

EQUINOX GOLD, MINA LOS FILOS

# SUMMARY AUDIT REPORT

FOR THE  
INTERNATIONAL CYANIDE  
MANAGEMENT CODE

JULY 2025



Tel +51.947.259.440 | Email [bpizzorni@cyanideauditors.com](mailto:bpizzorni@cyanideauditors.com) | Web [CYANIDEAUDITORS.COM](http://CYANIDEAUDITORS.COM)

## Content

<i>Operation General Information .....</i>	<i>4</i>
<i>Operation Location Detail and Description .....</i>	<i>4</i>
<i>Auditors' Finding.....</i>	<i>11</i>
<b>Compliance Statement.....</b>	<b>11</b>
<b>Auditor Information.....</b>	<b>11</b>
<b>Auditor Attestation.....</b>	<b>12</b>
<i>Principles and Standards of Practice .....</i>	<i>13</i>
<b>Principle 1   PRODUCTION AND PURCHASE .....</b>	<b>13</b>
Standard of Practice 1.1.....	13
<b>Principle 2   TRANSPORTATION.....</b>	<b>14</b>
Standard of Practice 2.1.....	14
<b>Principle 3   HANDLING AND STORAGE .....</b>	<b>16</b>
Standard of Practice 3.1.....	16
Standard of Practice 3.2.....	19
<b>Principle 4   OPERATIONS .....</b>	<b>21</b>
Standard of Practice 4.1.....	21
Standard of Practice 4.2.....	27
Standard of Practice 4.3.....	28
Standard of Practice 4.4.....	31
Standard of Practice 4.5.....	33
Standard of Practice 4.6.....	34
Standard of Practice 4.7.....	34
Standard of Practice 4.8.....	37
Standard of Practice 4.9.....	38
<b>Principle 5   DECOMMISSIONING .....</b>	<b>40</b>
Standard of Practice 5.1.....	40
Standard of Practice 5.2.....	41
<b>Principle 6   WORKER SAFETY .....</b>	<b>43</b>
Standard of Practice 6.1.....	43
Standard of Practice 6.2.....	46
Standard of Practice 6.3.....	54
<b>Principle 7   EMERGENCY RESPONSE .....</b>	<b>61</b>
Standard of Practice 7.1.....	61
Standard of Practice 7.2.....	65
Standard of Practice 7.3.....	69
Standard of Practice 7.4.....	74
Standard of Practice 7.5.....	75

Standard of Practice 7.6..... 77

**Principle 8 | TRAINING ..... 80**

Standard of Practice 8.1..... 80

Standard of Practice 8.2..... 82

Standard of Practice 8.3..... 86

**Principle 9 | DIALOGUE AND DISCLOSURE ..... 91**

Standard of Practice 9.1..... 91

Standard of Practice 9.2..... 94

*Appendix A: Los Filos Interviewees ..... 97*



## Operation General Information

Name of Mine:	Los Filos Mine
Name of Mine Owner:	Equinox Gold Corp.
Name of Mine Operator:	Desarrollos Mineros San Luis, S.A. de C.V.
Name of Responsible Manager:	Juan Alberto Pineda
Address:	Domicilio Conocido, Mezcala
State / Province:	Guerrero
Country:	México, C.P. 40191
Telephone:	+52 733 33 39500
E-mail:	juan.pineda@EquinoxGold.com

## Operation Location Detail and Description

*Desarrollos Mineros San Luis, S.A de C.V. (DMSL)*, Mexican subsidiary of Equinox Gold Corp., owns the Mining Unit Los Filos (UMLF). The mine operation is located in the municipality of Eduardo Neri, state of Guerrero, Mexico, approximately 180 km southwest of Mexico City at an elevation of 1800 meters above sea level. The property is centered on latitude 17°52'13" north and longitude 99°40'55" west (UTM [Universal Transverse Mercator] Zone 14Q 1,976,300N 427,400E). The UMLF can be accessed by road or by air by helicopter or plane. The overland drive is four hours (240 km) from Mexico City follow National Highway 95/95D south to the village of Mezcala, then 18 km on a paved road to the mine site.



The mine is located in an arid tropical zone. The average annual temperature ranges are approximately 18-22°C. The average annual rainfall is 590 millimeters. The predominant wind direction for most of the year is the northwest.

The area is characterized by large limestone mountains divided by wide valleys. The slopes of the hills vary from very flat (5-10%) to steep slopes (50%). The slopes of the valley are covered with hardwood forests, while the valley bottoms are usually cultivated. The maximum elevation in the Project area, at 1,820 meters above sea level, is the summit of El Bermejal Hill. The Carrizalillo valley is located at an altitude of 1,000-1,100 meters above sea level.

Currently, 2,000 people work at the site. Power is supplied through the local utility service, Federal Electricity Commission and potable water for the project is sourced from a large well and filtration gallery in the Balsas River located 1.5 km west of Mezcala. Site communications include satellite service, using Voice over Internet protocols (VoIP for phones) and Internet protocols (for regular computer business). Operations use two-way radio communications.

Mining Operations are carried out throughout the year with maximum shifts of 12 hours of work per day.

As of January 2025, Los Filos mine had two active open pits: Los Filos Open Pit (LFOP) and Bermejal Open Pit (BOP); Guadalupe Open Pit (GOP) was inactive. Open pit mining involves conventional drilling and blasting and loading and hauling processes. Loading is carried out with shovels and front loaders and hauling with trucks with a capacity of 136 tons. The ore can be destined for the crushing area (for breaking prior to deposit in the leaching pad) or directly to the leaching pad.

Underground Norte was the only active underground operation, while Mina Sur and Bermejal were closed. Underground mining employs cut-and-fill, or long hole stop methods, with contractors transporting all ore to the crushing station.

### Crushing

Crushing equipment includes primary and secondary crushers, screens and associated motors and electrical equipment, conveyor belts, agglomerator, hoppers and supports. High-grade ore is crushed and stacked on leaching pads using conveyor belts and a stacker. The crushing process involves hauling ore from pits and underground mines. Initially, the ore goes through a jaw breaker and then two conical breakers, reducing it to 80% minus 154 mm. Vibrating screens then produce 80% minus 25.4 mm ore, with dust controlled by foam suppressors. Finally, belts transport the crushed ore to leaching pads, forming five-meter-high beds.

### Agglomeration

In order to improve the efficiency of the heap leaching process with ores with a high proportion of fines, these are combined into larger, more manageable aggregates. The

fine particles are bonded together, creating larger, more porous granules or pellets. This process improves permeability and prevents issues like channeling and poor leaching rates.

### Leaching pads

The operation of leaching pads begins with a layer of compacted clay that is covered with High Density Polyethylene (HDPE) plastic membrane, also known as Geomembrane or Liner. This membrane is impermeable, preventing the solution from seeping into the natural soil. Next, a network of solution collector pipes is installed, followed by a layer of gravel called Over Liner. The ore to be leached is then deposited on top of this layer. The ore placed in the leaching pad comes from the Los Filos and Bermejil pits and is referred to as "ROM Mineral" (Run of Mine Mineral); the highest-grade crushed ore in gold originates from the Los Filos Pit and the underground mine.

The ROM ore is stacked in layers, with each layer being five meters high. Once a minimum area of 250 m<sup>2</sup> is available, a 6-inch diameter pipe is laid, and sprinklers or wobblers hoses are connected to one edge through which the cyanide and antifouling solution is dispensed; subsequently, the ore is moistened. Upon wetting the ore, the leaching process commences—dissolving gold and silver from their solid states into liquid form as the cyanide solution comes into contact with the precious metal molecules within the ore. The leaching solution filters through the ore and the Over Liner, ultimately reaching the surface of the Geomembrane. It then flows through the collector pipe placed atop the Geomembrane and is directed to the rich solution ponds. This filtered solution is referred to as a rich solution. The facility includes two storage ponds for the rich solution, each equipped with two pumps. These pumps transfer the solution to the Adsorption, Desorption and Recovery (ADR) Plant.

The sodium cyanide is transported in solid briquettes in an 18-ton isotainer truck. The isotainer is connected to the T-100 tank, freshwater is added, and recirculated between the isotainer and tank until the solid cyanide is completely dissolved. After dissolving the solid cyanide, the solution is transferred to a storage tank (T-200) for dosing to different process points, such as the barren tank, recirculation tank, and activated carbon circuit. This solution has a concentration of approximately 30 percent sodium cyanide.

The cyanide solution is added to the barren solution at the outlets of the barren and recirculation tanks and then pumped to the booster station for recirculation to the heap leaching pad. The average concentration is 350 a 425 ppm parts per million (ppm) of free cyanide. When the solution contacts the ore, the cyanide reacts with the gold and silver, converting to a pregnant solution that reports to two gravel-covered ponds at the toe of the heap leaching pad (i.e., North Pregnant Pond and South Pregnant Pond). Each pond is equipped with two pumps to pump the solution to the Adsorption, Desorption and Recovery (ADR) Plant.

There is a recirculation pond capturing overflow from rich solution ponds and spillage from the ADR plant. It also compensates for evaporation or wetting of new mineral.



Additionally, a contingency pond stores neutralized surplus solution during rainy seasons in a closed-circuit system without discharging any solution outside the process

Due to the extraction of ore with high copper content during the development of the Bermejil UG (Under Ground) project (Guadalupe), it became necessary to leach the ore with cyanide concentrations ranging from 700 to 900 ppm. To facilitate this process, platforms were constructed within Heap Leach Pad (HLP) 1 South Interliner Additional Stacking 8 Ha (HLP 1 South Interliner) for irrigation purposes. In February 2023, Los Filos installed Area 800b on level 1473 of yard 1. This area comprises a 40,000-liter tank designed to store 30% liquid cyanide and includes a pumping system that distributes the cyanide solution via a 10-inch sweeper solution line to irrigate ore with high copper concentration on platform 1489. Initially, the operation of Area 800b was projected to last approximately eight months; however, the mine has encountered greater quantities of high-copper ore than anticipated. Consequently, there is an ongoing requirement to maintain the operation of Area 800b until May 2025.

Area 800b supplies a high-concentration cyanide solution to HLP 1 South Interliner utilizing tank T-300. The construction followed established and accepted engineering practices appropriate for such facilities. Liquid cyanide is transported using isotanks from tank T-100 in Area 800 and transferred to tank T-300 in Area 800b, located within the HLP 1 South Interliner leaching pad, approximately one kilometer distance, for storage and subsequent dosing to the leaching pad. As of January 2025, Area 800b keeps operating.



**ADR Plant and Associated Storage Ponds**

### ADR Plant

The recovery of precious metals is conducted at the ADR Plant (Adsorption, Desorption, Recovery, and Smelting) currently operational at the UMLF. The primary function of this plant is to recover gold and silver values dissolved in the rich solution from the rich solution pond, subsequently melting them to form doré bars.

The solution from the leaching pads is pumped to the ADR plant, starting in the activated carbon columns, which adsorb gold into activated carbon. This system has seven parallel trains of four columns each, with each column containing about six tons of activated carbon. The carbon adsorbs the gold and silver from the rich solution that flows through the tanks. The solution enters at the bottom, moves upwards through the fluidized bed of activated carbon, and passes by gravity through each column. By the time it leaves the last column, most of the gold and silver have been adsorbed onto the carbon. The remaining solution, now stripped of values, is called a sterile solution.

A vibrating screen at the end of each activated carbon train retains fine activated carbon to prevent it from reaching the yard. The sterile solution from the activated carbon trains is generally sent to the Barren Tank and the Recirculation Tank, but during the rainy season, it may also be directed to two neutralization tanks before reaching the contingency pool.

The subsequent stage in the ADR Plant involves transferring the activated carbon from one column to another, moving against the flow of the rich solution. The activated carbon is then transferred from the initial column in each train to the stripping column, where the gold is once again extracted into a small volume of solution with a highly concentrated value. This solution is directed to electrolytic cells that operate based on electric current, resulting in the production of sludge—a solid material primarily composed of gold and silver. Once dried, the sludge is combined with flux materials and introduced into the induction smelting furnace. The mixture of sludge and fluxes, referred to as charge, is heated to approximately 1,200 °C.

Activated carbon regeneration consists of chemical and thermal processes. Post-gold stripping activated carbon goes into acid-washing vessels—fiberglass-lined steel tanks that handle six tons each. Dilute hydrochloric acid dissolves scale and metal precipitates that block carbon's porous structure, impairing adsorption. This occurs after each desorption cycle. Following acid washing, activated carbon is neutralized with caustic soda, screened for fines, washed with fresh water, and sometimes moved to the storage tank before returning to adsorption columns based on its characteristics.

Activated carbon contains organic materials like fats and oils that compete with gold for adsorption sites. Thermal regeneration of activated carbon removes these pollutants every third adsorption-desorption cycle. This process occurs in a furnace with a 400 kg/hour capacity. Reclaimed carbon is screened for fines, stored in a tank, and returned to the adsorption columns as needed.



The recovered fine carbon is placed in a fine carbon tank until there is a sufficient amount to fill a fine carbon filter press. Once filtered, the activated carbon fines are partially dried with air and then transferred into a container located below the filter press, where they are stored in bulk bags.



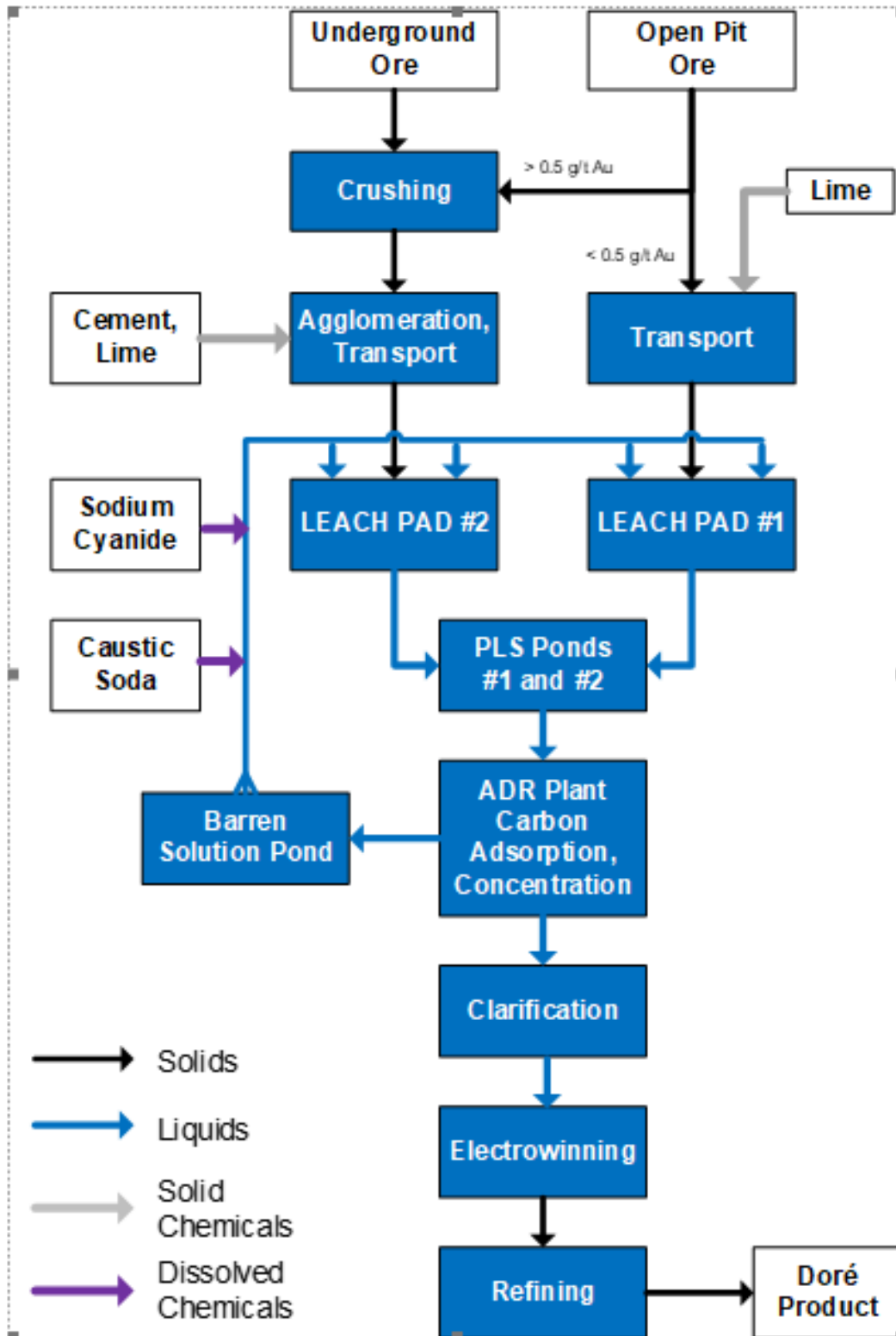
### Complementary Facilities

The UMLF has established infrastructure for energy, water, and communications. Electrical power is provided by a 115 Kv high-voltage transmission line from the Mezcala electrical substation to the mine substation. The Mezcala substation is connected to the national electricity grid. Approximately 80% of the energy for the national grid is generated from thermal sources (natural gas and activated carbon burning), while hydroelectric, nuclear, and geothermal sources account for the remaining 20%.

Water for both processes and human consumption at the mine is sourced from a large well near the Balsas River, located 1.5 km west of Mezcala. On-site communication includes satellite and VoIP (Voice over Internet Protocol) for telephones, as well as Internet Protocol for regular business activities. Open pit and underground operations use two-way radio communications, and the open pit operation utilizes a GPS-based automated truck dispatch system.

The UMLF has adequate surface rights for ongoing and future mining operations. The power, water, personnel, waste disposal, heap leach, and processing plant facilities are suitable for current mining activities.

Los Filos simplified ore processing flowsheet is presented below:



## Auditors' Finding

This operation is


- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

with the International Cyanide Management Code.

## Compliance Statement

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

## Auditor Information

Audit Company:	Cyanide Auditors S.A.	
Lead Auditor:	Bruno Pizzorni	
Lead Auditor Email:	bpizzorni@cyanideauditors.com	
Technical Auditor:	Bruno Pizzorni	
		
Auditor in training	Jean Lostaunau	Signature
Dates of Audit:	January 13 to 16, 2025	

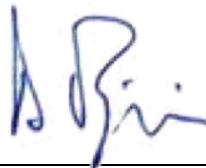
## Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Auditors.

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

Mina Los Filos

Name of Facility



Signature of Lead Auditor

July 17, 2025

Date

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

## Principles and Standards of Practice

### Principle 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 with Standard of Practice 1.1  
☐ in substantial compliance with  
☐ not in compliance with

Los Filos acquires cyanide from Draslovka Holdings a.s. (Draslovka), headquartered in Prague, Czech Republic. The supply contract is signed with Covoro Mining Solutions Mexicana S. de R.L. de C.V. ([LINK](#)), which is a part of Draslovka Holding. The supply contract was assumed by Draslovka, after it acquired all of Chemours' global operations

Draslovka provides sodium cyanide from its Cyanide Code certified Memphis (Tennessee) production operation. The auditor reviewed the ICMI (International Cyanide Management Institute) website verifying last certification of Draslovka US Production and Packaging Operations dated May 24<sup>th</sup>, 2023, which includes this plant. Also, this sodium cyanide is transloaded on its bulk transloading facility in San Luis Potosí, in México, into Iso tanks. The auditor reviewed the ICMI (International Cyanide Management Institute) website verifying last certification of Draslovka San Luis Potosi Bulk Transloading Facility was dated November 10<sup>th</sup>, 2021 (at the date of the audit), being recertified on March 11<sup>th</sup>, 2025. Both Production and Transloading facilities were absorbed by Draslovka, after it acquired all of Chemours' global operations. The last audit from the US Production plant (2023) has been issued in the name of Draslovka, while the 2021 audit of the transfer plant in San Luis Potosi has been issued in the name of Chemours, and the 2025 audit for this last one in the name of Draslovka.

The auditor reviewed the agreements between Los Filos and Draslovka, which have been renewed in a yearly basis. The contracts, shipping documents, reception and purchasing records were available for reviewed. The agreement requires the production facility to be certified as following the Code requirements.

The auditor verified compliance by interview with the Contract Administrator and its staff; and reviewing the cyanide purchase agreements, purchase orders, commercial

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

invoices and land dispatch shipping guides since January 2022 to December 2024. The current contract considers the sodium cyanide supply for year 2025.

## Principle 2 | TRANSPORTATION

Protect communities and the environment during cyanide transport.

### Standard of Practice 2.1

*Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.*

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

The auditor reviewed chain of custody records to identify each carrier and supply chain component that participate in the transport of cyanide by train from production facility of Draslovka in Memphis (Tennessee) to the bulk transloading facility in San Luis Potosí (México), and then the road transportation of Iso tanks from San Luis Potosí state to Guerrero state in México, and finally to the mine site, confirming that each of these parties is certified or is part of a certified supply chain.

The cyanide supply contract between Draslovka and Los Filos specifies that the INCOTERM (International Commercial Term) for the sale is DPU (Delivery at Place Unloaded). For this reason, not only all the logistics for transportation of the cyanide is in charge of Draslovka, but also the operation of the dissolution process that converts cyanide from solid to liquid solution.

The auditor also reviewed the document with statement from Draslovka describing their cyanide supply chain from the production plant in Memphis (Tennessee) to Los Filos cyanide dissolution plant and storage tanks. The supply chain from Draslovka to Los Filos mine is as follows:

- Draslovka has certified its logistics chain for both the United States and Mexico. In the case of the United States, the latest certification audit is from April 7<sup>th</sup>, 2022. In the case of Mexico, the latest certification audit is from February 18<sup>th</sup>, 2022.
- In the United States, Draslovka's supply chain for Los Filos consists of rail transport from the Memphis plant to the rail yard at the Texas/Mexican border, in Laredo, Texas, as part of the U.S./Canada rail and barge supply chain. The rail carrier used is Union Pacific Railroad (UP).
- In México, Draslovka's supply chain for Los Filos first stage, consists of rail transport from the Texas/Mexican border, in Laredo, Texas, to the Transloading Facility at San Luis Potosí in México, as part of the Draslovka Mexico Supply Chain.



The rail carriers used are Mexican Railroad Railway (FERROMEX), and Kansas City South of Mexico (KCSM).

- In México, Draslovka's supply chain for Los Filos second and final stage, consists of road transport from the Transloading Facility at San Luis Potosí to Los Filos mine, as part of the Draslovka Mexico Supply Chain. The road transport company that carries the Iso tanks to Los Filos is Transportes Especializados Segutal S.A. de C.V. (SEGUTAL).

In terms of direct document control, Los Filos has a record of every dispatch made by SEGUTAL from San Luis Potosí to the mine site. They have records of:

- Factura Comercial (Commercial Invoice)
- Carta Porte (Road transport Bill of Lading)
- Hoja de Control de Ruta (Route Control Checklist)

The distance between Draslovka Transloading facility in San Luis Potosí to Los Filos mine is aprox. 660 km, and it is programmed to be done in 14 hours. The intermediate rest and vehicle shelter points are in Zacapalco (Guerrero state) and in Iguala de la Independencia (Guerrero state). The vehicles with the Iso tanks usually arrive to Iguala and wait there for the daily program from the mine in order to not have more than 3 Iso tanks on the mine site at the same time with cyanide (one dissolving or empty, and up to two full). Each Iso tank carries around 18 mt. of sodium cyanide in solid.

The auditor reviewed the purchase agreement between Draslovka and Los Filos (which includes transport based on the INCOTERM of the contract), and also the Draslovka transport agreement describing the supply chain actors participating between the production plant to the mine site, confirming that sodium cyanide is being transported by companies included in a certified supply chain listed on the Cyanide Code website, finding Full Compliance with Standard of Practice.

Although the listed transporters do not have their own certification under the Cyanide Code (UP in the USA, FERROMEX, KCSM & SEGUTAL in México), they are all included within the respective certified logistics chains of Draslovka, both for México and the United States.

## Principle 3 | HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

### Standard of Practice 3.1

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

✓ in full compliance with      Standard of Practice 3.1

The operation is    ☐ in substantial compliance with

☐ not in compliance with

Facilities for unloading, mixing and storing cyanide at Los Filos have been designed and constructed in accordance with sound and accepted engineering practices for these facilities. The initial cyanide offloading, storage, and mixing area was built to international engineering standards, designed and constructed in accordance with applicable jurisdictional rules and accepted engineering practices in 2010, verified by audits in 2014, 2016, and 2019, and remains largely unchanged.

Los Filos receives solid sodium cyanide briquettes in an 18-ton isotainer truck. Area 800 at the ADR Plant serves as the cyanide offload zone. This area includes a mixing tank (T-800), a storage tank (T-200), and multiple pumps, pipelines, valves, and other associated equipment.

The cyanide mixing area is situated in a designated section approximately 25 meters from the ADR plant. Los Filos retains design and as-built drawings prepared by the engineering firm Degussa for Area 800, dated 2005. In February 2021, Los Filos replaced the cyanide mixing tank (T-100) following annual preventive maintenance ultrasound tests that indicated the necessity for replacement. A specific procedure was developed for the dismantling and decommissioning of the tank. The new tank was constructed according to the same specifications as the existing tank, as documented in the preceding audit report.

During this certification period, a dosification point Area 800b was constructed in 2024 to supply high-concentration cyanide solution to HLP 1 South Interliner Additional Stacking 8 Ha (HLP 1 South Interliner), utilizing tank T-300. This construction adhered to sound and accepted engineering practices for these facilities. The cyanide solution is transported with isotanks from the cyanide storage tank T-100 in Area 800, to tank T-300 in Area 800b, situated within the HLP 1 South Interliner leaching pad, about one km from Area 800. There, the cyanide solution is transferred from the isotank to tank T-300 tank for storage and subsequent dosing to the leaching pad.

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

The auditors confirmed that Los Filos possesses a full set of engineering plans, including calculation records by *Gruminex Soluciones Mineras*, which detail the design of the T-300 tank, pumps, and pipes, as well as specifying the materials to be used. The operation also demonstrated the quality controls implemented during the construction of Area 800b. This requirement of the Code was confirmed through interviews with process personnel, review of design and as-built drawings, and field observations.

The cyanide offload Area 800 is situated in a remote facility away from communities and water bodies. The nearest seasonal creek, Cañada 23, is several hundred meters west with no connection path. Carrizalillo, the closest community, is kilometers uphill and upgradient. Area 800 is about 25 meters from the ADR plant on concrete hardstanding. The fenced plant area has no nearby offices or worker congregation points, and unauthorized access is prohibited. A fixed hydrogen cyanide (HCN) gas monitor with alarms and handheld monitors during cyanide mixing ensure safety. The outdoor location provides natural ventilation.

Area 800b cyanide storage dedicated facility, is similarly remote and built on a waterproofed liner within HLP 1 South Interliner. It is fully fenced and located away from offices and worker gathering spots, with restricted access. Operators use handheld HCN monitors during cyanide transfer, and its outdoor setting allows good natural ventilation. This was confirmed through field observations and interviews with process personnel.

Los Filos receives cyanide briquettes via isotainer in Area 800 such that there is no liquid cyanide until the offload procedure starts. The isotainer is parked on a curbed concrete pad that slopes to a sump that drains by gravity via a double-walled pipe to the nearby recirculation pond. The auditors observed the concrete pad and sump to be in good condition to serve as a barrier to minimize seepage to the subsurface. The auditors confirmed that the cyanide mixing area is on well-maintained concrete hardstanding. The mixing and storage tanks are within concrete berms, providing capacity to contain over 110% of the largest tank's volume

Area 800b is constructed over a gravel surface waterproofed by the interlined installation at HLP 1 South Interliner, providing a surface that can minimize seepage to the subsurface. The isotainer parking area for cyanide solution transloading to tank T-300 inside the gravel area waterproofed by the HLP 1 South Interliner to minimize seepage to the subsurface.

The cyanide offloading Area 800 at Los Filos includes a mixing tank (T-100), a cyanide storage tank (T-200), and a cyanide storage and distribution tank (T-300) in Area 800b. These tanks are equipped with ultrasonic level indicators and high-level alarms. The level indicators in Area 800 are continuously monitored from the process control room, while tank T-300 is controlled locally by an area operator.

Each tank has both a Hi-level alarm (94.7% and 93%) and a Hi-Hi level alarm (97.8% and 97.3%). Interlock valves automatically shut off when the Hi-level indicator is reached. Auditors observed screenshots in the control room confirming that the level indicators were functioning correctly. Additionally, visual alarms are present in the control room.

These level alarms undergo calibration on a quarterly basis and are included in the preventive maintenance routines. Los Filos maintains a written work instruction outlining the required maintenance and calibration of the level sensors and all other types of sensors. This procedure references the specific work instructions for level sensors and switches. Auditors reviewed calibration records for the recertification period to verify that the level sensors and switches were consistently maintained and calibrated throughout this period.

Cyanide mixing and storage tanks in Area 800 are located 25 meters from the ADR plant within concrete berms with epoxy-sealed flooring to prevent infiltration. This setup has remained unchanged since the last audit. The containment area is connected to a recirculation pond that can hold at least 110% of the largest tank's volume, and it has automatic sump pumps to keep it free of fluids. A 60-mil HDPE liner underlies the concrete and sump, with a barrier to prevent seepage. Engineering checks and during the field audit it was confirmed the containment areas are in good condition with no significant damage.

Tank T-300 at Area 800b is situated on a gravel surface that is waterproofed by the interlined installation at HLP 1 South Interliner, creating an impermeable barrier between the tank bottom and the ground to prevent seepage into the subsurface environment. The auditors also examined the as-built drawings and the quality assurance and quality construction (QA/QC) dossier for tank T-300, confirming its structural adequacy and verifying that the tank rests on an impermeable barrier to prevent any releases to the subsurface.

The secondary containment for the cyanide mixing tank T-100 and storage tank T-200 is constructed with concrete, providing an effective barrier against leakage. Underlying the concrete and sump is a 60-mil HDPE liner. The design and construction quality assurance for this pad were reviewed during the initial certification audit in 2010 and were deemed acceptable. These tanks are situated within a bermed concrete impoundment, which was observed to be structurally sound and suitable for containment in the event of a release or tank failure, effectively preventing leakage. The berms and containment area undergo weekly inspections. The arrangements have remained unchanged since the previous recertification audit.

Solution collected in the secondary containment sump is pumped either to the recirculation pond or back to the T-200 tank. Los Filos has developed a written procedure outlining the operation of the sump pump and valves. Cyanide solution is returned to the T-200 Tank, while rainwater and/or cleaning water is directed to the recirculation pond. As the Area 800 secondary containment lacks the capacity to contain

110% of the largest tank, it is connected to this larger adjacent secondary containment (recirculation pond), which provides additional capacity and includes a pump and sump for transferring any spilled solution to the recirculation pond. This recirculation pond is constructed of a material (HDPE liner, heat sealed) that provides a competent barrier to leakage.

Tank T-300 at Area 800b is located on a gravel surface that is waterproofed by the interlined installation at HLP 1 South Interliner, creating an impermeable barrier between the tank bottom and the ground to prevent seepage into the subsurface environment.

Los Filos does not store solid cyanide on site, as it receives solid cyanide as briquettes in isotainers. The cyanide mixing and storage tanks are located outdoors with natural ventilation, which prevents the build-up of hydrogen cyanide gas if cyanide contacts water. Additionally, there are fixed HCN monitors with audible alarms located at Area 800 and 800b.

The operation does not store solid cyanide on site. It uses only liquid cyanide stored in enclosed tanks, eliminating the possibility of contact between water and solid cyanide. Cyanide solution at Los Filos is stored in secured areas where access by the public and unauthorized personnel is prohibited. Warning signs are posted at the entrance of the ADR Plant, Area 800, and Area 800b to restrict non-authorized personnel from entering.

Access to the plant area is also limited. The cyanide mixing and storage tanks are situated within a fenced, gated, and patrolled area for the ADR Plant, which is also inside the fenced mine property. Area 800b is similar within a fenced, gated area. Security guards at the ADR Plant gate communicate via radio with process staff to grant entry permission. Additionally, the offload area is continuously monitored by video camera by the control room operator.


At Los Filos, the cyanide solution is stored away from acids, strong oxidizers, explosives, and food, with barriers to prevent mixing. Secondary containments ensure cyanide spills do not mix with incompatible materials, as confirmed by inspecting potential flow paths. The field inspection observed no other materials in storage.

### Standard of Practice 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 with Standard of Practice 3.2  
☐ in substantial compliance with  
☐ not in compliance with

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

Los Filos receives solid cyanide in isotainers; no drums or wooden crates are involved.

Los Filos has procedure Reception, offload and transfer of sodium cyanide in Area 800 and Procedure for Transporting and Filling

Isocontainers with sodium cyanide (NaCN) in Area 800b, and detailed work instructions for every step of the process for the safe offloading and transfer of cyanide. The offload procedure requires that the isotainer be inspected for leakage and that the isotainer connections be rinsed after an offload is complete.

Work instruction Rinse with water and emptying of isotainer describes the process to rinse the isotainer once cyanide offload is complete.

Any spills or leaks related to a cyanide offload and onto the concrete pad are captured in sumps and pumped out with automatic pumps to return liquids to the process circuit. Work instruction Operation of sump pump Area 800 describes the process to operate the pump depending if the fluid in the sump is cyanide solution or rainwater/cleaning water.

These requirements were verified through field inspections and interviews. All personnel interviewed have knowledge of their tasks and associated risks during cyanide handling.

Los Filos follows procedures for handling sodium cyanide in Area 800 and for transporting and filling isocontainers with NaCN in Area 800b. These procedures include detailed work instructions and address the operation for each step of safe offloading, transfer, operation, and maintenance of equipment (including hoses, valves and couplings) used for mixing and offloading liquid cyanide (during transfer).. Responsibilities for both the transporter and site personnel are clearly outlined. The procedures also feature checklists for cyanide preparation, such as measuring pH levels, inspecting emergency showers and eye wash stations, and verifying antidote kits and tank levels. The auditors reviewed the completed checklists for the recertification period and found them satisfactory. A cyanide offloading event in Area 800 was observed during the audit. The review indicated that the Los Filos has appropriate SOPs (Standard Operating Procedures) and practices to handle and offload cyanide solutions in a safe manner. Los Filos receive cyanide in isotanks, no cyanide containers are handled or used at the site.

Work Instruction "Procedure to Respond to Contingencies in Area 800," includes a mandate for the immediate clean-up of any cyanide spills during mixing. This procedure also involves flushing the secondary containment area where cyanide mixing occurs.

The procedure for cyanide solution preparation in Area 800 and cyanide solution unloading in Area 800b requires drivers and site operators to use the necessary personal protective equipment (PPE) during cyanide offloading activities. The required PPE includes steel-toed rubber boots, rubber gloves, an approved respirator, a face shield,



Tychem coveralls, a hard hat, hearing protection, a personal HCN detector, and a harness for working at heights. The procedure also mandates that a second observer monitor the offload operation. Additionally, cyanide offloading activities in Area 800 are observed from the control room via a closed video circuit.

The cyanide briquettes in the isotainer already comes with red colorant dye. Colorant dye is added to solid cyanide at Draslovka San Luis de Potosi cyanide transfer plant from boxes to isotainers. This was verified by the auditors during the field visit and through interviews with process personnel.

## Principle 4 | OPERATIONS

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

### Standard of Practice 4.1

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

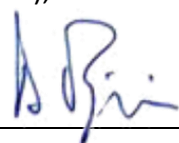
The operation is ☒ in full compliance with Standard of Practice 4.1  
☐ in substantial compliance with  
☐ not in compliance with

Los Filos has established various plans, manuals, procedures, and work instructions for the safe operation of cyanide facilities. These facilities include offloading, storage, and mixing areas; barren, neutralization, and recirculation tanks area; ADR plant; and heap leach operations. The auditors reviewed a complete set of procedures and work instructions which addressed all the different work procedures related to cyanide including discharges, mixing and storage facilities for the process plant, HLP, regeneration and disposal systems, among others.

All procedures and work instructions contain detailed descriptions of the tasks to be performed, including requirements for personal protective equipment (PPE) and considerations of safety hazards. These documents are reviewed periodically and updated whenever there are significant changes to the tasks. Upon review, the procedures and work instructions were found to be sufficiently detailed to ensure safe operations.

Los Filos maintains operation manuals, plans, procedures, and work instructions that include critical parameters for the safe operation of cyanide facilities. Procedure "Solution Management in Ponds due to Excess Water," specifies maximum operating levels for the Pregnant Leach Solution (PLS), recirculation, and excess water ponds. As

Mina Los Filos

  
Bruno Pizzorni - Lead Auditor

July 17, 2025

all the ponds are interconnected, critical volumes at Excess Pond 1 and 2 are defined as 454,158 m<sup>3</sup> and 968,229 m<sup>3</sup>, respectively. These volumes include a freeboard of 2 meters. This procedure also incorporates the design storm event for solution ponds, referring to the 100-year/24-hour storm event with 150 mm used in the Los Filos water balance model. There are no treated water discharges at Los Filos; therefore, there is no cyanide limit for water discharges.

Work instruction "Measurement of pH in Solutions at ADR Plant," indicates that minimum pH levels in the carbon trains should be 9.7. Procedure "General Procedure," states that the ideal pH level in the leaching process is between 10.2 and 10.4. Procedure "Reception, Offload and Transfer of Sodium Cyanide in Area 800," requires that pH values are maintained at 11.5 for cyanide mixing.

Procedure "Monitoring and Analyses of Springs, Underdrains and Ponds," indicates that the maximum Weak Acid Dissociable (WAD) cyanide values in process ponds should not exceed 50 mg/L.

Los Filos has created manuals, procedures, and work instructions for cyanide-related tasks to ensure safe and environmentally sound operations. The operation identifies equipment, personnel, and procedures for cyanide offloading, mixing, processing, heap leach facilities, and associated systems.

Procedure details managing solution levels in ponds, including maximum operating levels and neutralizing cyanide solutions. Pond levels are monitored online daily from the control room.

An inspection program with daily, weekly, and monthly frequencies is in place. Process personnel inspect various areas weekly and monthly, checking emergency showers, eye wash stations, cyanide kits, tanks, valves, pumps, flowmeters, etc. Leaching pad personnel conduct daily inspections for wildlife presence, ponding, and HCN formation, with additional checks during the rainy season. Environmental personnel inspect cyanide facilities daily, weekly, and monthly. Weekly preventive maintenance plans are generated using SAP software (System Applications and Products in Data Processing software), with corrective maintenance based on inspection work orders. Auditors reviewed maintenance records and found them complete for the recertification period.

Pond levels for contingency ponds 1 and 2 and the recirculation pond are checked daily using topographic methods. This data is compared to maximum design capacity and spillway height according to the solutions management procedure.

Los Filos has procedure "Procedure to conduct operational changes" that is used for changes in the process area. The Management of Change (MOC) procedure 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, and subsequent implementation of the changes. The process includes a

format which is signed off by all areas that participated in the evaluation of the changes. The MOC procedure is used consistently by Los Filos process area.

Examples of management of change completed registers were reviewed for the recertification period including construction of Area 800b with tank T-300. The completed forms were signed off by operational, environmental and safety staff.

Los Filos has established contingency procedures and work instructions for heap leach facilities and the process plant to address operational water balance upsets, deviations from design conditions, issues identified through monitoring and inspections, as well as temporary closure or cessation of operations. These procedures include detailed steps for halting and initiating plant operations, managing power outages, responding to emergencies associated with cyanide equipment failures, and plans to handle disruptions in the process water balance during regular operations, as well as during long-term shutdowns or cessation of operations.

The Cyanide Emergency Response Plan dated April 2024 and procedure "Solution Management in ponds due to excess water" include detailed steps to be followed in case of a risk that could potentially exceed the design containment capacity of the process solution and excess ponds.

The operation procedures and work instructions include actions to be taken to regain control of the operation in case of upset conditions identified during cyanide facilities monitoring and inspections. Procedures that address these scenarios include:

- Contingency in area 250, booster station and raisers in Leaching pad 1 and 2
- Solution Management in ponds due to excess water
- Transfer of Hydrogen Peroxide
- Emergency for high concentration of cyanide in underdrains
- Neutralization of natural soil
- Procedure to respond to contingencies in area 800
- Procedure to respond to contingencies in area 420
- Procedure to Start up backup generators for ADR plant
- Cyanide Emergency Response Plan that includes scenarios such as cyanide solution releases, power outages, overflow of process solution ponds, leaching pad failure, lack of hydrogen peroxide to neutralize process solutions, among others.

The General Emergency Response Plan outlines procedures for responding to all foreseeable emergency situations identified through a risk assessment. These scenarios include temporary or unforeseen shutdowns of operations due to factors such as work stoppages, essential materials shortages, economic issues, civil unrest, or legal or regulatory actions. The aim is to minimize losses to people, the environment, property, and operations. The Plan describes critical activities and personnel required to operate the plant facilities and maintain the water balance and avoid potential overflow of cyanide solution.

The operation inspects the following at unloading, storage, mixing and process areas:

- a) Tanks holding cyanide solutions for structural integrity and signs of corrosion and leakage.
- b) Secondary containments provided for tanks and pipelines for physical integrity, the presence of fluids and available capacity, and to ensure that any drains are closed and, if necessary, locked, to prevent accidental releases to the environment.
- c) Leak detection and collection systems at leaching pads and ponds, as required in the design documents.
- d) Pipelines, pumps and valves for deterioration and leakage.
- e) Ponds and impoundments for the parameters identified in their design documents as critical to their containment of cyanide and solutions and maintenance of the water balance, such as available freeboard and integrity of surface water diversions.

- a) The ADR plant supervisor conducts weekly inspections of cyanide solution tanks T-100, T-200, and T-300 in Areas 800 and 800b. They check for cracks, leaks, valve damage, and ensure proper signage. The solution transfer pump and line 05 of the Barren tank are also inspected. The auditors reviewed completed inspection checklists for these areas and found them compliant.

Monthly inspections by process personnel assess the structural integrity, corrosion, and leakage of cyanide solution tanks. Wall thickness evaluations occur every three years for all tanks, and annually for cyanide tanks in Area 800. The auditors reviewed the annual structural integrity tests carried out by the external contractor ACSIM (*Asesoría Capacitación Servicios de Inspección y Mantenimiento*) carried out by an ASNT (American Society for Nondestructive Testing) Level II inspector ASNT-TC-1A in December 2023 for tanks T100 and 200, and in January 2024 for tank T300, issuing the respective industrial ultrasound inspection report. Inspection reports and integrity tests sampled during recertification were complete.

- b) Inspection of secondary containments provided for tanks and pipelines located in Areas 800, 250, 420 and the booster station are included in monthly inspection forms, including physical integrity, the presence of fluids and available capacity. None of the containment areas has any drains to the adjacent land surface. During the field visit, the secondary containments were observed to be free of any fluids or materials stored within them.
- c) The LCRS (leakage collection and recovery system) at PLS1 (including two sub ponds: North Pregnant Pond and South Pregnant Pond) and PLS2 ponds, and the recirculation pond are monitored on a daily basis for flow and WAD cyanide. Volumes of pumped fluids and WAD cyanide concentrations are recorded daily. Examples of these inspection forms were reviewed for the recertification period. Water quality data indicate that there are cyanide concentrations detected between the liners of the recirculation pond. Daily, water samples are taken from between liners in rich solution ponds, pump flow is measured, and laboratory tests

determine gold and cyanide concentrations. Leak detectors between liners identify any damage. Interliner pumps operate automatically, stopping when flow reaches zero. WAD cyanide is sampled daily, with average values of 4.86 ppm in 2024, 3.19 ppm in 2023, and 2.06 ppm in 2022.

- d) Pipelines, pumps and valves in the ADR plant and heap leach area, are inspected on a weekly and daily basis, respectively. Any deficiencies identified are corrected and verified in the following inspection. Inspection forms for the plant and heap leach facilities were verified for the inclusion of items related to deterioration and leakage of pipes, pumps and valves. The auditors reviewed inspection forms for the recertification period and found them to be complete.
- e) The heap leaching pads, process solution ponds and excess ponds are inspected and monitored on a daily basis for critical aspects, including available freeboard. Inspections for integrity of surface water diversions channels around the leaching pads and ponds are conducted on a monthly basis 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 offloading, mixing and storage facilities. Records were found to be complete.

Los Filos has established and implemented a comprehensive inspection program for cyanide facilities, with inspection frequencies varying from daily to weekly, and monthly. Process personnel conduct weekly and monthly inspections of Areas 800, 800b, 420, 250, and riser pad 2. Weekly inspection forms include checks on emergency showers and eye wash stations, cyanide kits, secondary containments, tanks, valves, pumps, pipes, and flowmeters, among other components. Monthly inspection forms focus solely on the conditions of tanks and secondary containments.

Leaching pad personnel perform daily, weekly, and monthly inspections of Leaching pads 1 and 2. Daily inspection forms address the presence or mortalities of wildlife, ponding on leaching pads, and HCN formation. Weekly inspections cover leaching cells, valves, pipelines, and other general elements. Monthly inspections are conducted only during the rainy season, focusing on the diversion channels around the leaching pads.

Two operators conduct daily inspections of the leaching pads, noting observations, actions taken, and updating an irrigation map. Supervisors perform weekly inspections of pipes, showers, leaching pads 1 and 2, the re-pumping station, pumps, valves, irrigation areas, fresh material deposits, lixiviate discharge area, and HCN gas presence.

Environmental personnel carry out daily, weekly, and monthly inspections of cyanide facilities, including ponds, areas 800 and 800b. Daily inspections forms monitor the presence or mortalities of wildlife at the process ponds and Area 800. Weekly inspection

forms assess the conditions of plastic-lined areas at ponds and solution channels. Monthly inspection forms review the condition of fences surrounding the ponds.

The inspection program for cyanide facilities, covering unloading, mixing, and storage activities, along with the frequency of inspections, is designed to ensure safe operation within the design parameters. Auditors reviewed inspection records for the recertification period, confirming that inspections are conducted consistently and effectively to ensure and document that they are functioning within design parameters.

Los Filos records of inspections are systematically maintained and completed inspection registers were reviewed by the auditors for the certification period. These inspections are thoroughly documented, noting the date of inspection, the name of the inspector, and any observed deficiencies. The inspection program encompasses cyanide offloading, mixing, and storage facilities. The auditors reviewed examples of various of inspection verification lists and records, covering the certification period for Area 800, 800b, 420, 250, HLP 2, tanks monthly inspection checklists and water control.

Maintenance-related corrective actions at the ADR plant or leaching pad areas are managed by the Maintenance team using SAP software for tracking, prioritizing, planning, and closing work orders. Auditors confirmed that cyanide facility issues were given priority. They reviewed examples of deficiencies found during inspections and corresponding records showing corrective actions taken through work orders. Other non-maintenance corrective actions identified during inspections by Leaching pad or ADR Plant personnel are tracked, implemented, and followed up by each sub-area until closure. Auditors reviewed examples and records of these corrections until they were resolved.

Los Filos Maintenance area has a mechanic, electric and instrumentation preventive maintenance program for pumps, pipelines, valves, flow meters, level sensors, pH meters, HCN sensors, sump pumps, tanks and cyanide facilities in general. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time it is needed to keep equipment and facilities working properly. Preventive maintenance routes have frequencies that varies between weekly, biweekly, monthly, bimonthly, quarterly, triannual and biannual.

To ensure proper supervision, Los Filos maintain an annual preventive maintenance program in Excel, categorized by areas and equipment. The auditors reviewed maintenance work orders examples of key equipment in Area 800, such as the cyanide transfer pump, among others. A work order is issued, detailing the personal protective equipment (PPE) required, specified activities, and instrumentation readings. The auditors examined work orders from 2022 to 2024.

Los Filos develops a weekly plan for preventive maintenance using SAP software. Preventive maintenance plans are generated automatically for each week. Corrective



maintenance occurs as a result of work orders based on inspections. Work orders generated from inspection forms are entered in the system, including assigned priority. The auditors observed examples of both preventive maintenance and corrective maintenance records for the recertification period and found them to be complete.

Los Filos utilizes electricity from the public grid to power its operations, requiring a total of 14.5 Megawatts (MW) for full functionality, with 8 MW dedicated to running the plants and leaching pads. As a contingency measure, the operation is equipped with two 2 MW backup generators that automatically activate during a power outage to ensure continuous operation of critical pumping equipment, including barren to the leaching pads, and pregnant solution to the plant, as well as Areas 800, 250 (inclusive of the neutralization plant), and 420. Additionally, Los Filos has established Work Instruction, "Procedure to Start up Backup Generators for ADR Plant," to manually initiate the generators if automatic startup fails. The operation also maintains two portable power generators for specific needs: one with a capacity of 250 Kilowatts (KW) located at the plant, and another with a capacity of 500 KW situated in one of the underground mines.

Los Filos has contracted an external vendor, MADISA Caterpillar, to execute a preventive maintenance program for the backup generators, with maintenance intervals that vary between quarterly, biannual, and annual frequencies. Examples of preventive maintenance records for the power generators were provided for the recertification period, and a review of these records confirmed that the generators undergo regular checks, including assessments of fuel levels, lighting, and heating, as well as operational testing. Any issues identified during these inspections would prompt the issuance of a corrective maintenance work order if necessary.

#### Standard of Practice 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 with Standard of Practice 4.2  
☐ in substantial compliance with  
☐ not in compliance with

This Standard of Practice is exclusively applicable to Los Filos mining operations which do not have milling operations.

## Standard of Practice 4.3

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

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

The operation is a closed system with zero discharge of solutions. No precipitation falling onto the ore heap is retained within the solution management system, ensuring no discharge or runoff. In the event of a pump or power failure, the excess ponds are sized to store the draindown volume from the leaching pads, and two backup generators are available to provide power to the heap leach pumping operations.

The mine employs a water balance tool, the Goldsim Model developed by Golder Associates (now WSP), which is updated every three years. The most recent calibration of this model was completed at the end of 2024, and the auditors have reviewed the corresponding WSP report.

The operation maintains a meteorological station on-site, next to the recirculation pond. In 2022, a new station was installed replacing the old one, transmitting data in real-time. The operation has also installed pluviometers in various locations on the site. Each time it rains, the environmental department sends an email indicating the rainfall in millimeters for each rain gauge, as evidenced by the reviewed emails. The operation also utilizes data from the ADR meteorological station. Precipitation data from 2006 to 2024 feeds the database in Excel "Unit precipitation data Los Filos.xlm" (monthly precipitation data).

The latest calibration of the Goldsim Model demonstrated that it aligns with the actual data. The mine uses this tool for long-term planning to prevent overflow events. Operationally, the mine utilizes an Excel spreadsheet to manage the water balance. This spreadsheet includes factors such as solution application rates, precipitation, evaporation and seepage rates, addition of fresh water, undiverted run-on from upgradient areas, and potential power outages.

The Excel spreadsheet utilized to manage the water balance at Los Filos includes solution application rates for the leaching pads, which range from 7-8 liters per hour per square meter. It also accounts for a 100-year / 24-hour storm event, estimated at 150 mm, as this value is crucial to prevent the overtopping of solution ponds throughout the operational life of the facilities and to maintain a freeboard of 2 meters in both Excess Ponds 1 and 2, as per design specifications.

Los Filos ensures that the quality of existing precipitation and evaporation data accurately reflects actual site conditions. A weather station located adjacent to the recirculation pond collects meteorological data, including precipitation, evaporation, temperature, wind speed, and direction. This data serves as input for the aforementioned Excel spreadsheet. Additionally, three pluviometers are installed on the leaching pads (HLP 1, 2 and the merger of both pads), with an additional one located at the plant, all serving as reference points. In year 2022 Golder Associates (now WSP) developed an update of the existing model “Los Filos Heap Leach Water Balance” focused on determining potential overflow risks based on updated weather data updates.

The heap leach facilities at Los Filos feature a surface water control system designed to manage and safely direct runoff from upgradient watersheds around the heap leach and ponds, thus excluding upstream precipitation from the model. The site does not experience freezing and thawing conditions due to its tropical climate.

The Excel spreadsheet considers solution losses, such as those from evaporation fogger units used to promote evaporation in the two Excess ponds, ensuring adequate storage capacity before the onset of the next rainy season. However, it does not account for other solution losses since water from the underdrain systems is recirculated back into the process system. There are no allowable seepage losses or discharges to surface water at Los Filos.

The model can simulate a power outage by zeroing out selected pumping rates for a specified period, such as 24 hours. Los Filos is equipped with backup generators that automatically activate in case of a power outage, safeguarding the water balance operations. However, this scenario is considered highly unlikely unless both the primary power source (public grid) and emergency power generators fail simultaneously.

There are no discharges to surface water at Los Filos. Moreover, the site does not possess a tailings storage facility.

Procedure “Solution Management in ponds due to excess water” specifies the maximum operational levels for the PLS, recirculation, and excess water ponds, and how to manage them to maintain the designed storage capacity. These pond levels are monitored daily online. This data is used in the Excel spreadsheet for running the water balance. Since all ponds are interconnected, critical volumes for Excess Pond 1 and 2 have been set at 454,158 m<sup>3</sup> and 968,229 m<sup>3</sup>, respectively. These volumes include a freeboard of 2 meters.

Inspection records for the heap leach facilities and process pond levels were reviewed during the recertification period and found to be complete. Pond levels are monitored in real time online. The auditors reviewed monitoring data for the recertification to verify that solution volumes in the process ponds were managed according to design criteria. According to the Excel water balance and pond levels, the process ponds must

maintain a free volume of 545,104 m<sup>3</sup> to contain a 100-year/24-hour storm event. During this recertification period, the free volume in the ponds was lower than required, indicating compromised capacity to contain a 100-year/24-hour storm event. Los Filos engaged WSP to evaluate the water balance and use the Goldsim model to determine the actual status of the water balance.

The auditors reviewed a PowerPoint presentation by WSP, dated December 19, 2024, titled "Los Filos Goldsim Model Updates and Results," which concluded that no future pond overflows are indicated by the model, Los Filos has maintained sufficient capacity to contain a 100-year/24-hour storm event, and the current pond capacity is adequate for future years to prevent overtopping.

Los Filos performs daily, weekly and monthly inspections of heap leaching pads and ponds to ensure they meet design criteria. This schedule is suitable given the area's high average precipitation of 590 mm per year. Inspections cover valves, pumps, pipes, flowmeters, underdrains, LCRS, diversion canals, leaching cells, PLS, recirculation, and excess ponds. The heap leaching pads, process solution ponds and excess ponds are inspected and monitored on a daily basis for critical aspects, such as available freeboard. Weekly inspection focuses on secondary containments, tanks, valves, pumps, pipes, and flowmeters, among other components. Monthly inspections focus on the physical conditions of tanks and secondary containments, and integrity of surface water diversions channels around the leaching pads and ponds. Inspection records for the recertification period were reviewed and found complete.

A weather station located adjacent to the recirculation pond collects meteorological data, including precipitation, evaporation, temperature, and wind speed and direction. This data serves as an input for the Excel spreadsheet used in running the water balance analysis. Additionally, three pluviometers are situated in the leaching pads (HLP 1, 2 and the merger of both), along with one in the plant, which serve as reference points. The auditors examined the on-site meteorological monitoring data and confirmed its completeness.

The environmental department manages the information from the weather station and, upon validation, provides it to the Process personnel for inclusion in the Excel spreadsheet water balance. Los Filos commissioned WSP to compare the results to design assumptions and adjust operating practices, as necessary. The December 2024 update of the Los Filos Goldsim Model by WSP considered the following data, among other factors:

- Review of Conceptual Model Update
- Data received from Los Filos
- Updates to Operations
- Installation of a new pump from Recirculation Pond to HLP 2
- Addition of two new Super Sprayer Fields
- Changes to existing pump operations to evaporators/sprayer fields on HLP 1
- Creation of a new sprayer field on HLP 1

- Corrections to flows to Evaporators on HLP
- Adjustments to operating logic based on final clarifications of the conceptual model
- Inclusion of future foggers planned for installation on HLP 2

#### Standard of Practice 4.4

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

✓ in full compliance with Standard of Practice 4.4

The operation is ☐ in substantial compliance with

☐ not in compliance with

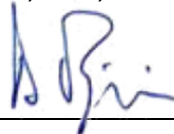
Los Filos operates process ponds (PLS1, PLS2, recirculation pond and excess ponds 1 and 2) with WAD cyanide concentrations below 50 mg/l. During this recertification period, Los Filos installed fences of cyclonic mesh around the perimeter of both pools to restrict access for wildlife and cattle. Additionally, two local workers were hired as cowboys to assist in managing the cattle. Work Instruction "In case of Ponding" mandates daily inspections to check for ponding on the leaching pads and provides steps to manage surface ponding.

For open ponds that might contain cyanide solution above 50 mg/l WAD cyanide in contingency scenarios, Los Filos has implemented measures to restrict wildlife access to open waters, including perimeter fences and daily inspections by Environmental and Leaching pad personnel. Bird deterrents have been installed near the ADR plant (Area 420) and the cyanide mixing area (Area 800), which are locations where more birds have been sighted. Furthermore, the PLS1 pond (including the North Pregnant Pond and South Pregnant Pond) has been backfilled with gravel and is inaccessible to wildlife and livestock. The secondary containment of the process pipelines from the leaching pads to ponds and the process plant did not contain process solution during the field audit..

During this recertification period, Los Filos has been conducting daily analyses of WAD and free cyanide at the process ponds (Pregnant Leaching Solution or PLS, recirculation, and excess ponds), which are the only open water cyanide facilities. The analytical data of cyanide concentrations at monitoring points are provided through the yearly Excel worksheet "Water Control." This worksheet records various parameters including the date, WAD and free cyanide, pH, copper, and gold content.

According to the annual monitoring plan Environmental Monitoring Plan 2024, and procedure "Monitoring and analyses of springs, underdrains and ponds" Los Filos analyzes free and WAD cyanide daily at the process ponds PLS-1 north and south and PLS-2. Weekly sampling is performed at contingency ponds 1 and 2, also for WAD and free cyanide. Bimonthly sampling for WAD, free, and total cyanide is carried out at all

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

process ponds (PLS, recirculation, and excess ponds). Sampling is conducted bimonthly during the dry season and monthly during the rainy season by internal and external contractor laboratories.

Los Filos used Mercury Lab for water quality sampling until September 2022, then switched to ABC Laboratories, Chemistry, Research and Analysis (Intertek) lab. Both labs are accredited by EMA (*Entidad Mexicana de Acreditación*), which validates their technical competence and reliability. WAD cyanide analysis used the Standard Methods 4500-CN I 17a Ed. 2011 Spectrophotometry from UV-Vis. The auditors reviewed the labs test reports corresponding to the recertification period.

Values of WAD cyanide recorded during this recertification period were below the Code limit of 50 parts per million for WAD cyanide. As an example, the maximum and average values recorded during the year 2024 are shown. Similar value ranges were recorded for the years 2022 and 2023.

WAD cyanide concentration in open water process ponds	WAD CN in ppm	
	Max.	Average
PLS-1 south (LF-AG-PRO-SDS)	52.8*	3.35
PLS-1 north (LF-AG-PRO-SDN)	38.30	4.66
PLS-2 (LF-AG-PRO-DFP2)	6.67	0.81
Recirculation pond (LF-AG-PRO-SDP)	18.58	1.36
Intermediate recirculation pond (LF-AG-PRO-PI)	22.4	6.18
Excess pond 1 (LF-AG-PRO-PC1)	19.40	4.88

\* Unique value exceeding 50 parts per million of WAD CN. Registered on January 26, 2024. Next day's lectures dropped to 23.76 and below.

Los Filos has installed perimeter fences, cattle guards, and conducts daily inspections to keep wildlife away from open waters. Procedures ensure wildlife monitoring, conservation, and rescue. No wildlife deaths have been reported during this recertification period. By the end of 2021, fences were completed around two excess ponds and the PLS2 pond, previously problematic areas. The field visit confirmed all perimeters are fenced with cattle guards. These measures prevent wildlife deaths. Auditors reviewed daily inspection records, confirming ongoing monitoring.

Work Instruction requires daily inspections for ponding on the leaching pad. It outlines steps like stopping leaching in affected areas, excavating for drainage if ponding persists beyond 12 hours, or using a liner to prevent wildlife access. Los Filos has communicated this procedure to its workforce.

During the site visit, HLP surfaces were mostly level and uniformly moist with minimal ponding. Leach lines were evenly spaced, and no pipe leaks were observed. Los Filos uses drip emitters and sprayers to apply cyanide solution. Sprayers aid water evaporation, while drip emitters prevent overspray by applying lower solution rates on slopes and borders.

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025



## Standard of Practice 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 with Standard of Practice 4.5  
☐ in substantial compliance with  
☐ not in compliance with

Los Filos does not have direct discharges to surface water. Los Filos mine operates with zero discharge of process solutions.

Los Filos does not discharge directly into surface water but monitors total cyanide in the Balsas River at 8 points along 8 km downstream. In 2024, monitoring with the Autonomous University of Guerrero personnel and the local communities showed that cyanide levels in the Balsas River were below 0.022 mg/l downstream. Additionally, the operation monitors quarterly for free and WAD cyanide in Cañada 23, a Balsas River tributary.

Monitoring at sites adjacent to the communities surrounding the mining unit is carried out to ensure that mining operations do not generate impacts on the surface and underground bodies of water from which the inhabitants of these communities are supplied.

Los Filos has two underdrain collection systems below the PLS1 pond that discharge into Cañada 23, a seasonal creek. Water from these systems is pumped back to the system and sampled daily and quarterly. WAD and free cyanide concentrations are below detection limits (<0.02 mg/l) for the recertification period.

Surface water samples at monitoring station 18 in Cañada 23 are taken monthly during the rainy season. The auditors reviewed monitoring results from 2022 to 2024, generally showing WAD cyanide values below detection limits.

Los Filos does not have indirect discharges to surface water.

## Standard of Practice 4.6

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

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

There is no designated downgradient beneficial use, point of groundwater use, or applicable groundwater standard near Los Filos operation. Despite this, Los Filos has implemented measures to protect groundwater and manage seepage from cyanide facilities. These measures include composite clay and geomembrane liners in leaching pads and PLS ponds, an underdrain system with pumps to return water to the process circuit, leak collection recovery systems between liners of PLS and recirculation ponds, secondary containment for cyanide facilities, and standard operating procedures for managing cyanide facilities.

Los Filos has a groundwater monitoring network analyzing WAD and free cyanide levels. There are 3 wells near the cyanide facilities: well 18 (downgradient), well 19 (upgradient), and well 27 (downgradient of Leaching pad 1). These wells are monitored and sampled quarterly. Data from the recertification period show no detectable cyanide (WAD and free cyanide < 0.02 mg/l).

Los Filos does not have mill tailings. Does not have seepage that has caused cyanide concentration of groundwater to rise about levels protective of beneficial use.

## Standard of Practice 4.7

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

The operation is ☒ in full compliance with Standard of Practice 4.7  
☐ in substantial compliance with  
☐ not in compliance with

Spill prevention and containment measures are implemented for all cyanide mixing, storage, and process solution tanks. Los Filos has concrete secondary containments for tanks located at the ADR plant area (Area 420); cyanide mixing and storage (Area 800); barren, neutralization, and recirculation (Area 250); and booster station.

The secondary containment of the cyanide mixing area is connected to the recirculation pond, which provides additional capacity to contain at least 110% of the largest tank's volume. The solutions channels connecting the concrete containment areas to the

recirculation pond are also made of concrete. Additionally, automatic sump pumps maintain the secondary containments free of any fluids. The concrete secondary containment, the sump and the solution channels connecting the containment areas to the recirculation pond are underlain by a 60-mil High Density Polyethylene (HDPE) liner, with a competent barrier between the concrete and liner to prevent seepage to the subsurface.

The ADR plant area is enclosed within a concrete pad surrounded by curbs and walls, forming a proficient barrier against seepage. The concrete floor is sloped to drain into two concrete sumps, where spills or rainwater are pumped back into the process. The sump pumps are included in routine preventive maintenance. Furthermore, a solution channel connects the ADR plant with the recirculation pond, providing additional capacity.

The barren, neutralization, and recirculation tanks are situated adjacent to the recirculation pond, offering extra capacity to contain at least 110% of the largest tank's volume. The booster station features a concrete secondary containment that drains by gravity to the lined heap leaching pad via a solution channel.

Secondary containment systems undergo weekly and monthly inspections as part of the process facilities inspection program. All tanks are equipped with ultrasonic level indicators that are continuously monitored from the process control room and included in preventive maintenance schedules. During the audit, it was observed that the concrete containment systems were in good condition and devoid of any fluid.

Tank T-300 in Area 800b is placed on a gravel surface waterproofed by the interlined installation at HLP 1 South Interliner, creating an impermeable barrier to prevent seepage into the subsurface environment. The auditors reviewed the as-built drawings and the quality assurance and quality construction (QA/QC) dossier for Tank T-300, confirming its structural integrity and verifying that the tank is situated on an impermeable barrier to avert any releases to the subsurface.

Secondary containments for cyanide offloading, storage, mixing, and process tanks are sized to exceed the volume of the largest tank plus piping and design storm event capacity. Previous Cyanide Code recertification audits confirmed the adequacy of these containment calculations, which have not changed since the last audit. The secondary containments for Areas 800, 420, and 250 were deemed acceptable in previous audits and were not re-reviewed. Containment areas are equipped with sump pits and dedicated pumps that recirculate collected solutions back into the process circuit. Additionally, these secondary containment areas are constructed using reinforced concrete.

The process area includes a barren tank with a volume of 620 m<sup>3</sup> and secondary containment near the recirculation pond, which has a capacity of 179,000 m<sup>3</sup> when empty. This setup ensures it can hold at least 110% of the tank's volume.

Auditors noted that all secondary containments are in good condition and free of materials that could affect their capacities.

All containment areas have sump pits equipped with pumps that return collected solutions to the process circuit. There are no discharges from secondary containments into the environment.

The pumps are equipped with automatic level sensors to maintain the secondary containments free from water. These pumps undergo weekly inspections and are part of the preventive maintenance program. All tanks are fitted with level sensors. Furthermore, the recirculation pond offers additional excess capacity in case the secondary containments are compromised.

Solutions within the secondary containment for the booster station drain by gravity to the lined heap leaching pad, subsequently returning them to the process circuit.

Field observations and interviews with process and maintenance staff verified this requirement.

All cyanide process tanks at Los Filos have concrete secondary containment. Tank T-300 in Area 800b has as secondary containment the interlined installation at HLP 1 South Interliner, creating an impermeable barrier to prevent seepage into the subsurface environment.

Cyanide pipelines at Los Filos have secondary containment within the process plant (Area 420), cyanide mixing area (Area 800), barren tank area (Area 250), booster station, and leaching pad areas. These containments include concrete and plastic lined channels. No pipelines are buried in the plant area, and pipe-in-pipe features cross pipelines under roads where necessary.

Pipelines connecting the leaching pad, PLS ponds, and the process plant are lined with HDPE to direct leaks to large containment areas. Los Filos also uses plastic sleeves on pipelines to prevent high-pressure releases outside containment. Cyanide pipelines in the leaching pad are inspected daily by plant personnel and included in the preventive maintenance program.

No cyanide pipelines pose a risk to surface water since there is no surface water body needing extra protection beyond existing containment measures. The pipelines remain unchanged with the same safety features as in previous audits.

All cyanide mixing, storage, and process tanks and pipelines at Los Filos are made of materials compatible with high pH and cyanide solutions like HDPE, coated carbon steel, stainless steel, and Yellow Mine PVC. The auditors saw no regular (white) PVC pipes or tanks. All equipment was well-supported and in good condition.

## Standard of Practice 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 with  
☐ in substantial compliance with Standard of Practice 4.8  
☐ not in compliance with

Los Filos has implemented QA/QC programs for cyanide facility construction. The mine keeps QA/QC reports for facilities built before the 2021 recertification audit which met Code requirements and applies the same programs to new facilities built during this period.

Since the 2021 recertification audit, new facilities include the HLP 1 South Interliner Additional Stacking 8 Ha for cyanide solution irrigation. In February 2023, Los Filos added Area 800b on level 1473 of yard 1, which features a 40,000-liter tank storing 30% liquid cyanide and a pumping system to distribute cyanide solution via a 10-inch sweeper line for irrigating high copper ore on platform 1489.

Area 800b supplies a high-concentration cyanide solution to HLP 1 South Interliner via tank T-300. This construction adhered to proper engineering standards. Liquid cyanide is transported from tank T-100 in Area 800 to tank T-300 in Area 800b, about one kilometer away, for storage and dosing to the leaching pad.

The auditors reviewed QA-QC records of welding activities, quality of pipelines and tank materials and non-destructive tests and reviewed the as-built drawings. The new facility was built and tested following a quality control and quality assurance program.

Los Filos QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The mine maintains files with the QA/QC reports for its cyanide facilities including the ADR plant (Area 420), cyanide leaching pad stages, PLS ponds, recirculation and excess ponds, booster station, Area 250, 800 and 800b.

The QA/QC reports for the HLP 1 South Interliner Additional Stacking leaching pad area cover concrete tests, material certificates, and specifications for HDPE drainage products, liners, piping, and instrumentation. For the cyanide tank, reports include welding records, pipeline and tank quality, and non-destructive tests.

QA/QC reports for facilities built before the recertification period include various test logs and repair controls. The previous audit confirmed that materials meet design specifications, compaction is adequate, tank foundations are suitable, and geomembranes have been installed properly.

Los Filos has kept QA/QC records from previous audits in the ADR Plant conference room. An inventory was prepared to ensure none are misplaced. Auditors checked and verified some reports for compliance.

For Area 800b, auditors reviewed the *Gruminex Soluciones Mineras* report for the T-300 tank, including engineering calculations and material specifications. They also examined quality assurance documents and as-built drawings. The external contractor FREMA Ingeniería S.A. de C.V. handled the liner installation and shaping of the Area 800b leaching pad, led by civil engineer César Galván. This Code requirement was confirmed through interviews with process personnel and review of design and as-built drawings.

Qualified engineering firms carried out the QA/QC inspections and reviews during the construction of the cyanide facilities at Los Filos. They also prepared the final construction reports and as-built drawings, certifying that the facilities were built in compliance with the design drawings and technical specifications.

Auditors reviewed construction records, including as-built drawings for Area 800b, which were stamped by a qualified engineer. Previous audit reports noted that other cyanide facilities were reviewed by reputable engineering firms. Los Filos possesses as-built drawings and certification for all cyanide facilities, stamped by a qualified engineer. Additionally, Los Filos maintains quality control and quality assurance documentation for its cyanide facilities.

#### Standard of Practice 4.9

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

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

The “Water Monitoring Plan for Los Filos Operations” establish the monitoring plan for Los Filos operations that outlines the proposed procedures and protocols for water quality monitoring during operations. Prepared by GOLDCORP (August, 2016). The annual “Environmental Monitoring Plan,” which establishes measures and criteria to comply with Mexican legislation and regulations in accordance with what is indicated in the environmental impact and risk authorizations, prepared by the Department of the Environment, Los Filos Mine (July, 2021) is reviewed and updated as needed. The program monitors cyanide facilities and specifies locations for surface and groundwater sampling, techniques, frequency, parameters like total, free, and WAD cyanide, and permissible limits for WAD and free cyanide.

The Environmental Monitoring Plan includes work instructions and checklists for sampling techniques, equipment decontamination and calibration, preservation, quality control (e.g., duplicate samples, field and equipment blanks), and chain of custody and shipping procedures. Los Filos also follows a procedure to comply with water monitoring limits (0.5 mg/l WAD cyanide and 0.022 mg/l free cyanide) and details corrective actions if these limits are exceeded. The Environmental Monitoring Plan includes also instructions for wildlife monitoring activities.

Los Filos used Mercury Lab for water quality sampling until September 2022, then switched to ABC Laboratories (Intertek). Both labs are accredited by EMA for competence and reliability.

Competent individuals from Los Filos mine developed, reviewed, updated, and approved the Environmental Monitoring Plan and work instructions. The water quality monitoring program was initially prepared by Noelle Overdeest, a Goldcorp environmental scientist with 10 years of experience, and Alicia Sierra, a Los Filos environmental engineer with 7 years of experience. The program is revised annually and updated in-house as needed by qualified environmental personnel and approved by the Environmental Superintendent.

All personnel developing and updating the environmental monitoring plan and instructions are registered engineers (e.g., Biologists, Chemical Engineers) with experience in environmental management and in mining.

The environmental monitoring is managed by a Los Filos Environmental Technology Engineer with 7 years of mining operations experience, in collaboration with a Los Filos Ecology Engineer with 14 years of experience. They updated the Environmental Monitoring Plan to incorporate current regulations. The water quality monitoring procedure lists the professionals responsible for the program. Intertek laboratory, EMA certified, developed the current sample analysis protocols. The auditors reviewed letters of certification and website documentation verifying compliance

The Environmental Monitoring Plan and supporting work instructions describe sampling locations, preservation techniques, chain of custody procedures, shipping to external labs, cyanide species analysis, and quality assurance/control requirements. It specifies sampling frequencies for surface and groundwater (which vary from daily, weekly, biweekly, and quarterly), the parameters to be analyzed (including Total, WAD, and Free Cyanide), and includes maps showing the monitoring locations for surface water, groundwater, and underdrains in relation to cyanide facilities.

Completed chain-of-custody records for the recertification period, demonstrating proper use of the forms, were reviewed.

Los Filos field data sheets for surface and groundwater samples document sampling conditions such as weather, livestock presence, anthropogenic influences, field parameters (conductivity, pH, temperature), and groundwater levels. The auditors



reviewed examples of completed field monitoring finding consistency in the recorded field data of sampling conditions.

The Los Filos Environmental Monitoring Plan is reviewed and updated annually, detailing sample locations, frequencies, and parameters including cyanide species. The sampling frequency varies from daily to quarterly. Auditors reviewed records for all activities and deemed the monitoring frequencies appropriate.

## Principle 5 | DECOMMISSIONING

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

### Standard of Practice 5.1

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

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

Los Filos has a conceptual Mine Closure Plan (MCP) dated August 2024 updated by external contractor WSP and approved internally. The MCP has been developed in compliance with the requirements listed in Mexican regulations, the commitments presented in the Environmental Impact Statements (EIS), and the requirements of the Cyanide Code.

Section 6.0 Conceptual Closure Designs and Activities of the MCP includes decommissioning activities for cyanide facilities such as the leaching pads, management of lixivate solutions, ponds closure, dismantling and demolition of the cyanide installations including the ADR plant (Area 420), barren tank area (Area 250), cyanide mixing and storage area (Areas 800 and 800b), booster station, heap leaching pads 1 and 2, process and excess water ponds and solution channels.

At closure, once gold recovery ceases, all processing plant items and steel structures will be decontaminated. All concrete surfaces will be thoroughly washed down to remove any residual material. Decommissioning activities include decontamination of equipment (tanks, pipelines, pumps, and valves), rinsing of heap leaching pads, neutralization of process water for 2 years after operations ceases, final decommissioning and disposal of cyanide facilities, and/or reclamation of facilities. There is no solid cyanide storage at Los Filos and as such, it is not considered as a reclamation item in the MCP. No water treatment needs for cyanide facilities are considered for the post closure phase.

In accordance with the provisions in Section 7.0 Approximate Closing Schedule of the conceptual 2024 MCP, UMLF's Life of Mine Plan (LOM), assuming no additional mineralization discoveries, projects the mining operation will extend to 2037, followed by an active closure phase spanning two additional years through 2039. The current plan includes a progressive closure strategy, with an active closure phase from 2038 to 2039, and a five-year post-closure phase from 2040 to 2044. It is estimated that by 2044, all activities will be completed, and it can be demonstrated that the closure of the facilities is stable, self-sustainable, and in compliance with the Official Mexican Standards.

A detailed closure plan will be developed before the active closure period to ensure compliance with Mexican environmental regulations and international standards mentioned in this Conceptual Closure Plan.

Los Filos conducts periodic reviews of the conceptual Mine Closure Plan (MCP) and updates it as necessary, particularly when there are significant changes to closure strategies. Additionally, Equinox Gold's corporate office mandates that all operations, including Los Filos, review and update their Asset Retirement Obligation (ARO) and Standard Reclamation Cost Estimator (SRCE) cost estimations for the mine, which include decommissioning costs for cyanide facilities. These cost estimations are reviewed and updated annually and submitted to the corporate office, where they undergo financial audits by an external party.

#### Standard of Practice 5.2

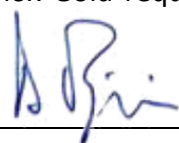
*Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.*

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

The Conceptual Closure Plan prepared by WSP includes estimating closing costs to fully fund third-party implementation of the cyanide-related decommissioning measures as identified in its site closure plan, following relevant World Bank requirements and International Finance Corporation performance standards. Cost estimates were guided by the accounting procedures of International Financial Reporting Standards (IFRS), DMSL's financial reporting requirements, and construction costs provided by the Mexican Chamber of the Construction Industry. Direct costs were calculated based on contractor work.

Los Filos reviews the conceptual MCP and updates it periodically including the cost estimate. The MCP is updated on an as-needed basis (when closure strategies significantly change). According to Equinox Gold requirements, Los Filos reviews and

Mina Los Filos

  
Bruno Pizzorni - Lead Auditor  
Page 41 of 98

July 17, 2025

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 auditors reviewed the previous versions of the SRCE model.

The local government does not require mining companies to provide financial guarantees for closure activities. Therefore, Los Filos uses self-insurance to cover these costs. Los Filos relies on self-insurance or self-guarantee to cover closure costs, including decommissioning cyanide-related activities.

As local and central authorities has no requirement for financial assurance of closure activities, Los Filos has established self-insurance as a financial assurance mechanism for closure activities, which includes decommissioning of cyanide-related facilities. The auditors reviewed a letter from Wittig, Márquez y Asociados, S.C. (WM&A) dated April 12, 2025, for the review of document ANNEX 1 - Sheet 1 Report on Compliance Rules 264.143 - Apr 2025 Los Filos Statements of Financial Position as of December 31, 2024 and 2023, verifying its conformance with the financial tests for a self-guaranteed mechanism to cover the estimated costs for cyanide-related decommissioning activities.

WM&A report concludes that Desarrollos Mineros San Luis, S. A. de C. V., based on the financial information provided as of December 31, 2024, meets the criteria established in Section 264.143 title 40 "Financial Guarantee for Closing" paragraph (f) subsection (i) in relation to environmental protection, of the Code of Federal Regulations (CFR) of the United States of America, updated as of April 10, 2025.

The foregoing, only considering the costs for the Dismantling and Environmental Restoration of the Facilities where cyanide is handled, which amount to \$26,469,684 US dollars, converted at the exchange rate of December 31, 2024 of \$20.5103 (Official Gazette of the Nation) represent \$542,901,160 Mexican pesos.

The auditors reviewed the statement from WM&A and confirmed that the self-insurance was calculated including the estimated decommissioning cost for cyanide facilities and that the operation has sufficient financial strength to fulfill the self-insurance obligation. The auditors also verified the professional certification of the WM&A financial auditor Martha Márquez with certification number 14321 from the Mexican Institute of Public Accountants.

## Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

### Standard of Practice 6.1

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

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

Los Filos has developed and implemented several procedures and work instructions, for the tasks that require management of cyanide, in order to ensure that worker exposure to cyanide is minimized and controlled when performing these related tasks. These include procedures for routine operations such as mixing, unloading, storage, pumping and leaching pad use, pregnant solution management and plant operations for gold recovery, as well as non-routine operations as equipment decontamination prior to maintenance or confined-spaces entry.

These procedures and work instructions include a description of risks associated with specific work tasks and the precautions and safety equipment required to safely complete the tasks.

Work permit systems have been developed for more general activities which apply across various areas of the plant and/or the mine operation. These include, for example, lock out/ tag out/try out, hot work and confined space entry permits.

Los Filos Procedures and Work Instructions include a line-item listings of requisite personal protective equipment (PPE) to prevent and/or minimize worker exposure to cyanide and/or cyanide containing solution. In addition to these procedures, signage and task safety training is used to provide awareness to personnel of the requisite minimum PPE requirements for an area.

During pre-start checks, operators are required to identify whether they have the required PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures. Any task in the operation requires the use of "Tarjeta De 5 Puntos Mina Op" (5 points card – Mine Operations), which is a personal safety checklist, to be completed prior to the start of any operation. This checklist is a local adaptation of the "STOP" program, which is a behavioral based safety program designed to prevent injuries and occupational illnesses in the workplace. "STOP" in the STOP program means – Safety training Observation Program. Los Filos has adapted the program in Spanish as "Seguridad en el Trabajo por la Observación

Preventiva" (Safety at Work through Preventive Observation). This checklist is designed to be completed by the worker in no more than 5 minutes, including lists of YES or NO questions grouped into five blocks:

- Entrances and access routes in good condition
- Workplace and equipment in good condition
- Working safely / Trained for the task
- Performing a safety act (this section involves performing a task and proceeding to detail it briefly)
- Can I continue working safely?

This checklist includes at the end a section to be completed by a supervisor, and it is related to task observation. In situations where the task is non-routine, a Job Hazard Analysis (JHA) may be required to identify any risks associated with the work, obtain a Work Permit, and ensure that adequate PPE is provided to complete the work safely.

All Los Filos work procedures require the use of personal protective equipment (PPE) and address work inspections for cyanide related tasks. Procedures may include work permits requirements, training pre-requisites and pre-task checklist, plan and prepare for the job, perform the job and job completion checks and/or inspections. In addition to the use of general PPE, such as hard-hat, steel toes shoes, and safety glasses throughout the production area, areas and/or tasks where personnel may come into contact with cyanide have additional PPE requirements. In particular, PPE with a higher level of respiratory protection is considered according to the potential level of exposure to HCN in the workplace or in the operation to be carried out. Also, PPE with a higher level of chemical contact protection is required, related to a higher potential of direct exposure to solid or solution sodium cyanide (body, hands, eyes, feet). The use of these PPE is complemented with the use of a portable gas monitor for HCN. In the case of cyanide mixing and unloading, lifeline and body harness is required in order to perform tasks on top of the Iso tanks, as hoses connection, cleaning and inspection.

Special works will require a JHA, a work permit, and usually the application of specific Work Instructions or Procedures, as well as special PPE and equipment, e.g.: multigas detectors (including lower explosive limit [LEL] and percentage of oxygen [O2]) in the working atmosphere, lifelines, body harnesses, means of entrance and exit, positive-pressure respiratory filtration protection, air-line supplied air respiratory protection, self-contained breathing apparatus (SCBA) respiratory protection, atmosphere ventilation, and others.

In the operation, the general guidelines for respiratory protection PPE related to cyanide are the following:

- Any operation in Area 800 and 800b related to mixing and unloading cyanide, requires full face filtrating respiratory protection, regardless of the HCN concentration indicated by the gas monitors.

- In areas where there is no potential of formation of HCN, or it can be under 2.3 ppm of HCN, the use of filtering respiratory protection related to cyanide is not required.
- Where there is potential to generate between 2.3 and 4.7 ppm of HCN, full face filtrating respiratory protection is required.
- Over 4.7 ppm of HCN, is considered an emergency that requires a Level B chemical protection ensemble (semi-encapsulated chemical splash resistant suit, high chemical-resistance boots and gloves, and self-contained respiratory protection [Self-Contained Breathing Apparatus – SCBA]), as defined by the US Chemical Hazards Emergency Medical Management (LINK). Los Filos uses DuPont Tychem 2000 semi encapsulated suits, and Dräger PSS® 5000 NFPA (National Fire Protection Association,) - Certified SCBAs.
- Over 10 ppm of HCN, is considered an emergency that requires the entry of the Emergency Response Team (ERT), with a Level A chemical protection ensemble (fully encapsulated suit with resistance to chemical splashes, gases and vapors, high chemical-resistance boots and gloves [glove incorporated to the suit], and self-contained respiratory protection [Self-Contained Breathing Apparatus – SCBA]), as defined by the US Chemical Hazards Emergency Medical Management (LINK). Los Filos uses DuPont™ Tychem® 10000 Encapsulated Level A Suits, and Dräger PSS® 5000 NFPA-Certified SCBAs.

Workers at the operation are given the opportunity to provide input to procedures via a variety of mechanisms. The first of them is the mentioned “TARJETA DE 5 PUNTOS MINA OP” (5 points card – Mine Operations), on which the worker can include their observations related to safety previous the execution of a task. All the comments for improvement are directed to supervisors and/or management for consideration. Los Filos obtains employee input regarding its health and safety procedures and considers this input in developing and evaluating its procedures. Methods include the pre-shift meetings (5-minute talks), training sessions, incident investigations, and JHA and work permit issuing.

During the pre-start meetings there is direct communication between operators, supervisors, and first line area managers, where worker input is considered to improve existing procedures. Records of the pre-start meetings conducted in the last years, including discussion of safety issues related to cyanide, were reviewed by the auditor.

In the pre-operational check lists and inspections check lists related to procedures and work instructions, the workers can include notes, which can be issued related to Health and Safety (H&S) observations and improvement opportunities identified in field operations. The auditor reviewed a sample of check lists related to cyanide operations. Although there were find no notes related to cyanide, it was evidenced that the workers do include written notes in these documents to provide feedback on their field observations.

Los Filos conducts regular Safety Committee meetings, which include workers representatives, being these ones provided the opportunity to discuss procedures. This

Safety Committee meetings are held based on a Mexican legal requirement on work health and safety, NOM-019-STPS-2011 "Constitución, integración, organización y funcionamiento de las comisiones de seguridad e higiene" (Constitution, integration, organization and operation of health and safety committees).

Los Filos has a Management of Change (MOC) Procedure for making changes and modifications to the plant's operating method and uses it regularly to evaluate changes with respect to cyanide releases and exposures. New and revised documents go through a review procedure which may include feedback from area operators with significant experience in that area. Procedures related to cyanide management are reviewed and/or updated periodically with the participation of process operators. Comments are incorporated and then updated procedures are disseminated to the supervisors for review with the crew for final review and implementation.

In the case of incidents investigation, workers also have the opportunity to provide input on how to improve safety procedures. The auditor reviewed examples of incidents investigation reports. Although these incidents were not related to cyanide, it was evidenced that the system and mechanism to provide feedback in safety procedures are in place.

Operators and maintenance personnel interviewed demonstrated knowledge and understanding of the company's pre-work risk assessment where workers identify potential risks associated with the work and communicate any potential procedural or other problems to a supervisor. Interviews with medical staff also demonstrated that they had been instrumental in the development of the procedures.

General cyanide safety training, as well as in specific cyanide safety trainings for operational working areas, are conducted to disseminate the updated procedures. Feedback is provided by the workforce during those sessions. Records of input from workers and records of training sessions were reviewed by the auditor and were found to be complete.

#### Standard of Practice 6.2

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

The operation is ☒ in full compliance with  
☐ in substantial compliance with Standard of Practice 6.2  
☐ not in compliance with

Los Filos has determined that the optimal pH control for process solutions is 11.5 to prevent the evolution of HCN gas, as part of their operational guidelines during mixing process. To help control pH, caustic soda solution is used to increase the alkalinity of



barren solution previous the mixing process in tank T-100 in Area 800. The system automatically stops the adding of caustic soda solution in the pH level reaches 12.

Procedure "Reception, download and transfer of NaCN Area 800" describes the dissolution of solid sodium cyanide into concentrated cyanide solution (30%), and states the requirement of pH values above 11.5 when sparging, mixing and distributing cyanide solution to be dosed into the lixiviation Pads. To help control pH, barren solution is used to mix and dissolve solid sodium cyanide briquettes in the Iso tank, and sodium hydroxide is added to rise the pH to the desired value.

For controlling pH in the ADR processing circuit, Los Filos has established a work instruction "pH adjustment in cyanide solution." pH monitoring is performed by the sensor installed in the T-100 tank and can be viewed on the Area 800 panel as well as in the operations control room. There is also a low and high pH alarm. If the pH is less than 11.5, continue adding soda to the T-100 tank. If the pH is greater than 11.5, stop the PP-420-51 pump. The high pH alarm is activated at a value of 12 and can be seen on the control room screen (CN system). pH readings are taken manually every time a cyanide preparation is performed. The auditor verified records for 2022, 2023 and 2024, and certify that solution was raised to 11.5 prior to mixing in a consistent way during the audit recertification period.

The auditor verified this requirement though review of Work Instructions and Procedures, plant daily operating logs, control room operating logs, and discussion with personnel from H&S, Environmental, and Plant Operations areas. Observation of a cyanide mixing event confirmed that the mix tank was filled with a mix of barren and caustic soda solution prior to initiating the sparge process with sodium cyanide in the Iso tank and found no levels above 4.7 ppm of HCN detected neither by lower and upper sensor, or portable sensors used by the operators and supervisors.

Los Filos has determined appropriate controls including the use of appropriate PPE. Operating procedures, which specify the PPE required, have been developed and implemented in these areas. Based on a General Base HIRAC analysis (Hazard Identification, Risk Assessment and Controls) applied to all the operations inside the mine site, Los Filos has established the following areas where workers may be in risk of exposures to HCN gas:

- Area 250 – Barren, Recirculation, and Leach Pads Area
- Area 420 – ADR – Carbon in Column Areas
- Area 800 – Cyanide Mixing and Unloading process
- Agglomerator (considered not only HCN, but also solid particulates impregnated with sodium cyanide solution, cement, and caustic soda)

The HIRAC Analysis was performed based on Mexican regulation NOM-023-STPS-2012, "Minas subterráneas y minas a cielo abierto - Condiciones de seguridad y salud en el trabajo" (Underground and open-pit mines - Occupational health and safety conditions),

and ISO 45001:2018 – Occupational health and safety management systems – Requirements with guidance for use.

Los Filos currently uses a more stringent HCN limits than those required by ICMI. Monitors around the plant are calibrated to alert personnel to HCN gas in the area, with the first alarm at 2.3 ppm, and second alarm at 4.7 ppm. Los Filos uses fixed and personal (portable) monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide. HCN alarms are set to emit a visual and audible alert at 2.3 ppm and 4.7 ppm. The alarm for 2.3 ppm activates a flashing strobe locally and an alarm shows in the control room, alerting to possible high HCN gas in the area. At the activation of the alarm at 4.7 ppm, the workers must leave the area and use a more protective respiratory protection (Level B chemical protection ensemble, as indicated in Standard of Practice 6.1), in order to reenter the work area and regain control. If the HCN concentration raises to 10 ppm or more of HCN, the Emergency Response Team (ERT) will have to intervene to regain control of the plant, using not only a more protective respiratory protection, but also a gas-tight encapsulated protective suit (Level A chemical protection ensemble).

Fixed HCN gas monitors (Honeywell) are installed in the Cyanide Preparation Area and Carbon in Columns circuit. Workers are also required to wear personal HCN monitors (Drager).

In the case of respiratory protection, the highest potential exposure during regular operations is in the cyanide mixing area, during the mixing and unloading process. For this operation, workers are requested to use negative-pressure full face mask with acid gas – organic vapors cartridges, and HEPA (high efficiency particulate air) filters, as indicated by Draslovka in the sodium cyanide SDS. All the filtering respiratory protection PPE fulfill US NIOSH (National Institute for Occupational Safety and Health) standard for respiratory protection, and are of the brand 3M ([LINK](#)).

Work procedures have been developed for all activities in which cyanide management is involved. These work instructions include a section where the PPE requirements are listed. Signage listing the PPE requirements to enter a cyanide facility has been installed at appropriate entrances.

Signage, procedures and training developed by the process plant help to ensure that workers understand the high-risk areas and the alarm responses requirements. Process plant personnel are responsible for ensuring that adequate levels of signage and alarms are maintained throughout the plant to protect against HCN exposure.

For the areas listed above where workers may be in risk of exposures to HCN, Los Filos has provided alarms, protective equipment and signage to remind personnel of the possible exposures and prevent them from exceeding their operational exposure limit of 2.3 ppm of HCN.

Los Filos uses continuous atmospheric monitoring for HCN in the areas listed in section 6.2.2. In this case, they are installed Honeywell XNX Universal Gas Detector Transmitter for monitoring Hydrogen Cyanide (HCN), equipped with HCN gas sensors ([LINK](#)). The technical measuring limit for the fixed gas detectors is up to 30 ppm for HCN.

The portable gas detectors are of the brand Dräger ([LINK](#)). They are two models of gas detectors used in Los Filos:

- Dräger Pac 7000 (for HCN): assigned to each operator potentially exposed to HCN, in Area 420, Area 800, Leach Pad, as well as Environmental Area team members who perform field activities, and
- Dräger X-am 5000 (including sensors for explosivity lower explosive limit [LEL], oxygen, HCN, and CO): assigned to ADR plant supervisors, H&S Area, and Emergency Response.

The first one is a single gas monitor for personal use, with an HCN sensor. The second one is a multi-gas detector, used for more complex operations (such as confined-space entry). The technical measuring limit on each case for the portable gas detectors is up to 30 ppm for HCN.

The operators from SEGUTAL (transport company of Draslovka), use the Honeywell BW Solo (for HCN) personal monitor ([LINK](#)).

Work procedures have been developed for all activities in which cyanide management is involved. These procedures include a section where the PPE requirements are listed. Signage listing the PPE requirements to enter a cyanide facility has been installed at appropriate entrances.

Los Filos employs both fixed HCN detectors and personal HCN monitors. Both types of HCN detectors are tested and calibrated on a routine basis by Process Maintenance Electric and Instrumentation Area (E&I) personnel, following manufacturers recommendations (Honeywell and Dräger). Los Filos has around 45 personal single-gas handheld HCN monitors, and 5 multi-gas detectors.

Records of these tests and calibration activities are recorded and maintained in the preventative maintenance system by E&I personnel. Gas calibration is conducted on a weekly basis, and a bump test on a monthly basis, in accordance with manufacturer's instructions, and performed by E&I professional technical staff (electrical engineers) qualified and accredited by the manufacturers (Honeywell and Dräger).

Personal HCN monitors are issued to personnel working in high-risk activities such as cyanide mixing and offloading, or carbon columns. Personal HCN monitors are released to process operations personnel by way of a registry. Records of maintenance activities are kept by the E&I Area.

The control of calibrations, bump tests, battery and sensors life, is managed following the Work Instructions "Calibration of Honeywell HCN Monitor" for fixed monitors, and "Calibration of Drager HCN Devices" for portable monitors.

A sample of gas detectors was reviewed for the time period of the recertification audit, in order to check their records of maintenance, finding consistency on calibrations and bump tests historical records, as well as in sensor and battery replacements. Instrumentation Area retains a digital and a hard copy of the calibration records for the HCN monitors (fixed and portable). These records will be retained for at least 05 (five) years as hard copies, and a permanent record as digital copies.

Signage is displayed at the ADR Plant complex entrance, and throughout the various facilities, including the Areas 250, 420 & 800, as well as Agglomeration plant, Area 800b, Pumping Boosting Station, the access road entry to the lixiviation pads, and pond fences, in order to alert personnel to the presence and/or possible presence of cyanide, access restrictions and the requisite PPE for the area. To support identification of pipeline contents, all pipelines in the plant are labeled to identify the line, the contents (i.e., cyanide solutions, caustic soda solution, pregnant solution, barren solution) and flow direction, following ANSI standards. The storage tanks are identified using the pictograms established for chemical risk by the United Nations Globally Harmonized System ([LINK](#)) applicable to cyanide solution (health hazard, toxic and environmental impact). The use of this system is mandatory in México, as stated by NOM-018-STPS-2015 "Sistema armonizado para la identificación y comunicación de peligros y riesgos por sustancias químicas peligrosas en los centros de trabajo" (Harmonized system for the identification and communication of hazards and risks from hazardous chemicals in the workplace).

In addition to identification of cyanide areas and PPE requirements, signage is also used to restrict eating, drinking, smoking and open flames in areas with presence or potential presence of cyanide.

Warning signs are posted in the language of the workforce (Spanish). Verification was through visual inspection of the signs located in areas where cyanide solution is prepared and used. These areas included ADR Plant complex entrance, Areas 250, 420 & 800, Agglomeration plant, Area 800b, Pumping Boosting Station, access road entry to the lixiviation pad, and ponds fences.

The auditor verified this requirement through site inspection and review of physical positioning of information, awareness and alert signs. Also, it was reviewed the plant risk map, and the checklist of signs deployed by operational area, and complemented through discussion with personnel from H&S, Environmental, and Plant Operations areas.

High strength cyanide solution is dyed in red color for clear identification when observed out of proper containment and for clear differentiation with other solutions or rainwater

that may be present, as requested by ICMI. Dye is sent with the cyanide briquettes inside the Iso tanks, set by Draslovka in their transfer plant in San Luis Potosí. So, at the sparging operation the high strength cyanide solution (30%) results colored in red, in a concentration that provides a clear visual indicator of the presence of high-strength cyanide solution.

The Los Filos processing plant is equipped with a number of fixed emergency showers with eyewash stations, in order to provide emergency rinsing in the event of chemical exposure, installed at strategic locations throughout the operation in all areas where there is a potential for exposure to cyanide and other chemicals. These emergency showers are connected to the mine's drinking water network or have their own drinking water reservoirs. They are checked as part of daily inspection checklists to ensure that they are operational, the water quality is good, and that water flow is adequate. This process of testing the showers and eyewash stations prior to commencing work was observed during the audit. In addition to the daily checks, routine preventative maintenance on the showers is completed by the process maintenance personnel no less than quarterly.

There were observed emergency showers with built-in eyewash stations in the cyanide mixing and unloading area (Area 800), Area 800b, Area 250, Area 420, agglomerator, and pumping booster station. Emergency showers and eyewash stations are built and operated under the ANSI/ISEA Z358.1 Standard (ANSI: American National Standard for Emergency Eyewash and Shower Equipment/ISEA: International Safety Equipment Association), considering water quality and water temperature.

To protect against fire, only dry chemical powder fire extinguishers are used in the operation areas of the mine, in order to prevent generation of HCN gas whilst extinguishing a fire. These extinguishers are checked as part of the daily inspections by each area operators. In addition, the H&S team is responsible for routine inspections and replacement of undercharged or faulty extinguishers. The auditor randomly checked fire extinguishers to confirm they are the acceptable type for use with cyanide. Verification was conducted by reviewing Los Filos's inspection and testing records for showers, eye wash stations and fire extinguishers and records of annual fire extinguishers inspections and maintenance. Fire extinguishers are also inspected on a monthly basis by the Emergency Response Team (ERT). The dry-chemical portable extinguishers comply with NFPA 10: Standard for Portable Fire Extinguishers.

In order to ensure that individuals that may come into contact with solutions containing cyanide, solid particulates impregnated of cyanide solution, or cyanide-bearing carbonate deposits (including employees involved in maintenance, and any other individual that may be exposed to released solution) be alerted to its presence, Los Filos identifies the tanks and piping with appropriate signs and labels all the areas with actual content or presence of cyanide. This includes the tanks and piping in the ADR Plant complex (including Areas 250, 420 & 800), Agglomeration plant, Area 800b, and Pumping Boosting Station.

To support identification of pipelines, personnel participate in areas specific training to identify process tanks and pipelines in their respective work areas. Labeling provide workers and others with notice that a dangerous material is present as necessary to protect their health and safety. Labeling is typically done at a spacing of no greater than 6m to allow personnel to easily identify and track the lines to identify contents. Pipes containing cyanide (high or low concentration) are marked as containing cyanide solution or barren solution, and flow direction arrows for cyanide bearing lines are used to allow personnel to understand the flow and possible exposures and/or response requirements for leaks and/or maintenance work. Color coding is also used to identify tanks and process solution pipelines: concentrated cyanide solution piping is colored magenta/purple, and barren cyanide solution piping is colored yellow. These color codes are done in accordance with ANSI standards. Also, the coloring code for piping is mandatory in México based on regulation NOM-026-STPS-2008 “Colores y señales de seguridad e higiene, e identificación de riesgos por fluidos conducidos en tuberías” (Safety and hygiene colors and signs, and identification of risks from fluids carried in pipes).

Cyanide mixing and storage tanks, as well as process tanks, are marked as containing cyanide when appropriate. Signage of confined spaces are also placed on cyanide tanks, pumping boosting station tank, barren solutions tanks, plant process tanks, and Agglomeration plant drum.

Spanish is the most widely used and widespread official language in Mexico. It is also the language used by the vast majority of the workforce in Los Filos. In this sense, it is the language used for all documents related to the physical operation of the mine, as well as safety management, environmental management, emergency response, training, and relations with local stakeholders.

Los Filos maintains Safety Data Sheets (SDS) for all chemicals on site, including for sodium cyanide as solid and as solution, provided by Draslovka (note: some of them with logos of Chemours). Employees have access to Safety Data Sheets and information on cyanide intoxication first aid in areas where cyanide is used, and particularly where reagent-strength cyanide is managed, like in ADR plant (i.e., Area 800, Area 420), Area 800b, and pumping booster station. They also have binders with first aid and emergency response procedures in the 7 different locations where they have first aid response kits for cyanide intoxication inside the operations area, plus the medical center. SDSs were also found in the control room.

Safety Data Sheets information is provided by Draslovka. Safety Data Sheets comply with ANSI Z400.1/Z129.1-2010 standard “Hazardous Workplace Chemicals – Hazard Evaluation and Safety Data Sheet and Precautionary Labeling Preparation”, as well as with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS Rev. 9, 2021, United Nations Economic Commission for Europe).

Cyanide warning signage has been placed all around the hydrometallurgical plant (as information panels on access routes, and as safety signage in operational areas) [note some of them still with logos of Chemours], alerting personnel for the presence of cyanide, indicating the required mandatory PPE to be used in the area, the prohibition of eating, drinking or smoking in such areas, the mandatory use of HCN gas detector, and the emergency response requirements in the high-risk cyanide areas.

Los Filos has the procedure “Incident reporting and investigation” and a guidance (updated in 2024), which describes that in the event of an incident, how it will be notified, and how the staff proceed to control the situation. Subsequently, the investigation of the incident is done to identify root causes and ensuring that corrective actions are determined.

Los Filos uses Equinox systematic process to find critical factors, immediate and root causes of incidents (using the Taproot methodology [<https://taproot.com/>] and other tools). The system is used to collect, understand, and organize evidence when an incident happens. It helps identifying administrative, human errors or equipment failures that led to the problem.

Los Filos also uses the Nasdaq Metrio Sustainability Software system ([www.metrio.net](http://www.metrio.net)) to register and track action plans for incidents, especially the ones that have the potential to affect the local stakeholders. This is an ESG (Ethical, Sustainability and Governance) reporting system.

The auditor reviewed this procedure, the Equinox systematic process documents, Metrio software, as well as records of past investigations. Since the last audit period, the operation has reported no incident related to sodium cyanide or HCN in the operation. No significant cyanide-related accidents have occurred at Los Filos during the recertification period, being the last cyanide-related incident recorded in December 16<sup>th</sup>, 2020. The auditor reviewed the incident report records, including incidents not related to cyanide, confirming that the operation is implementing a general program for incident investigation



## Standard of Practice 6.3

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

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

Los Filos is prepared to respond to cyanide exposure emergencies with effective response procedures, proper equipment, and trained personnel. The operation has the necessary equipment for emergency response in order to treat a worker exposed to cyanide, initiation with first response on field, and then receiving a second response based on the technological and professional resources available in the Medical Center inside the operation.

Los Filos has made available water, oxygen, resuscitators, radios, telephones, and alarms in the process plant and Medical Center. Oxygen bottles, resuscitators and first aid kits are located throughout all the places at the process plant where cyanide in reagent grade is present.

Los Filos employs a variety of medical emergency response equipment to ensure effective response to any possible exposure scenarios. The first aid stations distributed along the operations area include:

- Oxygen resuscitation kits: medicinal oxygen bottle + jockey regulator + automatic high-pressure oxygen deliver mask system -replaces the need of resuscitation bags for cardiopulmonary Resuscitation (CPR) application- [note jockey regulator can provide an oxygen flow between 0.5 and 25 liters per minute)
- Oxygen masks with reservoir bag
- Portable blood oxygen saturation meter, with batteries
- Mini refrigerator containing:
  - Amyl nitrite Inhalants, USP (United States Pharmacopeia), 0.3 ml
  - Gauze cloths
  - Bottle with activated charcoal capsules (medical grade)
  - O2 bottles of 500ml with fresh drinkable water
  - Binders with first aid and emergency response procedures, plus cyanide SDS
- Box with disposable medical gloves
- Control notebook with checklists and pen

These first aid stations are located within the area of operations at:

- Area 250

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

- Main transit yard at the ADR Plant, outside the plant maintenance workshop
- Laboratories
- External border of PLS2
- Agglomerator
- Area 800b
- Pumping booster station

The first three ones are the closest to Area 800.

The Medical Center is located close to the office areas of the mine site, at 5 minutes driving distance from the ADR Plant complex. This center is equipped with more specialized material and equipment, such as:

- Oxygen resuscitation kits (Oxy-packs): high-capacity medicinal oxygen bottle + jockey regulator + automatic high-pressure oxygen deliver mask system (replaces the need of resuscitation bags for CPR application) [note jockey regulator can provide an oxygen flow between 0.5 and 25 liters per minute)
- AED (Automatic Electric Defibrillator)
- Resuscitation bag
- Secretion aspirator
- Heart rate monitor
- Blood pressure meter
- Blood oxygen saturation meter
- Crash cart
- IV (intravenous injection) kits, tourniquets, and disposable needles of various sizes
- Stomach lavage kits
- Medicines and injectables (such as saline solution)
- Activated charcoal capsules (medical grade)
- Antidotes:
  - Amyl nitrite Inhalants
  - Sodium Nitrite injection for intravenous use, 300mg/10mL (30mg/mL)
  - Sodium Thiosulfate injection for intravenous use, 12.5 grams / 50 mL (250 mg/mL)

The antidotes found in the first aid stations and Medical Center are from the following brands:

- Amyl Nitrite inhalants: James Alexander Corporation ([www.james-alexander.com/stock-medical-products/amyl-nitrite-inhalant-usp/](http://www.james-alexander.com/stock-medical-products/amyl-nitrite-inhalant-usp/))
- Sodium Nitrite and Sodium Thiosulfate injections (Nithiodote): Hope Pharmaceuticals (<https://hopepharm.com/nithiodote/>)

All the Amyl Nitrite inhalants found in the first aid stations and medical center had a shelf life of no more than 3 months. In the case of Nithiodote kits, they indicated a shelf life until August 2026. The staff in the Medical Center indicated that the Amyl Nitrite inhalants would no longer be replaced, as they will be switching between 2025 and 2026

from the current antidote kit, now moving to the use of Hydroxocobalamin (CYANOKIT - <https://cyanokit.com/>).

Los Filos has two fully equipped ambulances. One of them is located near to the entry of the ADR Plant complex, and the other one is located outside the Medical Center. The are properly equipped for intoxicated evacuation and life support if needed.

Los Filos has an emergency communication procedure with instructions to activate the alarm system by radio or telephone. All employees and visitors are trained in this system as part of the induction. It also has a dedicated radio channel for paramedics as well as dedicated landline extensions for paramedics and security. Operators are required to carry a radio while performing their tasks, as well as the ambulance drivers. Workers and visitors in Los Filos are trained to initiate emergency response procedures by contacting any emergency number on the operation:

- From internal line phones in Los Filos, extension number: 88888
- From external phones
  - Mobile number: 733 155 2652 – Extension 88888
  - Mobile number: 733 333 9400 – Extension 88888
- Radio channel for emergencies: Channel 1

The alarm systems for all the HCN fixed monitors in Los Filos have a visual and sound alarm and are hard wired to the control room. There are push button alarms at various locations on the ADR Plant complex, including the Area 800.

Los Filos regularly inspects the cyanide first aid equipment to make sure it is available when needed. This includes daily checks by area operators. Los Filos also has monthly formal checks by the ERT, to ensure it is available and in working conditions if needed. The refrigerators that keep Amyl Nitrite inhalants cool also have an analog thermometer that records the maximum temperature reached, in order to verify that temperature control has not been lost during storage. Each check is registered in the control notebook inside each first aid station.

The H&S area is responsible for the procurement of antidote for cyanide intoxication, and all the equipment and supplies required by the Medical Center, including medical-grade oxygen. The replacement for cyanide intoxication antidotes is required three months before the expiration date. The Amyl Nitrite inhalants would no longer be replaced, as they will be switching between 2025 and 2026 from the current antidote kit (Nithiodote), now moving to the use of Hydroxocobalamin (CYANOKIT). All antidotes on Medical Center or first aid stations are stored under the conditions directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed. No injectable medical element is found outside the Medical Center, and only the doctor or nurse on duty is the only technical and legally authorized personnel to apply these elements.

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

Los Filos regularly checks the cyanide emergency response equipment to ensure it will be available when required. The personnel in the Medical Center are directly in charge of safekeeping and regular inspection of antidotes under their control and keep a log of expiration date for the ones under their direct control as well as from those distributed in the operation in the first aid stations. They are also responsible of safekeeping and regular inspection of all the equipment used in the medical center, as oxygen tanks with masks and humidifiers, blood pressure meters, blood oxygen saturation meters, heart rate meters, AEDs, digital thermometers, secretion aspirators, and other specialized equipment used regularly in a medical center and that may be required for use in emergency case of poisoning with cyanide. These reviews are carried out on a daily basis, being that there is equipment that is used on a regular basis for medical control of visitors and personnel with medical conditions (because of accidents or medical incidents in operations, typical of the volume of working population in the site).

Medical staff and/or ERT personnel perform weekly inspections of the ambulances. Inspections are documented and registered. The ambulance inspection includes a review of the inventory of medical equipment in each vehicle, as well as the operation of energized or pressurized equipment: medical oxygen, AED, heart rate monitor, secretion aspirator, stretchers, immobilization elements, and transfer of the injured, and stock of consumables (cotton swabs, gauze, bandages, and others).

Antidote's expiration dates and oxygen tank pressures were checked during the audit. Verification was through visual examination of the Cyanokits expiration dates, interviews with process personnel and onsite doctor and nurse, and review of inspection records. These records were available for review during the audit and were found to be consistent and complete.

The auditors verified this requirement through review of procedures from Medical Center, for medical attention, emergency medical attention, and ambulances operation and maintenance. Also, performed visual examination of the antidote expiration dates (in plant and in Medical Center), interviews with onsite doctors and nurses, and review of inspection records. Also, it was reviewed the plant risk map and checklists of emergency response equipment deployed in the operations. The auditors confirmed that all antidote kits components were stored at the correct temperature and that they have not expired up to the date of the audit. This verification was complemented with interview with plant workers, and through discussion with personnel from H&S, Emergency Response, Medical Center, and Plant Operations areas.

Los Filos has developed the emergency response plan "Emergency Response with Sodium Cyanide" (ERP), which contains in a comprehensive and detailed manner all the elements with potential for operational emergencies in cyanide management within the site, including human exposure to cyanide, as well as general and specific treatment guidelines. They have also developed procedure "Patient poisoned by Cyanide," which details more specifically the potential modes and routes of poisoning, initial and

advanced symptoms, and detailed flow charts of action according to the route of poisoning and the result of patient triage.

These two documents include personnel responsibilities, intoxication routes, description of intoxication levels, symptoms of mild and acute poisoning, on-site decontamination, first aid procedure (for conscious and unconscious patient), derivation to the medical center, medical attention, advanced treatment to conscious and unconscious patient, advanced decontamination process, advanced use of oxygen therapy, use of injectable antidotes, patient stabilization and transfer to medical centers outside the mining operation by ambulance.

The first responder in the place initially will aid the victim securing the area and administering oxygen first, and potentially Amyl Nitrate inhalants and/or activated charcoal by oral way. These documents also detail the tasks and responsibilities of the ERT, and medical staff from Medical Center and ambulance crew. Specific instructions are given for treating 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. Then the Medical Center will receive the victim decontaminated by the ERT to receive advanced medical treatment, and use of the injectable cyanide antidote if necessary.

The first steps of action in case of contact or intoxication, including the use of emergency showers and basic first aid, as instructed to all workers and visitors to Los Filos. Workers are expected to provide first aid during an emergency that involves cyanide exposure, starting with the use of emergency showers – eyewash stations and the use of oxygen kits, and proceed with the administration of inhalable amyl nitrite and/or oral activated charcoal, depending on the characteristics of the exposure and the symptoms presented by the poisoned person.

Emergency shower and eyewash can be used directly by the contaminated person, or with the help of any person near. Also, the contaminated person can use oxygen by himself, or with the help of first responders (workers trained in immediate emergency response actions), and/or the ERT. If the person cannot evacuate the location of the incident by his own means, it will be helped by first responders and/or the ERT, in order to reach the medical center.

In order to provide occupational medical assistance and medical first aid to all persons that work or visit the mine site, Los Filos has a Medical Center onsite, that is located in the mine site office area, within 5 km from the entrance of the ADR Plant complex (10 minutes driving at 30 km/h, less than 5 circulating with an ambulance calling for emergency transport protocol for stopping all other transit of vehicles in the mine site). This Medical Center, installed and operating on the site, includes medical office equipped for performing triage and diagnostic, a quarantine / rest area, a waiting room and an administrative service module. The Medical Center has sufficient equipment, medicinal oxygen and cyanide poisoning antidotes, in order to treat and stabilize any

worker affected. Also, the mine site has two fully equipped ambulances, in case it is necessary to urgently evacuate the injured or intoxicated.

The staff operating the Medical Center are all employees of Los Filos, consisting in total of 3 physicians, 3 nurses, and 6 paramedics, who work in rotating shifts. This rotation allows the Medical Center is always staffed with one or two physicians, one or two nurses and between one and three paramedics during the day shift (at least 3 persons in total per day shift). One paramedic stays on duty during the night, while the rest of medical and emergency response staff is on site and on call during the night. The staff on duty spend the night in the operation, in order to be available 24 hours in case of emergency. The paramedic on night duty can summon the rest of the medical team if necessary. The ambulances can be driven inside the operation by the paramedics, the nurses, or the designated members of the ERT that have been trained and are authorized to drive them inside and outside the mine site. In case that an external evacuation is needed, the personnel beneath the ERT that are designated as ambulance drivers will be called to bring support in case its needed, going along with the patient one nurse and one paramedic.

Los Filos has determined that in the case of cyanide poisoning, patients will be best treated at the on-site Medical Center with its trained staff and proper equipment. The physicians, nurses and paramedics are qualified to provide medical/emergency assistance. The physicians, nurses, and paramedics received advanced training in risks and emergency care with cyanide, as well as risks and emergency care in mining. In particular, physicians and nurses have received advanced training in the use of antidotes against cyanide poisoning, as well as in measures for storage and inventory control of antidotes and medicines. For this reason, patients will not be transported to any external facilities for treatment until they are stabilized.

All the members of the ERT have also been trained in first aids, including the ones related to cyanide exposure. In occasion of the audit, the ERT was made up of 6 paramedics and 35 workers distributed in 3 working shift rotations and two turns per day, with at least 08 emergency responders on site in any moment.

The Medical Center and ERT will apply the ERP and procedure "Patient poisoned by Cyanide," on which is detailed patient stabilization and transfer to medical centers outside the mining operation if needed.

The mine has two fully equipped ambulances that can be used to transported injured or intoxicated patients in order to receive advanced medical treatment outside the mine site. Los Filos has considered three options for medical centers outside the mine site:

- Hospital 3 IMSS, Chilpancingo, Guerrero state  
(<https://clincasimss.com/hospital-3-imss-de-guerrero/>)
- Hospital Sur Corporativo S.A. de C.V. , Chilpancingo, Guerrero state  
(<https://hospitalsurcorporativo.com>)

- Médica Sur, S.A.B. de C.V, CDMX (Ciudad de Mexico)  
(<https://medicasur.com.mx>)

The first two hospitals are in Chilpancingo, the capital city of Guerrero state. It is approximately 70 km away from the mine site, which takes two hours of travel with the ambulance due to the characteristics of the route. No hospital or medical center has been considered in the city of Iguala because, despite being on the route to Mexico City and also being about 70 kilometers from the mining operation, the medical centers in Chilpancingo have been considered more appropriated in terms of equipment and impact on community relations. Draslovka may have considered medical facilities in the city of Iguala, which is located on the cyanide land transport route.

Although these two hospitals in Chilpancingo have been considered in the emergency planning of Los Filos, agreements have been signed with them, and their medical staff has been trained in the care of cyanide poisoning, the transit time makes that they are preferably used for the treatment of stabilized patients who are not in a serious condition. In the case of the hospital located in Mexico City, the transit by ambulance would take between 5 and 6 hours, but only two hours or less with the use of air transport by helicopter. This last hospital is considered the most advanced and the best equipped in México, including a hyperbaric chamber.

For the aerial transport, Los Filos has a signed agreement with Fundacion para la Atencion y Traslado del Paciente Crítico AC (Foundation for the Care and Transfer of Critical Patients, Civil Association – [www.seunangel.mx](http://www.seunangel.mx)) in order to receive emergency air transfer services by helicopter. Los Filos has an area enabled for helicopter landing that can be utilized for air medical evacuation.

Los Filos has formalized arrangements with the three hospitals previously listed, in the event that follow-up is required for a stabilized patient who has cyanide poisoning, or the emergency treatment of a patient who presents medical complications that could not be treated at the mine's Medical Center.

These hospitals are at the following distances:

- Hospital 3 IMSS, Chilpancingo (70 km, 2 hours in ambulance)
- Hospital Sur Corporativo S.A. de C.V. , Chilpancingo (70 km, 2 hours in ambulance)
- Médica Sur, S.A.B. de C.V, CDMX (180 km, 5 to 6 hours in ambulance, 2 or less hours in helicopter)

The Los Filos Medical Center's physicians have trained these three hospital's medical staff on the treatment of cyanide poisoning, as well as in the use of antidotes. In the event of a cyanide exposure emergency and the need to transfer a patient to the hospital, the site will treat the patient on site and then go with the patient to the hospital once it is stabilized.



The medical staff at Los Filos is confident that the medical facilities in Chilpancingo and CDMX have adequate qualified staff, equipment and expertise to respond to a cyanide exposure follow-up treatment. The auditor reviewed signed letters of agreements with the staff of the three hospitals

## Principle 7 | EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

### Standard of Practice 7.1

*Prepare detailed emergency response plans for potential cyanide releases.*

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

Los Filos has developed a General Emergency Response Plan, which considers all the elements that are part of the site, from underground and surface mine operations, operations at the ADR Plant Complex and other operations using energized machinery and/or storage of chemical solutions, leach pads and ponds, property security, firefighting scenarios, and potential evacuations due to social conflict. It also details the generalities of the classification of emergency levels, the responsibilities and those responsible for incident command and crisis management, the communication, alarm and alert systems, impact of natural disasters in the operation, and the general flow-management to follow depending of the type and level of emergency occurred.

This general emergency response plan indicates that all the elements related to cyanide emergencies (including human exposure, leakage of cyanide-containing solutions and/or excessive formation of HCN in operational areas, and environmental impacts from leakage of cyanide-containing solutions), will be addressed in a specific cyanide-related emergency response plan "Emergency Response with Sodium Cyanide" (ERP). The ERP addresses response procedures for various types of emergencies in addition to those related to poisoning and impact on human life, such as: firefighting, hazardous leaks and spills of solid or liquid products, deviations in the control of the pH of solutions, HCN generation, natural disasters impact on cyanide storage and use, and others. This document outlines the various credible event scenarios for the operation and the responsibilities, actions, and notifications required to ensure an effective and efficient response. In particular, it includes, in a comprehensive and detailed manner, all the elements with potential for operational emergencies in cyanide management within the site, including human exposure to cyanide, as well as potential releases of cyanide solutions on its various concentrations among the operation.

The ERP is complemented by other documents that provide specific actions for responding to cyanide incidents, such as the following procedures:

- a) Patient poisoned by Cyanide
- b) Contingency in area 250, pumping booster station, and raisers PADs 1 and 2
- c) Procedure for dealing with contingencies in Area 420
- d) Procedure for attacking contingency in area 800
- e) Procedure for attacking contingency in area 800b
- f) High cyanide concentration emergency [for the presence] in springs and sub-drains
- g) Solution management in pools due to excess water
- h) Natural soil neutralization
- i) Fire Emergencies Response
- j) Monitoring and analysis of springs, subdrains and ponds
- k) High cyanide concentration emergency [for the presence] in springs and sub-drains
- l) Natural soil neutralization

The auditor verified this requirement through revision of written procedures and documentation for plant operations and emergency response and complemented through discussion with personnel from H&S, Emergency Response, Environmental, and Plant Operations areas.

The ERP lists the various credible event scenarios for the site inclusive of cyanide incidents including cyanide exposures, cyanide solutions release, and HCN massive generation. The ERP and procedures provide response actions for all potential cyanide failure scenarios identified.

- a) The ERP and its complementary documents consider possible scenarios and procedures to be followed, related to a generation of HCN as a result of a failure to control the pH of cyanide solutions, a leak of cyanide-containing solutions into the plant or into the environment, or even during maintenance processes. Los Filos considers the presence of 4.7 ppm or more of HCN as the limit for determining the start of emergency protocols. Los Filos General Emergency Plan identifies catastrophic incidents in the ADR Process Plant management which includes pipeline ruptures, tank failures, and flow diagrams on how to respond. Procedures for contingency in areas 250 and 420 procedure LFIL-PO-PLPRO800-001 to identify catastrophic incidents in the ADR Process Plant management which includes pipeline ruptures, tank failures, and flow diagrams on how to respond. LFIL-PO-PLPRO250-002 cover contingencies on area 250, pads, pumping recirculation, and raiser system. LFIL-PO-PLPRO420-003 Contingencies in Area 420 covers the ADR plant.
- b) In the case of transportation accidents in the site, there is movement of high-concentration cyanide solution (30%) from Area 800 to Area 800b. This transport is performed in the same Iso tanks from Draslovka that originally carried the solid

sodium cyanide, and the same transport company, SEGUTAL. Almost all of this transport is done on routes that run along the leach pads. Transport protocols are in place (such as escorting the truck during transport and providing a kit in case of leaks or spills of solution throughout transport and until discharge is complete), and potential scenarios are covered in the ERP and its complementary documents. In the case of transport outside the mine operation, the emergency response is the responsibility of Draslovka and SEGUTAL. However, Los Filos considers the application of support protocols and the dispatch of equipment and personnel to support an emergency during the transport of cyanide outside the mine in case it is required by Draslovka or SEGUTAL.

- c) Procedures to control exposures and accidental releases during mixing and unloading from Iso tanks and storage of cyanide solution, are detailed in Procedure "Reception, download and transfer of NaCN Area 800" and its complementary Procedures and Work Instructions. Procedures to respond to cyanide spills are detailed in the Procedure for attacking contingency in area 800, as well as in the ERP.
- d) Potential or possible scenarios for fire and explosion events related to cyanide are described in the ERP, as well as general emergency response plan. There is also an emergency response plan for firefighting, Procedure "Fire Emergencies Response." These documents together consider firefighting in areas with storage of sodium cyanide solutions (e.g., fire on pumps, electrical motors, control panels) and occurring during hazardous leaks and spills of this solutions, deviations in the control of the pH of solutions, HCN generation, natural disasters and others. The preferential use of dry chemical powder extinguishers is indicated, as well as the prohibition of use of CO<sub>2</sub> extinguishers in the presence of cyanide.
- e) Potential or possible scenarios in case of a pipe, valve or tank rupture incident related to cyanide and the procedures to apply in the emergency response, are described in general in the ERP and its complementary documents
- f) Potential or possible scenarios in case of overflow of ponds and impoundment areas are described in general in the ERP and its complementary documents in specific in Procedure "Solution management in pools due to excess water"
- g) Actions to ensure that critical equipment continues to operate and ensure environmental compliance as well as preventing operational / mechanical interruptions and failures are considered in the general emergency response plan and in the ERP and its complementary documents
- h) Potential or possible scenarios in case of uncontrolled seepage are considered in the general emergency response plan and in the ERP and its complementary documents, in specific in Procedure "High cyanide concentration emergency [for the presence] in springs and sub-drains"
- i) Potential or possible scenarios in case of failure of the cyanide destruction system are considered in the ERP and its complementary documents, in specific in "Procedure for dealing with contingencies in Area 420"
- j) Los Filos has no tailing storage facilities, since they do not process the mineral by grinding and leaching in tanks, but by heap leaching. Potential or possible scenarios in case of failure in leaching pads or ponds, and other process facilities,

are considered in the ERP, and complementary documents

Los Filos's sodium cyanide supplier, Draslovka, is responsible for delivering sodium cyanide product from the production plant in Memphis, Tennessee, to the transloading facility in San Luis Potosí, and from there to the mine site. The purchase INCOTERM in DPU (Delivery at Place Unloaded). Draslovka has certified it is supplying chains in USA and México, including in those certifications the rail transport in USA and México (UP in USA, FERROMEX & KCSM in México), and the road transport in México (SEGUTAL).

Los Filos has reviewed the planning for transport and for emergency response systems developed by Draslovka and SEGUTAL, finding that they do consider transportation route (main and alternatives from San Luis Potosí state to Guerrero state, and to the mine site), physical and chemical form of the cyanide (solid, bulk in Iso tank), method of transport (road transport), the conditions of the road system in México and their safety conditions according to weather conditions throughout a calendar year, and the design and technical aspects of the transport vehicle (6x4 tractor truck, with 2-axel short semi-trailer platform designed for 20-foot maritime container and with 4 ISO twist locks).

Draslovka has provided to Los Filos electronic copies of the following documents:

- Procedimiento de Emergencias en Transporte (Transportation Emergency Procedure)
- Procedimiento de Manejo de Derrames de Cianuro (Cyanide Spill Management Procedure)
- Evaluación de Ruta: EQUINOX GOLD, Desarrollos Mineros Los Filos (Route Evaluation: EQUINOX GOLD, Desarrollos Mineros Los Filos)

The ERP and its complementary documents consider the various aspects related to potential emergencies with a cyanide leak or spill, or HCN generation. Elements were found describing and referring to:

- a) Specific actions, related to potential leak or spill scenarios, and the potential impact on people, communities, the environment, and operations
- b) First aid measures (considering decontamination and use of oxygen therapy) and use of antidotes for cyanide poisoning,
- c) Control of leaks and spills from the source (e.g., Iso tanks, tanks, pumps, or pipes), and
- d) Containment, risk assessment, impact assessment, mitigation and remediation when applicable, and future prevention of leaks or spills.

The general emergency response plan, the ERP and its complementary documents, have been developed to provide a suitable level of detail to ensure that effective response can be completed in an emergency situation related to cyanide. They cover a range of credible event scenarios and the immediate and longer-term actions required to control the event. These response procedures will help to ensure that personnel can effectively:

- Clear site and/or area personnel from areas of exposure.

- Notify and/or evacuate potentially affected communities.
- Apply cyanide first aid and use of antidotes for cyanide exposures.
- Control releases by stopping pumps or closing valves at their source.
- Initiate emergency spill containment at critical points to prevent downstream impacts.

In the case of first aid procedures, the specific document to be referred to is Procedure "Patient poisoned by Cyanide" as well as the Medical Center general and emergency procedures, such as emergency triage, vital signs monitoring, general first aids, chemical intoxication, chemical burns, respiratory support and cardiopulmonary resuscitation, stomach lavage, injectables and application of medications by infusion to the vein.

In the case of leaks and spill scenarios inside the operation, it has to be considered that that the entire hydrometallurgical plant has secondary containment systems as part of the original technical and construction design or drain directly into the leach pads. Also, pipelines with cyanide or barren solution have installed secondary containment systems (HDPE membrane) installed throughout all its lines.

The general emergency response plan, the ERP and its complementary documents describe appropriate actions to be taken in the event of a cyanide spill. These documents specifically address emergency response decontamination and evacuation, as well as medical treatment procedures for personnel who may have been exposed to cyanide, and procedures for evacuation of the mine. These documents also define ERT member responsibilities, communication procedures for notifying outside emergency response resources, government agencies, the community, other stakeholders and the media.

As part of Los Filos's continuous improvement program, event investigation records, current procedures and training are requested to be reviewed after significant events, in order to identify areas for improvement and/or corrective actions.

#### Standard of Practice 7.2

*Involve site personnel and stakeholders in the planning process.*

The operation is ☒ in full compliance with  
☐ in substantial compliance with Standard of Practice 7.2  
☐ not in compliance with

Los Filos developed the general emergency response plan, as well as the ERP, using cross-functional teams from the Process, H&S, Security, ERT, Environmental, Community Development and other areas. This helps to ensure that adequate consideration is given to the various impacted stakeholders and ensures that personnel understand and are aware of their roles in an emergency.

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

Los Filos has considered its workers within the planning of the response to cyanide emergencies. Los Filos's workforce is regularly approached by the operation with the use of several safety management and BBS (Behavior Based Safety) tools, like the "TARJETA DE 5 PUNTOS MINA OP" (5 points card – Mine Operations), daily pre-work meetings, and the H&S meetings with the contractors.

It should be considered that the ERT is made up of workers on duty within their respective areas in operations (such as from underground and open pit mine, ADR Plant complex, cyanide mix & unloading, leaching pads, hydrometallurgical circuit, mechanical maintenance, and others), as well as members dedicated full-time to emergency response (paramedics), along with staff from the Medical Center. This is important to mention, because an important percentage of the operational working personal members (at least 30%) of the ERT are part of the communities around the mine (Mezcala, Carrizalillo and Mazapa). These ERT members receive more than 80 hours of specialized training per year on emergency response and are usually considered as leaders in their communities.

External stakeholders do not have a direct involvement in the preparation of emergency response plans, procedures or work instructions since they do not have designated responsibilities in the emergency preparedness and response for Los Filos. Nevertheless, Community Development team maintains contact with community figures and shares relevant information with potentially affected peoples with regards to emergency response planning and address their comments and feedback. Los Filos conducts regular stakeholder meetings with the communities. The closest communities surrounding Los Filos are Mezcala, Carrizalillo, Mazapa, and Xochipala. Members of the communities are also able to visit Los Filos's Community Care House in Mezcala, where they have the opportunity to voice their concerns and ask questions to personnel about the operation.

Los Filos has its own on-site capabilities and resources in order to deal with all identified possible cyanide related incident scenarios. Los Filos will take full responsibility for response to a cyanide release within the facility. Los Filos has also established formalized arrangements with offsite medical facilities in Chilpancingo and CDMX, regarding the potential to treat patients that have been exposed to cyanide.

Los Filos has informed the closest community near to the mine site that is part of the transportation route (Mezcala) about cyanide, its use at the mine, emergency response and equipment that will be part of the cyanide transportation convoy. Also informed them about the nature of the risks associated with accidental cyanide releases. It also meets regularly with community members and leaders from Carrizalillo, Mazapa and Xochipala communities, in order to make them aware of the risks of cyanide, possible contingency scenarios, and the emergency response that Los Filos would perform. Topics on the meetings agendas include an introduction to Equinox Gold and Los Filos, the impact of mining on local economies, safety and environmental controls, the use of cyanide in gold mining and its potential cyanide risks, measures to prevent damage to

flora and fauna, past incidents (if occurred during the last 12 months before the meeting) and control measures.

Through the use of Community Care House in Mezcala and the Community Development area personnel, Los Filos is able to ensure communication flow with relevant stakeholders prior to and/or in the event of an emergency situation.

Los Filos has not designated specific responsibilities to off-site responders or communities for emergency response, with the exception of the hospital agreements for follow-up treatment for patients that have been exposed to cyanide (Chilpancingo and CDMX).

In terms of external support, Los Filos has considered three sources of external potential support:

- Support from medical centers in Chilpancingo and CDMX
- Support from helicopter transport association, and
- Notification and mobilization of people in case of level 3 emergencies or declared crisis (Firefighters, Police and Army)

Neither of these three sources of support in case of emergencies are considered as first response, due to

- The distance and time it would take to have external resources in the operation (two hours from Chilpancingo or Iguala as minimum), and
- The high level of preventive preparation and emergency containment and response elements that Los Filos has, both for chemical emergencies due to leaks or spills, and worker poisoning.

Los Filos would maintain responsibility for emergency response activities within the communities in the case of incidents related to cyanide. Local agencies (e.g., Firefighters and Police) have a statutory responsibility to assist with notification and mobilization of people under direction from Los Filos. Local medical, fire and police services have participated in training related to cyanide, as well as the Universidad Autónoma de Guerrero (Autonomous University of Guerrero) and the Secretaría de Gestión Integral de Riesgos y Protección Civil del Estado de Guerrero (Secretariat of Integrated Risk Management and Civil Protection of the State of Guerrero). There are considered as "local" the entities located in Mezcala, Iguala, and Chilpancingo (no national authorities or representatives in Mazapa, Carrizalillo or Xochipala).

In case required, for major incidents, related or not with cyanide, Los Filos can require intervention of the following external agencies and institutions:

- Secretaría de Gestión Integral de Riesgos y Protección Civil del Estado de Guerrero (Secretariat of Integrated Risk Management and Civil Protection of the State of Guerrero)



- Municipal Civil Protection
- Red Cross
- Cuerpo de Bomberos Chilpancingo (Firefighters Chilpancingo)
- Fuerza de Bomberos de Iguala (Firefighters Iguala)
- State Police
- Municipal Police
- Mexican Army
- SETIQ - Sistema de Emergencia en Transporte para la Industria Química (Emergency Transport System for the Chemical Industry - ), part of ANIQ – La Asociación Nacional de la Industria Química (The National Association of the Chemical Industry - <https://aniq.org.mx/webpublico/>) [Note: Draslovka and SEGUTAL are affiliated to SETIQ]

Also, Los Filos maintains a Mutual Support Agreement with the following mining companies in the state of Guerrero:

- Minera Tizapa, S.A. de C.V.
- Minera el Porvenir de Zacualpan, S.A. de C.V.
- La Guitarra Compañía Minera, S.A. de C.V.
- Minera Media Luna, S.A. de C.V.
- Minera Capela, S.A. de C.V.

Los Filos has not designated specific responsibilities to off-site responders or surrounding communities on emergency response. with the exception of the hospital agreements for treating patients that have been exposed to cyanide (Chilpancingo and CDMX).

The local communities of Mezcala, Mazapa and Carrizalillo are made aware of the emergency response plans from Los Filos, via the emergency responders who live in these locations.

Los Filos maintains a social engagement program (described in Principle 9 section) that allow communication and feedback between communities, stakeholders, and the mine. These include topics as the transportation and use of cyanide and provides also general emergency response written information. Los Filos has participated in consultations with stakeholders through meetings with community leaders in Mezcala, Mazapa, Carrizalillo and Xochipala during the recertification audit period, including among the topics of dialogue the use of cyanide in mines and preparation for emergency response.

Local community leaders and impacted persons will be briefed by the Community Development area and/or other relevant personnel of emergency response plans and requirements including updates if and when changes to our facilities dictate a change in our emergency response plans.

The main stakeholders that Los Filos considers for cyanide management are its own workers. In this sense, the dialogue and consultation processes are regular and constant, taking their opinion not only in terms of occupational safety and health, but also in preparation for emergency response, especially with cyanide.

### Standard of Practice 7.3

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

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

Los Filos general emergency response plan, the ERP, and the complementary documents for emergency response, contain or refer the following emergency response related elements:

- a) Los Filos has designated the paramedics as emergency response coordinators. From the 6 paramedics on payroll, two of them have been designated as Emergency Response Team (ERT) leaders, as Incident Commanders. It has been designated alternative ERT leaders among the other paramedics. Also, ERT group leaders have been designated, both by plant areas and by work shifts. Besides the emergency response coordinator and paramedics, all the members of the ERT are volunteers, with a 24/7 site coverage.

A Security Control Center (SCC) is in place to receive calls 24/7 from all the mine site and external areas, via mobile phone calls, land line phone calls, internal extension number phone calls, and radio communication. The SCC is part of the Security area. One of the SCC main tasks is to call the Medical Center / ERT emergency response coordinator office via phone, radio or other means in case of a declared emergency. It should be considered that not only any member of the ERT, but also any person in the operation, can request the activation of the emergency response, considering their right to safe work and access to communication media within the operation. No emergency alert is anonymous, the origin of said alert should always be considered in the report and in the incident investigation, be it a person or an automated alert element.

The SCC, ERT leaders and/or Operation Area Supervisors have been designated the appropriate authorities to commit required resources for first response and take command of emergency situations, including the ones related to cyanide, and also the handover to more senior or better trained personnel as required. They can use all the equipment, materials, consumables, and personnel considered in the general emergency response plan as dedicated for emergency response, including summoning the brigade members from their respective workplaces. If an emergency escalates and requires operational resources besides the ones

destinated for emergency response, the Incident Commander must require those resources to the Crisis Committee.

- b) The general emergency response plan and the ERP lists the members of the ERT, including their contact details. The ERT is made up of 6 paramedics, 35 workers for plant and surface operations, and 20 workers for underground operations, distributed in 3 working shift rotations and two turns per day, with at least 10 emergency responders on site in any moment. The ERT is formed by the following persons:

- Paramedics: have the position of emergency response coordinator, and one of them will assume the role of Incident Commander in case of emergency.
- ERT area leaders per shift. There is a designated leader and an alternate leader on every shift, beneath the ERT members.
- ERT members per shift. Beneath these members, there is at least two persons per shift designated and trained as ambulance driver (besides the paramedics and nurses), in order to support the Medical Center or ERT with the ambulance if they need to transport injured people outside the mine site.
- Medical Center staff.
- In case of emergency, the ERT will deploy an Incident Command System on the site, in a close / safe area near the location of the incident, In the event that the emergency must escalate, the activation of a Crisis Committee is considered. This Crisis Committee is made up of directors, manager and superintendents within the operation.
- These work teams will include, according to the level of the emergency, the following people:
- H&S staff members on duty, including supervisors, superintendent, and manager.
- Security area staff members on duty, including Control Center, supervisors, superintendent, and manager.
- Operation staff members on duty, including supervisors, superintendent, and manager.
- Mechanics, electrician, vehicle drivers and heavy machinery operators on duty.
- Environmental area staff members on duty, including supervisors, superintendent, and manager.
- Community Development area staff members on duty, including supervisors, superintendent, and manager.
- Other staff members from the mine areas (legal, commercial, public affairs, planning, general management).

- c) Los Filos Training Program details the plan of trainings to be held along the year by the ERT members. These training requirements are recorded in a yearly block training, and include but are not limited to:
- Emergency Call-Out procedures

- Use of Self-Contained Breathing Apparatus (SCBA) and advanced respiratory protection
- Industrial firefighting
- HAZMAT response, including:
  - Chemical intoxication and chemical burns treatment
  - Emergency response for chemical spills
  - Use of mono-gas and multi-gas monitors
  - Use of encapsulated chemical protection suits and advanced chemical protection
- Specific risks of cyanide exposure, according to working tasks and areas, including:
  - Emergencies due to HCN generation outside the operating parameters
  - Response to emergencies due to contact or cyanide poisoning (first response for all workers in warehouses and in the operations plant, advanced level for medical center personnel)
  - Emergency response due to cyanide spills or leaks (including decontamination, technical cleanup and environmental remediation)
- Rope rescue
- Rescue at heights
- Vehicle extrication and rescue
- Underground mine rescue
- First aids

These trainings and exercises are conducted by the paramedics' staff members that are trained and certified industrial firefighters, that have also the current registry as Agente Capacitador Externo (External Training Agent) by the Secretaría del Trabajo y Previsión Social (Ministry of Labor and Social Security - <https://www.gob.mx/stps/acciones-y-programas/agentes-capacitadores-externos>).

The ERT members receive an average of 8 hours of training per month during all year, but some trainings will take two or three days in a row, as HAZMAT Technicians or Underground Mine Rescue. All the ERT members receive the majority of training during the year (80 hours of training per year on average per person), considering that all of them can be part of a task force in case of need, on any area of the mine site (underground or surface).

- d) The general emergency response plan and the ERP, consider, indicate and detail the means of communication available 24/7 with the SCC in case of emergency, as well as the communication protocol for (1) receiving an emergency call/communication, (2) notify the ERT emergency response coordinator on duty, (3) notify the ERT members, and (4) notify the Medical Center. Also, if the emergency must be escalated, either the Incident Commander directly or with the support of the SCC can request the activation of the Crisis Committee.

- e) The Los Filos general emergency response plan, ERP and complementary documents, details the responsibilities, regular activities and tasks in case of emergency, of Incident Commander, leaders and members of the ERT, Medical Center staff, SCC, field / plant operators, and management staff that can be involved in an emergency response process, including the members, responsibilities / accountabilities and tasks to be performed by the ERT.
- As general guidelines, three main lines of action are considered: (1) communication and coordination by the SCC, (2) decontamination and transfer of injured people, and response to chemical emergencies by the ERT, and (3) response to medical emergencies by the Medical Center.
- f) The Los Filos general emergency response plan, ERP and complementary documents, detail the emergency response material resources available for the ERT to respond to emergencies inside the operation, and specifically for chemical emergencies and cyanide-related emergencies. Among the materials and equipment listed are:
- SCBA equipment, spare bottles, and type-D air compressor (Dräger, 4500 psi, 60 minutes)
  - Full face masks, cartridges and filters
  - High chemical-resistant encapsulated and semi-encapsulated suits (for training and for real use)
  - Disposable chemical-splash resistant semi-encapsulated suits
  - High chemical-resistant gloves
  - High chemical-resistant boots
  - Chemical sealing tapes
  - ATEX radios and mobile phones
  - Gas monitors (single-gas and multi-gas) with HCN sensor
  - Forced ventilation / forced air extraction equipment
  - Portable lighting systems
  - Plastic and non-sparking work tools (shovels, crowbars, mallets, brooms, dustpans, rakes)
  - Power tools
  - Portable decontamination system
  - Absorbent cloths for hydrocarbons and for corrosive chemicals
  - Different kits for plugging leaks in tanks and pipes
  - Portable dry chemical powder extinguishers (5kg, 12kg, 50kg)
  - Stretchers, head immobilizers, spinal immobilizers, neck immobilizers, first aid kits
  - Lockout / Tagout Implements
  - Bags, buckets, and containers for contaminated waste
  - Implements for Incident Command Post
  - Rope rescue equipment
  - Rescue at height and controlled-speed descender equipment
  - Rescue on water bodies equipment (including a motorboat and buoys)

- g) The Los Filos general emergency response plan, ERP and complementary documents, detail the emergency material resources available to respond to emergencies inside the operation. These lists are also detailed in specific checklists, which are formulated by type of emergency response discipline, like Firefighting or HAZMAT emergencies. For the cyanide related emergencies, each plant area (250, 420, 800), Area 800b and pumping booster station have their specific checklists, vinculated to their specific areas, tasks, and potential cyanide-related emergencies. These checklists refer to the ERP, which is the document that details quantities, condition (new / used), date of entry into operation, required maintenance/calibration/testing date, and usage record, referred to the nature and characteristics of the equipment or material to be used in a cyanide related emergency.

All inspections, maintenance, calibration, testing, recharging and/or replacement of spare parts, as well as withdrawal of use due to expiration of the useful life or warranty of operation, are carried out in accordance with the respective manufacturer's manuals of each equipment.

Inspections to the emergency response equipment are performed on a monthly basis, or after its use either on a real emergency or in a mock drill, to ensure that they are maintained in working conditions. The high chemical-resistant encapsulated and semi-encapsulated suits are the only equipment that have two different sets (one for use during trainings, and one for use only on real emergency situations) on manufacturer's recommendation.

- h) The general emergency response plan, the ERT, and Procedure "Patient poisoned by Cyanide," detail the role of external responders or external resources to be considered in the case of an emergency response, as hospitals, helicopter transport, firefighters, police and army. These documents also contain tables listing external resources, the type of assistance they can provide each one of them, and their travel time to Los Filos site. These resources are not considered for a first response, but to be activated on a case-by-case basis, depending on the type and level of the emergency.

Los Filos does not consider external resources as part of a first response on case of emergencies on the site, specifically for the ones related to cyanide. However, the site has established formalized arrangements with off-site medical facilities in Chilpancingo and CDMX, as well as with an emergency helicopter transport association. Los Filos has adequate staff, equipment, and expertise to respond effectively to emergencies related with cyanide.

External entities have not participated in mock drills or implementation exercises because neither the general emergency response plan, the ERP and associated procedures assigned them a role on the site for emergency response.

## Standard of Practice 7.4

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

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

The general emergency response plan includes the information for communicating with communities and media during potential or actual emergencies with major impact on human lives or environment, including the ones related to cyanide.

The general emergency response plan includes:

- Company key emergency contact list
  - Managers, superintendents, area heads, and supervisors
  - Paramedics and ERT members
- Key external emergency contact list
  - Medical centers
  - Police units
  - Military units
  - Firefighting units
  - Mining companies with mutual aid agreements
  - Prosecutor's Office
  - Mexican State Agencies
  - Cyanide supplier (i.e., Draslovka, México Office)
  - Cyanide transporter (i.e., SEGUTAL)
  - SETIQ
  - Local media key contacts
- Emergency level identification and required response flowcharts
- Emergency communications flowchart (internal and external)

This document also includes contact information for community leaders in Mezcala, Mazapa, Carrizalillo, and Xochipala.

The ERP includes 3 additional specific contacts for cyanide related emergencies:

- PROFEPA: Procuraduría Federal de Protección al Ambiente (Federal Attorney for Environmental Protection – [www.gob.mx/profepa](http://www.gob.mx/profepa))
- CONAGUA: Comisión Nacional del Agua (National Water Commission – [www.gob.mx/conagua](http://www.gob.mx/conagua))
- ICMI: International Cyanide Management Institute (<https://cyanidecode.org/notifications-to-icmi/>).



In the case of communities, the Community Development area will be in charge of coordinating the notification to them, as well as coordinate the main response and protection actions that will be required to perform, depending on the arose emergency situation. The Community Development area also maintains a listing of key community leaders and potentially affected people in the nearby communities.

In the case of media, the general emergency response plan details the roles for a Crisis Committee, in which is considered the role of “Press Communications Officer” (designated and alternate). The person in this role will be the official spokesperson in case of an unwanted event with cyanide. He works in coordination with the “Legal Area Officer” of the Crisis Committee.

The ERP includes a requirement and details to notify the ICMI of any significant cyanide incidents, as detailed on the ICMI’s website and defined in its *Definitions and Acronyms* document ([LINK](#)). It indicates that the notification will be done through the Notifications page in the ICMI’s website (<https://cyanidecode.org/notifications-to-icmi/>). No incidents have occurred during the certification period, which is the subject of this audit.

#### Standard of Practice 7.5

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

The operation is ☒ in full compliance with  
☐ in substantial compliance with Standard of Practice 7.5  
☐ not in compliance with

The ERP and related documents provide detailed information on cyanide event remediation activities including control and containment of any spilled/released material:

- a) Los Filos only receives and stores cyanide solutions, not solid cyanide in any form or packaging. The ERP and related documents specify the actions to follow in case of solutions spill (i.e., cyanide solutions, pregnant solution, barren solution). The preferred order of actions to be taken is:
- Pumping / transferring spilled solution contained in the plant area (i.e., ADR plant complex, Area 250, 420, and 800) into the recirculating pond (including industrial water used to rinse the spill area and secondary containment)
  - Allow the solution runoff to flow into the leach pad (i.e., Area 800b), integrate into the process and the excess solution be captured in the corresponding leaching pond
  - Absorb spilled solution with absorbent materials (i.e., absorbent mat pads for corrosive chemicals)

- Scrape/excavate the soil in the spill area, and add the material to one of the leaching piles, and
- Decontaminate the spill area

The only identified scenario in which a cyanide solution spill could occur on asphalt or concrete outside a containment area would be a spill of cyanide solution being transported from Area 800 to Area 800b. A spill occurring in the ADR process complex's maneuvering yard or on a paved portion of the road must be absorbed, and the floor subsequently decontaminated.

In the event of a spill on a portion of the transit route that is compacted natural soil outside the leach pads, it is preferable to collect the contaminated soil after absorbing or physically recovering as much of the solution as possible, and then move the contaminated soil recovered to one of the leach pads, as indicated in Procedure "Natural soil neutralization". No traces of cyanide are allowed to remain on natural soil after a spill.

- b) For decontamination of soils and other contaminated materials that may require detoxification (i.e., when it is not feasible to collect contaminated or impacted soils, and there is no risk of contact with open waters, such as asphalt or concrete), it will be used a 50% hydrogen peroxide solution. It will only be used in extreme situations, and only under the direction of the Process Superintendent or above, and if the spillage and reagent material are prevented from entering a run-off ditch or watercourse that flows outside any of the operation ponds. The 50% hydrogen peroxide solution is stored with compatible chemical reactivities in the ADR plant, having not least of 10 gallons in stock available for emergency response, in any given moment.
- c) The preferred absorbent material to be used in order to contain spills is absorbent mat pads for corrosive chemicals. It can be supplemented with dry clay soil or dry sand. The dry clay soil or dry sand contaminated with cyanide, would be incorporated into one of the leach pads. All the other contaminated disposable materials used, or the debris generated or contaminated during the clean-up process of a cyanide solution spill, will have to be collected, packaged and disposed as hazardous waste; or be decontaminated with 50% hydrogen peroxide solution, rinse with industrial water, and then disposed as regular waste. The decontamination solutions (including the one used for the decontaminations and clean-up of tools and equipment used on the emergency response) will be recovered and sent into the recirculating pond.
- d) Regarding provision for alternative drinking water sources for communities, the ERP clearly identifies Mazapa as the community that may be potentially affected in terms of water for domestic consumption and for its agricultural activities. The ERP also clearly indicates the water supply calculation table that must be provided to the community, both in tanker trucks and bottled water for human consumption, considering the number of households and the number of people in the entire community. This procedure has been discussed with community leaders.

The ERP and the specific documents for contingencies in Areas 250, 420 and 800, describe not only the requirements and precautions for cyanide spill cleanup, but also clearly states the prohibition of chemicals in solid or in solution (e.g., 50% hydrogen peroxide solution) in areas where it could percolate into the soil and reach groundwater (which can subsequently emerge in springs downhill from the mine), or reach any natural surface water body.

The ERP and the specific documents for contingencies in Areas 250, 420 and 800 require monitoring of spilled solutions, contaminated soils, and sampling of downstream water bodies. Process personnel obtain initial spilled solution samples, while environmental area personnel have responsibility for obtain contaminated soil samples, as well as downstream and surface water sampling.

The ERP also has a clear reference of the referential parameters for total CN, free CN and WAD CN, and to the analysis methodologies to be applied (NMX-AA-058-SCFI-2001 [[https://www.dof.gob.mx/nota\\_detalle\\_popup.php?codigo=762126](https://www.dof.gob.mx/nota_detalle_popup.php?codigo=762126)] for total CN, and SM-4500-CN-I [similar to [https://www.nemi.gov/methods/method\\_summary/9736/](https://www.nemi.gov/methods/method_summary/9736/)] for free and WAD CN.

Procedure “High cyanide concentration emergency in springs and sub-drains” specific document from the Environmental Area which address emergencies and monitoring in springs, sub-drains and ponds, complements the ERP.

#### Standard of Practice 7.6

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

The operation is ☒ in full compliance with  
☐ in substantial compliance with Standard of Practice 7.6  
☐ not in compliance with

The Los Filos general emergency response plan, ERP, procedure for human exposure to cyanide “Patient poisoned by Cyanide” and related emergency response documents are reviewed at least annually, or before in the following cases:

- Due to changes in mine facilities or activities.
- Due to changes in national legislation or regulations.
- Due to changes in the people or positions referenced in the emergency response plans.
- Due to changes in the contact information of the people or external institutions referenced in the emergency response plans.
- Due to changes in Equinox Gold's corporate policies, guidelines, standards, or procedures.

- Due to changes in voluntary standards to which Los Filos or Equinox Gold adhere (e.g., the Cyanide Code).
- Due to significant technological or certification changes in equipment and materials used in emergency response (e.g., the use of antidotes with lower unintended health impacts, or updates to the practice of using self-contained breathing apparatus (SCBA) established by NFPA 1981).
- Due to changes in emergency response regulations and best practices that apply to training (e.g., changes in CPR practices established by the AHA [American Heart Association]).
- As a result of lessons learned from drills or incident investigations, gaps in procedures, materials, or training are identified.
- Based on requests or recommendations from workers, supervisors, and managers, as well as third parties (e.g., transporters [such as SEGUTAL], equipment suppliers [e.g., Dräger] and materials suppliers [e.g., Draslovka]), social stakeholders (e.g., local communities), or relevant national or international case studies.

Each document has a signature block and version history log at the beginning of each one. The paragraph referring to the review and updating of emergency response documents indicates that Los Filos must always seek input from relevant areas of operations, especially those where workers have the potential to come into contact with cyanide.

The documents reviewed as part of this audit have been prepared or updated (as indicated in each of them) between January 2024 and November 2024.

Los Filos conducts mock emergency drills no less than twice a year to test the emergency preparedness and response of all the areas in the ADR Plant complex, open pit and underground mines, leaching pads and ponds, pumping booster station, agglomerator and other relevant. The idea is to evaluate the level of preparation and rapidness of response of the SCC, ERT, Medical Center, H&S area, Environmental area, Security area, Community Development area, and other relevant areas & personnel. Mock drills are developed to include a variety of locations and scenarios, including cyanide solution release and cyanide intoxication due workers exposure. In the case of cyanide emergency response, the drills testes the entire cyanide emergency process, from the initial emergency callout notifications to the close-out of the response process.

Drill scenarios are developed in advance and risk assessed to minimize potential impact of event unpreparedness. Video and photos of mock drill response are taken for documentation and training purposes, and an executive report is issued by the leader of the ERT. At the completion of emergency response mock drills and/or actual events, debrief sessions are held to review and identify the actual vs. expected outcomes of the emergency response, in order to identify opportunities for improvement and changes to training and awareness programs. When deficiencies are identified in the response,

Mina Los Filos



Bruno Pizzorni - Lead Auditor

July 17, 2025

corrective actions are assigned to relevant personnel and areas, which may include modifications to training and/or awareness programs to ensure that gaps are addressed.

The auditor reviewed the drills' reports and supporting documentation to verify the proposed practice scenarios and expected results, the actual conduct of the drill, and the actual results obtained. Records of the briefings and coordination sessions prior to the drills were also reviewed to verify that the proposed scenarios and expected results were relevant to Los Filos' cyanide operations, and the training received by operations personnel and the ERT; and therefore, provide a reliable basis for the proper development of emergency response actions in real-life scenarios.

Cyanide emergency response mock drills are scheduled no less than twice a year, into the yearly plan for mock drills for all the operational areas in Los Filos, in order to test the emergency preparedness and response level of all the areas. Various types of responses are tested for cyanide, including both cyanide spillages, and workers contamination and intoxication scenarios. During the recertification period, at least two cyanide drills were conducted annually. The last mock drill in Los Filos involving a cyanide release and cyanide intoxication scenario was executed on July 2024.

The general emergency response plan, the ERP, and all the documents related to emergency response with cyanide from Los Filos, have a clear indication of the frequency of scheduled reviews (at least one per year), and the changes, situations or occurrences that require a review and update of said documents.

As part of the improvement opportunities identified in the drill carried out in July 2024, the following were considered: highlighting the speed and promptness in executing an evacuation by plant workers, improving the volume and amplitude of the audible alarms to warn of a required evacuation, reinforcing the topics of incident command and organization of control zones in the brigade members, and including external entities in future training at their request (Civil Protection and local universities). No changes were required on the written documents for emergency response management.

## Principle 8 | TRAINING

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

### Standard of Practice 8.1

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

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

Los Filos has a Training and Human Development (T&HD) area, responsible for development, coordination, and execution of training programs, presented either by company personnel or external third parties.

México lists into its legal system a set of regulations related to safety and health for working, as well as one specific for mining activities. These regulations are required to be considered into training plans, depending on the tasks that the person will perform in the mine site.

Every person who enters Los Filos, whether as an employee (permanent or temporary, own or third party), transporter, or visitor, must necessarily receive an induction regarding the operation and the general and specific risks within it. It can be a visitor induction training, general site induction training, job induction training (e.g., open pit mine, underground mine, surface operations), task-specific training (e.g., Area 250, Area 420, Area 800), or emergency response training modules related to cyanide. The level of detail and depth of these training courses depends on the type of task the person will perform, and the work areas in the mine to which they will have access.

Los Filos has the Procedure "Attracting Talent," in which is detailed the general site induction training, and is indicated that the new worker will have to take job induction training and task-specific training, depending on the area for which they are being hired, and the tasks that will perform.

All personnel and visitors to the site attend at least a visitor induction training (for visitors) or general site induction training (for workers in any area), in which it is presented the general cyanide hazards on the site operations. With the exception of the job induction training for open pit mine or underground mine, all the other trainings include one or more modules related to cyanide, whether for workplace hazard identification, safety labeling and signage, use of HCN gas detectors, safety and evacuation alerts and alarms, use of emergency showers and eye-washers, area

evacuation, first aid for cyanide poisoning, first response in the event of cyanide solution leaks or spills.

For personnel and visitors requiring infrequent ADR plant complex, agglomerator, pads or ponds access, escorts are used to ensure their safety whilst inside these facilities or areas. In the case of regular workers, cyanide-related topics are also discussed as an update during each 5-minute meeting / toolbox meeting, at the start of each work shift in areas where cyanide is present.

Los Filos has developed training matrixes, which identify mandatory trainings and frequencies for refresher training, for all employees in the operation.

Los Filos requires all employees to have refresher training in basic cyanide awareness every year. This module is similar to the one presented during the general site induction training and takes 1 hour of the total yearly refresher training. Also, workers that perform tasks related to cyanide use in the operation have to take an advanced cyanide awareness and emergency response refresher training. This module takes an additional 2 hours and includes a more detailed explanation of the risks on working with cyanide, intoxication symptoms, first aid and emergency response scenarios. Additionally, workers that will perform specific tasks in specific areas related to cyanide (e.g., Area 800, Area 420, Area 250), have to take a specific refreshment training focused on the risk analysis and safety controls during the performance of their regular (e.g., cyanide dissolving, cyanide solution pumping) and non-regular tasks (e.g., pumps maintenance, confined spaces works in cyanide tanks), recognizing the presence and potential exposure to cyanide. Members of the ERT take additional 24 hours of training during the ERT Yearly Training Plan on emergency response with hazardous materials, from which at least 8 are related with cyanide emergencies.

In addition to formal refresher training, toolbox talks and Health & Safety meetings are held to discuss critical safety and environmental aspects including cyanide and cyanide related operations (regular and non-regular), incidents and events.

The Training and Human Development (T&HD) area is responsible of maintaining training records for all personnel on site, either as a digital database and on physical document files. Records to be kept include:

- Trainee name.
- Trainer name.
- Training type/course.
- Date of completion.
- Test Scores (Pass/Fail).

The T&HD area also keeps both physical and digital files for each employee, and specifically for plant operators and staff that will be in direct or indirect contact with cyanide.



The auditor reviewed training records from plant operators interviewed during the plant field visit and the task observation performed during a cyanide mixing, unloading and storage process. The records effectively identify the trainee, the trainer, topics covered, date and sign off sheet, and test scores in the trainings that included a final written evaluation. These written records were supplemented with photographs, and in some cases, with video recording. This requirement was verified through review of a sample of records covering the recertification period (January 2022 to December 2024). It is important to mention that the T&HD area keeps training records of workers from 2015 and older, because of both staff turnover and the preference for hiring workers from areas of influence close to the mine, many workers tend to return to work at Los Filos. Records include registries during Goldcorp, Leagold and Equinox Gold administration of the mine site.

### Standard of Practice 8.2

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

✓ in full compliance with

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

All personnel that work in the ADR process complex, agglomerator, pumping booster plant, Area 800b, lixiviation pads and ponds (including maintenance operations), undergo training prior to being allowed to work in those operations. Additional to the general site induction training, they receive a job induction training related to surface operations, and a task-specific training related to the specifics on the work area they are assigned.

The main objective of these trainings is to ensure that all operators understand and are able to operate the various areas of the plant in a safe and environmentally responsible manner. There is a strong focus on cyanide safety, considering the workers protection as first priority on risk management and controls applications. Formal training in task specifics is given in to the workers, among others, in order to show in the field how to perform proper operations, conducting them in a safe manner in order to avoid any cyanide exposure.

T&HD area keeps an excel matrix with work instructions and procedures training program, which covers job specific training. Each area has a specific section in the excel report, like for example:

- Area 250: 11 procedures directly (e.g., Sodium cyanide solution pumping and neutralization) or indirectly (e.g., Procedure for working in confined spaces) related to cyanide; and 16 work instructions directly (e.g., Adjusting sodium

- cyanide concentration) or indirectly (e.g., pH measurement of ADR plant solutions) related to cyanide.
- Area 420: 15 procedures directly (e.g., Sodium cyanide solution distribution) or indirectly (e.g., Review of facilities and equipment) related to cyanide; and 21 work instructions directly (e.g., Adjusting sodium cyanide concentration) or indirectly (e.g., pH Sodium hydroxide titration) related to cyanide.
  - Area 800: 10 procedures directly (e.g., Reception, download and transfer of NaCN Area 800) or indirectly (e.g., Procedure for making operational changes) related to cyanide; and 14 work instructions directly (e.g., Sodium cyanide dissolution) or indirectly (e.g., pH adjustment in cyanide solution) related to cyanide.

Task-specific training that involves work procedures and work instructions are performed once a year. In general, task-specific training does not apply to contractors because they are not responsible for operating the cyanide facilities; with the exception of procedures and work instructions for cyanide mixing and unloading, which is performed by operators of SEGUTAL under supervision of Los Filos.

The auditor Review training records from 2022 to 2024 related to training, specifically on training related to cyanide procedures:

- For Area 250: Contingency in area 250, pumping booster station, and raisers PADs 1 and 2
- For Area 420: Changes in cyanide concentrations
- For Area 800: Reception, download and transfer of NaCN Area 800

The T&HD area, in collaboration with functional area supervisors, has developed a series of task-specific training programs designed to build awareness and competency for various plant activities and programs. Each training program outlines the objectives and expected competency testing requirements for that specific program. Each training program details the training modules, based on the objectives and specific tasks that the worker must achieve. Also, each training program includes a detailed plan, with a monthly schedule of the modules to be developed, based on the number of workers in each area of the mine. This plan aims to distribute training dates throughout the year, to accommodate the entire workforce (new or existing), and to ensure orderly integration into the mine's production process schedules.

Training elements for each specific task are identified in each training program and distributed along the training modules. The procedures and work instructions are considered as the base for the training material elaboration. The modules of each training program follow a logic order. The procedures and work instructions include the step-by-step process to perform each task. The training material developed for each module include the objective of the procedure or procedures it is related to, photos of the task/activity to be conducted, required PPE, decontamination requirements, risks associated with the cyanide task, first response actions and emergency response

scalation in case of intoxication or cyanide spill, and the individual task specific steps. One module that is shared along all training programs for surface operations is safety and emergency response with cyanide.

The T&HD area is also responsible for providing the necessary training materials and resources for each program, such as training rooms suitable for the number of scheduled participants, instructor scheduling, instructor support equipment (multimedia projector, audio system, whiteboard, etc.), printed materials for participants, attendance records, evaluations, and satisfaction surveys. It is also responsible for coordinating the provision of some work equipment and PPE for demonstration purposes, as well as access to specific work areas for field reconnaissance and specific identification of the task execution area. If the training takes place over a full workday, they also coordinate the provision of food and beverages for participants' coffee breaks and lunch.

The auditor verified this requirement through review of training programs and matrixes, training plans, training modules, training materials, training records, interview to plant operators, and discussion with personnel from H&S, Emergency Response, T&HD, Environmental, and Plant Operations areas

The T&HD area coordinates the provision of training and competency testing to process area personnel. To qualify as a trainer, the individual must present the following:

- Professional qualifications relevant to the subject to be taught (e.g., chemical, metallurgical, electronic, electrical, mechanical, or environmental engineer, physician, nurse, paramedic or healthcare professional, professional firefighter)
- Professional experience in the subject to be taught (usually no less than 5 years)

In the case of emergency response trainers, the paramedics that are also professional firefighters have to fulfill a registry as "Agente Capacitador Externo" (External Training Agent) in the Ministry of Labor and Social Welfare, from the Government of México ([www.gob.mx/stps/acciones-y-programas/agentes-capacitadores-externos](http://www.gob.mx/stps/acciones-y-programas/agentes-capacitadores-externos)).

More than 95% of the training modules developed at Los Filos are taught by mine employees. The general cyanide exposure risk modules, as well as those related to emergency response, are developed by medical center staff or by the ERT's lead paramedics. The operational modules are taught by the supervisors or heads of the various processing plant areas.

Los Filos uses support from Draslovka to provide training to the site trainers (medical and emergency response) on cyanide management topics ("Train the Trainer"). They have also hired from time-to-time external trainers for specific topics, such as pump maintenance or weld inspection. Any external trainer is also required to present a professional qualification, have proven experience in the subject matter, and, if possible, be registered as an External Training Agent.

All Los Filos employees, contractors, and visitors receive cyanide hazard recognition training prior to entering and working on the site. The training will be relevant to the time spent at the mine and the tasks to be performed. This training may include visitor induction training, general site training, job induction training, or task-specific training. The latter includes Emergency Response Team (ERT) training on cyanide-related medical and environmental emergencies.

All workers who will perform tasks at the operation, especially those related to cyanide, will receive a period of field supervision by their area supervisor and/or more senior and experienced workers until they demonstrate both competency in the assigned tasks and an understanding of the risks inherent to the work and the presence and potential exposure to cyanide. This supervision complements the training received, both in the classroom and in the field, and is part of the worker's performance evaluation.

All Los Filos employees and contractors will have a refresher training, which will include the topics referred to cyanide awareness (as solutions and as HCN), hazards and risks, and for the performance of specific cyanide-related tasks. Cyanide awareness refresher training is delivered by the T&HD area no less than annually.

Los Filos training programs indicate that refresher trainings on cyanide awareness should be taken every year. T&HD area prepares a training plan with a monthly schedule of the modules to be developed and keeps track of employees and contractors which training will be overdue by the end of every month of the year. This information is then distributed to operation's area heads, so they can program their personnel for the mandatory refresher training or ask for specific dates available for training for their worker's staff.

Training programs include two types of assessments in their modules: theoretical and practical. To evaluate the effectiveness of cyanide-specific training, tests are typically conducted after an in-person training session, while the participant's supervisor conducts planned task observations, both during on-the-job training sessions and during subsequent field operations monitoring. Training programs include an assessment component to ensure that personnel understand the training received. Testing can be conducted through a written exam or a practical assessment, both conducted by qualified instructors. The results of these evaluations are kept on record in each worker's file. For classroom training, written tests are developed, and suitable pass rates are established for personnel taking the exam. Test scores are then recorded in employee's training records with a "Pass/Fail" designation. Determination of competency is based on test score and observations by the correspondent operations' area trainer.

Task observations are also carried out regularly and recorded in the "5 points card – Mine Operations". Feedback from these observations is provided to each employee to correct and/or improve work/task behaviors and performance. These observations help on identify deficiencies in task procedures performed by workers, so that these deficiencies can be corrected either on the spot or via additional task training.

Training records, testing results, and tasks observation records were reviewed for the audit recertification period, and were found to be consistent and complete.

The T&HD area is responsible of maintaining training records for all personnel on site. Training records are retained not only as group records, but as individual employee files. Records to be kept include:

- Trainee name
- Trainer name
- Training type/course.
- Date of completion
- Test Scores (Pass/Fail)
- Notes of the trainer on field test / task observations

The T&HD area keeps both physical and digital files for each employee, and specifically for plant operators and staff that will be in direct or indirect contact with cyanide. Employee training records are entered into the training matrix records and kept even after termination of employment by the worker. T&HD area keeps training records of workers from 2015 and older, because of both staff turnover and the preference for hiring workers from areas of influence close to the mine, many workers tend to return to work at Los Filos.

These training matrixes help on the follow up of training progression, and planning of refresher trainings and exercises.

Samples of training records (including training evaluations) were available for the audit period, were reviewed and were found to be consistent and complete.

### Standard of Practice 8.3

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

The operation is ☒ in full compliance with Standard of Practice 8.3  
☐ in substantial compliance with  
☐ not in compliance with

Every employee and contractor at Los Filos receive cyanide awareness and basic emergency response training, aside from their roles and responsibilities on the operation. The ADR plant operators receive a more extensive training based on the alert process and initiate emergency response actions, the emergency response to cyanide exposure, and cyanide solution release.

Plant operators from the ADR plant complex that participate in job induction or task-specific trainings receive information, instructions, and on-hand practice for actions to be taken in case of cyanide exposure or cyanide release. Every person that works on areas that have presence of cyanide, receive training on cyanide-related emergencies, following documented procedures as:

- Contingency in area 250, pumping booster station, and raisers PADs 1 and 2
- Procedure for dealing with contingencies in Area 420
- Procedure for attacking contingency in area 800
- High cyanide concentration emergency [for the presence] in springs and sub-drains

These trainings include modules that consider topics related to:

- Alert process / alarm activation, in case of cyanide emergency
- Area evacuation
- Cyanide exposure (through inhalation, absorption by skin or eyes contact, and ingestion)
- Personal use of emergency showers and eyewash stations
- Personal use of medical oxygen
- Cyanide solution spill containment
- Cleanup and decontamination of cyanide solution spills

Control room operators receive task training on emergency response to cyanide releases too. Additional to the previous topics listed, they get a training with a strong focus on plant emergency stop and emergency communications (for plant evacuation and for requesting emergency response support).

A designated number of personnel from each work shift are also programmed to attend a more advanced first response and/or first aid training, in order to be able to provide the initial response upon the arrival of the ERT. These groups typically also include ERT members who are part of the staff in the respective area.

Records and certificates of completion of these trainings are provided and maintained by the T&HD area as group training records, as well as in each worker's personal file record. Plant operators were interviewed and demonstrated good awareness of what actions are to be taken in the event of cyanide release. Records of training attendance were reviewed by the auditor and found them consistent and complete.

Process plant first responders and ERT personnel receive training in cyanide first aid and decontamination support to workers that cannot perform those duties by themselves, and clean-up procedures. To supplement the training program, personnel are routinely involved in drills to test their retention of emergency response.

Members of the ERT are required to have completed a more advance emergency response training, which considers hazardous materials and cyanide-related emergencies. This training includes modules related to:

- HAZMAT response, including:
  - Chemical intoxication and chemical burns treatment
  - Emergency response for chemical spills
  - Use of mono-gas and multi-gas monitors
  - Use of encapsulated chemical protection suits and advanced chemical protection
- Specific risks of cyanide exposure, according to working tasks and areas, including:
  - Emergencies due to HCN generation outside the operating parameters
  - Response to emergencies due to contact or cyanide poisoning (first response for all workers in warehouses and in the operations plant, advanced level for medical center personnel)
  - Emergency response due to cyanide spills or leaks (including decontamination, technical cleanup and environmental remediation)

Within the training topics that the members of the emergency response brigade receive, the elements relevant to emergencies with sodium cyanide are considered. In particular, they are considered topics regarding toxicology, first aid, generation of HCN, and attention to leaks and spills of cyanide solutions. The training for the ERT considers the use of PPE for advanced chemical and respiratory protection, the use of chemical absorbent elements, and protocols for handling, recovery and/or encapsulation of cyanide solutions and cyanide-contaminated materials, as well as neutralization and decontamination processes.

In the case of first aid, brigade members have been trained in the use of medical oxygen, use of emergency showers and decontamination of people, and immobilization and transfer of the intoxicated / contaminated worker. In a complementary way, the medical center staff have advanced training in the treatment of people intoxicated with cyanide, considering advanced monitoring of medical conditions (such as oxygen saturation, heart rate, blood pressure, temperature), application of injectable antidotal elements by intravenous infusion, and in general for prehospital care and life support.

ERT members and medical center staff undergo periodic refresher training exercises to ensure they are able and ready to respond to various scenarios across the plant.

Due to the location and capability of local agencies, Los Filos does not consider external agencies or entities in the first response in case of cyanide-related emergencies. Nevertheless, local medical, fire and police services have participated in training related to cyanide, as well as the Universidad Autónoma de Guerrero (Autonomous University of Guerrero) and the Secretaría de Gestión Integral de Riesgos y Protección Civil del Estado de Guerrero (Secretariat of Integrated Risk Management and Civil Protection of the State of Guerrero).



In terms of external support, Los Filos has three sources of external potential support, which is considered in the general emergency response plan and in the ERP:

- Support from medical centers in Chilpancingo and CDMX
- Support from helicopter transport association, and
- Notification and mobilization of people in case of level 3 emergencies or declared crisis (Firefighters, Police and Army)

The medical centers in Chilpancingo and CDMX have received training in cyanide intoxication treatment. Both medical centers and helicopter transport association are aware of the role they could hold in case of an activation of the general emergency response plan and in the ERP from Los Filos.

Refresher training for cyanide events is conducted as part of the site training programs. All Los Filos employees and contractors will have a refresher training, which will include the topics referred to cyanide and HCN awareness, hazards and risks, and work safety involving usage of cyanide or presence of HCN.

In the case of regular workers, cyanide-related topics are also discussed as an update during each 5-minute meeting / toolbox meeting, at the start of each work shift in areas where cyanide is present.

This requirement also includes refresher training for the emergency response brigade members, related to the level of involvement they will have in case of an emergency. This refresher training will be conducted annually or less, depending on the rotation of the personnel that make up the emergency response brigade (due to exit of personnel, entry of new personnel, and/or new members within the brigade). The ERT members receive at least 80 hours of specialized training per year on emergency response, having technical modules, practical modules, and field exercises developed every month, in order to ensure that they are able to respond to an emergency and that their skills remain current.

The refresher training on cyanide emergency response considers one or more of the following procedures, depending on the area of the worker and their role in emergency response:

- General Emergency Response Plan
- Specific cyanide-related emergency response plan (ERP) –Emergency Response with Sodium Cyanide
- Patient poisoned by Cyanide
- Contingency in area 250, pumping booster station, and raisers PADs 1 and 2
- Procedure for dealing with contingencies in Area 420
- Procedure for attacking contingency in area 800
- High cyanide concentration emergency [for the presence] in springs and sub-drains

Los Filos has the document "Training Program," which detail the plan of trainings to be held along the year by the ERT members. These training requirements are recorded in a yearly block training. These trainings and exercises are conducted by the paramedics' staff members that are trained and certified industrial firefighters, that have also the current registry as Agente Capacitador Externo (External Training Agent) by the Secretaría del Trabajo y Previsión Social (Ministry of Labor and Social Security - <https://www.gob.mx/stps/acciones-y-programas/agentes-capacitadores-externos>). There is also technical training received from Draslovka, related to cyanide topics.

The T&HD area is responsible of maintaining training records for all personnel on site, including emergency response trainings. These include training conducted by internal and external parties. Training records are administered by the TH&D area with input from the functional areas. Records to be kept include:

- Trainee name.
- Trainer name.
- Training type/course.
- Date of completion.
- Test Scores (Pass/Fail).

Samples of training records from the ERT members were reviewed and found to be consistent and complete. Records of emergency response cyanide training and hazardous materials emergency response training are retained not only as group records, but as individual records throughout each brigade member history. The records identify the trainer, trainee, topics covered, date and sign off sheet. The results of the testing are also maintained as part of the files. Written tests are completed to demonstrate each brigade member understanding of the training materials. The training materials are either PowerPoint presentations, the actual standard for emergency response from Los Filos, or documented guidelines from Draslovka. In the case of training developed by Draslovka in cyanide safety management emergency response, there is a certificate emitted for each brigade member that participated, as well as a digital copy of the training material used and the written evaluation format.

## Principle 9 | DIALOGUE AND DISCLOSURE

Engage in public consultation and disclosure.

### Standard of Practice 9.1

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

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

Los Filos has a Community Development area, responsible for developing a plan and program for contact, outreach, and dialogue with the communities in the mine's area of influence and other external stakeholders on a regular basis. The tools and resources they use are, e.g.:

- Community Development area team
- Community Development media and communications team
- Community Care House (Mezcala)
- Grievance mechanism procedure
- Routine face-to-face meetings / engagements
- Site tours
- Printed brochures related to Los Filos operations, and to cyanide use on gold extraction
- Local radio channel: La Filosita 96.7 FM (<https://lafilosita.losfilos.mx/index.html>)
- Facebook page (<https://www.facebook.com/UnidadMineraLosFilos>)
- Company website:
  - Corporative site: <https://www.equinoxgold.com/our-mines/los-filos-gold-mine/>
  - Local site: <https://losfilos.mx> (on development)

Radio “La Filosita” regularly broadcasts a series of radio sports programs with short and concise information regarding the use of cyanide in Los Filos operations:

- 01 Uso Minero del Cianuro (Mining Use of Cyanide)
- 02 Vías de Ingreso del Cianuro (Routes of Entry of Cyanide)
- 03 Síntomas de Intoxicación con Cianuro (Symptoms of Cyanide Poisoning)
- 04 Prevenir los Efectos del Cianuro tras Exposición (Preventing the Effects of Cyanide after Exposure)
- 05 Pedir Ayuda en Caso de Exposición con Cianuro (Seeking Help in Case of Cyanide Exposure)
- 06 Localización de Kits y Antídotos (Locating Kits and Antidotes)

- 07 Precauciones al Trabajar con Cianuro (Precautions When Working with Cyanide)
- 08 Lucha Contra Incendios en Presencia de Cianuro (Fighting Fires in the Presence of Cyanide)
- 09 Acerca del Código del Cianuro (About the Cyanide Code)

Although many of these radio spots are directed at workers in Los Filos, the radio signal also reaches communities in the surrounding area, so the message is also disseminated to their residents.

Related to cyanide, they are specific topics that are effectively communicated and are material of the yearly work plan from the Community Development area:

- General scope of Los Filos operations
- Use of cyanide for gold extraction
- Cyanide transportation to mine site
- Emergency response preparedness for emergencies (including the ones that can occur during cyanide transportation):
- Medical emergency response preparedness
- Environmental impact preparedness (related to soil and water contamination)
- Roles of the communities, local authorities, and Los Filos, in case of emergency

The Community Development area provides the opportunity for stakeholders to communicate issues of concerns in different ways, depending on the type of stakeholder, the location of them, and the approach strategy considered. Los Filos has an “open door” policy in the Community Care House in Mezcala. Also, questions are answered and information is shared by the Community Development area, during meetings with the locals in their respective communities. Also, Los Filos shares information with communities about the company’s responsible management practices and offers a first-hand view of the mine site operation and cyanide facilities during site tours.

Due to the pandemic restrictions in previous years, the work of the Community Development area during 2022 and 2023 was focused on resuming and strengthening channels of dialogue, mapping social actors, and restarting scheduled meetings and joint work with communities. The community outreach efforts focused on cyanide management issues were carried out by the Environment and Emergency Response departments during those two years. Community outreach efforts focused on cyanide management issues were carried out by the Environment and Emergency Response areas during those two years. In 2024, the Community Development area resumed activities related to sodium cyanide and emergency preparedness within its plan of activities. It coordinated and implemented guided mine tours (during which participants received an induction) and again held scheduled presentations for communities on Cyanide Emergency Preparedness and Response, with support from the Emergency Response area.

Los Filos allows community members to present their issues and concerns following a "Grievance Mechanism" procedure, which enables the site in general and the Community Development area in particular, to receive, process, manage and resolve written or verbal complaints and grievances in a timely and consistent manner. Grievances for 2022 to 2024 were reviewed on the records of the Community Development area and the Environmental area. It was found a request from the community of Mazapa, in which, after tropical cyclone "John" made landfall on September 22, 2024, the community requested Los Filos to carry out water and sediment sampling in the community area, due to the flooding caused by the tropical cyclone. Their concern was that the "La Galería Filtrante" spring, which supplies water to the community of Mazapa, is located next to the "Mazapa" ravine, which passes through the community of Carrizalillo (upstream) and which is joined by ravine "23", located inside the mine. For this reason, the main concern of the Mazapa leaders was that the water could contain cyanide. The Environment area scheduled a participatory monitoring program with community members to take samples and send them to a third-party laboratory outside the mining operation. Once the negative results were received, they were not only presented to the community, but also presentations were given explaining the mine's operations, cyanide use controls, and the environmental management tools used both regularly and in the event of emergencies.

Los Filos has informed the closest community near to the mine site that is part of the transportation route (Mezcala) about cyanide, its use at the mine, emergency response and equipment that will be part of the cyanide transportation convoy. Also informed them about the nature of the risks associated with accidental cyanide releases. It also meets regularly with community members and leaders from Carrizalillo, Mazapa and Xochipala communities, in order to make them aware of the risks of cyanide, possible contingency scenarios, and the emergency response that Los Filos would perform.

Likewise, the work of the Community Development area is complemented by the work of two areas of the operation in terms of dialogue and outreach with the communities in the area of influence:

- The Environment area, which conducts participatory water monitoring in the area of influence, both as part of its regular operations plan and at the express request of the communities, primarily regarding the potential presence of cyanide; and
- The Emergency Response area, which provides technical presentations and training to government and technical entities in the area of influence, regarding emergency response preparedness (including cyanide emergencies).

Finally, it is important to mention that an important percentage of the operational working force comes from the local communities around the mine site (Mezcala, Carrizalillo and Mazapa), and at least 30% of the ERT members are part of those communities. These workers receive training about cyanide on a yearly basis, and the ERT members receive more than 80 hours of specialized training per year on emergency response. These last ones not only stand out in their communities for the leadership

roles they assume, but also for being interlocutors with firsthand experience in mine preparedness for emergency response, and for their interest in dialogue and support for communities.

#### Standard of Practice 9.2

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

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

The Community Development area of Los Filos has developed printed brochures with information about the mine site, and about the use of cyanide in gold extraction. These brochures are usually distributed to the assistants during the presentations developed within the framework of the program of dialogue and approach to communities and local stakeholders. They have also developed a set of technically comprehensive presentations, presented in simple and accessible language, on Los Filos operations, the use of cyanide, occupational health and safety issues, environmental stewardship, and emergency response preparedness. This information is regularly shared as part of the annual Community Development area work plan, which includes meeting, discussion panels, and workshops held with community members in the mine's areas of influence.

The main topics considered either in the brochures and in the presentations are:

- The International Cyanide Management Code
- How is cyanide transported to Los Filos
- How is cyanide used for gold leaching
- Preventive measures implemented in the process plant, leach pads and leach ponds
- Worker's protection
- First-aid measures for cyanide exposure
- Spill control and emergency response actions

Equinox Gold utilizes a global website to share information on environmental, safety, health, and community relation topics. The access is available on the internet. It also includes information about cyanide management practices. It relates to global operations, as well as specific operations like Los Filos. Some of links with information related to Los Filos or to cyanide management are the following:

- <https://www.equinoxgold.com/responsible-mining/communities/>
- <https://www.equinoxgold.com/responsible-mining/environment/>
- <https://www.equinoxgold.com/responsible-mining/esg-strategy/>

- <https://www.equinoxgold.com/news/equinox-gold-announces-updated-feasibility-study-for-los-filos-expansion/>

Equinox Gold publishes also a technical report about its operations worldwide, which includes Los Filos (<https://www.equinoxgold.com/operating-mines/#technical-reports>). This report provides a variety of operational, H&S, environmental, and sustainability event information as submitted by each mine site across the company's portfolio. Also, the Equinox Gold website has a “News Centre” section (<https://www.equinoxgold.com/news/>) with information of the sites worldwide. This section publishes relevant or important news and facts in chronological order. Within the information published, it includes incidents involving cyanide, impacting workers, stakeholders, or the environment.

Spanish is the most widely used and widespread official language in Mexico. It is also the language used by the vast majority of the workforce in Los Filos (100% of Mexican workforce). The level of illiteracy is around 25%, mainly among people over 65 years of age. All the information that is provided to the local communities and stakeholders is in Spanish.

The task of the Community Development Media and Communications team within the Community Development area is to develop easily understandable presentations and media, while also considering their use in reaching people with limited reading skills or who are completely illiterate. In this regard, the brochures, presentations, and videos used in community meetings emphasize the use of graphic elements, including the information related to cyanide. This is also complemented by the radio broadcasts of Radio La Filosita. All this media developed (specially graphics) is used by the Community Development area, as well as for the H&S, Emergency Response, Environmental, and T&HD areas in the development of training material.

Los Filos is required to report any cyanide exposure and release incidents to the relevant national and local authorities. The information reported to the regulatory agencies will be made available to the public by those agencies. Also, any significant incident would be published in the main Equinox Gold's website.

In the event of a work-related accident (including those potentially related to cyanide), it must be filed with the Ministry of Labor and Social Welfare, the Labor Inspector, and the Labor Court of the Mexican government within 72 hours of the accident. To do so, the information must be entered through the portal <https://siaat.stps.gob.mx/>.

In the event of a cyanide releases off the mine site, which could affect the environment and/or require response or remediation, it must be reported to the following agencies of the Mexican government:

- PROFEPA: Procuraduría Federal de Protección al Ambiente (Federal Attorney for Environmental Protection – [www.gob.mx/profepa](http://www.gob.mx/profepa)), in case of cyanide release, and



- CONAGUA: Comisión Nacional del Agua (National Water Commission – [www.gob.mx/conagua](http://www.gob.mx/conagua)), in case that a cyanide release affects a water body.

During the recertification period:

- a) No cyanide exposures occurred at Los Filos during this recertification period.
- b) No off-site cyanide releases have occurred at Los Filos during this recertification period. The mine will report any cyanide releases off the mine requiring response or remediation to the corresponding regulatory agencies, national or local authorities, and communities, as described in the general emergency response plan, the ERP and related documents.
- c) No off-site cyanide releases have occurred at Los Filos that would result in significant adverse human or environmental effects during this recertification period.
- d) No off-site cyanide releases have occurred at Los Filos that would require reporting under applicable regulations.
- e) No significant release occurred during this recertification period that cause applicable limits for cyanide to be exceeded.

## Appendix A: Los Filos Interviewees

### Principle 1 | PRODUCTION AND PURCHASE

Gregorio Muniz Martínez  
Elber Jaime Vargas García  
Juan Ramírez Ibarra Estevez  
Juvencio Rosende

### Principle 2 | TRANSPORTATION

Gregorio Muniz Martínez  
Elber Jaime Vargas García  
Juan Ramírez Ibarra Estevez  
Juvencio Rosende  
David Aranda

### Principle 3 | HANDLING AND STORAGE

Olegario Nava  
Gisel Oropeza  
Luis Marcial  
Fermín Barajas  
Jesús Téllez  
Carlos Amezcua

### Principle 4 | OPERATIONS

Olegario Nava  
Giselle Oropeza  
Luis Marcial  
Iriana Marion Cruz  
Alejandro Linares  
Jesús Téllez  
Oscar Vega  
Lucía Monsiváis  
Kevin Mendoza  
Carlos Galván  
Bulmaro Villanueva  
Jorge Balois

### Principle 5 | DECOMMISSIONING

Fernando Velásquez  
Jesús Téllez

### Principle 6 | WORKER SAFETY

Juan Alberto Pineda Orellana  
Olegario Nava  
Albert Jesús García

Jonathan García  
Lucía Monsiváis

**Principle 7 | EMERGENCY RESPONSE**

Albert Jesús García  
Jonathan García  
Magdalena López Radilla  
Lucía Monsiváis

**Principle 8 | TRAINING**

Ana Laura Coronado  
Osmar Cantuí  
Juan Alberto Pineda Orellana  
Lucía Monsiváis  
Albert Jesús García  
Jonathan García

**Principle 9 | DIALOGUE AND DISCLOSURE**

Fátima Rivera  
Jesús Téllez  
Albert Jesús García  
Jonathan García  
Lucía Monsiváis