide producers come with red colorant dye. A cyanide offloading event was observed during the audit. The review indicated that the San Andres 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 includes the following cyanide facilities: Leach pad including Phases 1 - 6; six process solution ponds #1 - #6, Leach Collection Recovery Systems (LCRS) at ponds #1 - #4; six underdrains below the leach pad; a booster pond; a booster tank and a cyanide storage tank within the leach pad area; solution channels and pipelines between the leach pad, ponds and the plant, the Adsorption, Desorption and Recovery (ADR) plant with 7 process trains, a cyanide mixing area including a cyanide mixing tank, a solid cyanide storage area; and the agglomeration plant. Excess water is treated in ponds #5 and #6 and discharged at one location (DP6). There are no tailings facilities at San Andres.

San Andres has developed several operational procedures (SOP) for the safe operation of cyanide facilities, including unloading, mixing and storage facilities, heap leach operations, ADR plant operations, and cyanide detoxification. There are approximately 30 procedures related to cyanide management. All procedures include a description of the tasks to be performed, a section related to PPE requirements, considerations of safety hazards and potential impacts on the environment. Procedures are reviewed and updated every two years to ensure they reflect current practices. Procedures were reviewed and found to be sufficiently detailed to enable safe operation.

San Andres has procedures in place that include critical assumptions and parameters for the safe operation of cyanide facilities. Procedure “Management of water balance” indicates that water treatment activities should initiate when solution ponds levels reach 70% capacity. Cyanide concentrations in treated water discharges shall meet Honduras water quality standard of 0.5 mg/l Total Cyanide at the point of discharge. This value is included in monitoring reports to the authorities. Procedure “Operation and sampling of cyanide at booster pond” indicates that ideal pH in the leaching process is 10 units. Procedure “Internal transport of cyanide and preparation of cyanide solution” requires that pH values are at 10.5 for cyanide mixing. Design storm events for solution ponds, freeboard in ponds, and the maximum concentration of Weak Acid Dissociable (WAD) Cyanide in operating ponds are also documented in the procedures.

San Andres has continued using procedure “Management of Change” that includes the identification and review of the proposed changes; analysis and evaluation of the changes by a multidisciplinary team including health, safety and environmental aspects; approval, implementation of the changes, and an evaluation of its effectiveness. The process includes a format which is signed off by all areas that participated in the evaluation of the changes. Examples of completed management of change records were reviewed for the last 3 years, including sediment clean up and liner replacement at process pond #1 that was completed in 2023 and change of drainage system in the leach pad, which is under execution. The completed forms were signed off by operational, environmental and safety staff. San Andres also presented records of training to personnel in the management of change process.

San Andres has implemented contingency procedures for the heap leach facilities and the ADR plant to respond to upsets in the operational water balance, deviations from design conditions, problems identified by monitoring and inspections, and to address temporary closure or cessation of the facilities. Procedures include step-by-step measures for 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. The Emergency Response Plan defines actions to be taken and responsibilities in case of cyanide related emergencies. Procedure “Management of water balance” defines actions to be followed when the capacity of process solution ponds reaches a level of 70%. Procedure “Water treatment plant” includes steps to follow when there are high cyanide levels in pond #6 prior to discharge. San Andres has several 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. The drainage system from the ADR plant directs all meteoric water to process pond #1, where any cyanide solution spill would be collected. Process pond #1 represents an additional contingency measure in addition to the existing secondary containment systems of the ADR plant facilities. In case cyanide solution overflows outside of the plant containment systems due to an upset condition, it would also be captured in process pond #1. In case of power outages, San Andres has 4 backup generators to provide power and continue operating critical facilities. In relation to a temporary closure or cessation of operations scenario, San Andres has developed the document “Temporary Closure Activities” that provides details related to the management of critical activities and personnel required to operate the plant facilities to maintain the water balance and avoid potential overflow of cyanide solution. The document includes activities to maintain the water balance, ongoing management of solid cyanide, conducting ongoing facility inspections, environmental monitoring, preventive maintenance, personnel training and communication with governmental authorities.

Tanks holding cyanide solutions are inspected daily including items such structural integrity, signs of corrosion and leakage. There is a program in the IFS system (maintenance software) to conduct Nondestructive (NDT) tests in a preventive manner. Secondary containments are inspected daily including items such structural integrity, impermeability, the presence of fluids and their available capacity. None of the containment areas has any drains to the adjacent land

surface. The ADR plant secondary containment drains to process pond #1. Geomembrane integrity inspections at the leach pad are conducted monthly. There is one Leak Collection Recovery Systems (LCRS) at each of the process ponds #1 - #4. The LCRS are monitored by Environmental personnel for flow and cyanide concentrations. Monitoring frequency changed from weekly to monthly in January 2024. Water quality data indicates that there are cyanide concentrations detected between the liners of process ponds #1 - #4. This information is reported to Process so corrective actions can be implemented. Pipelines, pumps and valves at the ADR plant and heap leach areas are inspected daily including items related to deterioration and leakages. Solution pond levels are monitored daily during the rainy season and on a weekly basis in the dry season. The heap leach pad and process ponds are inspected on a weekly basis for critical aspects including integrity of surface water diversions and available freeboard which is done every 15 days during the rainy season. The auditors conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, water diversions, ponds freeboard and heap leach facilities. These inspections also included cyanide unloading, mixing and storage facilities. Records of the inspections conducted by San Andres to cyanide facilities were reviewed by the auditors and were found to be complete.

San Andres has developed and implemented procedures for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide unloading and mixing activities as well as for storage facilities, processing facilities, heap leach facilities and all associated piping and pumps as having contact with cyanide. San Andres has developed and implemented an inspection program for cyanide facilities with frequencies that vary from daily, weekly, monthly and annually. Process operators conduct inspections to cyanide facilities every 12-hour shift and on a weekly basis including the ADR plant, agglomeration area, leach pad, solution ponds, tanks, pipes and valves. Inspections for ponding on leach pads surfaces and the booster pond in the leach pad are also conducted on a daily basis. Inspections of geomembrane areas are conducted on a monthly basis. In the case of wildlife mortalities, process personnel conduct daily visual inspections at the process ponds and leach pads as part of their routine activities. The Environmental department has a bimestrial inspection program including cyanide facilities such as leach pads, ADR plant, crushing and the agglomeration area. Wildlife inspections (sighting and mortalities) are also conducted at least weekly at the leach pad and process solution ponds. Process Management also conducts programmed inspections of cyanide facilities on a monthly basis. Procedure “Management of water balance” indicates the frequency of inspections to be followed (e.g. pond levels are monitored daily during the rainy season and weekly in the dry season, visual inspections of pond levels are to be conducted daily, among others). The inspection program of cyanide facilities including unloading, mixing and storage activities and the frequency of inspections were found to be sufficient to assure that the operation is safe and functioning within design parameters. The auditors reviewed inspections records for the recertification period and verified that inspections are conducted in a consistent manner.

Records of inspections are retained and were reviewed by the auditors. The inspections are documented and include date of the inspection, the name of the inspector and, when applicable, observed deficiencies. The inspection program also includes cyanide offloading, mixing and storage facilities. San Andres has the following mechanisms to document, track and close corrective actions identified during inspections: Corrective actions that are related to maintenance of equipment at the ADR plant or leach pad areas are managed by the Maintenance area. These corrective actions are managed using IFS software, where work orders are tracked, prioritized, planned and closed. The auditors verified that corrective actions identified by Maintenance area related to cyanide facilities were prioritized for prompt implementation. All other corrective actions are tracked and followed up through a centralized corrective action register that is part of San Andres integrated management system.

San Andres has a preventive maintenance program for cyanide facilities. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks according to a maintenance program and every time it is needed to keep equipment and installations working properly. The preventive maintenance program, which is managed using IFS software, generates weekly, monthly and quarterly maintenance schedules and plans for the following week and also includes KPIs of maintenance activities for the previous week. Corrective maintenance occurs as a result of work orders based on inspections. Work orders generated from inspection forms are entered in the system, including assigned priority. The auditors observed examples of both preventive maintenance and corrective maintenance records for the last three years and found them to be complete.

San Andres facilities require 5.7 MW (Megawatts) of power that is provided from the national grid. In case of power outages, the power requirements to run critical equipment (ADR plant) and maintain the water balance is 3.0 MW. San Andres has four emergency power generators on site: three generators of 2MW, and one of 1.5 MW, with a total capacity of 7.5 MW of backup power. This emergency power system is connected to the critical equipment identified that needs to be running to prevent any release to the environment in case of a prolonged power outage. In the event of a power outage, these generators would start up automatically. San Andres provided examples of preventive maintenance records for the backup power generators for the last three years. San Andres personnel conduct daily inspections to the generators to check on leaks or visual deficiencies and start tests of the power generators on a weekly basis. The auditors reviewed evidence of these jump start tests. In case of power outages, San Andres has procedure “Start of generators at MINOSA” that details the steps to be taken to provide backup power when required.

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

The operation is: ■ in full compliance
□ in substantial compliance

□ not in compliance with Standard of Practice 4.2

Discuss the basis for this Finding/Deficiencies Identified:

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

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

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

Discuss the basis for the Finding/Deficiencies Identified:

San Andres has a positive water balance, with an average annual precipitation of 1500 mm. The operation continues using an Excel spreadsheet to manage the water balance, which does not have probabilistic capabilities to take into account the uncertainty and variability in the prediction of precipitation patterns. To prevent overtopping of ponds due to low probability, high volume rainfall events, the model uses meteorological data collected at site to determine water treatment requirements as well as water needed for the process during the dry season. Solution ponds levels are monitored daily during the rainy season to ensure there is enough pond capacity in case of high-volume rainfall events. This information is entered in the water balance on a daily basis during the rainy season and once a week during the dry season. The water balance includes the following factors: solution application rates; precipitation; evapotranspiration (calculated); and the capacity and availability of water treatment systems for surface discharges. Potential power outages are not considered in the water balance as there are four generators on site as backup power to prevent any release to the environment in case of a prolonged power outage. The water balance model, assumptions, calculations and operation are described in the document “Protocol for discharge and authorization of treated water effluents”. San Andres has recently implemented a water balance using the Goldsim model and is being used at the site, replacing the Excel spreadsheet. 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 this audit.

The water balance includes the solution rates applied to the leach pads, which is 18 liters/hour/m2. The required daily volume for leaching purposes plus the minimum water volume to maintain operations are considered as inputs in the water balance. As mentioned in previous recertification audit reports, the 100-year/24-hour storm event is 279 mm, and this key parameter is considered as input in the Goldsim water balance model. 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 m3 of additional pond capacity is needed to contain the 100-yr/24-hour precipitation event and prevent overflow of process solutions. This is an outstanding action included in the 2024 Q1 CAP report sent by San Andres to the International Cyanide Management Institute that needs to be implemented to fully comply with the Code. This action is included as part of a new corrective action plan (CAP) for San Andres Mine. There are two weather stations at San Andres: Estacion Fase 1 (located on the leach pad) and Estacion Mina (located at Cerro Cortés). Only the one located in the leach pad is used for water balance purposes. These weather stations collect meteorological data such as precipitation, temperature, wind speed and direction, solar radiation, atmospheric pressure, and relative humidity. Evapotranspiration is calculated. Meteorological data is available online. Both weather stations have been in operation since 2017; however, San Andres has been collecting on-site precipitation data since 2002. Meteorological data collected on-site is compared with a national meteorological network station located in Santa Rosa de Copan. The heap leach facilities at San Andres have a surface water control system for controlling and safely directing runoff generated from upgradient watersheds around the heap leach ponds and plants. There is no freezing potential at San Andres. The water balance includes the following factors: solution application rates; precipitation; evapotranspiration; and the capacity and availability of water treatment systems for surface discharges. The heap leach operations recirculate water from process solution ponds #1 - #4 to maintain the required water balance for the operations. There are 6 underdrains below the leach pad that are monitored on a periodic basis but are not considered in the water balance as they are not collected, nor sent back to the process. Potential power outages are not considered in the water balance as there are four generators on site as backup power to prevent any release to the environment in case of a prolonged power outage. Water treatment and water discharges are considered in the water balance. The water treatment plant that is currently used at San Andres has a treatment capacity of 340 m3/hr. The water balance allows to prepare water treatment projections for future months. San Andres does not have a tailings storage facility.

San Andres has ponds #1 - #4 for process solutions and ponds #5 and #6 for treated water prior to discharge into the environment. The water balance indicates that water treatment activities should be initiated when global ponds levels reach 70% capacity. The water treatment plant that is currently used at San Andres has a treatment capacity of 340 m3/hr. The operating ponds are inspected daily to maintain the water balance for the site. Freeboard volumes are monitored and recorded. Inspection records for the heap leach facilities and ponds were reviewed for the last 3 years. The auditors also reviewed monitoring data for the last 3 years and verified that the solution volumes at the solution ponds were managed at all times according to the design criteria.

San Andres conducts daily inspections and monitoring activities to the heap leach pad and solution ponds to ensure they are operated according to the design criteria. Solution pond levels are inspected daily during the rainy season and weekly during the dry season, and this information is entered in the water balance. This frequency is considered adequate considering the high precipitation rates in the area. In addition, LCRS are monitored and inspected on a

weekly basis (monthly since January 2024), and geomembrane areas and diversion channels are inspected on a monthly basis. Records of inspection forms for the last 3 years were reviewed.

There are two weather stations at San Andres: Estacion Fase 1 (located on the leach pad) and Estacion Mina (located at Cerro Cortés). Only the one located in the Leach pad is used in the water balance. These weather stations collect meteorological data such as precipitation, temperature, wind speed and direction, solar radiation, atmospheric pressure, and relative humidity. Evapotranspiration is calculated. Meteorological data is available online. Both weather stations have been in operation since 2017; however, San Andres has been collecting on-site precipitation data since 2002. Meteorological data collected on-site is compared with a national meteorological network station located in Santa Rosa de Copan. The information from the weather stations is collected by the Environmental area and once validated, is included in the Goldsim water balance model. It is expected that San Andres will continue calibrating the Goldsim water balance model using precipitation data collected from the weather stations. The auditors reviewed on-site meteorological monitoring data for the recertification period and found them to be complete.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

San Andres has continued monitoring free cyanide concentrations in ponds #1 - #3 on a daily basis and in ponds #4 - #6 as needed when there is water treatment. All these ponds do not have netting or other means to prevent access of birds as WAD cyanide concentrations are generally below 50 mg/l (considering a factor of 2 as a relation between free and WAD cyanide). Solution ponds #1 - #4 are within the fenced area of the ADR plant which prevents the entry of wildlife, and the heap leach facilities have 1-meter-tall berms to prevent access of cattle or other animals. The only pond where cyanide concentration could exceed 50 mg/l WAD cyanide is the booster pond. San Andres has protection for birds at this pond. Suitable fencing, signage and wildlife (bird) protection netting that completely cover the pond has been installed at this location. Procedure “Management of cyanide solution” requires inspections on leach pads to check for ponding and the required steps to handle surface ponding, including manual excavation to aid drainage and improve infiltration. No wildlife mortalities associated with cyanide have been reported during the recertification period.

San Andres analyzes free cyanide daily at process ponds #1 - #3 and at the booster pond. The auditors reviewed cyanide concentrations in the ponds for the recertification period. Considering

a factor of 2 as a relation between free and WAD cyanide (i.e. WAD cyanide doubles the amount of free cyanide in solution), WAD cyanide values are generally below 50 mg/l. Two periods of exceedances above 50 mg/l WAD cyanide were observed in December 2022 (for one month) and August 2023 (for one week) at process pond #1. The December 2022 event was due to drilling activities within the pad to improve percolation of process solution and gold recovery. The August 2023 event was due to the installation of inter-liners in the leach pad, which rapidly reported process solution to process pond #1. San Andres regained control of the situation, investigated both events and implemented controls to avoid these events from reoccurring. For the booster pond, which could eventually exceed 50 mg/l WAD cyanide, San Andres has implemented netting to prevent wildlife mortalities, as described above.

WAD cyanide values at ponds #1 - #4 are generally below 50 mg/l. For the booster pond, which could eventually exceed 50 mg/l WAD cyanide, San Andres has implemented netting on top of the pond to prevent wildlife mortalities. In addition, the heap leach pad area is inspected daily for ponding and wildlife mortalities. According to interviews with Environmental personnel, no wildlife mortalities associated with cyanide have been reported during the recertification period, which indicates that the implemented measures are effective. San Andres has a system to track wildlife mortalities and a procedure that includes details on where and how to dispose of dead animals, and a requirement to send wildlife carcasses for analysis to determine if the mortality occurred due to cyanide or other reasons.

Procedure “Management of cyanide solution” requires inspections on leach pads to check for ponding and the required steps to handle surface ponding, including manual excavation to aid drainage and improve infiltration. No wildlife mortalities associated with cyanide have been reported during the recertification period. During the field visit, the auditors inspected areas under leaching. Ponding areas were observed on the heap leach surface that were corrected by the mine. San Andres also has a procedure requiring daily inspections for areas under leach and actions to be taken if ponding persists after initial attempts to eliminate them. To avoid overspray of solution outside of the leach pad area, San Andres uses drip emitters the slopes and borders of the leach pads.

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:

San Andres discharges process treated water to the Rio Lara through monitoring station DP6. Discharges to the environment is via pond #6, following treatment. If water quality meets

discharge standards, water is discharged from the pond. There is no longer a requirement to request testing and authorization by a government agency prior to discharge as was indicated in the previous audit report. San Andres can now treat and discharge water directly into the environment and then report monitoring results to the government agency. The concentrations of WAD cyanide at the discharge point were reviewed by the auditors for the period between June 2021 and the end of 2023. No water discharges have occurred in 2024. All WAD cyanide values reported were well below 0.5 mg/l. Samples are analyzed at ALS Vancouver.

San Andres does not have an established mixing zone in Rio Lara after the discharge point in DP6, as this is not a requirement by government agencies. Discharge water samples are analyzed at ALS lab in Vancouver for WAD cyanide instead of free cyanide. The auditors verified quality control and quality assurance information from ALS. WAD cyanide concentrations at DP6 were reviewed for the recertification period. WAD cyanide concentrations for the recertification period were reported as non-detectable (<0.010 mg/l) which is below the 0.022 mg/l free cyanide required by the Code (considering a factor of 2 as a relation between free and WAD cyanide).

San Andres has 6 underdrains below the leach pad and a groundwater well network in the vicinity of the leach pad and solution ponds that are monitored on a periodic basis. These underdrains from leach pad Phases #2, #3, #4 and #6 discharge directly into the environment and are monitored every two months. WAD cyanide concentrations at these underdrains were non-detectable (<0.010 mg/l) between 2021 and 2023, which means that there are no discharges that exceeds 0.022 mg/l free cyanide to the receiving environment. During preparation of this report, San Andres sent monitoring results for samples taken in June 2024. The results indicates that free cyanide concentrations did not exceed 0.022 mg/l.

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 San Andres operation. Water for agricultural and livestock purposes is provided from surface water sources located in mountainous areas in the region surrounding the San Andres Mine. Regardless of that, San Andres has taken measures to manage seepage from cyanide facilities including a composite clay and geomembrane liners with underdrain systems in the leach pads and ponds; leak detection recovery systems (LCRS) between liners of solution ponds, secondary containments for cyanide facilities in the ADR Plant, standard operating procedures for management of cyanide

facilities, among others. There is a groundwater monitoring network with 8 stations in the surrounding areas of the heap leach operation and solution ponds which is monitored every two months. Traces of WAD cyanide has been detected in two groundwater wells for the recertification period.

As mentioned above, there is no actual or designated downgradient beneficial use, nor any actual point of groundwater use identified, nor any applicable groundwater standard for cyanide or other parameters determined by Honduras regulatory agencies. Regardless of this, San Andres has a groundwater monitoring network that analyses for WAD cyanide concentrations. There are 8 groundwater monitoring wells in the surrounding areas of the heap leach operation and solution ponds. These groundwater wells are monitored and sampled every two months. Data collected between 2021 and 2023 indicate traces of WAD cyanide in well PIE-1 which is located next to solution pond #1; and in well PIE-2. Maximum WAD cyanide values reported were 0.014 mg/l and 0.067 mg/l for PIE-1 and PIE-2, respectively. During preparation of this report, San Andres sent monitoring results for samples taken in June 2024. WAD cyanide concentrations were similar to those collected in previous years.

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:

Cyanide facilities at San Andres remain unchanged since the previous recertification audit. Spill prevention and containment measures are provided for all cyanide unloading, storage, mixing and process solution tanks. Tanks located at the ADR plant, including the cyanide mixing tank, are within a concrete secondary containment which provides a large containment area. The secondary containment of the cyanide mixing area is connected with the larger secondary containment of the ADR plant. The ADR plant 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 toward a concrete central collection ditch inside the ADR secondary containment area, which ultimately drains by gravity to process pond #1. The drainage system from the ADR plant directs all meteoric water to process pond #1, where any cyanide solution spill would be collected. Process pond #1 represents an additional contingency measure in addition to the existing secondary containment systems of the ADR plant facilities. In case cyanide solution overflows outside of the plant containment systems due to an upset condition, it would also be captured in process pond #1. The ADR plant secondary containment system is inspected daily as part of the process facilities inspection program. The auditors observed that the concrete containment systems were generally in good condition and free of any fluid. There is a cyanide storage tank that is located next to the booster pond on top of the leach pad area. Any potential

seepage or spill will ultimately be contained within the leach pad area. The solid cyanide storage area has perimeter drains that collect and convey any meteoric water by gravity towards process pond #1.

San Andres has not changed tanks or secondary containments since the last audit in 2021. Therefore, the original conclusion is still valid that the containments can hold a volume greater than that of the largest tank plus precipitation. The cyanide mixing tank is within the ADR Plant within competent secondary containment. Other cyanide-containing process tanks are also located within the secondary containment for the ADR Plant. The concrete floor of the secondary containment of the ADR plant is sloped to drain toward a central collection ditch, which ultimately drains by gravity to process pond #1. In addition, there is a roof over the ADR Plant to prevent precipitation from entering the secondary containment. The cyanide storage tank is located next to the booster pond on top of the leach pad area. Any potential seepage or spill from the tank will flow into the booster pond and will ultimately be contained within the leach pad area. The auditors observed that the secondary containments were maintained empty, with no materials stored inside them.

Any cyanide solution from leakage or spills from process tanks within the ADR Plant is captured in the floor drain system and drained by gravity to process pond #1. As such, the ADR plant secondary containment does not have sumps with pumps to drain water from the secondary containment. No water collected in the secondary containment in the ADR Plant is discharged directly to the environment.

Cyanide pipelines at San Andres are located within a secondary containment provided for at the ADR plant and leach pad area, including concrete and plastic lined channels as well as pipe-in-pipe containment where necessary. There are no buried pipelines in the plant area. Pipelines connecting the leach pads, ADR plant, and the solution ponds are lined with HDPE through all its extension to convey any leaks to larger containment areas. Process solution pipes around the leach pads flow by gravity, which helps avoid the risk of potential high-pressure releases outside of containment from pressurized pipelines. Cyanide pipelines are inspected daily as part of the routine inspections by plant personnel and are also included in the preventive maintenance program.

As mentioned in previous audit reports, no cyanide pipelines present a direct risk to surface water as there is no surface water body that requires special protection over and above the containment measures previously described. Pipelines remain unchanged and retain the same safety features identified in previous audits.

As stated in previous audit reports, all cyanide mixing, storage and process tanks and pipelines at San Andres are constructed of materials compatible with high pH and cyanide solutions, such as HDPE, coated carbon steel, stainless steel, and Yellow Mine PVC. 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:

As indicated in previous recertification audit reports, QA/QC programs for the original construction of the cyanide facilities were not retained during the transfer of ownership of the San Andre mine. The auditors reviewed a document from the Principal Project Metallurgist of Aura Minerals (Persio Rosario, P. Eng., PhD) who completed a review of cyanide facilities in July 2013 and endorsed the quality of cyanide facilities, including the ADR plant, and cyanide storage and mixing areas. During this recertification period, San Andres retained GM Ingenieria consultants to conduct a similar review of these facilities. The auditors reviewed this report dated May 2024 that confirms the quality of construction of cyanide facilities. QA/QC for the construction of phases V and VI the leach pad was available for review, however, QA/QC for the construction of the initial phases of the leach pad (phase I – IV) and solution ponds were not available. The auditors assessed the performance of the heap leach pad and solution pond liner systems during this recertification audit by reviewing the water quality data of the underdrains located below these facilities and groundwater wells around the area and determined that the liner system is generally functioning properly, as only small traces of cyanide concentrations have been detected in groundwater wells. The only new cyanide facility constructed since the 2021 recertification audit is a booster tank which is located inside the leach pad. San Andres provided a document including a review of this facility conducted by GM Ingenieria consultants concluding that this facility was constructed following QA/QC protocols.

As mentioned above, QA/QC programs for the original construction of the cyanide facilities were not retained during the transfer of ownership of the San Andre mine. The auditors reviewed a document from the Principal Project Metallurgist of Aura Minerals (Persio Rosario, P. Eng., PhD) who completed a review of cyanide facilities in July 2013 and endorsed the quality of cyanide facilities, including the ADR plant, and cyanide storage and mixing areas. During this recertification period, San Andres retained GM Ingenieria consultants to conduct a similar review of these facilities. The auditors reviewed this report, dated May 2024, that confirms the quality of construction of cyanide facilities. The QA/QC reports for Phases V and VI of the leach pad include soil compaction tests, subgrade and concrete testing, fabrication material certificates and technical specifications for HDPE drainage products, liners, piping, electrical and mechanical instrumentation. QA/QC data was available for review by the auditors and found it to be acceptable.

The auditors reviewed the document from the Principal Project Metallurgist of Aura Minerals (Persio Rosario, P. Eng., PhD) who completed a review of cyanide facilities in July 2013 and endorsed the quality of cyanide facilities, including the ADR plant, and cyanide storage and mixing areas. San Andres also provided a more recent report, dated May 2024, from GM Ingenieria consultants that conducted a similar review of these facilities. QA/QC records for some cyanide facilities are retained by San Andres. For cyanide facilities built before 2021 (i.e. expansion of the leach pads Phases V and VI), the auditors reviewed several documents in hard copy and electronic versions. No QA/QC records were retained for the earlier phases of the leach pad (Phases I – IV).

The existing cyanide facilities received during the transfer of ownership of the San Andres Mine were endorsed for quality by Persio Rosario PhD Engineer, Principal Project Metallurgist of Aura Minerals. San Andres also provided a more recent report, dated May 2024, from GM Ingenieria consultants that conducted a similar review of these facilities. Qualified engineering companies performed the QA/QC inspections and reviews during construction of the leach pads at San Andres and prepared the final construction reports and as-built drawings 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 leach pad Phases V and VI. As-built drawings were properly stamped by a qualified engineer. As mentioned in the previous recertification audit reports, construction of other cyanide facilities since 2014 was supervised and conducted by reputable engineering companies.

As mentioned above, QA/QC programs for the original construction of the cyanide facilities were not retained during the transfer of ownership of the San Andre mine. The auditors reviewed a document from the Principal Project Metallurgist of Aura Minerals (Persio Rosario, P. Eng., PhD) who completed a review of cyanide facilities in July 2013 and endorsed the quality of cyanide facilities, including the ADR plant, and cyanide storage and mixing areas. San Andres also provided a more recent report, dated May 2024, from GM Ingenieria consultants that conducted a similar review of these facilities.

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:

San Andres has a procedure “Surface water, groundwater and liquid effluents monitoring” dated April 2024, that provides details related to sampling techniques, sampling equipment, calibration of field equipment, preservation techniques, monitoring stations, sampling frequencies and

parameters to be analyzed. The procedure includes a monitoring program with sampling frequencies for surface, groundwater and treated water discharges that varies from weekly, monthly, bimestrial and biannual. Document “Protocol for water sampling, reception and shipping of samples for analysis” dated April 2024 complements the monitoring procedure and provides details about duplicate and blank samples, chain of custody procedures, shipping instructions and cyanide species to be analyzed. Procedure “Wildlife protection and monitoring” provides details for wildlife monitoring activities. San Andres has an environmental lab on site for internal control with the capability to analyze for Total cyanide. Water samples for WAD and Total cyanide analyses are sent to ALS lab in Vancouver.

Competent individuals from Aura Minerals have originally developed, reviewed and approved the environmental monitoring procedures. Their names are included in the monitoring procedure: Javier Romero, former HSE Manager for San Andres and forestry engineer with more than 10 years of experience; and Enma Palma, a chemistry engineer with 8 years of experience. The procedures were last reviewed and updated by Environmental superintendent Elvis Sanchez, an agricultural engineer with more than 16 years of experience. Analytical protocols for environmental samples are provided by ALS Vancouver lab. The auditors reviewed letters of certification to verify compliance. The Environmental lab at San Andres uses the references and procedures of the Standard Method for the Examination of Water and Wastewater.

Procedure “Surface water, groundwater and liquid effluents monitoring” provides details related to sampling frequencies and locations and preservation techniques, while document “Protocol for water sampling, reception and shipping of samples for analysis” includes details about blank samples, chain of custody procedures and shipping instructions, suite of parameters to be analyzed for the bimestrial samples, cyanide species to be analyzed (WAD, free or Total), duplicate samples and its sampling frequency. Examples of completed chain-of-custody records showing proper use of the forms were reviewed. Monitoring locations with respect to cyanide facilities were also reviewed by the auditors.

San Andres field data sheets for surface and groundwater samples register in writing field parameters (i.e. conductivity, pH, and temperature), groundwater levels, weather conditions, livestock/wildlife activity and anthropogenic activities. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered consistently.

San Andres has an annual monitoring program that includes sample locations, frequencies, and cyanide species and other parameters to be analyzed. The monitoring program includes sampling frequencies that vary between weekly, monthly, bimestrial and biannual. Samples are sent for analysis to ALS lab in Vancouver. Cyanide species (WAD, Total) are analyzed on bimestrial samples, or more often if there are water discharges. Records were available and reviewed by the auditors for all sampling and monitoring activities. The frequencies of the monitoring activities were deemed to be appropriate by the auditors.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

San Andres has a conceptual closure plan which was presented to the local authorities in 2020 and was updated in December 2022 by external consultant CIFE Consultoria. The Honduras government agencies do not require mining companies to present a stand-alone closure plan for approval. This closure plan is presented by San Andres to the authorities as part of its annual environmental report. The conceptual closure plan includes a section for decommissioning of cyanide facilities such as the ADR plant, refinery, crusher, conveyor and agglomeration area, water treatment plant and leach pad. Decommissioning activities include decontamination of equipment, rinsing of heap leach pads with water, subsequent water treatment prior to discharge to the environment, and removal of residual cyanide reagents. 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.

Honduras local regulations require that mining companies conduct a periodic review of their closure plans every 5 years, with minor updates every 2 years. The plan is updated to reflect concurrent reclamation of certain areas of the mine and the addition of new mining areas. In addition to that, Aura Minerals corporate office requires its operations to review and update its Asset Retirement Obligation (ARO) cost estimation for the mine, including cyanide facilities decommissioning costs. These costs are reviewed and updated every year for San Andres and submitted to the Corporate office, where it is financially audited by an external party.

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

The operation is: ■ in full compliance

☐ in substantial compliance
☐ not in compliance with Standard of Practice 5.2

Describe the basis for this Finding/Deficiencies Identified:

The conceptual 2022 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$ 28.95 MM (millions). The 2022 closure plan assumes that the heap leach pad will be rinsed for chemical stability and that solution (draindown from heap leach and rinsate water from decontamination of equipment at the ADR plant) will be treated. The decommissioning and cyanide decontamination estimates provided by San Andres were generated as a function of the full fund third party implementation costs, using the Standard Reclamation Cost Estimator (SRCE) model that was developed for the State of Nevada, USA. The costs were estimated using third-party rates from local contractor companies used by San Andres for earthworks, concrete, infrastructures and dismantling activities.

Honduras local regulations require that mining companies conduct a periodic review of their closure plans every 5 years, with minor updates every 2 years. The Closure plan was presented to the local authorities in 2020 and updated in 2022 to reflect concurrent reclamation of certain areas of the mine and the addition of new mining areas. Additionally, according to Aura Minerals requirements, San Andres reviews and updates its closure costs on an annual basis including decommissioning for cyanide facilities as part of its Asset Retirement Obligation (ARO) cost estimation exercise. The most recent closure cost estimate for 2023 is US$29.77 MM, which is slightly higher than the previous 2022 amount of US$28.95 MM.

The Honduras government requires mining companies to establish for each project guarantees equivalent to 1% of the investment cost. San Andres has established guarantees for 9 projects that are currently in operation. These guarantees are updated every year. The amount of all these guarantees (< US$ 1MM) are not sufficient to cover closure costs and decommissioning activities. This guaranty is not intended to cover all closure expenses, but rather it is to promote the effective closure by the mine owner. As such, San Andres has established self-insurance or self-guarantee as a financial assurance mechanism to cover closure costs.

As local and central authorities have no requirement for financial assurance of closure activities, San Andres has established self-insurance as a financial assurance mechanism for closure activities, which includes decommissioning of cyanide related facilities. The 2022 closure cost estimate was reviewed by PricewaterhouseCoopers LLP (PwC). The auditors reviewed a letter from PwC dated May 12th, 2023, for the review of MINOSA Financial Statements as of December 31st, 2022, 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 Asset Retirement Obligation (ARO) 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 PricewaterhouseCoopers 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:

San Andres has developed and implemented the operating procedures mentioned in Standard of Practice 4.1. Operating procedures from the Safety Health & Environmental (SSMA) Area describe the steps, controls and precautions to be taken in facilities where cyanide is used, that are aimed to minimize worker exposure to cyanide. These procedures provide detailed information on risks involved with each task and adequately describe safe work practices. Documented procedures have been prepared for unloading and storage of solid cyanide; mixing of cyanide solutions; operation of the ADR Plant; operation of the leach pads and ponds, entry into confined spaces, and equipment decontamination prior to conducting maintenance activities among others. Procedures were reviewed and found to be sufficiently detailed to enable safe operation and to minimize worker exposure. Verification also included worker interviews while conducting field inspections.

The auditors verified that all operating procedures provide a listing of the required personal protective equipment (PPE) to prevent and minimize worker exposure to cyanide and cyanide containing solutions. San Andres has standardized the development of procedures which includes a section with required personal protective equipment (PPE) for each activity. A risk matrix is required to define the necessary PPE for each activity. In addition, procedure PO-MI-G&A-SSMA-009-EN-Personal Protective Equipment describes how to protect the different parts of the body and how to properly use the PPE. The procedures include the following sections:

Objectives, responsibilities, tools/equipment to perform the task, personal protective equipment (PPE) required for each task, description of the tasks, consideration of safety and health risks and environmental aspects, and log of changes to the procedure. Some procedures include pre-work inspections forms. Prior to conducting an activity, a pre-work assessments (IPER-C) is completed to help identify PPE needed for that activity. The auditors verified that an IPER-C was completed prior to the cyanide preparation event. The auditors also reviewed the pre-operational check records for cyanide and hazardous materials work RE-RQT-04-049 which is a requirement of the operating procedure for cyanide use and discharges and also for internal transport and preparation of cyanide solutions. In addition to the use of general PPE, such as hard-hat, steel toes shoes, and safety glasses throughout the mine site, areas and/or tasks where personnel may encounter cyanide have additional PPE requirements. It was verified during the audit that several procedures require the use of special PPE in activities or tasks where personnel may come into contact with cyanide. For example, hearing protection, rubber boots, rubber gloves, chemical suits, approved full-face respirator and HCN gas monitors were in use for tasks that were performed at the cyanide mixing area.

San Andres has implemented several mechanisms in which takes into account worker input for the development of health and safety procedures. Among those, the ones to highlight are:
Daily Safety Dialogue (DDS), where safety and occupational health matters are discussed in 5-minute talks. The topics for the safety dialogue are distributed to supervisors every week. IPER-C pre-work risk assessments process, where workers identify potential risks associated with the work and communicate any potential procedural or other problems to a supervisor. All operators and maintenance personnel interviewed demonstrated knowledge and understanding of the company's pre-work risk assessment program. Safety approach, in which supervisors observe workers conduct certain tasks, provides feedback to the worker on safety practices and deviations observed, and the worker has a chance to provide ideas on how to correct them. Safety and Hygiene Mixed Commission periodic meetings, where union workers and employees meet to discuss safety topics. Review of procedures meetings, where the supervisor discusses the procedures with workers and operators, and they provide feedback before the procedure is finally approved. Every 2 years, as established by San Andres Integrated Management System (SIG), documents area reviewed. Operational procedures reviews are carried out between the area supervisors, SSMA personnel and plant operators to compare the operational procedures with field practices. The review every 2 years is. This is done every 2 years or when necessary, given a risk scenario or incident. There are also opportunities to solicit and actively consider workers input during approaches between SSMA supervisors and operational personnel for tasks observation where there is interaction regarding any suggestions about the task or engineering control. Supervisors have an established program to carry out these task observations and interact with the supervisees. The auditors reviewed the approach formats registers which are recorded in the Singular platform, including inspections; this according to the operating procedure PO-MI-G&A-SSMA-021-Close Approach. Since the end of 2022, this practice is being carried out. There are also opportunities to receive feedback from the workers during the daily security dialogues that are daily 5 to 10 minutes talks before the start of the work shift.

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:

San Andres has determined the appropriate pH for limiting the generation of HCN gas during cyanide mixing and other production activities. Procedure “Internal transport of cyanide and preparation of cyanide solution” requires that pH values are at 10.5 for cyanide mixing. Specifically for the cyanide mixing activity, the procedure POP-SA-ADR-CO-06 “Internal transport of cyanide and preparation of cyanide solution” indicates that prior to pouring the sodium cyanide briquettes in the mixing tank, pH should be above 10.5 and adjusted by using sodium hydroxide. Observation of the cyanide mixing procedure confirmed that the mix tank pH was checked prior to addition of sodium cyanide briquettes. The pH values are measured in the mixing tank with a fixed pH meter. Solutions within the leach circuit required that pH is to be maintained at a minimum of 10.0 to maintain cyanide in alkaline solution and limit the generation of HCN. The procedure for operations and sampling in the process plant establishes that the working pH must be controlled every 2 hours They take barren samples from the lixiviation tanks for the mine metallurgical laboratory to verify the pH of the sample.. Regulation of the pH is also controlled in the desorption cation area in the plant, monitoring each train, both at the head and at the tail, according to the operating procedure. The auditors confirmed this through interviews with process personnel and review of pH logs for cyanide mixing, desorption and lixiviation tanks.

San Andres has identified the areas where workers may be exposed to cyanide in excess of 10 parts per million (ppm) and 4.7 ppm. These areas are the places where San Andres has installed stationary HCN monitors (ADR Plant, agglomeration area, conveyor N°8, booster pond, cyanide mixing area, cyanide storage area and the lab). Stationary cyanide detectors have a data logger system which records data for 22 days. The auditors sampled HCN data for the last 3 years at the ADR plant, booster pond and conveyor #8 and verified that all values recorded are below 4.7 ppm. The areas where they have identified this possible exposure to high concentrations of HCN gas are signposted announcing the presence of high concentration of cyanide and the prohibition of smoking, eating and opening at the cyanide release points. Training has been provided indicating the areas with the presence of cyanide; there are signs warnings announcing the presence of cyanide at the entrance to the plant and also in the warehouse and cyanide mixing area. areas with exposures to cyanide are indicated along with the personal protective equipment to be used. Procedures for cyanide handling in the storage area, cyanide mixing, agglomeration area, and leaching process identify the potential for worker exposure to cyanide and require the use of the handheld HCN monitors as part of the required PPE. Signage listing the PPE requirements to enter a cyanide facility has also been installed at appropriate entrances. This

requirement was also verified through observation of a cyanide mixing event, and interviews with personnel.

San Andres has stationary HCN gas monitors located at the ADR Plant, agglomeration area, conveyor N°8, booster pond, cyanide mixing area, cyanide storage area and in the lab. Cyanide detectors are checked every shift by process personnel and every 22 days by SSMA personnel, to ensure that the equipment is working properly. Personal HCN gas handheld monitors are in use during operations where cyanide is present, such as the agglomeration area, conveyors N°8 and 13, booster pond, ADR plant and cyanide mixing area. PPE requirements defined in the cyanide handling procedures and maintenance procedures call for the use of personal HCN gas monitors during specific operations where there is a potential for exposure to HCN gas. Operators and maintenance personnel were observed using these monitors throughout the audit. Stationary and handheld HCN gas monitors are set up to produce a visual and sound alarm at 4.7 ppm and 10 ppm to limit worker exposure to HCN gas. Procedures indicate that if HCN gas concentration exceeds 4.7 or 10 ppm the operator should evacuate the area immediately. The supervisor of the area and the SSMM department must be immediately notified so that they can go to the work site specific where the alarm was triggered in the first instance.

Hydrogen cyanide gas monitoring equipment is maintained, tested and calibrated as directed by the manufacturer. The fixed monitors are calibrated every 3 months by the external contractor DEA (Desarrollo Energético y Ambiente and are records retained for at least three years. The Health and Safety Department keeps records of calibration for the Sense Alert Plus stationary monitors. The auditors reviewed maintenance and calibration records covering the recertification audit. Handheld HCN monitors are self-calibrated every time the equipment is turned on. In addition, the Health and Safety Department calibrates the equipment every 22 days to ensure that the alarm is set and working when detecting HCN gas at 4.7 ppm. These handheld HCN monitors are replaced every year. Calibration records for the stationary and handheld monitors are maintained indefinitely and were available for review. This requirement was verified through review of calibration records for the last 3 years and discussions with Health and Safety personnel. The calibration report from external contractor DEA for the fixed HCN gas monitors confirms the alarms are set at 4.7 and 10 ppm.

Warning signs are posted in areas where cyanide is present advising workers that cyanide is present and that smoking, open flames and eating and drinking are not allowed, and that, if necessary, suitable personal protective equipment must be worn. The signs are in Spanish, which is the language of the workforce. The PPE requirements are also posted by mean of pictograms in these areas. The auditors completed visual inspections of signage at the ADR Plant, heap leach operations, booster pond and solution ponds, and found that signage was adequate. Induction training for employees includes information on typical warning signage used at San Andres for cyanide. The operation has installed signage warning of the presence of cyanide in high concentration in the 2 cyanide addition points warning of the presence of cyanide in high concentration.

San Andres sent the auditors purchase orders from both cyanide suppliers and the emails from the suppliers confirming they will immediately begin sending sodium cyanide with dye to San Andres mine.

San Andres has installed 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. Additionally, bottles of eye wash solution were found at remote locations. Showers and eye wash stations are inspected on every shift by process personnel and every month by Health and Safety personnel. The auditors checked showers and eye wash stations during the site tour to verify functionality. The auditors also reviewed records of checklists and inspections of showers and eye wash stations. Fire extinguishers are inspected and tested monthly. Inspection records are kept visible with a check list tag attached to the extinguisher. The auditors randomly checked fire extinguishers to confirm they are an acceptable type for use with cyanide. All extinguishers observed were fitted with inspection tags, which documented monthly inspection checks.

San Andres has identified tanks and pipes that contain cyanide solution to alert workers of their contents. Pipes containing cyanide are painted purple, are marked as containing cyanide solution, and flow direction is indicated. Cyanide mixing, cyanide storage and process tanks are marked as containing cyanide. The auditors followed the cyanide solution circuit from the cyanide mixing area to the heap leach pad facilities. During the visual inspection of the ADR plant and interview with operators, there is evidence that workers are aware of the meaning of the color coding applied in the operation to identify cyanide presence. The operation has signaled the flow direction and contents in cyanide-containing pipelines pumping to leach pads.

San Andres has available the Safety Data Sheets (SDS) and first aids procedures at critical areas where cyanide is managed. Plastic binders were observed at every location including SDS, a plan to respond to cyanide emergencies, procedure for handling and dosing of amyl nitrate, and a leaflet with information about safe use and handling of cyanide. AII information related to cyanide management including SDS information, procedures and emergency response plans were found to be in Spanish, the workforce language at the site. The SDS was provided by Cyanco and the auditors verified that it corresponds to the latest version provided by the manufacturer. The auditors found evidence of SDS and first aid procedures located at the cyanide storage area, ADR plant, agglomeration area, conveyors N°8 and N°13, booster pond, metallurgical lab, ADR lab, and Environmental lab. Plant personnel and emergency responders are trained in first aid procedures and the use of amyl nitrate within a few months of starting work. The auditors reviewed the induction training information provided for operators and found it to be adequate.

Procedure Accidents investigation details the process to report, investigate and evaluate all accidents and incidents, including cyanide exposure incidents. This procedure documents the requirements to report and investigate health, safety and environmental related incidents to determine the basic causes of the incident and provide corrective and preventive actions to ensure that a similar incident does not reoccur. In the event of an incident, they must first make

a flash report and then they prepare the final report. The accident statistics are kept on the Singular computer platform. Incidents with high potential must be investigated. The auditors reviewed the incident investigation of the fall of a cyanide box during the unloading of a cyanide box from the sea container in January 2024. Accidents and incidents/near misses are classified according to its severity. Immediate reporting is required for high severity incidents. The incident report is distributed within the management staff. The incident investigation procedure was reviewed during the audit and was found to be comprehensive. Examples were available to show that several minor incidents had been appropriately investigated and corrective actions taken. No cyanide related emergencies occurred during this recertification cycle requiring the implementation of the emergency response procedures.

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:

San Andres has made available oxygen, radios, telephones and alarm systems at critical areas where cyanide is managed. First aid kits including oxygen with reservoir mask and ambu bags are stored in plastic boxes, together with SDS and first aid procedures, at different locations including the cyanide storage area, ADR plant, agglomeration area, conveyors N° 8 and 13, booster pond, metallurgical lab and Environmental laboratory. Operators are required to carry a radio while performing their tasks in the most critical areas where cyanide is handled, such as the cyanide mixing facilities. Radio frequency to be used in case of emergencies is channel N°1. Emergency notification would be via cellular phone or internal radio frequency used by supervisors and superintendents at remote locations and by telephones located within the ADR Plant. Cyanokits and resuscitator is located at the site´s clinic and is also carried in the site's ambulance to the place of the emergency as part of the first aid response. The ambulance also carries oxygen bottles. The clinic also has medical oxygen bottles. Verification of compliance against this requirement was by visual examination and interview with process personnel and onsite doctors to ensure proper training and qualifications. The Cyanokit storage temperature is controlled, according to the manufacturer storage specification.

First aid equipment is inspected on a monthly basis by the Health & Safety Department (which includes the Emergency Response Team and Medical personnel) to ensure it is operational. Inspections include checks of expiration dates of cyanide antidote kits and storage at the recommended temperature range. The antidotes were all found to be within expiration date. The auditors reviewed inspection records of first aid equipment for the recertification period and found them to be complete. This requirement was verified through antidotes expiration dates, review

of safety and shift inspection records, and also with interviews with process plant, medical and emergency response personnel.

San Andres has “Emergency and Crisis Response Plan” (ERP) that includes a section to respond to accidents related to cyanide exposures; and procedure “Treatment in cases of acute cyanide intoxication” that describes what is to be done in the event of a cyanide exposure. Specific instructions are provided to treat victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes. Instructions detail the steps to be taken for conscious versus unconscious victims. Emergency contact information is included.

San Andres has its own onsite capability (infrastructure, equipment and medical resources) to provide first aid and medical assistance to workers exposed to cyanide. The site has a complete medical facility (clinic) located close to the mine area. Medical staff for each shift include a doctor, nurse and a driver for the ambulance. The clinic is well-equipped for dealing with many types of medical emergencies, including cyanide exposure. The clinic has an ambulance in case victims need to be evacuated to local hospitals. Procedures are in place for treatment of cyanide exposure, for determining the need to evacuate a victim to a local hospital, and for evacuating victims using ambulances. Compliance with this requirement was verified by conducting interviews with medical staff and through the inspection of the clinic and training records.

Cyanide treatment is provided on-site by company medical staff in the medical clinic. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Rosa Medical Center is required to provide additional medical care. An ambulance is maintained at the clinic to transfer victims if needed. Procedures are in place for treatment of cyanide exposure, for determining the need to evacuate a victim to Santa Rosa Medical Center (located approximately 1 hour drive from the mine site), and for evacuating victims using ambulances. For life, critical scenarios that exceed the Santa Rosa Medical Center capabilities, victims would be transferred to either San Pedro Sula or Tegucigalpa as part of the private medical insurance network that San Andres provides to the workers.

Cyanide treatment is provided on-site by company medical staff in the medical clinic. San Andres would manage any cyanide exposures without involving other local clinics. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Rosa Medical Center is required to provide additional medical care. The Santa Rosa Medical Center is part of the private medical insurance network that the mine provides to the workers, and San Andres has many years of experience working with them.

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:

San Andres has the “Emergency and Crisis Response Plan” (ERP) that sets out emergency response procedures for the entire mine site including scenarios involving cyanide releases and injuries. Procedures for alerts, initial response, PPE requirements, emergency response duties, communication, evacuation, training requirements, first aid and spill response are also provided in the ERP. The ERP considers the following cyanide emergency scenarios: transportation incidents, releases during fires in the cyanide storage area, cyanide solution spills, HCN gas intoxication, leach pad and process ponds releases to surface or groundwater.

The ERP provides response procedures for all potential cyanide failure scenarios required by the ICMC mine protocol, including releases during unloading and mixing, releases during fires and explosions, equipment failure (valve, pipe or tank ruptures), overtopping of the ponds, power outages, uncontrolled seepage, failure of the cyanide treatment process, and failure of the heap leach facilities. This requirement was verified through discussion with Health & Safety and Emergency Response personnel and the review of the ERP and emergency procedures. The ERP does identify an emergency scenario due to massive generation of HCN gas. San Andres has stablished actions in page 88 of the ERP regarding transportation accidents. The procedure for collecting contaminated soil, which according to what was indicated to the auditors is also the one that would be used for a spill of solid sodium cyanide. The SOP details the steps to follow for each phase of recovering a cyanide spill, including final disposal of material, PPE and debris, monitoring and remediation, stablishing the maximum allowable limit of 8 mg/kg (ppm) according to the Canadian Soil Quality Guidelines for the Protection of Environmental and Human Health. The ERP indicates that they must be located against the wind in case of emergency due to HCN gas; Tyvek suit is included among the PPE; and in case of cyanide spill from piping, to specify which valves will close.

Transportation of cyanide to the site by truck is included in the San Andres ERP and considers the conditions of the road from Puerto Cortés to the mine site. The cyanide transporter trucking company would have primary responsibility for a spill of solid cyanide during transportation from Puerto Cortés but would draw on resources from San Andres for support if the spill occurred close to the mine site. The operation has a copy of the cyanide transport company’s emergency response procedures..

The ERP describes site specific response actions for site personnel and potentially affected communities, use of cyanide antidotes and first aid measures for cyanide exposure, control of

releases and assessment, mitigation and future prevention. In the event of an emergency involving cyanide, the ERP provides for specific actions to be undertaken. The ERP includes specific response measures for the following cyanide emergency scenarios: transportation incidents, releases during fires in the cyanide storage area, cyanide solution spills, HCN gas intoxication, leach pad and process ponds releases to surface or groundwater. Any emergency that has the potential to affect the surrounding communities will trigger the notification requirements outlined in the ERP. The General Manager or delegate will notify the authorities and, if required, will inform potentially affected communities. Initial response, first aid and the use of cyanide antidotes by trained medical personnel is also included as an Annex in the ERP. The ERP also provides responses to cyanide spills or leaks from ADR plant and heap leach facilities, and makes provision for initial response, first aid, and spill reporting control and cleanup. The Emergency Response Team (Emergency Brigades - EB) have received training to respond to cyanide emergency incidents. In addition, all employees are trained in emergency communication and evaluation procedures. San Andres incident reporting and investigation procedure will trigger the evaluation of root causes from an incident involving cyanide release and will include preventive actions to avoid future events.

7.2 Involve site personnel and stakeholders in the planning process.

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

Describe the basis for the Finding/Deficiencies Identified:

The operation provides opportunities to involve its workforce in the cyanide emergency response planning process during the ERP training and interaction with staff. Also, during the annual Plan review, the superintendent of SSMA participates as a brigade member. After the emergency mock drills (of all kinds) there are meetings to evaluate the plan, this is another opportunity to involve its workforce in the emergency planning. Regarding external stakeholders, a copy of the Plan is given to the fire department of Santa Rosa de Copan, who issues a certificate of conformity. They also have direct formal communication through the boards of trustees (elected representatives of the community supported by the Municipal Authority), which includes emergency procedures. The mine has agreements with the communities of influence as the neighboring San Miguel, Azacualpa and San Andrés and maintains communications. They meet periodically and take advantage of those spaces to bring them information about the ERP. The mine also interacts with hospitals: Santa Rosa Medical Center who received cyanide emergency response training treatment by the cyanide provider. The mine has an agreement with this hospital for the workers medical insurance. The mine Security Department interacts directly with the national police based in the Municipality of La Unión including actions for emergency response. The auditors reviewed training records in the ERP and versions of the reviewed Plan

with his workforce, as well as meeting minutes with external stakeholders where among others, they interacted regarding the ERP.

San Andres has included local communities in ERP development/planning to a limited extent. Training on cyanide awareness and emergency response was provided to the surrounding communities that could be affected by a potential cyanide spill. The training included the use of cyanide at the San Andres mine and actions that would be taken if there was a release into the local community. A potential spill could affect community of San Miguel because of the leaching pads vicinity. In July 2023, due to the unusual rainy year, the mine met with them to coordinate any emergency response. Communities are not expected to play any response role in case of a cyanide incident other than staying away from the area of the incident and report any accidents to the authorities and the mine. Communications channels are in place to advise the local community leaders. San Andres provides to the communities a flyer called “Cyanide and the Community” that includes information on what to do in case of a cyanide emergency. Many of the local community members either work or have close family members who work at San Andres.

San Andres has on-site capabilities for dealing with all possible cyanide related incident scenarios, therefore its emergency plan does not consider external entities having responsibilities or roles nor formally participation in emergency response planning process, except medical from hospital of *Santa Rosa de Copán*: Santa Rosa Medical Center. Firefighters and other local response entities will only be requested to participate to provide additional resources, if needed. San Andres would maintain responsibility for emergency response activities within the communities if required, however, its emergency responders mostly are workers that come from the communities.

Training on cyanide awareness and emergency response was provided to the surrounding communities that could be affected by a potential cyanide spill. The training included the use of cyanide at the San Andres mine and actions that would be taken if there was a release into the local community. Communities are not expected to play any response role in case of a cyanide incident other than staying away from the area of the incident and report any accidents to the authorities and the mine. Every year the ERP is reviewed and certified by the firefighter department of Santa Rosa, as part of a legal requirement of the local and national authorities. Firefighters and other local response entities will only be requested to participate to provide additional resources, if needed.

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 ERP includes an operational structure to respond to emergencies. There is a Unified Command led by the General Manager (GM) and/or Health, Safety and Environment (HSE) Manager. The GM has authority to ensure that sufficient and adequate resources are allocated to carry out the ERP. The operation's Emergency Response Plan identifies in Section 9.1 the Emergency Brigade members by number of members in each work position per shift. Also, the ERP exhibit 6 lists the environmental emergency response team made up of ten brigade members, with their name, position and contact telephone number. The Emergency Brigade (EB) responsibilities are described in the ERP. San Andres has a total of 26 brigade members conformed by personnel from different areas of the mine. In every shift there is a minimum of 6 brigade members. The ERP includes in Appendix 4 training requirements for the EB and it is the responsibility of the Emergency Response Leader to ensure that training is provided and maintained. The Emergency Response Leader reports to the Health and Safety Manager onsite. In addition, the EB received external training once a year in emergency response. As scheduled in the Emergency Brigade Training Plan, Appendix 4 of the ERP, in 2022 and 2023 they had hazmat training and entering confined spaces with the firefighters. Another training was in cyanide awareness in February 2023 provided by the cyanide supplier. The Plan includes office and 24-our cell phone numbers for all paramedics and the brigade members. First call to the cell phone number is to the Monitoring Room and they to SSMA or directly to radial frequency 1 to SSMA who activate the emergency brigades which are approximately 25 people. Section 8.1 of the ERP, Emergency Activation, describes the necessary actions for call-out procedures and 24-hour contact information to follow. Section 6 of the ERP, Roles of Those Involved, describes the roles and responsibilities of all personnel who have responsibilities in case of an emergency in the mine. It describes the responsibilities of the General Manager, SSMA manager, Area Managers, medical personnel, Brigade Commander, brigade members and workers. Emergency response equipment including PPE´s is provided in Annex 8 of the ERP. The list includes among others: clothing for fire intervention, equipment for rescue at heights, transportation and vehicle rescue, hazmat and support equipment. The cyanide emergency response equipment is checked regularly; however, no records of checklists were available for review by the auditors. During preparation of this report, San Andres sent evidence of inspections to emergency response equipment, regaining control of the situation and addressing the deficiency. The ERP does not provide specific functions to outside responders as San Andres has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility. According to an interview with the SSMA Superintendent, firefighters act as auditors during mock drills and as trainers, and if necessary, they would be called in case of fire or leak (spill). Regarding police, they would request their presence in the mine in case of possible crime, to confine and prevent passage in case of spills. The ERP specifies quantities of equipment and materials available in the equipment list. There are provisions to inspect the emergency response equipment.

The ERP does not provide specific functions to outside responders as San Andres has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility. Current contact information for fire, police, and hospitals is included in the ERP. The ERP is reviewed and certified annually by the firefighter department of Santa Rosa, as part of a legal requirement of the local and national authorities. Firefighters and other local response entities will only be requested to participate to provide additional resources, if needed. Firefighters from Santa Rosa participate as observers in the mock drills conducted at the mine site.

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 ERP includes procedures to notify management, regulatory agencies, outside response providers and medical facilities in case of an emergency. Contact information for outside responders and medical facilities are included in Appendix 3 of the ERP. Procedure “Communication with stakeholders on Health, Safety and Environmental Matters”, provides details on how to notify external parties in case of emergencies and contact information of regulatory agencies.

The ERP includes procedures to notify potentially affected communities and communication with the media in case of an emergency. Procedure “Communication with stakeholders on Health, Safety and Environmental matters”, provides details on how to notify communities in case of emergencies and contact information of community representatives. Section 17 of the Plan, Escalation to CEO and Corporation, describes the specific communication steps to take for each scenario. In Section 8.4 of the Plan is described communications with the media and communities and stakeholders.

During the field audit, the auditors did not find a specific document to notify ICMI of a significant incident, however San Andres personnel established in the ERP a requirement to notify the ICMI in case of a significant cyanide incident. After the audit San Andres sent the auditors the new version of the ERP where this requirement was included. No additional information was required to consider this Protocol Question in Full Compliance with the Code.

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 ERP includes remediation measures for liquid and solid cyanide spills, including materials to be used for cleanup and for disposal of contaminated spill clean-up materials. Procedure "Cleanup of soils contaminated with chemical products" provides details on how to clean contaminated soil. In the case of cyanide spills, sodium or calcium hypochlorite that is stored at the warehouse, will be used in a solution at 5% for neutralization purposes. The procedure also indicates the depth at which impacted soil must be excavated and how samples should be taken to determine that the area is clean. All cyanide-contaminated material is disposed of in the heap leach area. The drinking water supply for local communities around the San Andres mine is from springs located upgradient of the mine. No alternative drinking water supply would be required in the case of a cyanide spill. Annex 20: POP-SA-MA-CO-12-Treatment Collection of Soil Contaminated with Chemicals details the steps to follow for each phase of recovering a cyanide spill, including final disposal of material, PPE and debris, monitoring and remediation, stablishing the maximum allowable limit of 8 mg/kg free cyanide according to the Canadian Soil Quality Guidelines for the Protection of Environmental and Human Health.

San Andres ERP specifically prohibits the use of cyanide treatment chemicals such as sodium hypochlorite, hydrogen peroxide and calcium hypochlorite when responding to a cyanide emergency where cyanide has been released into surface water.

The ERP includes information on environmental monitoring following a cyanide release to surface soils and water, including sampling and analytical methodologies to be followed. Possible sampling locations are also included. San Andres has an extensive water monitoring program that would be modified as necessary in case of a spill. The Environmental Department would manage the characterization, extent and remediation of a spill, and is responsible for reporting spills to the regulatory agencies. San Andres monitoring plan includes surface water and groundwater sampling and regulatory reporting program that must be initiated if cyanide is detected downstream of process ponds and leach pad facility. This requirement was verified through discussion with the Environmental Manager and document review.

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:

San Andres performs annually reviews of its ERP, recording at the end of the document the changes made and the current version. The Management Standard for Control of Documents and Records PG-AU-SSMA-GES003-ES requires that all internal documents be reviewed every 2 years or when required. Also, the ERP is reviewed after significant changes, new projects, incorporation of new hazardous materials, new significant aspects or after a significant unwanted event occurs. Previous and current versions of the ERP were reviewed to verify changes and updates conducted during the recertification period.

San Andres conducts mock emergency drills according to an annual emergency drills program. The auditors reviewed evidence of emergency response drills during the re-certification period which included scenarios with cyanide intoxication and cyanide releases that required to test the full hazardous materials response protocol. Verification was through review of records and photos of mock cyanide drills performed during the recertification period and also by reviewing training plans and materials. In December 2021 they performed a cyanide emergency drill with cyanide exposure in the agglomerator area with participation of the emergency brigade and another drill in the ADR plant due to liquid cyanide spill. In 2022 and 2023 they had mock drills simulating cyanide spills with exposure, as stated by the SSMA Superintendent. In May 2024 they performed another related to cyanide exposure by HCN gas in the stacker. The drill report included opportunities for improvement, there were 6 participants. San Andres performed a cyanide emergency mock drill on June 14, related a cyanide spill in the leaching tanks area, with 14 participants. The drill report includes opportunities of improvements and has established corrective actions, responsible and due dates to close these.

Provisions to review the Plan after its activation are included in Section 16. There have been no cyanide-related emergencies during the recertification audit period requiring the implementation of the emergency response procedures.

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 San Andres receive an initial general induction training on health, safety and environmental matters before they can start working or enter the mine. This induction includes information about the production process and the use of cyanide, its characteristics, health effects, risks, controls, storage and handling, PPE, signage, areas of risk, fires, spills, HCN monitors, symptoms, first aid, and emergency response. Inductions are given on Mondays and Tuesdays, no one can work without the induction card. All staff receive a 2-day employee induction, there are visits, and everyone is taught Safe Use and Handling of Cyanide. The auditors reviewed the content of training material and training records for the recertification period. Interviews with employees working near the booster pond, at the heap leach operations and in the ADR Plant were conducted, showing knowledge of cyanide management. In all cases the auditors found evidence of training records. Training material showed solid briquettes and dyed liquid cyanide, it also states to evacuate the area when the alarms of the HCN monitors are activated at 4.7 and 10 ppm.

Annual refresher training including cyanide is provided in San Andres. Training includes chemical and physical properties of cyanide; hazards of cyanide; symptoms of cyanide exposure; emergency response; and first aid, including use of oxygen. The training includes a written test. The annual training plan includes Safe Handling of Cyanide 2024 at operational levels (1.5 hours, Toxicology and Application of Antidotes (2 hours for medical personnel), Response to Emergencies with Cyanide for the brigades (by Cyplus Idesa, a 12-hour course). In 2023 they received training from Draslovka to 37 workers and from firefighters in hazmat. In 2022 and 2021 had the training Safe Handling of Cyanide for 22 plant personnel, leaching and ADR plant. The survey to find out the degree of knowledge of workers about cyanide resulted in 70% correct answers out of 12 questions, considering that there are new personnel. The operation continues to work to improve the degree of knowledge, as informed the training personnel. The auditors reviewed refresher training records which were offered at different times to cover all shifts, covering the recertification audit period. Training is recorded on sign-in sheets with training records signed by both trainer and trainee.

Training records, including refreshers and cyanide hazard training for San Andres personnel are retained by the training coordinator, which is part of the Human Resources Department, in the form of hard copies and also an electronic version stored in Microsoft Excel spreadsheet format. Training records were reviewed for the audit recertification period and were found to be complete. Training records identify the trainer, trainee, topics covered, date and sign off sheet. This requirement was verified through review of a sample of records for the recertification period.

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:

Employee specific training include a detailed annual program that covers operational procedures in the storage area, ADR plant and leach pad. This training program covers key operating procedures: cyanide unloading and storage, cyanide mixing in the process plant, HCN monitoring systems, pH adjustment, leach pad irrigation cells placement and operation. Aspects such as cyanide awareness, response, process information, hydrogen cyanide monitor and alarm operation, and location of cyanide safety equipment are included. Experienced supervisors provide training on cyanide hazards, work procedures and PPE in classroom sessions and in the field using the operating procedure documents. Supervisors are trained to provide this training to workers. Each area leader or the immediate supervisor is responsible for their training, as stated in the mine Induction procedure. San Andres also engaged outside specialists from the cyanide provider on training matters. Training included a test at the end of the session to evaluate effectiveness. Refresher training on procedures is tracked and records are signed by both the supervisor and the trainee. Employees are also instructed on the use of risk assessments and area inspections, which are carried out within work areas. The auditors reviewed these training materials and confirmed by means of interviews with supervisors and workers in the ADR Plant and heap leach operations that this training was effective. The auditors reviewed examples of training records covering the recertification period.

San Andres has developed a comprehensive list of procedures for the process plant and leach pad operations that define the steps required to complete a task that involves cyanide handling in a safe manner. The annual procedures training program is prioritized based on tasks and risks with sign off required from both the trainer (process trainer or supervisor) and the trainee. Training elements required for a task or area is recorded on a training sheet. The auditors verified that procedures used at the process plant and leach pad operations that involve the use and handling of cyanide are included in the annual program. Training elements such as required personal protective equipment (PPE) and decontamination requirements are included in the training materials used to train operators and maintenance personnel. Training materials were available for review. On-the-job training by a senior operator or supervisor is also conducted prior to allowing a new employee to work alone. The trainee is provided with the procedures for review and then the supervisor verifies his understanding. After that, the trainee works under direct supervision of the supervisor, then it is supervised by an operator, and once the trainee has acquired experience, is allowed to work on its own. Presentations, training materials, and tests were reviewed. All information was found to be complete.

Training on specific tasks is provided by the process trainer, area managers, supervisors or lead operators that have successfully passed a “train-the-trainers” course. Trainers are also considered qualified to provide training based on their experience. Task training related to cyanide management activities are provided by experienced area supervisors and superintendents. For example, the general supervisor of the ADR plant has 23 years working at San Andres, the leaching supervisors have 18 and 20 years of experience. This requirement was verified by discussion with the process trainer.

As stablished in Aura´s corporate standard Major Risk Management and in the mine´s Induction procedure, aII new employees and contractors that will work or might encounter cyanide during their tasks, are trained on cyanide before being allowed to operate onsite. National regulations establish in the Labor Code that workers must be trained in the specific task before being allowed to perform the work. Training includes cyanide awareness training and, for those that will be working within the process plant and leach pad, review and understanding of operating procedures related to their tasks is mandatory. Some of the aspects covered include cyanide alarms and monitors, first aid and the use of cyanide safety equipment. The auditors verified this by means of interviews with workers in the ADR Plant and at the booster pond. Records of the induction training and refreshers are maintained by the Human Resources department. The auditors inspected examples of these records and found them to be effectively maintained.

Annual refresher training including cyanide awareness is provided in San Andres. Module 5 “Cyanide use and management, and environment” presentation includes chemical and physical properties of cyanide; hazards of cyanide; symptoms of cyanide exposure; emergency response and first aid. The training includes a written test. Additional training is also provided by the cyanide provider. Besides the annual cyanide refresher training, San Andres also provides re-training on operating procedures, which includes cyanide hazards and controls, and is performed in an annual training program. Experienced supervisors provide re-training on cyanide hazards, work procedures and PPE in classroom sessions and in the field using the operating procedure documents. Supervisors are trained to provide this training to workers. Refresher training on procedures is tracked and records are signed by both the supervisor and the trainee. The mine tracks through an Excel worksheet the names of all the workers who had received the courses related to cyanide management in such a way that it allowed them to track those who had received them and those who had not yet taken them.

Task direct observations at field by supervisors are used to evaluate competency of workers and effectiveness of training. Evaluation of the cyanide training received is by observation of tasks performed by workers to ensure they are following appropriate work procedures and using suitable PPE when working with cyanide. The auditors reviewed the checklist used to conduct these task observations, and interviewed supervisors in the ADR Plant and in heap leach operations. In addition, written tests are also used to evaluate the effectiveness of training. This requirement was verified through discussions with process personnel and review of training and evaluation records for the last three years.

Training records documenting the training that was received are retained throughout an individual's employment. Training records include the name of the trainer, trainee, date, subject covered and are signed by both the trainer and trainee. Written and verbal tests are completed to demonstrate the employees' understanding of the training materials. Samples records were available for review and found to be complete. The auditors verified this requirement by randomly checking records of four workers on site: The general supervisor of the ADR plant, two process plant operators that participated in the cyanide mixing event observed during the audit, and the Leaching Superintendent. In all cases the auditors found evidence of training records and evaluations in compliance with this requirement.

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:

All plant, leaching and crushing personnel receive annual training in first aids, in the ERP, in the safe use and handling of cyanide, including the procedures to be followed if cyanide is released and decontamination procedures for the case of a cyanide exposure victim and decontamination of the equipment and facilities. All operators which include cyanide unloading, mixing, production, and maintenance personnel, are provided with site-specific hazard training including cyanide awareness, hydrogen cyanide monitoring, emergency response, recognition of cyanide exposure symptoms, cyanide exposure first aid, and actions to be taken in the event of a cyanide spill. Response procedures are covered during hazard and awareness training and during cyanide refresher training (Module 5). Operators and maintenance personnel in different areas and shifts were interviewed and demonstrated good awareness of what actions are to be taken in the event of cyanide release.

San Andres has an Emergency Brigade (EB) on site. The EB is formed by personnel from different areas of the mine. On every shift there are brigade members. The EB members are trained through participation in mock drill exercises as well as formal training programs. The auditors interviewed members of the emergency response team and found them to have received training on cyanide hazards and to be knowledgeable on how to manage cyanide releases, including use of response equipment. The EB received training on hazardous materials handling and emergency response provided by Firefighters of Santa Rosa in 2023.
Mock scenarios and drills are regularly undertaken to test the effectiveness of the EB. The review of drill reports in the last three years showed that the EB actively participated in emergency drills including scenarios involving cyanide emergencies. Records of training for the EB were reviewed for the recertification period and were found to be complete.

No off-site emergency responders would be included in an emergency response to a cyanide release. The ERP does not provide specific functions to outside responders as San Andres has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility. In case of cyanide exposures, it is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Rosa Medical Center is required to provide additional medical care. Regardless of that, medical staff at the Santa Rosa Medical Center have received briefings in 2024, on the ERP and dealing with cyanide poisoning. The auditors verified that San Andres maintains sufficient medical resources, infrastructure and equipment that would not require to treat exposed patients to cyanide in medical facilities off-site.

Annual refresher training including cyanide is provided in San Andres. Module 5 “Cyanide use and management, and environment” presentation includes chemical and physical properties of cyanide; hazards of cyanide; symptoms of cyanide exposure; emergency response; and first aid, including use of oxygen and amyl-nitrite. Additional training is also provided by the cyanide provider. Besides the annual cyanide refresher training, San Andres also provides re-training on operating procedures, which includes cyanide hazards and controls, and is performed in an annual training program. Refresher training on procedures is tracked and records are signed by both the supervisor and the trainee. Personnel interviewed showed a good level of awareness of emergency response procedures in the event of cyanide exposure or release. This was confirmed through a review of training records for process personnel and emergency response team members.

Training records, including refreshers and cyanide hazard training for San Andres personnel, are retained by the training coordinator, which is part of the Human Resources Department, in the form of hard copies and also an electronic version stored in Microsoft Excel spreadsheet format. Training records were reviewed for the audit recertification period and were found to be complete. Training records identify the trainer, trainee, topics covered, date and sign off sheet. This requirement was verified through review of a sample of records for the recertification period.

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:

San Andres provides opportunities to stakeholders to communicate their concerns related to cyanide management, including engagement programs, meetings, and tours to the mine site. The operation has formed a patronage with the communities of San Andrés, San Miguel and Azacualpa and delivers a booklet as part of the training to its workers, as 95% of the mine´s workers are residents of the communities, where they replicate this information in their community. The mine´s PO-MI-G&A-COMU-001-ES Communication with Interested Parties on Issues Related to Safety, Health and Environment stablishes in Section 8.5 that communication with interested parties in case of convoke to training or transmitting information related to safety, health and environment, the Community Relations Management will communicate with different local organizations, (patronage, water boards, educational centers, health personnel, family parents, churches, and the community in general. Informs that this communication will be made by the means already defined written (as communiqués, banners, trefoils, banners), verbal (via telephone, personal or training), via social networks and with the Aura MINOSA APP. San Andres has implemented a program called “Open Mine” that includes tours to the mine by students, schools, journalists and other stakeholder. The auditors reviewed mine visit records corresponding to this recertification period. San Andres has also implemented the program called “Itinerant Mine” in which the mine appears in the media (e.g. TV) and visits the communities to provide information about the mine, including cyanide management and handling. This program includes a presentation that covers all aspects of the operation, including cyanide. San Andres has developed a flyer called “Cyanide and the Community” that includes information on what to do in case of a cyanide emergency. These flyers are distributed massively in meetings with communities and stakeholders. San Andres also has a grievance mechanism in place to receive, process, manage and resolve complaints and grievances in a timely and consistent manner. Complaints are received via phone calls. There have been no cyanide related complaints in the last 3 years. San Andres provides information using social media (Facebook, LinkedIn, Instagram) where stakeholders can raise concerns or questions about any topic, including cyanide. The Community Relations department maintains a community engagement plan, which includes a schedule of meetings with provincial authorities, agencies and communities. In addition, it has implemented an open-door policy that includes a program for attention to families of the surrounding communities, where the families held private meetings with San Andres’ representatives to raise questions about any subject, including cyanide management. Communities around San Andres has not raised any issues about cyanide in past years. Community concerns are primarily with job opportunities, water pollution, wildlife impacts and human health impacts of mining in general. The auditor reviewed evidence of all these initiatives, including attendance lists of mine tours, complaints registers, presentations, flyers, social media, and minutes of community meetings, among others.

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:

San Andres continued using mechanisms to provide opportunities to stakeholders to communicate their concerns related to cyanide management, including engagement programs, meetings, and tours to the mine site. San Andres has developed a flyer called “Cyanide and the Community” that includes information on what to do in case of a cyanide emergency. These flyers are distributed massively in meetings with communities and stakeholders. San Andres also has a grievance mechanism in place to receive, process, manage and resolve complaints and grievances in a timely and consistent manner. Complaints are received via phone calls. There have been no cyanide related complaints in the last 3 years. San Andres provides information using social media (Facebook, LinkedIn, Instagram) where stakeholders can raise concerns or questions about any topic, including cyanide. The Community Relations department maintains a community engagement plan, which includes a schedule of meetings with provincial authorities, agencies and communities. In addition, it has implemented an open-door policy that includes a program for attention to families of the surrounding communities, where the families held private meetings with San Andres’ representatives to raise questions about any subject, including cyanide management. Communities around San Andres has not raised any issues about cyanide in past years. Community concerns are primarily with job opportunities, water pollution, wildlife impacts and human health impacts of mining in general. The auditor reviewed evidence of all these initiatives, including attendance lists of mine tours, complaints registers, presentations, flyers, social media, and minutes of community meetings, among others. All the referenced written descriptions of the operation’s cyanide management activities are written in the local language.

San Andres utilizes the same mechanisms described above as opportunities to interact with stakeholders and provide them with information regarding cyanide management practices and procedures. These mechanisms include hosting mine tours, the “Open Mine” and “Itinerant Mine” programs, and public meetings with local communities, among others. A flyer describing cyanide use at the San Andres mine has been prepared for distribution to local communities and stakeholders. Minutes of these meetings, power point presentations, and the cyanide flyer were reviewed by the auditors.

Information reported to the regulatory agencies in Honduras regarding confirmed cyanide releases and/ or exposure incidents would be made available to the public by the government agency, for cases of cyanide exposure resulting in hospitalization or fatality; cyanide releases off the mine site requiring response or remediation; cyanide releases on or off the mine site resulting

in significant adverse effects to health or the environment; cyanide releases on or off the mine site requiring reporting under applicable regulations; and releases that cause applicable limits for cyanide to be exceeded. In case it occurs, it will be communicated to INHGEOMIN (Honduran Institute of Geology and Mines), the mining authority. Information on cyanide releases would also be included in the annual corporate responsibility report, separately identifying any incidents occurring in San Andres so that stakeholders would be aware of the nature and location of the release. San Andres has provisions in place to make information publicly available regarding potential cyanide releases or exposure incidents, if any such incidents were to occur. No such accidents had occurred during this last 3 years recertification period, therefore there was no need to communicate to the authority in this regard.