INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

MINING OPERATIONS

SUMMARY AUDIT REPORT

PREPARED FOR THE
INTERNATIONAL CYANIDE MANAGEMENT CODE
CONDUCTED FOR EQUINOX GOLD CORPORATION'S
RIACHO DOS MACHADOS MINE
PERFORMED BY FERREIRA & CERQUEIRA LTDA.
AUDITOR NAME: LUIZ EDUARDO FERREIRA

FINAL REPORT DATE: July 18, 2025

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MINING OPERATIONS SUMMARY AUDIT REPORT

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The International Cyanide Management Code (hereinafter "the Code", "Code" or "the Cyanide Code"), this document, and other documents or information sources referenced at *www.cyanidecode.org* are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.

MINING OPERATIONS SUMMARY AUDIT REPORT

Introduction

This document provides the framework for the information that an auditor must include in the Summary Audit Report prepared for a Cyanide Code Certification Audit conducted for a mining operation and serves as a general template for presenting the required information.

The International Cyanide Management Institute ("ICMI" or "the Institute") reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audit is complete, it posts the Summary Audit Report on the Cyanide Code website.

Instructions

1) The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in the Summary Audit Report. The Summary Audit Report is intended to provide a summary of the information included in the Detailed Audit Findings Report prepared for the certification audit; and therefore, should include only information that is presented in the Detailed Audit Findings Report.
2) The name of the mining operation, the Lead Auditor's signature, and the submittal date of the final report must be included at the bottom of each page of the Summary Audit Report.
3) An operation that is found in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
4) The Summary Audit Report, the Detailed Audit Findings Report, and any necessary Corrective Action Plan with all required signatures must be submitted in electronic format to ICMI within 90 days of completion of the site inspection portion of the audit. An electronic copy of a letter from the owner or authorized representative of the audited operation granting ICMI permission to post the Summary Audit Report and Corrective Action Plan (if one is necessary) on the Cyanide Code website must also be submitted, along with both an electronic copy and a hard copy of a completed Auditor Credentials Form. The Lead Auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent. Electronic documents should be submitted to the Institute via email at:

   audits@cyanidecode.org

   The hard copy of the notarized Auditor Credentials Form should be sent to:

   International Cyanide Management Institute
   1400 I Street, NW, Suite 550
   Washington, DC 20005, USA

5) The Summary Audit Report should include a description of the operation, identifying the facilities included within the scope of the audit and any new facilities or facilities that have undergone substantial changes since the previous audit (in the case of a recertification audit), and indicating key operational components such as the mine type (e.g., open pit, underground) cyanide forms used such as briquettes or liquid, cyanide packaging and method of delivery and storage, processing methods (e.g., heap leach, milling, carbon-in-leach, Merrill-Crowe), nature and purpose of ponds and impoundments, cyanide destruction circuits, and other site-specific operational features that provide context to the reader ahead of the audit findings. The description of the operation should include sufficient information to describe the scope and complexity of the operation being audited.

MINING OPERATIONS SUMMARY AUDIT REPORT

Operation General Information

Name of Mine:	Mineração Riacho dos Machados
Name of Mine Owner:	Equinox Gold Corporation
Name of Mine Operator:	Mineração Riacho dos Machados (MRDM) Mine
Name of Responsible Manager:	Herbert Guido Ernesto
Address:	Fazenda Francisco Sá II, Mato da Roça, Zona Rural Riacho dos Machados, MG, Brasil
State / Province:	Minas Gerais
ountry:	Brazil
Telephone:	+55 38 3831 1303 – Ramal 1092/ Mobile: +55 38 9816 6894
Fax:	N/A
Email:	herbert.ernesto@equinoxgold.com

Operation Location Detail and Description

Provide a description of the mining operation (see Item 5 in the Instructions, above).

Aspects of the location and description of the operation:

Mineração Riacho dos Machados Mine is situated in the northern part of Minas Gerais State, Brazil. The area is approximately 580km northeast of the state capital, Belo Horizonte, 145 km by road northeast of the city of Montes Claros (population 413,000) and 25 km from the nearest town, Riacho dos Machados (population 10,000). . The center of the current open pit has geographic coordinates of 16°03'40" south latitude and 43°08'16" west longitude and its primary activity conducted is open-pit mining to supply an ore beneficiation unit through a hydrometallurgical process with a capacity of 2,8 million tons/year of Run-of-Mine (ROM) ore. The site location is shown in Figure1.

Figure 1 – MRDM Mine Location. Source: SILVA *et al.,* 2001.

The production process unfolds across three main areas: Open-pit mine, ore transport, and beneficiation. In the mine, ore is excavated and transported to the beneficiation plant's feed area. The technological route adopted for ore processing commences with primary crushing followed by the secondary and tertiary crushing, after the step of crush the ore is feeding a closed-circuit ball mill system with hydrocyclones.

The product of grinding (classification overflow) is thickened and pumped for cyanidation in tanks (CIL Process). The CIL rejects undergo a detoxification according to current legislation. The tailings are hydrocycloned where the underflow is disposed of in paddocks which are then loaded and dry-stacked and the overflow is disposed in the dam.

The loaded carbon, originating from the initial CIL tanks, is transferred to the elution area. The eluate liquor undergoes the electrolytic gold extraction process, with the cathodes being washed and melted separately for bullion production. Below is a summary flowsheet of the process in Figure 2.

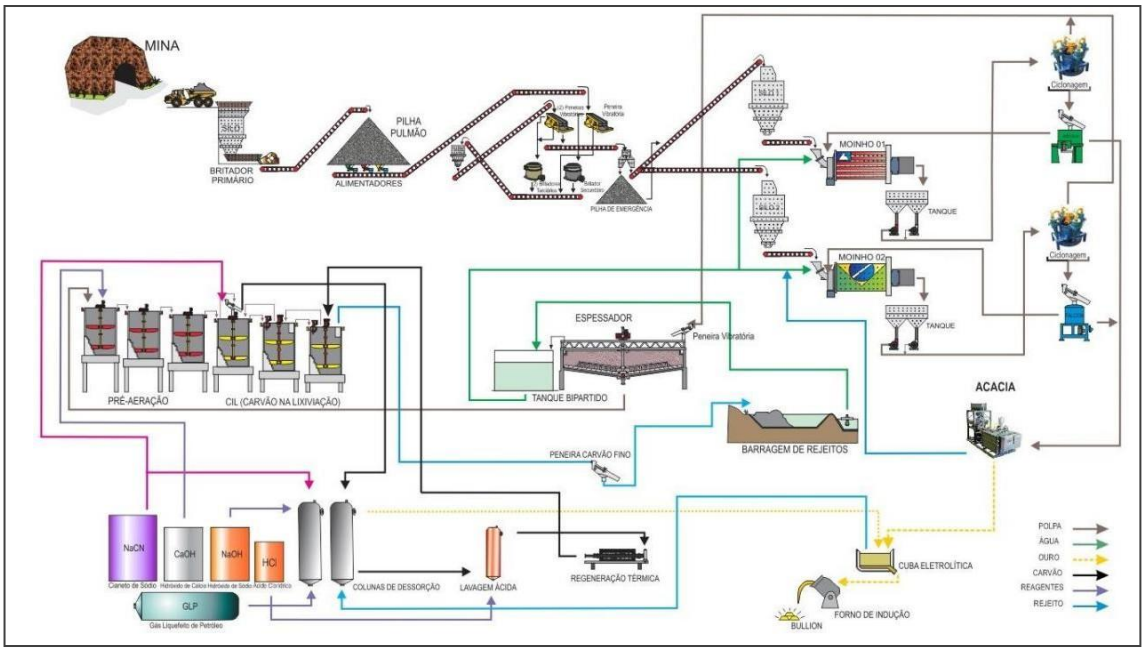

Figure 2 – Flowsheet of the plant's production process.

Crushing

The blended ROM is fed into the feed hopper or piled up by road trucks or Cat 777, equipped with a fixed grizzly with a 800 mm opening. An apron feeder removes the ore from the hopper at a mass flow rate of 410 t/h (dry basis) and feeds it to a vibrating grizzly with a 100 mm opening. The ore retained in the vibrating grizzly is discharged into the Metso C140 jaw crusher. The material passing through the vibrating grizzly and the crusher discharge is collected by a conveyor belt equipped with metal detectors and metal extractor.

From there, the ore goes through primary screening, where the material that passes goes into the grinding silo and the retained material is fed into the Metso HP500 (standard) secondary crusher. The discharge is transported by a conveyor belt to the secondary screen, where the material that passes through continues as product to the silo, while the retained material feeds a closed circuit between the HP500 tertiary crusher (short head) and the secondary screen.

Grinding

The grinding circuit is designed to receive the product from crushing and generate a granulometrically compatible product for the Carbon in Leach stage, with 80% passing at 0.053 mm (270 mesh). The retrieval of crushed ore for grinding, with a mass flow rate of about 350 t/h (dry basis) and a gold content of 0,7 g/t, is carried out by feeders and the conveyor belt equipped with an integrating scale. The material passing through the mill ball trommel is collected in the discharge box where process water is added to adjust the solids percentage in the pulp (to 45% solids) for feeding, by pumping, into the battery of classification hydrocyclones composed of 10 (ten) hydrocyclones. The material retained in the trommel is returned to the mill feed. The underflow from the hydrocyclones is collected in the distribution box and combined with fresh feed totaling the circulating load.

It is important to emphasize that no cyanide is added in the grinding area. Consequently, the grinding circuit is not considered a cyanide installation.

Thickener

The cyclones' overflow is sampled to assess the particle size distribution, which should achieve a passing percentage greater than 80% at 270 mesh. The material retained (trash) on the screen is collected in a box for disposal, while the passing pulp containing 24% solids is feed the tank for gravity feeding to the high-performance thickener with a 40-meter diameter.

The thickener's overflow, water virtually free of solids, is collected and pumped to the mill's discharge box. The thickened pulp, at a flow rate of 750 m³/h containing 38.0% solids, is pumped for leaching.

Carbon in Leach (CIL)

The thickening underflow, pulp containing 38% solids, feeds the first tank that consists in the pre-liming treatment which subsequently feeds the CIL (carbon in leaching) consisting of a total of 10 mechanically agitated tanks with a capacity of 1,900 m³, arranged in two parallel lines of 5 tanks each. The cyanidation in CIL is conducted at pH = 10.5 to 11.0, achieved by adding lime milk at a ratio of 3,5kg/t of ore and sodium cyanide at a ratio of 0.90 kg/t of ore. Cyanide concentration in tanks is measured by titration based cyanide analyzers with integrated sampling system (TAC 1000) and by manual samplings.

The total residence time considered for cyanidation in the CIL tanks is 25 hours, resulting in the solubilization of 87% of the gold values contained in the solids. The CIL tanks are equipped with interstage screens to retain the carbon. Thus, in addition to the continuous pulp in a cascade, they contain a total of approximately 100 tons of activated carbon. The new or regenerated carbon after dewatering on a screen feeds, preferably, the last tanks of the CIL. The carbon operates in countercurrent, i.e., the new/regenerated carbon fed in the last tank, then the penultimate, and so on, until it reaches the first CIL tank, when it contains approximately 600g/t of gold per ton of carbon.

The pulp containing loaded carbon from the first tanks feeds the vibrating screen to retain the carbon, which is pumped to the acid wash area. The slurry that passes through the carbon-free screen returns to tank 3, re-entering the CIL circuit. The overflow from the last tanks, CIL effluent, passes through the safety screen to remove any carbon particles that may have passed through the circuit. The material that passes through the safety screen is pumped to the neutralization area, called DETOX.

Detox

The treatment of CIL rejects aims for environmental compliance for the discharge of industrial effluents and consists of the neutralization of cyanide, in concentrations of Weak Acid Dissociable (WAD) cyanide in solutions classifying the waste as Class II-A waste (inert), as per Brazilian Registered Standard (NBR) 10.004 classification. The slurry from the CIL feeds the DETOX circuit, in a reject box where ammonium bisulfite is added at 0.35 kg/t. MRDM has a Detox process that uses ammonium bisulfite to destroy or reduce residual cyanide ions present and not rejected before final disposal. The pulp from the CIL feeds the Detox circuit in a 2035-CX02 tailings box at the discharge of the last tank in the leaching process (2035-TQ-02), where ammonium bisulfite is added at a rate of 0.35 kg/t. This process occurs automatically based on the mass processed in the Grinding Unit. Data is monitored via supervision in the Control Room. After this step, the tailings are sent to the Tailings Dam. There is no environmental waste disposal.

Acid Wash/Elution/Carbon Regeneration

Acid Wash:

Acid washing begins when one of the two acid washing columns are filled with charged carbon. A diluted hydrochloric acid (HCl) solution is added to the column to allow soaking for the removal of alkaline earth ions (notably calcium carbonate) from the pores of the carbon, which impede gold adsorption/elution capacity. After soaking, the carbon is washed with water and caustic solution and transferred to the elution column. The washing step, as well as the entire elution area, will operate in cycles, with 3 cycles considered per day.

Elution:

Elution takes place in the elution column, by circulating a solution containing 2.0% NaOH by weight through the loaded carbon at a temperature of 140°C and a pressure of 45 to 50 psi. Elution involves the physical-chemical displacement of the gold adsorbed in the carbon (600 g/t) to the poor electrolyte until it is depleted (<100 g/t).

The electrolyte is recirculated in a closed circuit between the electrolytic cell and the elution column. The eluted carbon is removed from the column and transferred by ejector for dewatering on the vibrating screen. The extinguished carbon retained in the screen feeds the regeneration stage.

Carbon Regeneration:

The carbon retained in the screen is sent to the carbon silo of gas and electric regeneration kilns and transferred by screw feeder to the rotary kiln, which operates at a temperature of 700°C, with an approximate residence time of 1 (one) hour, at a feed rate of 0.5 t/h. The regenerated carbon feeds the quench tank (quench) from where it is pumped to the regenerated carbon classification screen. The material retained in the screen goes to the CIL – carbon in leach. The passing material through the carbon screens is collected in the fine carbon tanks.

Electrolysis/Fusion

Eluate/elution liquor feed by gravity, the electrolytic cells. The cells operate with a potential difference between anode/cathode of 3 to 4 volts, sufficient to allow, by the action of the electric current, the reduction of gold to the elemental state and deposition on the cathode according to the cathodic reaction below:

$Au(CN)2- + e- = Au + 2CN$

The spent (poor) electrolyte is collected and pumped to the CIL tanks at the end of the electrolysis cycle. The gold deposited on the cathodes, is removed by washing with high- pressure water jets. The slurry from the wash, along with process water, feeds by gravity into the slurry box that pumps the material to the slurry filter, which is operated manually. The material retained in the filters is then taken to the furnace to remove moisture, mixed with fluxes, and fed to the induction furnace for melting at 1250°C.

Note on the use of Cyanide:

Currently, MRDM only uses cyanide in solution, however in the past it used cyanide in briquette form. The last purchase of solid cyanide was on December 22, 2017 and the last time it used solid cyanide was in the year 2018. During the field audits, evidenced that there were 53 tons of solid cyanide in the MRDM warehouse, and this stock has been in existence since 2018. At the moment there is no forecast for its use, this current stock of solid cyanide and its maintenance is due to a strategic factor due to the possible occurrence of adverse logistic conditions, which have never occurred. During the present audit, both the facilities related to liquid cyanide and solid cyanide were audited, and evidenced for both cases are in accordance with the requirements established by the Cyanide. Additionally, both liquid and briquette cyanide have been purchased from Proquigel Química S.A., which uses tanker trucks for delivery of liquid cyanide to MRDM.

Auditor's Finding

This operation is

☐ X in full compliance

☐ in substantial compliance *(see below)

☐ not in compliance

with the International Cyanide Management Code.

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

Auditor Information

Audit Company: Ferreira & Cerqueira Ltda.
Lead Auditor: Luiz Eduardo Ferreira
Lead Auditor Email: luizeferreira2015@gmail.com

Names and Signatures of Other Auditors:

Auditor 1:	**Luiz Eduardo Ferreira**	
	Name (Print/Type)	**Signature**
Auditor 2:		
	Name (Print/Type)	**Signature**
Auditor 3:		
	Name (Print/Type)	**Signature**

Dates of Audit: December 9-13, 2024 (onsite) and March 10-11, 2025 (offsite)

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.

MRDM Mine		July 18, 2025
Name of Facility	Signature of Lead Auditor	Date

MRDM Mine		07/18/2025
Name of Operation	Signature of Lead Auditor	Date

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

Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

Yes. Evidenced that MRDM has been purchasing cyanide produced by Proquigel Química S.A, which is a Brazilian company that has two facilities located at Camaçari and Candeias cities both at the State of Bahia, Brazil, which produce solid and liquid cyanide. The auditor compared the operation's purchase agreement and chain of custody documentation with the listing of certified cyanide production facilities on the Cyanide Code website to confirm that the cyanide was, in fact, produced by a certified operation and concluded that Proquigel (Camaçari Operation and Candeias Operation) are certified as being in compliance with the Code (see https://cyanidecode.org/sig-directory-type/proquigel-quimica-s-a-brazil/). Besides, reviewing the above mentioned web site, it was noted that Proquigel's certifications (Candeias and Camaçari operations) have not been disrupted. Noted that contracts between on one hand, as seller Proquigel, and, on the other hand, as buyer, MRDM for the article NACN states that all sodium cyanide provided by Proquigel must be produced in a facility having a current certification under the International Cyanide Management Code. Evidenced that since Signatory Date: August 11, 2020 only bought liquid cyanide. Sampled examples were Purchase orders valid from September 01, 2019 until December 31, 2025. Please see Note of Item 1 - Company Description, for additional information

Principle 2 | TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1

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

The operation is
- ☐ X in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

Yes. MRDM maintains the chain of custody records identifying all transporters and supply chains responsible transporting cyanide from the producer to the operation. MRDM only purchases liquid form of cyanide. No solid cyanide is transported. Cyanide cargo is transported from Proquigel (Camaçari and Candeias plants both at Bahia State, Brazil) directly to MRDM by road in accordance with Brazilian legislation such as Resolução from National Land Transportation Agency (ANTT) 5947/21, Registered Brazilian Standard (NBR) 15481/2021, NBR 16173/2021, NBR 15481/2021, NBR 15701/2020 and Labor Regulatory Standard (NR) 16. There is no interim storage. MRDM maintains chain custody records in accordance with Brazilian laws such as Electronic Invoice Auxiliary Document (DANFE), Electronic Bill of Lading Auxiliary Document (DACTE), Electronic Invoice (Nfe) and (CTe) - Electronic Bill Of Lading. DANFE and NFe are issued by the seller and DACTE and CTe are issued by the transporter. Evidenced DANFE and NFe issued by Proquigel as well as DACTE and CTe issued by the transporter clearly defining information such as the seller, buyer, transporter name, transporter National Registry of Road Cargo Transporters (RNTRC) number, cyanide amount, cyanide type, cyanide United Nations (ONU) number, cyanide risk class, truck identification, container identification, driver name, dates of departure, transportation and arriving duly established and maintained as stated he contract between MRDM as buyer and Proquigel defines that Proquigel shall use only use transporters that are certified as being in full compliance with the Code. The auditor compared chain of custody records with the listing of certified cyanide transporters on the Cyanide Code website to confirm that a certified transporter has transported the cyanide. Evidenced through pertinent records that cyanide was transported from Proquigel to MRDM by Confins Transportes and Ergotrans (Transchemical Transporte e Logística) which are certified as being in compliance with the Code (see https://cyanidecode.org/sig-directory-type/confins-transportes-ltda-brazil/ and https://cyanidecode.org/wp-content/uploads/2022/05/ErgotransSAR2025.pdf. Besides, reviewing the above-mentioned(a.m.) web site, it was noted that both transporters certification has not been disrupted.

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.

The operation is
- ☐ X in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

Yes. Evidenced that MRDM designed and constructed facilities for unloading, mixing and storing cyanide in accordance with cyanide producers' guidelines and Brazilian engineering requirements. Several design documentations such as drawings and data sheet specification were reviewed and showed that the facilities were designed and constructed as stated. Evidenced that the design and manufacture of subsidiary systems are in accordance with the relevant codes and standards from regulatory agencies and institutes such as: Brazilian Association of Technical Standards (ABNT); American National Standards Institute (ANSI); American Society of Mechanical Engineers (ASME); Registered Brazilian Standard (NBR); British Standard Institute (BSI); (ASTM) American Society for Testing and Materials; American Welding Society (AWA); International Organization for Standardization (ISO); Standardization of valve and fitting manufacturers; Pipe Manufacturing Institute (PFI); Underwriters Laboratories in Brazil (UL-BR); Canadian Standard Association (CSA). During the field audit evidenced that unloading, mixing and storing areas for liquid and solid cyanide are located away from other people and surface waters of the plant. The access to the process plant is controlled. All doors are locked. The unloading, storage and preparation areas are far from surface waters. During the unloading, only authorized operators are allowed to circulate in these areas. Evidenced duly implemented as required. During the field audit, it was evidenced that liquid cyanide is unloaded on a concrete area as well as that the unloading area was designed and constructed to contain, recover or allow remediation of any leakage from the tanker truck or isotainer system. Besides, evidenced that for all tanks containing high-strength cyanide solution are parked in a specific assigned concreted area. All the internal and external areas of the warehouses are concreted foundations. Evidenced, during the field audit, that MRDM has systems in place to prevent overfilling of cyanide storage tanks such as automatic level indicators, high-level alarms, shutdown valves and pumps. Evidenced that MRDM defined and documented procedures establishing methodology for testing, maintaining and calibrating equipment, instruments and systems (previously identified as critical) in order to ensure that they are available for the normal operations and this way preventing overfilling of cyanide storage tanks. Evidenced that as well as of identified critical equipment in case

of occurrence an incident involving cyanide release in this area in which the product is recovered by using environmental kits. Evidenced that MRDM has been testing, maintaining and calibrating them (where applicable) in accordance Brazilian regulations laws as well as MRDM's Maintenance Plan and MRDM' Calibration Plan. Evidenced, during the field audit that overfill protection equipment and instrumentation are properly functioning. Reviewing pertinent documentation records such as drawings, construction and Quality Assurance/Quality Control (QA/QC) records, it was evidenced that cyanide mixing and storage tanks are located on a concrete area prevent seepage to the subsurface. During field audit, it was evidenced mixing and storage areas are in good condition. Reviewing pertinent documentation records such as design and construction and QA/QC records it was evidenced that secondary containments for cyanide storage and mixing were constructed of reinforced concrete which provides a competent barrier to leakage as required by internal documented procedures. During the field audit, it was evidenced that secondary containments for cyanide storage and mixing are in good conditions free of cracks and other breeches that compromise their ability to effectively contain releases Evidenced that MRDM defined, documented, implemented and maintains an Inspection Plan for Secondary Containments for Cyanide Storage and Mixing. Evidenced duly implemented. Evidenced that MRDM defined and documented that solid cyanide shall be stored in buildings roofed, off the ground and enclosed structures to minimize the potential for contact of solid cyanide with water preventing contact with precipitation. During the field audit it was evidenced that MRDM stores cyanide in their original boxes, over pallets, on concreted floor, under roof, brick walls and with adequate ventilation as evidenced during the field audit. Additionally, during the field audit was noted that water systems for potable use, safety showers or and other purpose are not present in inside cyanide storage warehouse. Evidenced that MRDM defined and documented that cyanide shall be stored with adequate ventilation to prevent the build-up of hydrogen cyanide gas. During the field audit, it was evidenced that MRDM stores cyanide with adequate ventilation to prevent the build-up of hydrogen cyanide gas. I Cyanide is stored in a secure area where public access is prohibited, such as within the fenced boundary of the plant or within a separate fenced and locked area. The MRDM has defined, documented, implemented, maintained and provided adequate ventilation for the solid and liquid cyanide storage areas, since storage occurs in a ventilated area, with side enclosures and a top cover, with openings on the sides that ensure continuous natural ventilation. For liquid cyanide, the tank is installed in an area with side enclosures and a top cover, also ensuring adequate ventilation of the environment. In both cases, access to the storage areas is restricted and controlled. Cyanide is stored separately from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, animal feeds and tobacco products with berms, bunds, walls or other appropriate barriers that will prevent mixing. During the audit evidenced that Quality Assurance/Quality Control (QA/QC) documentation includes the on-site warehouse used to store solid cyanide. During the audit evidenced that the sampled Project drawings and specifications of data materials were issued, reviewed and approved by engineers duly qualified in accordance with Brazilian legislation.

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
☐ X in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM defined internal documented procedure which clearly defines that empty cyanide containers are prevented from being used for any purpose other than holding cyanide. During the field audit, evidenced that cyanide containers used only for holding cyanide. Evidenced duly implemented. MRDM defined internal documented procedure which clearly defines that contaminated big bags and liners shall be inserted into a package (new big bag) as well as the contaminated Personnel Protective Equipment (PPE) must also be included and, then, this container shall be sealed. Then, these sealed packages shall be are placed in a wooden box for return to Proquigel (Camaçari and Candeias plants, Bahia) certified as being in compliance with the Code (see https://cyanidecode.org/sig-directory-type/proquigel-quimica-s-a-brazil/) which will carry out the appropriated disposal in accordance with Brazilian environmental laws. It was noted that all operators involved with cyanide preparation were trained as previously planned. MRDM does not use cyanide drums. MRDM defined internal documented procedure which clearly defines that during the cyanide handling process shall be cleaned any cyanide residue from the outside of cyanide containers that are returned to the supplier (Proquigel) and securely close them for shipment, including the hose connections and couplings on tanker trucks and isotainers as above mentioned . Evidenced that MRDM defined, documented, implemented and internal documented procedures which define methodology for preventing exposures and releases during cyanide unloading activities such as operation and maintenance of all hoses, valves and couplings for liquid cyanide. Reviewing inspections records it was evidenced that hoses, valves and couplings have been inspected in accordance Brazilian legislation. During field audit was evidenced that a.m. procedures are duly implemented. MRDM defined internal documented procedure which clearly establishes methodology to prevent exposures and releases during cyanide unloading and mixing activities such as for handling cyanide containers without rupturing or puncturing since it defines tools to be used in specific activities, such as a hammer; lever; crowbar; alpha knife and how to use them. It was noted that all operators involved with cyanide preparation have been trained as previously planned. For additional information, please see Principle 8. During the audit, it was evidenced that MRDM defined, documented and implemented internal procedure POP-MA-19 Control for Environmental

Cyanide Emergency Revision 2.0 which defines several management tasks related to cyanide including methodology for timely cleanup of any spills of cyanide during the transfer of liquid cyanide from tanker trucks. Additionally it is defined that Cyanide residues are stored in drums inside a sealed area, with access restricted exclusively to properly trained and authorized employees. The gate to this area has two padlocks: a key to one of them is kept in the room where the processing operation is supervised, where the employee who wishes to access it must publish a logbook and obtain authorization from the responsible supervisor. The key to the other padlock is under the control of the property security team, and access also depends on the authorization of this team. Only with the joint permission of these two areas can the employee enter the storage area. When necessary, contact is made with the cyanide supplier to send materials for transportation suitable for this type of disposal, which will subsequently be incinerated in accordance with the environmental standards applicable to the incineration of this class of waste, in accordance with Brazilian legislation. In the case of equipment or maintenance parts that will be returned to the workshop for maintenance services, wash with a 10% sodium hypochlorite solution before releasing for maintenance; collect a sample of the wash water and send it to the Laboratory for analysis of free cyanide. Note 1: If the result obtained is <0.50ppm of free cyanide, the material will be made available for maintenance. Note 2: If the result is ≥0.50ppm of free cyanide, repeat the process until the concentration of free cyanide is <0.50ppm. For recording the results it is used the Form RS - PL - 011 named as Release of Equipment, Pipes and Cyanide Parts for Maintenance. Field Interviewed personnel showed to be aware of this matter. Besides, it was evidenced that MRDM defined, methodology for, prior the use, inspecting and maintaining materials and equipment that are used for handling cyanide containers. Evidenced pertinent inspections and preventive maintenance records duly maintained as stated. MRDM defined internal documented procedure which clearly establishes methodology to prevent exposures and releases during cyanide unloading and mixing activities such as for limiting the height of stacking of cyanide containers since it defines that the stacking of boxes must respect the maximum limit of 03 (three) boxes. During field audit, it was evidenced that a.m. procedure is duly implemented since visiting MRDM's cyanide warehouse noted that all stored cyanide are respecting the defined limiting the height of stacking of cyanide containers.. In the case of occurrence an incident involving liquid cyanide release in this area, for instance any spills of cyanide of liquid cyanide from tanker trucks and isotainer the product is easily recovered by using environmental kits. It was not evidenced incident reports MRDM Signatory Date with ICMI. Evidenced that internal documented procedure which clearly establishes methodology to prevent exposures and releases during cyanide unloading requiring the appropriate use of PPE and having a second individual observe from a safe area, or observe remotely by video. It is clearly defined the PPEs to be used as well as the needing the prior inspection of them. During the field audit, it was evidenced that operators performing unloading of liquid cyanide using the appropriated PPE as stated as well as they issued pre work records as required such as: Sampled examples were: *(Polyvinylchloride)(* PVC) boots; protective goggles; helmet with jugular; panoramic mask with gas filter; shell-type noise damper; *Long-length PVC gloves,* cowhide glove; nitrile

rubber glove; tyvek or tychem coverall, radio communication, Pocket Preliminary Analysis Task (APT) and Work Permit (PT) reports. Reviewing PPE inspection records it was noted that they have been inspected before the use as previously stated. Besides, during the field audit it was evidenced a second MRDM's individual operator observing the activity being performed from a safe area. The addition of a dye to high concentration liquid cyanide supplied by Proquigel and received at the mine is made at Proquigel facility before delivery to the MRDM site. The liquid cyanide received in MRDM has the dye Carmoisine for quick visual assistance in identifying the product, as required by the Cyanide Management Code program of the International Cyanide Management Institute. The use of this dye by Proquigel is registered in the (Sodium Cyanide Product Manual -POR-ENG-ESP, Ver: 6) and upon arrival at MRDM mining the product must be operated according to the above mentioned procedure ensuring that the colorant is added. Since the addition of the dye is mandatory, it has never been evident that the dye was not used. Evidenced that defined internal documented procedure which clearly establishes methodology to prevent exposures and releases during solid cyanide unloading and mixing activities such as for addition of colorant dye to solid cyanide at the point of mixing into solution since it clearly defines all step by step for adding the artificial coloring Carmoisine Chemical Abstract Service (CAS) # 3567-69-9.

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
☐ X in full compliance with
☐ in substantial compliance with Standard of Practice 4.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM defined, documented, established, implemented and maintains several documented procedures in included loading mixing storage facilities, process plants, tailings impoundments, Sampled examples were PG - PL - 001 - Cyanide Operations; POP - PL - 003 - Leaching and Detox Operation; POP - PL 004 - ADRAdsorption, Desorption, and Regeneration (ADR) Operation; POP - PL 007 - Preparation and Receipt of Reagents; POP - PL - 008 - Receipt of Liquid Cyanide; RS - PL 001 - Leaching and Detox Inspection Checklist; RS - PL - 002 - Leaching and Detox Field Worksheet; RS - PL - 003 - Sampling Standard; RS - PL - 008 - ADR Inspection Checklist; RS - PL - 010 - Cyanide Unloading Inspection Checklist; POP – PL - 015 – Dam Operation; POP - PL - 021 - Hydrogen Peroxide Dosage; RS - PL - 011 - Cyanide Unloading Inspection Checklist; POP - PL - 022 - Receiving Cyanide in Briquettes; POP - PL - 023 Neutralization of Cyanide Waste; PG - MA - 021 - Environmental Management and Monitoring Program; PG - MA - 006 - Solid Waste Management; POP - MA - 006 - Waste Handling; POP - MMP - 022 - Equipment Lubrication; RS - MMP - 001 - Monthly Mechanical Inspection - Receiving and Preparation Tank and Dosing and Distribution Tank. During the field audit evidenced that MRDM has been implemented the necessary operational controls for operating MRDM's cyanide facilities related to its environmental aspects and impacts and hazards and risks to occupational health and safety. MRDM identified those tasks that, if not performed properly, have the potential to cause cyanide exposures or releases and defined measures to mitigate and control them. Reviewing inspection records it was evidenced the effective implementation of operational documented procedures as stated. Reviewing training records evidenced that involved personnel have been training as stated. MRDM defined, documented, implemented and maintains internal procedures which identify and account for the assumptions and parameters on which the facility design was based and any applicable regulatory requirements. These documents apply to unit operations such as: Cyanide Reception; Cyanide Storage; Crushing; Milling; Clarification; Thickening; Carbon-In-Leach (CIL); Filtration; Acid Wash; Elution; Carbon Regeneration; Electrolysis; Mixing and Fusion. Evidenced that MRDM's procedures clearly identify the assumptions and parameters on

which the facility design was based and specify operating requirements to prevent cyanide releases. The Variable Control Operation provides guidance by filling out the forms in the above-mentioned operational control areas as well as identifying deviations in the measured variables regarding performance indicators and carrying out continuous monitoring and correction are Prior Work Analysis (APT), Work Permit (PT), Pre-Use Check list, Operational Inspection records; Maintenance Records, Inspection Records Testing Records and Calibration Records. Evidenced that documented procedures clearly define parameters such as the design and required freeboard for the dam, the concentration of cyanide discharged to and allowed in surface water, the concentration of Weak Acid Dissociable (WAD) cyanide in open water as well as the designed storm events for process solution. Tailings dam records were reviewed and showed that they are in accordance International and Brazilian regulations. Reviewing MRDM's documentation it was evidenced that they incorporate and reference the assumptions and parameters on which design was based. During field audit, reviewing MRDM's documented procedures and records assessed provided evidences that procedures were in place, they include design parameters and that are effective to prevent cyanide releases and exposures consistent with applicable requirements. has a plan called 'Water Balance' for water management involving captured water, reuse of water and stored water to maintain projected storage capacities. Evidenced that MRDM defined, documented and maintains procedures that describe the standard practices necessary for the safe and environmentally sound operation including the specific measures needed for compliance with the Code, such as water management, inspections and preventive maintenance activities. It was evidenced that the procedure POP – MAN -001 - Maintenance of Processing Plant as well as RS - MAN - 001 Matrix - ABC Classification of Equipment which provide technical guidelines for the execution of predictive, preventive and corrective maintenance in the gold processing plant, in the area of reception, storage, mixing, distribution of cyanide and in the process plant, covering critical machines, equipment, instruments and systems. The objective is to ensure safety, occupational health, prevention of adverse environmental impacts, sustainable production, process quality, extend the useful life of assets and improve operational efficiency, based on the assessment of the criticality of the plant's assets. The implementation of this procedure results in a significant reduction in failures and in increased availability and achievement of operational reliability, preserving the environment, safety and occupational health of employees and third parties working on the MRDM premises. Evidenced that aforementioned documented procedures present the classification of assets through the establishment of the asset criticality matrix record (RS-MAN-001), which is the basis for defining the maintenance strategy and considers five characteristics to determine the criticality for the asset in the process. These characteristics are: • Impact on the Environment, Occupational Health and Safety: A failure can generate impacts on health or safety or the environment or community; • Impact on production: If the equipment fails, what will be the impact on production; • Process quality: If the equipment fails, what is the impact on the quality of the final product or on the production stages; • Maintenance and replacement costs: What is the cost associated with equipment downtime and the repair required to restore its operational condition; and • Frequency of occurrences: Frequency at which failures may occur. For each of these five factors, they are classified according to the classification of risks to health, safety and the environment; the classification of production loss levels; the impact on quality reliability; the classification of impacts on costs as well as

the classification of failure particles, which are classified into one of four options: low, small, medium and high. The definition of criticality is carried out by a multidisciplinary team composed of professionals the following areas: • Maintenance (Mechanical and Electrical); • Instrumentation; • Operation; •Dam; • Security; • Health; • Environment and Process. All maintenance, calibration and inspection plans are addressed into the MRDM computerized system (Datasul system). The minimum requirements for preparing maintenance, calibration and inspection plans are: • Specific structured code; • Title referring to its content; • Tasks to be performed, in logical sequence; • Specialties; • Expected times; • Materials and quantities; • Tools and instruments; • Protective Personnel Equipment (PPE) to be used; • Frequency; • Technical control parameters and their tolerance ranges; • Minimum-security requirements.as well as Human Resources Qualification required. Note: Records of Maintenance (Preventive, Predictive, and Corrective), Calibration and Inspection are maintained for at least 3 years. MRDM established, documented, implemented and maintains internal documented procedure PG-SEG-018 - Management on Change which establishes the guidelines to ensure that all changes are planned in relation to potential risks to health, safety, quality and the environment, and that measures are taken to ensure that they are not implemented and/or tested without proper risk analysis and the necessary controls to eliminate or minimize risks. Applies to MRDM and contractors, contracting any and all changes, temporary or permanent. Change is defined as any alteration of environments, processes, tasks or activities that modify or may alter the existing risk profile. The change can be changed as: − Major: when it involves new projects or changes to the current project with an impact on the existing risk profile, resulting in a high or extreme level, according to PG-SEG-001; - Minor: when it involves modifications made by the area itself, without the need for changes to projects or without an existing risk profile, resulting in a medium or low level, according to PG-SEG-001; − Permanent: when the proposed situation will remain in place for an indefinite period after the change is made. - Temporary: when the proposed situation has specific data for completion; Note: The emergency scenario already mapped should not be reinforced as a change, as it must already be identified and evaluated regarding the associated events, risks and consequences through the MRDM Risk Assessment Worksheet. Change management team: Group of people composed of: Requester and/or person responsible for the change; Coordinator or Supervisor of the area where the change will occur; Safety, Health, and Environment Team. Note: This team is the minimum required. It may be accredited by General Manager, Managers, Consultants or other representatives as needed. Duties and responsibilities are clearly defined and documented. Sampled examples were: General Manager; Managers; Coordination/Supervision; Maintenance Engineering; Operation/Maintenance; Health, Safety, Environment and Community; Contract Manager; Change Executor; Employees in general; Human Resources. Evidenced that the procedure mentioned above defines the flow for change management or which includes the following steps: Identification of the change; Definition of the team to analyze the potential risks of change; If the change is approved, planning for implementation of the change; Implementing the Change; Systematizing the controls and verifying the effectiveness of the change. Considering that the change process can come from several sources, these must be managed through Change Management Form - RS-SEG-051, informing, among other data, the applicant, the type, time, reason and expected result of the change. Evidenced that RS-SEG-051 includes: Identification of the

change; Pre-Analysis of Change Classification; Result of the Pre-Analysis and Approval of Viability; Category of change in relation to Changes in the Project/Infrastructure, Changes in Technology, Changes in Procedures, Organizational Changes, Social Risks; Assessment of the Change; Reference Documents Used in the Change; Analysis of the Risks of the Identified Impacts; Assessment of the Experts; Change Planning Phase; Change Approvers; Multidisciplinary Team Comments; Project Execution Verification; General Manager Approval. Evidenced duly implemented. The mine has operational contingency procedures and plans such as MRDM Mine Closure Plan (PFM) that consider how cyanide will be safely managed during long-term shutdowns or cessation of operations. These documents are included in site cyanide management including locations with possible presence of cyanide with ongoing facility inspections and required maintenance, water monitoring activities or possibly draining process solution tanks and piping, draining process washing and neutralization tanks. It was evidenced that MRDM has a management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases, such as: an upset in the operational water balance that presents a risk of exceeding the design containment capacity; problems identified by facility monitoring or inspection; and temporary closure or cessation of operations due to situations such as work stoppages, lack of ore or other essential materials, economics, civil unrest, or legal or regulatory actions. Sampled examples were MRDM Mining Dam Emergency Action Plan (PAEBM) and PG-SEG 005 – Cyanide Emergency Plan (PAEC) Evidenced that procedures consider the temporary closure or cessation of operations. Reviewing pertinent MRDM's documentation it was evidenced that MRDM have been addressed effectively planned responses to the potential issues.

MRDM defined, documented, established, implemented and maintains methodology for inspecting tanks holding cyanide solutions for structural integrity and signs of corrosion and leakage, 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, leak detection and collection systems at ponds, as required in the design documents, pipelines, pumps and valves for deterioration and leakage and 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 at unloading, storage, mixing and process areas, as applicable to the site. Reviewing inspections forms, it was evidenced that they direct the inspector to evaluate specific items. Reviewing MRDM's documentation, it was evidenced that Service Order (OS) clearly define the named Who, When, Where, Why, What and How (5W1H) for inspection activities. Sampled examples were Cyanide Solutions Storage Tanks Inspection; Cyanide Solutions Pumps, Valves and Pipelines Inspection; Containment Basins Inspection; Leak detection and collection systems Inspection. Reviewing inspections records it was evidenced that MRDM has been inspected cyanide facilities on an established frequency, according internal documented procedures, sufficient to assure and document that they are functioning within design parameters criteria. Additionally, reviewing internal documented procedure that establishes methodology for inspection in containment basins, it was noted that it defines that monthly inspection must be carried and duly recorded as well as that in the case of detecting anomalies in the pipes, pump: drain, suction and discharge

and sealing water; checking physical conditions of the basin: concreting, painting, presence of vegetation, presence of animals and accesses, checking the internal condition of the basin: solids level and water level, checking main drain for damage or presence of foreign body (basin overflow) these and others types of anomalies eventually detected for instance presence of cracks and leaks, accumulation of water, accumulation of pulp, closed and locked drain valve) shall be clearly described. Besides, annual technical inspections must also be carried out for the cyanide containment basins, the issuance of a conclusive report and certificates of conformity, according to the Technical Inspection Schedule for Cyanide Containment Basins. Evidenced Cyanide Containment Basins Inspections duly implemented. During the audit, the auditor reviewed MRDM's internal documented procedures which clearly define methodology for cyanide facilities inspections incorporating the through the named 5W1H and defining the pertinent established frequencies to be followed, reviewed several inspection records of cyanide facilities and, as already mentioned, during the field audit, the auditor performed its own inspection on MRDM's facilities in which proved that cyanide facilities are in good order. In accordance with my professional judgment I conclude that inspection and monitoring programs currently in place by MRDM as well as the established frequencies are adequate to ensure and document that they are functioning within design parameters that cyanide facilities ensure and document that cyanide facilities are functioning within design parameters. Evidenced duly implemented. Service Orders OS and others internal documented procedures identify specific items to be observed. Reviewing inspection records it was evidenced that they include date of the inspection, the name of the inspector, and any observed deficiencies as well as the nature and date of corrective actions (when applicable) documented, and are records retained. Evidenced duly implemented as stated. Sampled examples of inspection records were: were: RS - PL - 001 - Leaching and Detox Inspection Checklist; RS - PL - 008 - ADR Inspection Checklist; RS - PL - 010 - Cyanide Unloading Inspection Checklist; RS - MA - 015 - Venomous Animal Capture Equipment Inspection Checklist; RS - MA - 016 - Green Area Inspection Checklist; RS - SEG - 120 - OPT Checklist - Planned Task Observation; RS - SEG 129 - Tailings Line Inspection Checklist, Regular Inspection Form (FIR), Regular Inspection Extract (EIR), Safety Inspection Report (RIS), Regular Safety Inspection Report (RISR) and Declaration of Stability Condition (DCE). The records assessed were reviewed demonstrating routine inspections covering the available freeboard in pounds and dams and the physical integrity of any surface water diversions necessary to maintain water balance, such as: Regular Dam Safety Inspection Report for the first half of 2024, the first and second half of 2023 Issued by Geo HydroTech Engenharia including in all these reports the above mentioned items such as General Description of the Dam, Technical Characteristics of the Dam, Conservation Status of the Dam, Dam Conservation Plan, Operational Management of the Dam, Freeboard Available in pounds and dams, Diversions of surface water necessary to maintain the water balance, Physical Integrity, Technological Characterization of Tailings, Geological Aspects, Geological, Geotechnical and Hydrogeological Investigations, Documentary Evaluation of Routine Safety Inspections, Hydrological-Hydraulic Studies including pluviometric studies, Height-Area-Volume Curve, Height-Discharge Curve, Freeboard for Absorption of Wind Waves, Flood Transit, Flood Transit in the Reservoir, Structural Evaluation of the Overflow System as well as FIR Dam Inspection Records #125, #1024, #1124, #1224. #225 and #325 all being items checked for

A) Accesses (erosions, presence of water in accesses, identification plates, presence of improperly discarded material; B) Central Massive (erosions and cracks, emergences, animal and shrub burrows, surface, cover vegetation, instrumentation such as piezometers, prisms, tiltmeters, water level meters, robotic station, instrument identification, improperly discarded material, tailings pipeline leaks, geomembrane damage; C) Percolate (Percolate Water Level; Massif Drainage Flow Rate, Leakage System Flow Rate (fishbone), Pumps, Casually Discarded Material, Tailings Pipeline Leakage, Other Anomalies, Geomembrane Damage); D) Geomembrane (Dam Lake Water Level, Erosions, Shrubs, Improperly Discarded Material, Other Anomalies); E) Saddle Dike (Erosion, Surge, Slumps and Cracks, Animal and Shrub Burrows, Surface Drainage, Cover Vegetation, Instrumentation (Water Level Gauge, Prism and Tiltmeter, Instrumentation Identification, Leakage in the Tailings Pipeline, Damage to the Geomembrane, Modestly Discarded Material, Other Anomalies); F) Pile Dike (Erosion, Slumps and Cracks, Animal and Shrub Burrows, Cycloning and Removal Operations in the Bays, Water Level at the Foot of the Dike, Pump Operation, Leaks in the Tailings Pipeline, Damage to the Geomembrane, Casually Discarded Material, Other Anomalies); G) Plant Dike (Erosion, Slumps and Cracks, Water Level at the Foot of the Dike, Pump Operation, Leakage in the Tailings Pipeline, Damage to the Geomembrane, Uncovered Discarded Material and Other Anomalies); H) Auxiliary Dikes I and II (Erosion, Animal and Shrub Burrows, Water Level at the Foot of the Dikes, Damage to the Geomembrane, Leakage in the Reject Pipeline, Improperly Discarded Material and Other Anomalies) issued by duly qualified personnel in accordance with Brazilian regulations. MRDM defined, documented, implemented and maintains preventive maintenance programs and activities to ensure that equipment and devices function as necessary for safe cyanide management through internal documented procedures. Sampled examples were: POP -MAN - 001- Maintenance which applies to all equipment and systems of the MRDM beneficiation plant, covering: ▪Main processes: • Crushing, grinding, flotation and thickening and leaching. • Secondary processes • Environment, safety, medical and dam equipment will be managed directly by those responsible for each area, with support from RS-MAN-001. • Transport and pumping systems: • Conveyor belts, slurry pumps and sedimentation system. • Auxiliary equipment: • Electric motors, reducers, vacuum pumps, valves (specific types, if necessary). • Electrical and control systems, electrical power distribution system, electrical protection and control system, power and command systems for equipment, industrial lighting and sockets system, automation and control system, grounding and lightning protection system (SPDA), emergency power generation system, cooling and electrical ventilation systems.; RS - MAN - 001 - ABC Classification Matrix of Equipment; PG -ME-001- Instrument Calibration Management; POP- BAR - 001 Maintenance and cleaning of the dam; MN-LAB-001- Metrological Quality Manual; POP-LAB - 010 - Laboratory Equipment; POP - MA - 005 - Operation and Maintenance of Effluent Treatment Plant (ETE); POP - MEP - 011 Operational Procedure for Maintenance in Fire Detection Alarm System; POP - MEP -013 - Electrical Maintenance of Generator Set Synchronization Panel; POP - MEP - 019 - Preventive Inspection of Equipment; POP - MEP -021- Preventive Inspection of Equipment; POP - MEP - 026 Emergency Generator Maneuver; POP - MEP - 023 Maintenance on Electric Hoists; POP-MMP- 001 - Preventive Inspection on Equipment; POP-MMP - 022 - Lubrication of Equipment; RS - MMP - 001 - Monthly Mechanical Inspection - Receiving and Preparation Tank and Dosing and Distribution Tank; POP - MMP

- 014 - Replacing the Slurry Pump (Entire Structural Assembly); POP - PCM - 001 Maintenance Activities Scheduling that shall be determinate for each equipment and devices its criticality classified based on parameters such as: Occupational Hazards and Risks to workers; Significant Environmental Aspects and Impacts; Applicable Legal Requirements; Demands; to the Maintenance indicators identified as Mean Time Between Failures (MTBF) – Average time between one failure and another for the same monitored equipment or system; Mean Time to Repair (MTTR) – Average time used to repair a failure or defect in an equipment or system and Total Cost of Ownership (TCO) – Complete cost of acquisition, operation and maintenance of an asset or equipment or system throughout its useful life. MRDM defined and documented that maintenance of equipment instructions will be determined according to the maintenance strategy linked to the asset criticality matrix, in addition to acting in accordance with the equipment operation and maintenance manuals and the best practices used in the mining segment. Corrective procedures - Each corrective intervention must include: ▪ Identification of possible causes of equipment failure, ▪ Record of replaced components and parts, ▪ Immediate corrective actions to restore the asset's condition, ▪ Future corrective actions to prevent recurrences. Maintenance Execution - Maintenance execution is divided into three main approaches: predictive maintenance, preventive maintenance and corrective maintenance. Each one plays a fundamental role in preserving equipment reliability and continuity of operation. Below, we detail the procedures and techniques associated with each approach. Predictive Maintenance - Predictive maintenance aims to detect abnormal conditions before they become failures, using advanced monitoring and diagnostic techniques. Predictive Maintenance Methods include ▪ Vibration analysis: Detects misalignment, imbalance and failures in bearings of rotating equipment. ▪ Thermography: Identifies overheating in motors, electrical connections and mechanical components. Non-destructive testing (END) monitoring is a technique for assessing the integrity and properties of materials without causing damage, ensuring that the item being assessed remains or is put back into operation after the test. END: Detects leaks and wear in tanks, pipes, pressure vessels and equipment with significant welds. ▪ Oil analysis: Assesses contaminated and worn discharges. ▪ Online monitoring: Used in critical equipment, such as crushers, mills and main pumps, for real-time monitoring of operating conditions such as temperature, pressure, flow, current and voltage. Predictive Maintenance Procedure Predictive maintenance allows interventions before catastrophic failures, focusing on continuous monitoring of critical parameters such as vibration, temperature and wear. Techniques used: Our vibration data collection route has a defined scope that may vary according to the update of the criticality matrix and aims to monitor all critical A and/or equipment identified as critical due to operating conditions or repair costs. The process of monitoring hot spots (thermography) is performed on electrical connections, panels and disconnect switches in order to identify possible risks of damage to components due to high temperatures resulting from connection failures. Oil collection and analysis is mainly applied to reducers, diesel engines and transformers and seeks to identify the quality of carrier or insulating oils, and determine internal component failures, indicated by metal contamination. Through wear monitoring, it is possible to measure the useful life of a component based on periodic measurement of the material, analysis of the type of product produced and the average production time. Non-destructive testing is an evaluation technique used to ensure that materials or structures meet quality and safety requirements,

identifying defects or failures without damaging components. This is a set of low-cost techniques since they are mostly applied with equipment in operation and ensuring its integrity. Some examples applied are ultrasound for measuring thickness and detecting discontinuities, as well as tests using liquid penetrant or magnetic particles. Preventive Maintenance Preventive maintenance aims to perform periodic inspections and replacements of components, avoiding unexpected failures. It is based on wear history, equipment manuals and developments in conjunction with component suppliers, linked to a previously defined schedule, ensuring the longevity of the equipment. Preventive Maintenance Tasks ▪ Visual inspection: Checking the condition of the equipment and its components such as belts, pulleys, bearings, shoulders, motors, lighting, structures, screens, housings, sensors, scrapers, etc. ▪ Lubrication: Replenishment of financing to avoid excessive wear. ▪ Replacement of consumable components: At intervals pre-established in the catalog or based on condition monitoring ▪ Instrument calibration: Ensuring accuracy in control and monitoring systems. Preventive Maintenance Procedure - Preventive maintenance follows a structured plan to replace worn parts and perform periodic inspections. CIL - Preventive actions: o Review of component reserves to perform the rotation cycle in tanks, pumps and other equipment. o Scheduled quarterly cleaning of agitators and leaching tanks. o Biannual verification of adsorption and desorption systems. o Inspection of tank and pipeline linings. Corrective Maintenance - Corrective maintenance occurs when there is a failure. The objective is to restore the equipment efficiently, without risks to safety, health, the environment and the community and minimizing the impact on production. Corrective Maintenance Procedures - ▪ Fault diagnosis: identification of possible causes of the problem. ▪ Safety isolation: Ensure that the equipment is safe for intervention. ▪ Repair or replacement: Perform repairs or replace damaged components. ▪ Functional tests: Post-repair check to ensure that the equipment is in normal operation. As already mentioned, reviewing MRDM's documentation noted that defined, documented and implemented Maintenance Service Order (OS) which is a document that has two objectives. First, it is a document that defines all necessary information about the maintenance to be performed such as the named Why? / Who? / When? / Where? / What? / How? (5W1H). The other function of OS is for recording the results obtained from the maintenance performed. Evidenced documented procedures duly implemented by MRDM related to maintenance management. The auditor reviewed the above-mentioned maintenance plans and concluded that they are consistent with aiming of protect occupational health and safety of workers as well as protecting environmental media. Reviewing maintenance records it was evidenced that MRDM has been performing and recording maintenance results in accordance with previously planned in the respective Plans (Sensitive Inspection, Lubrication, Preventive Maintenance and Predictive Maintenance). Interviewing maintenance personnel, it was noted that they clearly know how performing and maintenance activity, the specific items to be verified, and the respective acceptance criteria as well as what they have to do if anomalies are detected. During field audit, the auditor verified the cyanide facilities are in good conditions. Based on all the above-mentioned factors it was evidenced that MRDM has been adequately performing preventive maintenance activities as stated. during field audit, that MRDM has necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted. Sampled examples

were: Generator 61170-1020-GE001; Generator 61170-1020-GE002; Generator 61170-1020-GE003 and Generator 61170-1020-GE004. Reviewing MRDM's Inspection Plan as well as MRDM" s Preventive Maintenance Plan that generators are included in the above-mentioned Plans with monthly frequency. Reviewing inspection records and preventive maintenance records it was evidenced that MRDM has been inspecting and performing preventive maintenance of its generators as stated.

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
☐ X in full compliance with
☐ in substantial compliance with Standard of Practice 4.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Yes. The operation has the practice of collecting samples using an online analyzer and collecting manual samples for titration and control of the Cyanide dosage automatically and in real time. The practice covered in the procedure POP - PL - 003 - Leaching and Detox Operation is the collection of samples to be analyzed online TAC 1000 every 20 min and collections of manual samples throughout the other tanks every shift for comparison with the results of the online analyzer and/or when the analyzer is undergoing preventive and isolated maintenance. The TAC 1000 controls cyanide through the V- 05 Cyanide Dosing Valve of TQ 01 and V- 06 - Cyanide Dosing Valve of TQ 02 control valves, dosing only the amount necessary to leach the mineral. The amount required for dosage control is determined through leaching diagnostic tests which determined the ideal amount of cyanide to be used in the circuit, depending on the gold content and the type of ore.

Standard of Practice 4.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Yes, evidenced that MRDM defined, documented, implemented and maintains internal documented procedure Water Balance Control which defines guidelines and

methodology for a MRDM''s comprehensive, probabilistic water balance management model in such way that it identifies and quantifies the uses, sources and consumptions of water in a standardized and traceable way, reducing potential impacts of disturbances in the operational balance. This procedure applies to the operation, processes of the metallurgical plant, dam and environmental, safety and occupational health areas. Noted that responsibilities and authorities related to water management are defined, documented and communicated. Noted above-mentioned procedure include aspects related to: a) Pluviometric analysis: measurement of the amount of rain that falls in a given area during a specific period of time It is expressed in millimeters (mm); b) Evaporation: it is the process by which water on the earth's surface turns into water vapor and is released into the atmosphere. This occurs due to the exposure of water to thermal energy from the environment, such as sunlight and c) Infiltration: refers to the process by which water penetrates the soil through the dam structure. Besides, it clarify the operational conditions such as fill daily, in the water balance control form, Water Balance information about rainfall and evaporation data (provided by Environmental Area), the volume occupied in the dam, volume of accumulated solids (m3),volume of reservoir water (m3), volume of accumulated solids, deposition rates, the mass processed daily, the apparent mining density, estimated volume of water in the dam reservoir, , estimated volume on the previous day, volume of precipitation on the day (m3), volume of water deposited by waste (m3, losses due to empty spaces (m3), losses due to evaporation (m3), infiltration losses, Volume of water deposited by tailings, tailings deposition rate, Evaporation losses, bathymetric results. The water balance considers all inputs and outputs that are measured such as pumping new water, pumping reused water, pumping non-rejected water through flow meters and considers rainwater and evaporation through rain gauges and evaporimeters. All this information makes up the water balance model, allowing predictability and being updated every six months through the bathymetric study of the lakes. Delving deeper into the balance in the downstream valley of the MRDM structures, currently for the rainy- day scenario, a rain with Recurrence time) (RT) of 100 years occurring permanently along the entire propagation section as evidenced in (PAEBM - Emergency action plan for dams mining - Tailings Disposal System). Reviewing water management records the auditor evidenced that they include results of all analyzed parameters in the Water Balance. Evidenced duly implemented. MRDM does not have neither discharge in surface waters. Reviewing the Water Balance, it was evidenced that the water balance considers the following in a reasonable and appropriate manner for the facilities and the environment considering factors such as: the rates at which tailings are deposited in tailings storage facilities; A projected duration of the storm and a storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be avoided during the operational life of the installation; The quality of existing precipitation and evaporation data in representing actual site conditions; The amount of precipitation entering a pond or impoundment resulting from surface run- on from any up gradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground; Solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface; The effects of potential power outages or pump and other equipment failures the emergency removal of water from a facility

and others aspects of facility design that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility. Reviewing water management records the auditor evidenced that they include results of all analyzed parameters in the Water Balance. Evidenced duly implemented. MRDM does not have leach pads. Reviewing several records of Water Balance, it was evidenced that they consider the rates at which tailings are deposited in tailings storage facilities and are duly implemented. evidenced that the water balance considers a design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility. The water balance storm model predicts a decamillennial storm. The (PAEBM - Emergency action plan for mining dams - Tailings Disposal System) provides that in the valley downstream of the MRDM structures, for the Rainy-Day Scenario, a rain with a Return Time (TR) of 100 years occurring permanently is considered. throughout the propagation section. In this way, before the rupture, a flood was simulated in the downstream, in order to create more realistic antecedent conditions and in favor of safety, preventing overtopping from occurring. Reviewing several records of Water Balance, it was evidenced that they are duly implemented. the water balance considers the quality of existing precipitation and evaporation data in representing actual site conditions Data obtained from MRDM's instruments are compared to Brazilian reference Meteorology Brazilian Institute (INMET) Reviewing several records of Water Balance it was evidenced that they are duly implemented. evidenced that the water balance considers the amount of precipitation entering a pond or impoundment resulting from surface run- on from any upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground. Reviewing several records of Water Balance, it was evidenced that they are duly implemented. There is no potential of freezing. evidenced that the water balance considers solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface and allowable discharges to surface water. Reviewing several records of Water Balance it was evidenced that they are duly implemented. the water balance considers the effects of potential power outages or pump and other equipment failures the emergency removal of water from a facility. Reviewing several records of Water Balance, it was evidenced that they are duly implemented. Reviewing several records of Water Balance was evidenced that they are duly implemented. the ponds and impoundments designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from water balance calculations. There are inspections in place to ensure the control of all parameters. The results were reviewed and showed to be in accordance Brazilian regulation laws. Evidenced that MRDM implements operating procedures that incorporate inspection and monitoring activities to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment; Inspection and monitoring records as well as check list dam safety, geotechnical inspection dams were reviewed and demonstrated that the results are in accordance with Brazilian regulation laws. The dam's current instrumentation includes INA's (Water Level Indicators), piezometers, Surface Landmarks and Flow Meters. Monitoring wells are also located around the dam and in other locations on site, to monitor the water quality For dams with High Associated

Potential Damage (DPA), which is the case of the MRDM Tailings Dam, according to Brazilian Mining Agency (ANM) Resolution No. 95/2022, 24-hour video monitoring of the structure must be turned on, and reserves must be stored by the developer for a minimum period of 90 days. This dam already has a video monitoring system installed. It is worth noting that, within the video monitoring plan, external cameras are installed on the downstream slope of the dam, in order to identify any anomalies that may arise. During field audit, evidenced duly implemented. All monitoring and inspection records are recorded in specific control sheets and spreadsheets that are duly archived in Volume III of the Dam Safety Plan (PSB).Reviewing PSB records evidenced duly implemented. MRDM measures the precipitation and compare the results to design assumptions. Records “reviewed showed be implemented as stated. Additionally, during the audit, evidenced that aspects that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility are duly considered. MRDM does not have neither discharge in surface waters. MRDM has a Detox process that uses ammonium bisulfite to destroy or reduce residual cyanide ions present and not rejected before final disposal. The pulp from the CIL feeds the Detox circuit in a 2035-CX02 tailings box at the discharge of the last tank in the leaching process (2035-TQ-02), where ammonium bisulfite is added at a rate of 0.35 kg/t. This process occurs automatically based on the mass processed in the Grinding Unit. Data is monitored via supervision in the Control Room. After this step, the tailings are sent to the Tailings Dam. There is no environmental waste disposal.

Standard of Practice 4.4

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

The operation is ☐ X in full compliance with / ☐ in substantial compliance with / ☐ not in compliance with Standard of Practice 4.4

Summarize the basis for this Finding/Deficiencies Identified:

MRDM defined, documented, implemented and maintains internal procedure Environmental Monitoring Plan which aims to establish a methodology for monitoring the quality of surface and underground waters and liquid effluents generated, water potability, monitor air quality as well as monitor noise levels in the MRDM environment and in strategic adjacent points, soil characterization and comparing the results obtained with the standards established by the respective applicable legislation. The auditor reviewed WAD cyanide monitoring for open waters records and concluded that MRDM does not present open water with WAD cyanide exceeding 50mg/l. Despite that, noted MRDM has been implemented special measure (fencing) as well as metal blocking siding, walls in concrete structures in the access to administrative areas (central entrance), fences in the environmental complex and in the metallurgical plant, in addition to barbed wire fence throughout the other areas as measures used to restrict access to wild animals and cattle in all open waters of the development. MRDM does not have heap leaching. Evidenced that there is no register of wildlife mortality caused by cyanide intoxication. Evidenced that MRDM defined, documented, implemented and maintains internal documented procedure Environmental Monitoring Plan that includes monitoring of surface water, groundwater and effluents, water potability, air quality, noise and soil characterization. .Evidenced that above-mentioned documentation clearly define the localizations points for monitoring surface waters quality, groundwater and effluents. It is clearly defined the methodology for monitoring of cyanide in the waters contained in the tailings dam, the forms of cyanide that are analyzed and defines the monitoring points of industrial effluents that are collected in the dam. Reviewing WAD cyanide records it was evidenced that all sampled records showed WAD cyanide concentration less than 50 mg/l in open water. The samples mentioned refer to those collected for WAD cyanide determination and not for wildlife mortality. Evidence that inspection records performed by Dam Team contain several items to be inspected and one of them is verifying the existence of some wild mortality. Reviewing record named daily Dam Inspections, which results, are consolidated in monthly reports. Evidenced duly implemented and noted that all sampled records indicate the results showing there is no wildlife mortality caused by cyanide intoxication. MRDM does not have leach pads.

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	☐ X in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.5

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM defined, documented, implemented and maintains internal procedure Environmental Control Plan (PCA) issued by YKS Environmental Services (YKS) on behalf of MRDM items 3, 5 and 7 that aims to establish a methodology for monitoring the quality of water surface, underground water, effluents, water potability; air quality; environmental noise, and soil characterization. Evidenced that it includes information such as A) methodology including Quality Assurance / Quality Control (QA/QC) data and protocols; B) Applicable legislation; C) Parameters to be analyzed for instance cyanide WAD, total and free; D) Sampling for instance points, localization, methodology, collection system, preservation, material resources; E) Responsibilities and Authorities for instance MRDM Area Team, Contracted personnel, F) Recording and reviewing monitoring results. Evidenced that surface water monitoring is in accordance with the Resolution of the Brazilian Environmental Council (CONAMA) 357/2005 as well as required by Water Management Institute of the State of Minas Gerais (IGAM) and State Environmental Foundation of Minas Gerais (FEAM). The surface water quality data obtained at the points monitored by MRDM were compared with the legal limits in accordance with the legislation applicable in the State of Minas Gerais, while the groundwater data were compared with federal legislation. For liquid effluents, a comparison was made with the discharge standards in receiving bodies and the efficiency project of the control systems, when there was monitoring data before and after treatment. This report is structured in 07 (seven) chapters, with Chapter 1 presenting the physical aspects and contextualization of the conditions in the river basin where the MRDM area is located regarding the location of the project and the quality of water resources. Chapter 4 presents a water resource quality sampling network, in addition to the methodology used to assess the quality data discussed in Chapter 5. In addition, Chapter 6 contains the summary and conclusions on the data obtained during the monitoring carried out during the period under evaluation. Chapter 7 lists the bibliography used. The following laws and standards were used to assess the analytical results: • Joint Normative Deliberation Copam/CERH-MG 08, of November 21, 2022 - Provides for the classification of water bodies and environmental guidelines for their classification, as well as establishes the conditions and standards for the discharge of effluents, and provides other measures; • Resolution of the National Environmental Council - CONAMA 396, of April 3, 2008 - Provides for the classification and environmental guidelines for the classification of groundwater and provides other measures. Preponderant use of water for human consumption, in accordance with the Maximum Permitted Values of Annex I; • Ordinance of the Ministry of Health - Ordinance MS 888, of May 4, 2021, which provides for the procedures for controlling and monitoring the quality of water for human

consumption and its potability standard; • Brazilian Association of Technical Standards - ABNT NBR 9898/1987. Preservation and Sampling Techniques for Liquid Effluents and Receiving Bodies. Confirmed on 04/08/2021 and • Brazilian Association of Technical Standards - ABNT NBR 15847/2010. Groundwater sampling in monitoring wells – Purging methods. Confirmed on 05/02/2024. The analyses were carried out by the laboratory Sintezis Análises e Tecnologia Ambiental Ltda, which until March 2024 was called the Água e Terra laboratory, accredited in sampling and testing by the National Institute of Metrology, Quality and Technology (INMETRO) with accreditation number 1311, as a laboratory of the Brazilian Network of Testing Laboratories (RBLE). The auditor reviewed sampled surface water monitoring results and concluded that the concentration of WAD cyanide in surface waters has been less than 0.5 mg/l. Evidenced that MRDM does not have any direct discharge of solutions containing cyanide to surface water. MRDM defined, documented, implemented and maintains internal procedure Environmental Control Plan (PCA) issued by YKS Environmental Services (YKS) on behalf of MRDM items 3, 5 and 7 that aims to establish a methodology for monitoring the quality of water surface, underground water, effluents,; water potability; air quality; environmental noise, and soil characterization. Evidenced that it includes information such as A) methodology including Quality Assurance / Quality Control (QA/QC) data and protocols; B) Applicable legislation; C) Parameters to be analyzed for instance cyanide WAD, total and free; D) Sampling for instance points, localization, methodology, collection system, preservation, material resources; E) Responsibilities and Authorities for instance MRDM Area Team, Contracted personnel, F) Recording and reviewing monitoring results. Evidenced that MRDM has been monitoring for cyanide in surface water down gradient of the site is in accordance with the Resolution of the Brazilian Environmental Council (CONAMA) 357/2005 as well as required by Water Management Institute of the State of Minas Gerais (IGAM) and State Environmental Foundation of Minas Gerais (FEAM). The monitoring points of surface waters are identified as PA-18 - MRDM Plant Supply; PA-19 - MRDM Plant Supply; PA-21 - Individual Supply Mr. Fernando; PA-22 - MRDM Plant Supply; PA-23 - Collective Supply - Piranga Community; PA-24 - Mr. Cravo Supply; PA-25 - Mr. Alfeu Collective Supply; PA-30 - Old Collective Supply - Ouro Fino Community Mr. Ataíde; PA30-A - Collective Supply - Ouro Fino Community Mr. Durvalino; PA-26 - MRDM Monitoring; PA-29 - MRDM Monitoring; PA-35 - MRDM Monitoring; PA-36 - MRDM Monitoring; PA-37 – MRDM Monitoring; PA-38 – MRDM Monitoring; PA-40 – MRDM Monitoring; PA-41 – MRDM Monitoring; PA-42 – MRDM Monitoring; PA-43 – MRDM Monitoring; PA-44 – MRDM Monitoring; PA-45 – MRDM Monitoring; PA-46 – MRDM Monitoring; PDR04- MRDM Monitoring; PDR05- MRDM Monitoring; PA-34-Surge Basin. Besides, it was considered the above -mentioned Technical report issued by Crono Engenharia Ambiental on behalf of MRDM. MRDM does not have direct discharge into surface waters Evidenced that MRDM does not have any direct discharge of solutions containing cyanide to surface water. MRDM defined, documented, implemented and maintains internal documented procedure Environmental Control Plan (PCA) issued by YKS Environmental Services (YKS) on behalf of MRDM items 3, 5 and 7 that includes monitoring of surface water. Reviewing pertinent monitoring surface water records, it was evidenced that MRDM has been monitoring for cyanide in surface water and that results demonstrate there are no indirect discharges to surface water. MRDM does not have any record of indirect discharge 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 ☐ X in full compliance with ☐ in substantial compliance with ☐ not in compliance with Standard of Practice 4.6

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM defined, documented, implemented and maintains internal procedure Environmental Control Plan (PCA) issued by YKS Environmental Services (YKS) on behalf of MRDM items 3, 5 and 7 that aims to establish a methodology for monitoring the quality of water surface, underground water, effluents, water potability; air quality; environmental noise, and soil characterization. Evidenced that it includes information such as A) methodology including Quality Assurance / Quality Control (QA/QC) data and protocols; B) Applicable legislation; C) Parameters to be analyzed for instance cyanide WAD, total and free; D) Sampling for instance points, localization, methodology, collection system, preservation, material resources; E) Responsibilities and Authorities for instance MRDM Area Team, Contracted personnel, F) Recording and reviewing monitoring results. Evidenced that ground water monitoring is in accordance with the Resolution of the Brazilian Environmental Council (CONAMA) 396 of August 7, 2009 as well as required by IGAM and FEAM. The monitoring points of groundwater are identified as PA-18 ; PA-19; PA-21; PA-22; PA-23; PA-24: PA-25: PA-30; PA30-A; PA-26 PA-29 PA-35; PA-36; PA-37; PA-38: PA-40: PA-41 PA-42; PA-43; PA-44 PA-45; PA-46; PDR04; PDR05 and PA-34. Evidenced duly implemented. Sampled examples were September 2023; October 2024; May. 2024; July, 2024. The auditor reviewed sampled under ground water monitoring results and concluded that both free cyanide as well as total cyanide are below levels that are protective of identified beneficial uses of the groundwater. *E*videnced that MRDM defined, documented, implemented and maintains internal documented procedure Water Balance Control in order to implement water management system in such way for managing seepage control systems to protect the beneficial use(s) of groundwater beneath and/or immediately down gradient of the operation. Reviewing pertinent records it was evidenced that internal documented procedure Water Balance Control is duly implemented. The cyanide areas are constructed with reinforced concrete floors with containment berms that provide containment against seepage. All cyanide solution pipelines are located within the containment areas and there are no cyanide buried pipelines. Collection drains and sumps are used to capture precipitation and any spillage and direct it to the process. The cyanide solution tanks are in areas provided of an impermeable barrier. The facilities are inspected and maintained to ensure the integrity these containment systems and prevent potential seepage. Evidenced that the secondary containments are covered by a HDPE, and all pipelines are within areas with secondary containment. Evidenced Containment Basins Inspections duly implemented. Sampled examples were Containment basin inspection checklist: BC 001- Containment Basin - Receiving Sodium Cyanide; BC 002- Containment Basin - Preparation of Sodium Cyanide;

BC 003- Containment Basin - Dosing of Sodium Cyanide and BC 004- Containment Basin - Leaching dated February 2024, October 2023; March 2024; May 2024, December 2023; July 2024; September 2023; September 2024 and October 2024. During the field audit, the auditor evidenced that the involved areas are in good conditions. The tailings dam is completely covered by a synthetic geomembrane and operates daily following the procedure Reassessment and update of the MRDM Dam Manual prepared by GeoHidro Tech on behalf of MRDM, identified as EQU-024-2043-RT-001-R0 and hereinafter referred to as the Dam Manual which establishes the following technical controls: Control of the waste discharge system and water recirculation; control of the reservoir water level; control in the reservoir area; control of the operation of the internal guidance outlet; inspections and geotechnical monitoring and environmental monitoring as well as the planning of safety inspections at the dam, defining how the inspections are carried out, the items to be functional, the inspection frequencies and, logically, the planning of maintenance considering structural maintenance, equipment and instrumentation and the maintenance of monitoring instruments. During field audit, interviews with the personnel involved as well as critical analysis of records evidenced proper implementation as required. MRDM does not use mill tailings as underground backfill. evidenced that there is no record of seepage from the operation that has caused cyanide concentrations of ground water to rise above levels protective of beneficial use. MRDM currently has a total of eight water resource use rights granted by the competent state agencies (Secretaria Estadual de Meio Ambiente (SEMAD) / Instituto Mineiro de Gestão das Águas (IGAM), seven of which are for the collection of groundwater and one for the collection of surface water from the Rodeador water dam. These authorities were obtained regularly, ensuring the water security of operations and meeting the legal and technical criteria required by Brazil current environmental legislation. However, based on water balance data from the last five years (2021-2025), the collection of groundwater has not been necessary. This is due to the adequate and regular availability of surface water from the Rodeador Dam, which has efficiently met all of the company's operational demands. Therefore, MRDM has operated exclusively using surface water outlets, maintaining groundwater outlets only as technical and strategic support for contingency scenarios, without compromising the water sustainability of the region.

Standard of Practice 4.7

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

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

Summarize the basis for this Finding/Deficiencies Identified:

MRDM has been implemented spill prevention and containment measures provided for all cyanide unloading, mixing storage, and process solution tanks. During the field audit it was evidenced that all the cyanide concentrated solution and process solution tanks and vessels with 0.5 mg/l or greater WAD cyanide concentrations are provided with spill prevention and containment measures, such as secondary containment and impermeable varnish. Besides,

MRDM has been implemented and maintains an inspection system of containment basins duly implemented. The frequency used for this inspection was analyzed and are appropriated. Besides, reviewing pertinent record Inspection of Containment Basins) used for this inspection, it was noted that it contains all requirements related to Code's Standard Practice of 4.7. Results recorded in the check list demonstrated that secondary containments are as stated. Reviewing design documentations including design drawings, data on tanks and vessels, containment's available volume calculations accounting for the volume occupied by the tanks as well as observations from the field audit it was evidenced that all cyanide storage, mixing and process tanks and vessels with 0.5 mg/l or greater (WAD) weak acid dissociable contain secondary containment sized to hold a volume greater than that of the largest tank within the containment in accordance with Brazilian regulations. MRDM has been defined, documented, Implemented and maintains internal documented procedures to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. Reviewing designed documents was evidenced that the system to prevent discharge to the environment of any cyanide solution or cyanide-contaminated water has been designed with sumps and dedicated pumps and piping to return all such water to the production process. Reviewing operational documented procedures, it was noted that it establishes all necessary steps to avoid discharge of cyanide solution into the environment in cases of spillage as clearly defines that no water collected in containment shall be discharged to the environment since all water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not. Interviewed personnel showed to be aware of this matter. MRDM does not have process tanks without secondary containment. Besides, all cyanide tanks are installed on concrete impermeable barrier between the tank bottom and the ground. During the field audit evidenced none areas where cyanide pipelines present a risk to surface water and requiring special risks. All pipelines are within controlled areas, by secondary containments. During the field audit and reviewing pertinent drawings evidenced the existence of an impermeable barrier between the tank bottom and the ground for all tanks. During the field audit evidenced that all cyanide process solution pipelines are provided with spill prevention to collect leaks and prevent releases to the environment. All cyanide process solution pipes, including waste pipes, are operated periodically and have secondary containments and are positioned on impermeable floors allowing leak containment and action in accordance with PAEC. Secondary containments are made up of waterproof reinforced concrete floors and channels in regions where the waste pipelines are closest to the plant and geomembrane in regions where there is no concrete. MRDM defined, documented, implemented and maintains several documentations such as Isometric Drawing, As Built Drawing, Flow sheet, Data Sheet, Project Memory, Engineering Manual, Materials Technical Specification including pipes, valves, fittings, flanges and other components. and other documents necessary for the execution of the project. The design and manufacture of subsidiary systems will be in accordance with the relevant codes and standards from regulatory agencies and institutes such as: (ABNT) Brazilian Association of Technical Standards; (ANSI) American National Standards Institute; (ASME) American Society of Mechanical Engineers; ASME B31.3 Process Piping (2034-01-4000-SPE-P-0001); ASME B31.11 Slurry Conveying Piping System; ASME B1.20.1 Pipe Threads, General Purpose, Inch; ASME B16.1 Gray Iron Flanges and Flanged Fittings; Malleable iron

threaded connections ASME B16.3, classes 150 and 300; ASME B16.5 Pipe Flanges and Flanged Fittings; Factory Made Forged Butt Welding Fittings ASME B16.9; ASME B16.11 Forged, Socket Welding and Threaded Connections; ASME B16.47 Large Diameter Steel Flanges, NPS 26 to NPS 60; ASME B16.48 Steel Line Shades; ASME B36.19M Stainless Steel Pipe; ASME B46.1 Surface Texture (Roughness, Waviness, and Surface Configuration); (BSI) British Standard Institute; (ASTM) American Society for Testing and Materials; (AWA) American Welding Society; (ISO) International Standards Organization; Standardization of valve and fitting manufacturers; (PFI) Pipe Manufacturing Institute; UL-BR Underwriters Laboratories in Brazil; Canadian CSA Standard Association. Reviewing design documentation and during field audit evidenced that all cyanide tanks are made of carbon steel ASTM A-36 and pipelines are made of carbon steel ASTM 53B and ANSI B36.10 or HDPE being constructed of materials compatible with cyanide and high pH conditions.

Standard 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	☐ X in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 4.8

Summarize the basis for this Finding/Deficiencies Identified:

The MRDM Tailings Dam has the specific purpose of disposing of waste from the gold ore beneficiation process and recirculating the water to a beneficiation plant. The reservoir has a full liner made of smooth HDPE geomembrane, a layer that overlaps the geotextile blanket and the soil, the purpose of which is to reduce infiltration and prevent contamination of the soil and water table. The waste stored in the reservoir is classified as non-inert, so the entire projection area of the reservoir, including the upstream face of the dam, has a waterproofing system consisting of geotextile and smooth HDPE geomembrane with a thickness of 1.50 mm. In addition, this structure is equipped with a leak detection system, designed to intercept and direct, downstream of the dam, flows due to failures/leaks in the waterproofing system. The dam has an internal drainage system consisting of a vertical sand filter and a sand and gravel sandwich-type drainage mat. The works aimed at raising the crest of the tailings dam and saddle dike to El. 840 are underway in 2024, consisting of the 7th Stage of the raising, in which surface drainage and instrumentation of the components necessary for the alteration of the structure are being carried out. For this stage, as in the previous stage, the raising of the crest of the tailings dam will be carried out by compacting soil, rockfill and extending the internal drainage system. Only compacted fill will be used to raise the saddle dike, in

addition to the extension of the existing internal diversion system. In parallel with the heightening of the structures, the waterproofing system of the reservoir from El. 837 m to El. 840 m will also be raised, starting with the installation of the 1.5 mm thick HDPE geomembrane. In this stage, the MRDM Tailings Dam will provide an emergency spillway system. This system will be designed to reuse the channel completed in the previous stage of the dam heightening, El. 837 meters. For this stage, the spillway will consist of the construction of a small dike inside the channel, raising a spillway to the 838.5 m mark. The spillway system was designed to meet the Probable Maximum Precipitation (PMP), in accordance with current legislation, since the structure has a high DPA, according to the 2022 Periodic Dam Safety Review. Therefore, the freeboard was lowered to approximately 20% of the height of the walls of the surface drainage devices in relation to the water level. Regarding the percolate under the reservoir and the internal drainage flow, monitoring is carried out separately through two wells located downstream of the foot of the main dam, where the flow originates and the flow returns to the reservoir through a pumping system. Before being redirected to the reservoir, the water collected by the leak detection and internal drainage systems is stored in the main reservoir. The affinity of the collaboration the leak detection system is at least 0.5%, as a result of the excavation of the dam foundation, which must be respected in its extension, which was carried out simultaneously with the raising stages. This decision may undergo some adjustment according to field suitability, through the approval of the designer and/or inspection, in case there are changes in relation to the project design. In order to monitor the main solid and the saddle dike, piezometers, water level meters, tiltmeters and positioning markers are installed in these structures, according to the Executive Project for Raising the Dam for El. 840m. The internal drainage system of the main massif has two distinct configurations. At higher elevations on the shoulders, a vertical filter connected to a homogeneous horizontal mat (sand). In the foundation region, a horizontal sandwich mat made of sand, gravel 0 and gravel 1 was connected to the vertical filter. All water that percolates through the dam or foundation is captured by this system and directed, by gravity, downstream of the dam, emerging in the foot drain. In the raisings, the horizontal mat is extended to the positions indicated in the respective projects of the raising stages. The saddle dike also has an internal drainage system made up of a vertical filter and a homogeneous horizontal mat (sand), the latter being extended along the advance of the landfill in the alteration stages. Evidenced that MRDM operation implemented quality assurance and quality control (QA/QC) programs during construction and substantial modification of all cyanide facilities. Evidenced that MRDM conducted quality control and quality assurance programs for new and existing cyanide facilities and modifications to existing facilities, including cyanide unloading, storage, and other cyanide facilities in accordance with is defined in the Code's Definitions and Acronyms Evidenced documentation for QA/QC management system which includes several requirements including detailed design requirements; technical specifications; legal requirements; materials quality specifications; testing and certification; visual inspections and testing of construction work; inspection of offsite fabrication work; (EPC) - Engineering, Procurement and Construction contractors; documents, drawings and records control system, commissioning consultancy; review

of material specifications (steel quality specifications and tests, inspections/testing of rebar and concrete for foundations, weld inspections and tests of steel works, and paint bonding tests for tanks and piping. Evidenced documentation codes and project identifications containing several information. Sampled examples were Mass balance; Scope Change Control; Measurement Criteria; Design Criteria; Timeline; Operational Data; Typical detail; Block diagram; Interconnection Diagram; Single-line Diagram; Supplier Documentation; Specification of Services; General Specification; Technical Specification; Project Analytical Structure; Flowcharts in General; Datasheet; Delivery Guide for Drawings and Design Documents; Asset List. Evidenced duly implemented. The entire construction of the tailings dam was based on Brazilian legislation and standards and the International Cyanide Code, following daily monitoring by the in-house and contracted engineering team according to documents made available to the auditor. MRDM operation implemented quality assurance and quality control (QA/QC) programs during construction of the tailings impoundment and related ancillary facilities Evidenced that MRDM has as quality control and quality assurance programs addressed the suitability of materials and adequacy of soil compaction for earthworks such as tank foundations and earthen liners, the installation of synthetic membrane liners used, and for construction of cyanide storage and process tanks. Specialized contractors were hired to carry out quality control for controlling the implementation of the activities required by Cyanide Code. During the audit, through reviewing pertinent QA/QC records, evidenced that they address the items identified in this question, as applicable to the facilities at the operation as well as Quality Management Systems (QMS) and by Brazilian legislations. As already mentioned the entire construction of the tailings dam was based on Brazilian legislation and standards and the International Cyanide Code, following daily monitoring by the in-house and contracted engineering team according to documents made available to the auditor. MRDM operation implemented quality assurance and quality control (QA/QC) programs during construction of the tailings impoundment and related auxiliary facilities. Reviewing pertinent documents and records it was evidenced that MRDM has been maintained quality control and quality assurance records for cyanide facilities. Quality control and quality assurance documentation define a systematic for inspection of facilities records as defined by orders that are automatically generated by MRDM system. Evidenced that records demonstrate that MRDM has been retained quality control and quality assurance records in accordance with the orders generated by Datasul system. As already mentioned the entire construction of the tailings dam was based on Brazilian legislation and standards and the International Cyanide Code, following daily monitoring by the in-house and contracted engineering team according to documents made available to the auditor. Evidenced that MRDM operation implemented quality assurance and quality control (QA/QC) programs during construction of the tailings impoundment and related ancillary facilities. Evidenced that appropriately qualified personnel reviewed cyanide facility construction and provided documentation that the facility has been built as proposed and approved. Verified that engineering personnel involved with the above-mentioned activity is appropriately qualified person based on their education, training, expertise and experience. MRDM has available quality control and quality assurance

documentation.

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 ☐ X in full compliance with ☐ in substantial compliance with ☐ not in compliance with Standard of Practice 4.9

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that the MRDM defined, documented, implemented and maintains a internal documented procedure PG-MA-011 - Wildlife Rescue Program The main objective of this Program is to minimize direct losses of wildlife individuals, in addition to relocating them in the best possible way. Associated with this main objective are specific objectives, namely: Monitoring native vegetation suppression activities in order to, when and if necessary, conduct and/or adequately capture, transport and release wildlife individuals that were found in transit or displaced during the activities; ▪ identify the individuals that will be assisted, analyze their health status and general biological characteristics, whenever possible and/or necessary; identify areas of natural vegetation in a better state of preservation in the area of direct influence (AID), for the eventual release of specimens that may be captured during the rescue; Create and organize a program-specific database and images with information obtained through wildlife rescue activities and Collect and fix weakened individuals that have conditions for survival in their natural environment. The Fauna Rescue Program aims to be applicable to minimizing the impacts generated on fauna eventually caused by the project, reducing the number of specimens affected by it. Duties and responsibilities are clearly defined and documented. Sampled examples were: Management: Support the implementation of the Wildlife Rescue Program in accordance with the criteria defined in this Procedure and in related projects, Provide the necessary personnel and material resources to comply with this procedure, Assign responsibilities and assignments for the management of the Wildlife Rescue Program, Periodically carry out critical analysis regarding the MRDM Wildlife Rescue Program; Environmental Area: Ensure the implementation of the Wildlife Rescue Program in accordance with the criteria defined in this Procedure and Projects and legislation, Ensure the monitoring of he Wildlife Rescue Program and its due registration, Keep the documents and monitoring relevant to the Wildlife Rescue Program updated, Perform audits to verify the compliance of the Wildlife Rescue Program with this Procedure, the Projects, the relevant legislation and the MRDM Environmental Control Plan, Ensure the treatment of deviations related to the MRDM Wildlife Rescue Program and Ensure the training of employees and third parties regarding the Wildlife Rescue Program, when applicable. Implementation of the Wildlife Rescue Program. MRDM must implement a Wildlife Rescue Program, considering assessments of past activities, the operational phase and also controls after the activities are concluded. Scope of the Wildlife Rescue Program - Target Impacts of the Program and Expected Benefits for MRDM project, the impacts on fauna of specimen mortality, scaring and predatory hunting were identified. The

implementation of the Wildlife Rescue Program aims to minimize the impacts generated on fauna caused by the project, thus reducing the number of specimens affected by it. Activities and Phases of the Project Related to the Program - The impacts on fauna originate mainly from vegetation removal activities and earthworks (mobilization and implementation phases). Therefore, the focus of this program will be primarily to monitor these activities. It is worth noting that, for activities that pose risks to fauna in the implementation and operation phases, the people involved must be advised on the safety procedures to be taken if the presence of wild animals is observed. Scope of the Program - The wildlife rescue activities during the deforestation of the MRDM project structures can be divided into six stages, foreseen in the planning and execution of the work, namely: planning, monitoring the suppression of the planning, conducting and/or rescue, transporting the rescued specimens, triage and veterinary care, final destination of the captured fauna. The coordinator of the Wildlife Rescue Program, the biologists responsible for executing the rescue in the field, as well as their assistants will be involved in these stages. Each team, composed of a biologist and field assistants, must remain with the workers and machines monitoring the work fronts during the vegetation suppression. The number of people responsible for the rescue is conditioned by the number of deforestation fronts, that is, one team per front. In addition, entomological teams will be needed, responsible for removing bees, wasps and hornets before and during the vegetation suppression. The development of this program involves activities of a technical nature and institutional relationships, and should therefore be carried out chronologically and in a participatory manner. The removal of vegetation will be gradual (in strips) and in the upstream/downstream direction of the natural drainage, allowing teams to lead animals from the removal areas to adjacent forest fragments, remove injured animals, capture animals dislodged from their nests, dens or shelters in trees during these deforestation actions, as well as animals in transit through the construction sites. Therefore, it is expected that most fauna specimens will be able to move to adjacent forests without being “reached” by workers and machinery, thus avoiding accidents involving fauna and, consequently, captures. Rescued animals that require more care will be seen by a veterinarian at CETAS (preferably associated with the enterprise), where they will be identified, cataloged and registered, in addition to taking standard measures for veterinary care and/or release. Given that the proposed vegetation removal, when well carried out, significantly reduces the need for veterinary care, it is intended to sign an agreement with the Wild Animal Triage Center (CETAS) of Brazilian Institute of the Environment and Renewable Natural Resources (IBAMA) in Montes Claros to provide support for this program, as described in the planning stage of this program. To carry out the work, contacts will be made with the agencies responsible for licensing, inspection and partnership during rescue activities, namely IBAMA) the Wildlife Rescue Plan will be progressively prepared for the program and sent to IBAMA for analysis and approval. After analysis, this Institute will issue the “License for capture/collection/transport/exhibition or maintenance of wild animals”. Also, in this stage, the need to implement a CETAS at the site of the project will be defined together with IBAMA. Alternatively, an agreement with IBAMA’s CETAS installed in Montes Claros will be possible. Ezequiel Dias Foundation (FUNED): due to the risk of snakebite accidents during the execution of the mine implementation activities. It is also necessary to deliver vials of anti-snakebite and anti-scorpion serums, to be supplied to local hospitals; ▪Hospitals in the region: due to the risk of accidents with venomous animals during the activities, contacts will be made with hospitals in the region, in case emergency care is

necessary. Also, at this stage, meetings will be held with workers on the work fronts, with the aim of introducing the wildlife rescue teams and explaining how the work will be carried out during deforestation. These meetings will present the main information on procedures, care and correct handling of animals during the deforestation operation. 2nd Stage: Monitoring the removal of vegetation from structures During all stages of deforestation (preliminary clearing of undergrowth using leaves; felling of trees using chainsaws; clearing of trunk branches; opening of accesses; removal of wood) monitoring will be carried out to care for the fauna, locate occurrences, nests, direct and indirect traces of wild animals. When locating nests of birds and/or mammals, adults or chicks, the rescue team's biologists, after a technical assessment, will verify the conditions and the need to temporarily halt the felling activities of the tree or group of trees in question, until the removal and translocation of the nests and/or animals. During each of the suppression stages, fauna rescue and monitoring activities will be carried out, as described below: ▪ Preliminary cleaning of undergrowth using leaves: during this activity, fauna rescue teams will travel through the areas with the aim of detecting the presence of animals in these locations. This activity will be carried out through transects in the area worked. The identification of animals will be done through indirect and direct visualization, and by detection by zoophony. The location of bird nests with eggs or chicks and the location and removal of snakes will also occur during the execution of these activities. This phase is of great importance, since at this time it is also possible to locate and remove swarms of bees and wasps, thus avoiding accidents with workers; Felling trees: the role of the wildlife rescue teams during this activity will be to inspect the trees before felling them and to advise workers about the presence of animals, especially arboreal mammals and reptiles and nests, instructing them on the necessary precautions to avoid injuring or killing the animals. The detection of the presence of animals in the trees, such as deforestation activities, on site, will be temporarily suspended until the rescue team technician takes the permitted measures to remove or transport the animal. Regardless of the technique used to fell the trees, the wildlife rescue team will be present to provide guidance and assistance; Cleaning branches from the trunk: the role of the wildlife rescue team during this activity will be to check for hidden, injured or dead animals under the branches, in order to remove them; Opening access roads: if access roads are opened to facilitate deforestation activities, wildlife rescue teams monitor this activity with the aim of locating, identifying and removing animals from the front of the bulldozer, especially the fossorial ones, which appear due to the turning of the land; Removal of wood: during this process, trucks, tractors with tires and agricultural trailers can be used. Wildlife rescue teams will monitor this activity objectively, locating, identifying and removing animals that are under the wood and that will be removed, mainly snakes, amphibians and rodents. 3rd Stage: Capture and Transport During the deforestation period, active searches should be carried out, focusing mainly on active nests, both of birds and reptiles, burrowed animals and injured and weakened individuals. During the deforestation, some chicks, eggs and snakes, if found, may be captured by the field team. Regarding the capture methods, these vary depending on the species to be captured. Physical restraint will be used in most cases, through the use of auxiliary equipment, such as scraper gloves, snare hooks, nooses, hooks and nets. After restraint, the animals will be carefully placed in transport boxes. These will be of varying sizes, with attention being paid to differences in size and behavioral aspects of the animals distributed. Boxes containing captured animals that require veterinary care will be kept in a shaded place while they wait to be transported to release areas or, if necessary, CETAS,

where the animals will receive the necessary care and await their final destination. Biometric procedures will be performed for each captured animal, where information regarding sex, reproductive condition and standard measurements will be recorded. When possible, captured animals should be marked before being released. Data on the capture (data, locations, coordinates of the capture point, etc.) will be recorded on cards attached to the boxes, and will be filled out by the biologist or field assistant. Subsequently, the data recorded on the cards should be tabulated to integrate the database and support the evaluation of the program's efficiency. It is important to note that capture will only be carried out if it is not possible to take the animals to forest fragments adjacent to the deforested areas. The details and dimensions of the materials used in the capture and storage of the animals will be presented to IBAMA in the Wildlife Rescue Plan. 4th Stage: Transport of Rescued Specimens The correct packaging and transport of the specimens found can prevent the death of the rescued individuals, minimizing the impact of the works on the movement of local fauna. It is also worth noting that the correct removal of snakes reduces the risk of snakebites involved in operations. The captured animals must be transported in containment boxes suitable for transport. These boxes will be made of wood and of different dimensions, taking into account the differences in size and behavioral aspects of the animals delivered. 5th Stage: Screening and Veterinary Care Animals captured and in need of veterinary care will be taken to CETAS, where the boxes will be opened and the animals will be sorted by area of specialization (Mastofauna, Avifauna, Herpetofauna and Entomofauna).All animals sent to CETAS must be operated on by a veterinarian and will undergo treatment for those with injuries, trauma, dehydration, hypo/hyperthermia, among others. 6th Stage: Final Destination of Captured Fauna After screening and marking, it will be up to the biologists and the program coordinator to decide on the final destination of the specimens, that is, whether to release them or send them to accredited institutions. Release: The locations for any possible releases will be previously selected by the coordinator, who will consider parameters such as: size, conservation status of the forest fragment and the needs of each species. When applicable, the solutions will be carried out by the biologist and/or coordinator, who will record the data related to this process, such as: locations, geographic regions, number of individuals, species released, day of release, etc. The animals will be released at the end of the daylight period (between 3 and 1 hour before dusk), thus minimizing the stress caused to the animal, due to the limited time between the release, conditioning and release. Forwarding to Institutions: The wildlife rescue team will contact educational and research institutions with the potential to receive biological materials from the rescue. The list of institutions interested in receiving this biological material must be included in the Wildlife Rescue Plan submitted to IBAMA, and the respective declarations of registration of the deposited zoological material must be submitted together with the final report of the program. Monitoring and Evaluation of Program Performance The effectiveness and performance of the program can be evaluated by quantifying the total number of specimens captured, and also by identifying, for all species, the number of dead specimens, cause of death, number of specimens that required veterinary treatment, number of reintroduced specimens and survival rate after veterinary treatment. Monitoring and evaluation of this program are also related to compliance with the schedule described in the following item. Synergy with Other Programs. This Program has interfaces with other biotic environment programs, with the Environmental Education Program and with the Social Communication and Interaction with Communities Program,

promoting the perpetuation of knowledge of local fauna among workers. Schedule - The fauna rescue program must be carried out during the development of vegetation suppression activities, following the deforestation schedule planned for the MRDM project. During the audit, it was clearly evidenced that MRDM defined, documented, implemented and maintained monitoring plans. Sampled examples were: Environmental Monitoring Plans For Water and Wastewater, Wildlife Monitoring Plan and Flora Monitoring Plan. MRDM established, defined, documented, implemented and maintains internal written standard procedures for monitoring plans or procedures for wildlife and water quality in order *to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality,* which clearly define methodology for monitoring the quality of surface water, groundwater, liquid effluents, potability, air quality, noise and soil characterization and for monitoring of fauna and flora. Evidenced that they clearly define applicable legal requirements, sampling techniques, sampling points, parameters to be monitored, frequency of analysis, analytical procedures, necessary resources (human and material), and preliminary technical analysis of analytical results and dissemination of results. MRDM defined that only uses (ISO) – International Organization for Standardization (NBR) – Norma Brasileira Registered 17025 certified laboratories to perform environmental analysis. Evidenced that all sampling and analytical protocols have been developed by MRDM's chemicals lab in accordance with (AWWA) - Standards Methods for the Examination of Water and Wastewater, of the National Guide for the Collection and Preservation of Samples of the (ANA) National Water Agency and the (CETESB) – São Paulo State Environmental Company, and of the Associação Brasileira de Normas Técnicas (ABNT), Norma Brasileira Registrada (NBR) such as NBR 9897/87 - Sampling planning of liquid effluents and receiving bodies; NBR 9898/87 - Preservation and sampling techniques for liquid effluents and receptors; NBR 13895 - Construction of monitoring wells and monitoring of groundwater. Evidenced that MRDM's analytical protocols have been developed by an appropriately qualified person as defined in Code's *Definitions and Acronyms. Sampled example was the Environmental, Health and Safety Manager Rodrigo Dhryell* Santos Reviewing pertinent records including his (CV) - Curriculum vitae and registration at CREA (Regional Engineering Council) as well as interviewing him was evidenced that has a high a degree in an appropriate scientific discipline and experience with sampling and analytical techniques as required. The auditor concluded that Rodrigo Dhryell Santos is considered appropriately qualified personnel based on his education, expertise, training and experience. MRDM established, documented and implemented and maintains internal documented procedure POP-LAB-013 - Determination of WAD, total and free cyanides, which clearly defines items such as: A) levels of responsibility and authority; B) Description of activities including Principle of Method, Analysis Process, Receiving of Samples, Procedure for Free Cyanide Analysis, Free Cyanide Calculation, WAD Cyanide Analysis, Cyanide WAD Calculation, Total Cyanide Analysis, Total Cyanide Calculations, Accessories and Equipment Used, Reagents Used, Environmental Aspects and Impacts, Occupational Health and Safety Hazards and Risks, Control Measures and PPE. Additionally, Environmental Monitoring Plan that clearly defines methodology for sampling activities. Reviewing the above-mentioned Plan it was evidenced that considerers Underground Sampling: Sets of water samples collected in tubular wells monitoring.as well as Surface Sampling: Set of water samples collected in rivers, streams, lakes, pits or dams; Sampling types - Simple Sample: Sample containing water collected during a sampling operation at a single point and location and at a specific time; Composite

Sample: Sample containing a mixture of small portions of collected water of multiple points in the same location, during a given time; Equipment Blank Samples: Samples used to detect contamination of a sampling equipment (flask, filter holder). These samples are obtained from the rinse the material with deionized water, after collecting this water for analysis and after its proper preservation; Field Blank Samples: Samples used to avoid contamination during a collection and transport of samples. They are prepared during the sampling event by the filling the bottle with deionized water. These samples are also preserved as regular samples; Duplicate Samples: Replicate samples are used to evaluate errors in sampling due to variation in results within the area investigated. They are generated through collection of multiple bottles at the same point. They are labeled and preserved individually and are judged separately for laboratory analysis; Split Samples: Split samples are used to evaluate analytical errors, with based on variation in results. A sample is collected in sufficient quantity and divided into two bottles. They are preserved and labeled, individually, after being submitted, separately, to chemical analyzes. The decision on simple or compound collection also is closely linked to the objective of the study. Simple collection is one in which only a sample for analysis from a given point, at a given time, assuming that it is representative of the sampled site. However, in some sources, it is only possible to representative samples with composite collection over a given period. In others, it is more informative to do several separate analyzes over a period, obtaining maximum and minimum variability data. In the case of composite samples, individual portions are collected in a mouth container broad at the predetermined frequency and mixed at the end of the sampling period. If preservatives are used, they must be added at the beginning of sampling so that all portions are preserved at the time of collection bottle environment. If the bottle contains the preservative to avoid overfilling the bottle and drain the collected solution. Groundwater Sampling: Groundwater sampling by the Low Flow Sampling is a methodology that can correspond to the specifications of the traditional sampling. The Low-Flow Method (bladder or inertial pump) for sampling of groundwater controls sample turbidity and minimizes changes in composition sample chemistry since the pumpardment is carried out at low flow rates within the section filter, avoiding disturbances in the water column and formation. Sample preservation procedures for the vast majority of chemical components to be measured in groundwater, are the same as those used for surface water However, there are some aspects that deserve to be highlighted and reinforced. Groundwater has characteristics related to geological structures by where they circulate. Furthermore, most groundwater does not contain abundant free oxygen and when exposed to open air, depending on the initial physical-chemical conditions of the aquifer, oxidation of the originally soluble iron (Fe II) to iron in the insoluble form (Fe III -iron hydroxide). This occurrence occurs within a few minutes and leads to a decrease in pH and increased adsorption potential of a suite of trace metals on the iron hydroxide solid phase precipitate. Physicochemical properties of water such as conductivity, pH or turbidity can be monitored to indicate the stabilization of that water and consequently the identification of its origin as being from deeper regions of the aquifer both in unconfined aquifers and in confined aquifers. Sample Collection: Water samples must be removed from the well using a pump low flow. Positive pressure electric pumps, made with inert materials, are permitted for use in collecting any type of water sample. Positive pressure pumps activated by air or nitrogen and made with inert materials are permitted for any type of collecting water samples, as long as the sample does not come into contact with nitrogen/air. pumps positive pressure valves operated by water mechanically restricted by a check valve,

are permitted for any type of water sampling. Decontamination: All non-dedicated sampling equipment (pump, tubes, collectors, buckets), which may come into contact with the sample, must be decontaminated before and after use. Non-dedicated pumps require decontamination of internal and external parts before placed inside a well. Non-dedicated equipment must be initially washed with water previously recommended and of approved chemical composition, non-phosphorus detergent, and rinsed with drinking water. For analysis of inorganic elements, an HCl solution weakly acidic should be used for a second wash. Final rinse with distilled water and deionized completes the decontamination process. For decontamination of equipment after use, proceed in the same way. Samples: Quantities, Types and Documentation: Samples must be collected in sufficient quantity for the type of parameter (metal, metalloid, and anion, organic matter) to be applied. These values must be specified in the sample collection protocol and on the form field sample collection. The field form must be used as daily documentation sample collection activities. Samples must be provided to the laboratory under the conditions for preserving the necessary samples (acidified, refrigerated) and registered in Chain of Custody Sample Recipients: The type of recipient and the validity period of each parameter to be to be collected is defined by the ABNT standard – NBR 9.898/1987 and must be obeyed. All Containers must be new and suitable for collection. All water samples must be registered, labeled, sealed and placed in boxes with ice and lids for storage and transport. Samples must be received by the laboratory to perform the analysis, within the validity period of each maximum group of parameters. Acceptable Materials for Sampling: The choice of materials used in manufacturing. Sampling equipment must be based on knowledge of the elements to be investigated and in their interaction with the environment in which they find themselves. Accepted materials that may come into contact with any type of water sample is stainless steel and fluorocarbon resin (Teflon, polytrafluoroethylene (PTFE), Fluorinated Ethylene Propylene (FEP) or perfluoroalkoxy (PFA)). Glass is an accepted material for sampling, except in cases of silica and fluoride analysis. Plastics (PVC, polyethylene, polypropylene, tygon) are accepted in the case of sampling for elements inorganic (metals, anions, cations). Interviewing personnel involved with sampling activities was evidenced that the procedures are in accordance with International Cyanide Management Code (ICMC) requirements and have been duly implemented and that interviewed personnel showed to be aware of this matter. Noted that through POP-LAB-013 cyanide species are liberated at moderate pH (pH 4.5) such as aqueous HCN and CN- , the majority of Cu, Cd, Ni, Zn, Ag complexes and other metal cyanide complexes having similar low dissociation constants; Total Cyanide: A measurement of cyanide concentration that includes all free cyanide, all WAD cyanide complexes and all strong metal cyanides including ferro-cyanide Fe(CN)6 -4 , ferri-cyanide Fe(CN)6 -3, and portions of hexacyano cobaltite Co(CN)6 -3 and those of gold and platinum. Only the related or derived compounds cyanate (CNO-) and thiocyanate (SCN-) are excluded from the definition of total cyanide and Free Cyanide: The uncomplexed cyanide ion (CN-) and gaseous or aqueous hydrogen cyanide (HCN).Reviewing above-mentioned procedure POP-LAB-013 it was evidenced that it contains information related to : Duties and Responsibilities. Examples sampled were: Laboratory Supervisor - Provide physical and material resources for the development of activities; Train personnel to safely perform activities according to pre-established procedures; Ensure compliance with this procedure and the controls required for the physical preparation of samples with quality.; Ensure that the defined quality control measures are known and understood by all employees; for

Employees in General - Perform the activity safely, specifically using the control measures specified in this procedure, including those determined in the Work Permit (PPT), when necessary; Perform the activities described safely, without deviations or that may affect the results obtained; Use all PPE required for the activities, operating them visually before use; Perform pre-use inspections of the tools to be applied in the activities/tasks; Evaluate the working conditions for possible accident and/or emergency situations before starting the activity; Collect all waste destined for the appropriate collection points; Protect the environment, avoiding the generation of waste, spills and contamination; Interrupt your activities, exercising your right to refuse, whenever you find evidence of serious and imminent risks to your safety and health or to other people, immediately reporting the fact to your hierarchical superior, who will take the appropriate measures. Laboratory Technician/Laboratory Technician and Laboratory Assistant - Operate equipment in accordance with POP-LAB-020 - Operation and Verification of Wet Area Equipment.The tasks of the activities are provided for in PD-LAB-001 - Responsibility and Authority of Key Personnel. With the client's guide in hand, collect the sample, assessing the physical and packaging conditions. Principle of the Method; Equipment and Instruments; Glassware and Accessories; Reagents; Actions to Control Environmental Aspects; Sample treatment; Active chlorine verification tests; Sulfide Verification Test; - Titrimetric Method (for CN- ≥ 1mg/L) – CN WAD; Colorimetric Method (for CN- < 1.00 mg/L) - CN WAD; Preparation of Samples, Calibration Standards and Analytical Blank; Calibration Curve Verification Standard; – Color Development - CN WAD; Determination of Free Cyanide in liquid samples using the Argentometric Method; Determination of Free Cyanide in solid samples using the Argentometric Method; Determination of Total Cyanide in liquid samples using the Colorimetric Method; Titrimetric Method (for CN- ≥ 1mg/L) – Total CN; - Determination of Total Cyanide in solid samples using the Argentometric Method; Determination of Total Cyanide in solid samples using the Colorimetric Method; Checking the Cleaning Conditions of Distillation kits; – Analytical Quality Control / Results Acceptance Criteria; Preparation of Solutions; Cyanide Stock Solution 1000 mg/L (1µg CN- / mL of solution); Standardization of the Cyanide Stock Solution; Reference Solution for Determination of Free Cyanide 10 mg/L CN; Solution Preparation: Distillation - CN WAD and Total; Reference Solution for Determination of Free Cyanide 10 mg/L CN; Receiving, Preservation, Storage, and Care of Cyanide Compounds, as well as Quality Assurance and Control Requirements such as NBR 17025 certification for labs performing Cyanide analysis. Evidenced duly implemented. During field audit evidenced that related personnel are aware of this matter. Evidenced that sampling conditions (weather, livestock/wildlife activity, anthropogenic influences) and procedures documented by MRDM in accordance with Environmental Monitoring Plan, Biodiversity Monitoring Plan. It is defined that monitoring results reports shall include recording all sampling conditions that may affect the analysis. Reviewing pertinent records it was verified that MRDM actually records sampling conditions. Evidenced duly implemented as stated. MRDM has been conducted the monitoring at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner. The monitoring frequencies are defined by FEAM and IGAM as well as Federal Brazilian legislation. My professional judgment to evaluate the adequacy of MRDM's monitoring frequencies I conclude that the defined monitoring frequencies are adequate to characterize the medium being monitored and to identify changes in a timely manner based on amount of existing data, the stability of the parameters being monitored, and for groundwater, the depth

to groundwater.

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 protecthuman health, wildlife, livestock, and the environment.

The operation is
- ☐ X in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 5.1

Summarize the basis for this Finding/Deficiencies Identified:

MRDM defined, documented, implemented and maintains documented procedures for decommissioning cyanide facilities at the cessation of operations named as MRDM's Mine Closure Plan (PFM) issued by HidroGe Engenharia e Gestão de Projetos on behalf of MRDM and dated on February 03, 2022 which is identified as HDG-21P013-RH-RT-002-01 revision 01 as well as Degraded Areas Recovery Plan - PRAD. The auditor reviewing – MRDM's PFM evidenced that it is in accordance with Brazilian legislation such as ANM Resolution 68 dated on dated on April 30, 2021; Normative Deliberation (DN) State Environmental Policy Council (COPAM) 220 dated on March 21, 2018; Registered Brazilian Standard (NBR) 13030 and Mining Regulatory Standard (NRM) 19, 20 and 21. Reviewing the MRDM's Mine Closure Plan, the auditor evidenced that it is an environmental management instrument that brings together technical information, projects and actions that allow achieving environmental conditions acceptable and safe after the closure of mining activities. To facilitate the closing of a project, a fully planned area is divided in different subareas (operational units), for which closure actions must be carried out be planned and renewed progressively or simultaneously. Therefore, then as soon as activities in a given subarea are completed, recovery should begin and incorporated into the final project for overall project closure. It is a technical document that describes the guidelines and general guidelines for the decommissioning and closure of all project structures. The correspondent engineering design was developed at a conceptual level. This represents an update of the latest version of the closure plan carried out by the company Pimenta de Ávila in 2017. The main focus was on reviewing some closing concepts and the cost spreadsheet, as well as updates on the socioeconomic aspects of the region. According to Pimenta de Ávila (2017), the general objective of the Closing Plan is to Mina Riacho dos Machados the complete decommissioning of the mining unit, the recovery of impacted areas and maintenance of the Water Dam as an asset that It can be recommended for capturing and supplying water to a region. The technical solutions to be proposed must guarantee compliance with the objectives specific to the closing stage, and must meet the following aspects: 1. Make the areas affected by the implementation and operation of the mine capable of offering long-term public health and safety conditions; 2. Guarantee environmental quality

in the long term; 3. Reestablish natural drainage conditions in possible locations; 4. Allow beneficial and sustainable use of the area, if possible; 5. Minimize the impacts generated by the closure; 6. Prove the success of the closing. In order to comply with the specific proposal, this Closure Plan is divided into 18 chapters, the contents of which are summarized as flows: Chapter 1: consists of an introduction to the theme and objectives of the work developed. Chapter 2: presents the related phases of preparing the Plan of Mine closure throughout the project's life cycle. Chapter 3: presents the legal aspects that guide the mine closure activity in Brazil, also cut the legislation declared, in this work, for the elaboration of the asset decommissioning project. Chapter 4: presents the characterization of the enterprise under analysis, in terms of location, existing situations and scenario considered for the preparation of closure. Chapter 5: presents an environmental diagnosis of the region and Chapter 6 the assessment socioeconomic status of the area of influence of MRDM Chapter 7: presents the aspects conditioning the closure, considered in the process of defining decommissioning actions for structures, based on the future use and ensuring long-term physical, chemical and biological stability. Chapter 8: presents a future use study for the Riacho dos Machados Mine area, were not substantiated as guidelines for this Plan. Chapter 9: presents the closure guidelines, barriers, at a conceptual level, the actions for the implementation of the proposed future use, based on a sequencing of activities of a general and specific nature for each asset considered. Chapter 10: presents suggested measures for surface water management and drainage mine acid in closed condition. Chapter 11: presents guidelines for revegetation of each mine component aiming to recover possible areas and reintegrate the landscape. Chapter 12: indicates guidelines for program development socioeconomic aspects external to the reduction of impacts resulting from the closure of the mine. Chapter 13: presents post-closure environmental management, based on activities monitoring and maintenance change the success of closure and establishment of proposed future use. Chapter 14: presents the implementation schedule and Chapter 15 the estimated costs of the activities provided for in this Closure Plan. Chapter 16: we find final considerations on the work developed. Chapter 17: the responsible technical team. Chapter 18: presents the bibliographical reference used to prepare this report. The team responsible for preparing this Closure Plan was composed by: Flavio de M. Vasconcelos - Consulting Director, Michael Miczarek - International consultant covering and piles, Igo de Souza Tavares - Technical Coordinator, Willam Faria/Antônio Carlos Magalhães - Civil/Geotechnical Engineer, Clarice Galhardi - Environmental Analyst Geologist, Nathalia Salles - Mining Engineer, Marcelo Pereira - Environmental Chemist, Debora Soares - Designer and Gabriel Facury – Administrator. Reviewing MRDM's PRAD the auditor observed that it is based on the definitions and requirements established in the Brazilian standard NBR 13030:1999, which establishes guidelines for preparation and preparation presentation of the rehabilitation project for areas degraded by construction activities and it it has as main objective to define the set of measures that will subsidize the recovery and rehabilitation of areas degraded by MRDM, through the recomposition of floristic communities that make up the native flora of the region and consequent reintegration of the mined areas in the context of local ecosystems through the establishment of functional, structural and ecological interactions with biodiversity occurring in the region. Specific objectives constitute: • Meet the environmental quality requirements of the area after rehabilitation, establishing previously the quality, composing the behavioral scenario of the rehabilitated area and follow, conceiving and developing solutions to achieve such a result; • The development of detailed techniques for the rehabilitation of project areas of MRDM, considering the particularities and characteristics of the mine and the mining region project insertion; • provide an appropriate restoration model, in accordance with the proposed future

use undertake an enterprise; • Assist in controlling erosion processes in the mining structure; and • Reintegrate degraded areas into the dominant landscape of the region, with consequent benefits for fauna. MRDM's PMF includes an implementation schedule for decommissioning activities. Reviewing MRDM's PMF the auditor evidenced that it defines at item 13 that the schedule was developed considering the operating period of the MRDM from 2021 to 2026 (5 years). The period of closure and post-closure of the mine, in How much of the decommissioning and monitoring actions will be carried out was estimated in 8 years, execution of the closure plan in 3 years (2026-2029) and another 5 years monitoring period (2029-2034). In relation to the activities foreseen in the MRDM's PFM, it is highlighted that the deadlines presented in the schedule are subject to changes due to changes associated with life useful, cash flow, team sizing, sequencing and chronology of activities, fleet and capacity of equipment and vehicles, working days and working hours to be considered and level of reuse of equipment and parts. Table 13-1 presents the preliminary schedule for carrying out the activities, and the PFM establishes that it will be improved and revised as activities are developed. The following steps are planned in the schedule: 1. For the Management and Management area: Preparation of the Closing Plan - Basic Level; Preparation of the Closing Plan - Executive Level; Hydraulic studies of evaporation basins; Classification of tailings; Hydrogeological studies; Physical stability studies and Engineering Studies and Projects. 2. For the Pit Area: Manual regularizing cut and embankment slopes and Implementation of the protective windrow; 3. For the Waste Pile: Upgrading, Implementation of drainage systems and Installation - topographic landmark. 4. For the Tailings Dam: Installation of High-Density Poly Ethylene (PEAD) protection and Implementation of the Sterile Cover; 5. Industrial and Support Area: Dismantling of Equipment, Metallic and Civil Infrastructure, Environmental Investigation and Topographic Reconformation and Revegetation 6. Monitoring: Revegetation Monitoring, Geotechnical Monitoring, Groundwater and Surface Water Quality Monitoring and Air Quality Monitoring; 7. Evaporation Basins: Implementation of Evaporation Basins; 8. General: Implementation of Warning and Control Signs Access, Post-Closing Monitoring Physical Stability of Drainage Structures and Conservation and Post-Closure Monitoring of Evaporation Basins and Geochemical and Biological Stability. MRDM's PRAD defines that it will begin planning rehabilitation work in mining areas together with mining planning, the waste rock deposit and the rejected. Rehabilitation activities will begin throughout the project operation phase, as soon as these mining structures reach, even partially, their configuration end. According to the mining planning, the MRDM mining structures will begin to reach their final pit in some its faces from the 3rd year of mining. Therefore, PRAD will use the initial two years of the operation phase to study and development of techniques for using local flora. Many rehabilitation activities occur throughout practically the entire lifespan. useful life of the enterprise, special emphasis regarding these activities will occur in the last years of mining operation, and from the deactivation of the processing plant, when all the structures of the enterprise underwent changes, alterations and will undergo a rehabilitation process to adapt to the proposed future use of the site. Reviewing pertinent documentation, was evidenced that MRDM updates its plans with sufficient frequency to reflect changes in the operation as they affect decommissioning, as well as changes in planned decommissioning techniques and measures. It is defined that, due to the dynamic nature of mining activity, this conceptual closure plan must be reviewed or updated throughout the useful life of the mine, preferably every five years, in order to refine and confirm the closure actions that by chance were carried out during this period

(recovery actions concomitant with the operation), as well as reevaluating the other initial proposals for the closure/demobilization of the structures, considering the update scenario compared to that initially proposed for future use. . Therefore, it is possible to periodically update this conceptual closure plan, which must always consider the substantial changes that may occur in the project during its operations or in the conditions and aspects related to business stakeholders. In the revisions or updates to the plan must be incorporated into developments in knowledge about the area of the mine and its socio-environmental context, as well as applicable scientific and technological innovations, existing, from the moment of its conception. It is clear that the main steps of Mine Closure Planning are presented in accordance with ICMM (International Council on Mining and Metals Guidance Manual 2019. (additional information at web site https://www.icmm.com/website/publications/pdfs/environmental-stewardship/2019/guidance_integrated-mine-closure.pdf?cb=60008. Evidenced that all obligations imposed in the MRDM" s Mine Closure Plan is in compliance with legal requirements, government regulatory bodies, and conditional good practices by national and international non-governmental bodies, such as Resolution ANM (National Mining Agency) 68/2021, the good practices recommended by the following guidelines: Planning for Integrated Mine Closure; Tool kit. International Council on Mining and Metals; ICMM, 2008. Version translated by IBRAM (Brazilian Mining Institute); Integrated Mine Closure, Good Practice Guide, 2nd Edition; ICMM, 2019 and by Financial Concepts for Mine Closure, ICMM, 2019 which are in line with the environmental and sustainability policy practiced by Equinox Gold. Reviewing MRDM Mine Closing Plan and Degraded Areas Recovery Plan address the Cyanide decommissioning activities discussed in the Guidance for Use of the Mining Operations Protocol as applicable at MRDM facilities.

Standard of Practice 5.2

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

The operation is
- ☐ X in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 5.2

Summarize the basis for this Finding/Deficiencies Identified:

MRDM developed an estimate of the cost to fully fund third-party implementation of the cyanide-related decommissioning measures as identified in its site decommissioning or closure plan Item XIV of the PFM presents the costs of the MRDM's decommissioning costs. The decommissioning activities of MRDM will generate costs to be detailed by the companies selected to carry out their respective activities. A preliminary cost estimate was prepared with the aim of presenting an order of magnitude in the expenses to be generated with the implementation of activities provisions in MRDM's PFM. This estimate includes activities associated forecasts to be carried out during the operational phase, in addition to

specific decommissioning activities of the Waste Pile, Evaporation Basins, Tailings dam, pit and industrial area. In general, the closing cost estimate aims to inform the entrepreneur the amount that must be spent on the implementation of all activities provisions in the closure plan, in addition, it helps in decision-making on how to financial guarantee to be used. The financial disbursement schedule, in turn, integrates cost estimates into the predicted execution schedule, providing estimates of the amounts to be spent on the over the time foreseen for the decommissioning/closing of the MRDM. In relation to the latter, it is worth highlighting that, similar to the considerations made for the Execution Schedule, the estimates made to forecast the disbursement financial statements are subject to change as a result of changes in variations used as targets in estimating deadlines, for example: useful life, cash flow, team sizing, sequencing and chronology of activities, fleet and capacity of equipment and vehicles, working days and working hours to be considered and level of reuse of equipment and parts. In each version of the MEDM's PFM it is defined that costs must be reviewed, not only to monetary update, but also to know the increases/reductions in expenses to be being incurred as environmental liabilities increased/decreased. The auditor evidenced that Table 14-1 shows the estimated values relating to the Closure of the MRDM Mine. Table 14-1 shows the estimated values relating to the Closure of the MRDM Mine. Evidenced t that in table XIV the costs are stratified into sub-activities. Sampled examples are costs of: Preparation of the Basic Plan; Preparation of the Executive Plan; Hydraulic studies of evaporation basins; Classification of tailings; Hydrogeological studies; Physical stability studies; Engineering Studies and Projects; Manual regularization of cut slopes and landfills; Rework - Excavation, loading and transport of material; Drainage - Peripheral Concrete Channel; Drainage - Concrete water drops; HDPE Protection - Application of non-woven geotextile needled with longitudinal tensile strength; HDPE Protection - Excavation, loading and transport of material; HDPE Protection - HDPE Geocell; Protection of HDPE - Self-densifying concrete with silicate aluminum; Waste cover – Excavation, loading and transport of 1st category material; Waste cover – Excavation, loading and transport of 2nd category material; Deactivation of Systems and Dismantling of Structures; Topographic reconstruction and revegetation; Environmental Study; Soil Investigation / Rehabilitation - Soil survey; Research / Soil Rehabilitation – Research hydrogeochemical; Revegetation-Inputs (fertilizers and correctives); Revegetation – Planting seedlings; Revegetation – Sowing; Revegetation – Soil decompaction; Revegetation - Dismantling - electrical system; Demolition - civil structures; Demolition - reinforced concrete; Transporting debris and other materials to destination end; Revegetation monitoring - Ant control (with Supply of the anticide); Revegetation monitoring - Manual mowing (change maintenance); Revegetation monitoring revegetation; Revegetation monitoring - Crowning; Revegetation monitoring - Top dressing with supply of nitrogen, phosphorus and potassium (N, P, K) fertilizer; Geotechnical Monitoring - Topographic landmark, piezometer; Water monitoring Underground and Surface; Environmental air monitoring (Hi-vol) with analytics laboratory tests and report issuance (3 fixed points with weekly frequency). MRDM' Mine Closing Plan defines that asset demobilization cost estimates are updated and reviewed annually, considering the evolution of operations and possible changes in projected project information of proven and probable reserves as well as and when revisions to the decommissioning plan are made that effect cyanide-related decommissioning activities. Evidenced duly implemented. Sampled examples were

Consolidated Cost Estimate Closure of the MRDM Mine – 2022; Consolidated Cost Estimate Closure of the MRDM Mine – 2021. It was evidenced t that MRDM's Mine Closure Plan presents the approximate distribution by phase of mine closure, as well as the distribution by structure to be deactivated and, the estimated Physical – Financial Schedule for the process of decommissioning MRDM Mine. Provision for environmental recovery its main objective is the formation of long- term values, for financial use in the future, when the asset's use ends. The provisions taken by MRDM refer to the closure of the mine, with the completion of mining activities and the deactivation of assets linked to the mine. MRDM confirms an obligation to demobilize assets in the year in which it is estimated that this will occur. MRDM considers accounting estimates related to the recovery of degraded areas and the costs of closing a mine as a critical accounting practice, as they involve significant amounts of provision and because they are estimates that involve several aspects, such as interest rates, inflation and useful life of the asset, considering the current combustion stage and projected combustion data for each mine. The Brazilian Constitution, the main Brazilian legal regulation defines the by the principle that the polluter pays for the environmental change and that is is responsible for correcting and mitigating the environmental condition when the project is found. The ANM (National Mining Agency) together with the Brazilian Constitution does not clearly define the estimated costs for decommissioning activities linked to cyanide, however, it defines the polluter pays principle where the person responsible for the environmental change is responsible for correcting and mitigating the condition environment when the project is found. MRDM uses sodium cyanide, MRDM has the PFM (Mine Closure Plan - MRDM) detailing the commissioning steps and an estimate of the resources required for this, including cyanide. Financial audits have been carried out in accordance Brazilian and International auditing standards by a third independent of MRDM, in accordance with the relevant ethical principle set out and in the Accountant's Code of Professional Ethics and in the Federal Accounting Council, complying with other ethical responsibilities, in accordance with the standards. The financial auditor who carried out the financial assessment of the self-insurance or self-guarantee mechanism presented a declared declaration that the operation or its controlling company has sufficient financial strength to comply with the decommissioning obligations. The audited financial projections for December31, 2023 and December 31, 2022 were provided as objective evidence performed by an auditor duly qualified Regional Accounting Council (CRC) of the State of Rio de Janeiro that presented a declared statement that the operation or its controlling company has sufficient financial strength to comply with the decommissioning obligation, including all actions involving cyanide.

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	☐ X in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 6.1

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM defined, established, documented, implemented and maintains internal documented procedures that clearly defines methodology for describing how cyanide-related tasks such as unloading, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimize worker exposure. Sampled examples were: PG - PL - 001 - Cyanide Operations; POP - PL - 003 - Leaching and Detox Operation; POP - PL 004 - ADR Operation; POP - PL - 008 Receiving Liquid Cyanide; POP - PL - 015 - Dam Operation; POP - PL - 022 - Receiving Cyanide in Briquettes; POP - PL 023 - Neutralization of Cyanide Waste; RS - SEG - 033 - Guide to Confined Space Identification; RS - SEG - 034 - Early Confined Space Management; RS - SEG - 035 - PEEC - Confined Space Entry Permit; PG - SEG - 016 Hazardous Chemical Substance; POP - MAN - 001 Beneficiation Plant Maintenance; POP - MEP - 019 - Preventive Inspection of Equipment; POP - MEP - 023 Maintenance of Electric Hoists MN - MED - 001 – Health Care Manual; RS - MED - 030 - First Aid Kit List - Antidote and Diphoterine Kit; RS - MED - 031 - Defibrillator Daily Checklist; RS - MED - 032 - Sphygmomanometer Daily Checklist; RS - MED - 033 - Oxygen Cylinder Checklist; RS - MED - 034 - Diphoterine Kit Checklist; RS - MED - 35 - Self-contained Panoramic Mask Checklist; RS - MED - 036 - TYVEK Jumpsuit Checklist. Reviewing above-mentioned procedures, it was clearly evidenced that they not only focused on operations but they also describe cyanide-related safe work practices. Process control records provided evidences that MRDM has been performed its activities in such manner that it is minimized worker exposure. During the field audit and interviewing field personnel, it was evidenced that they showed to be aware about how they shall conduct their activities in such manner that they minimize their cyanide exposure. MRDM defined and documented that before performing all activities shall be implemented and maintained records of using significant tolls for identifying potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them such as: Pocket Task Preliminary Analysis *(PEACE) and Preliminary Risk Analysis of the Task (APRT). Reviewing PEACE and APRT records during the field audit it was evidenced pre-work inspections have been duly implemented and recorded. Furthermore, during field audits, it was evidenced that workers cyanide involved carry out their day-to-day activities, using the necessaries PPE such as PVC boots; Long-length PVC gloves protective goggles; helmet with jugular; : Panoramic face mask with gas filter against organic gases; Shell-type noise damper; Leather glove; Nitrile rubber glove; Tyvek or Tychem coverall; Communication radio; Portable HCN detector previously calibrated as stated and in accordance previously defined in the respective operational procedures. Evidenced that MRDM defined and documented methodology for PPE's Pre-Work Inspection as well as it establishes that results shall be recorded at form – Check List for Emergency equipment items related to activities involved in cyanide". Reviewing*

pertinent records, it was evidenced duly implemented. Sampled examples were: Monthly Inspection of RE-Check-List of Fire Extinguishers, Visual inspection, monthly, Hydrostatic Test 5 years and annual recharge; Fortnightly Inspection • RE- Check-List of the 5L oxygen cylinder - ICU Ambulance; • RE-Check-List of the 5L oxygen cylinder - Reagent area container; • RE-Check-List of 15L oxygen cylinder; Check List DEA's inspections, • Emergency Shower RE-Check-List; • Autonomous Panoramic Mask RE-Check-List; • First Aid Kit RE-Check-List - Antidote and Diphoterine Kit; Daily Inspection• RE-Check-List of ICU ambulance health materials. Reviewing pertinent PPE's inspections records it was noted that MRDM has been implemented an adequate methodology for pre-inspection their PPEs before using in order to assure they are functioning in perfect physical *conditions and acting as required by legal requirements. Evidenced duly implemented. Interviewed related personnel showed to be aware of this matter.* MRDM has been solicited as well as considered worker input in developing and evaluating health and safety procedures. Observed that MRDM established implemented and maintains procedures to review proposed process and operational changes and modifications for their potential impacts on worker health and safety, by several ways such as formal safety meetings, informal pre-work safety sessions for instance during the named Daily Safety Dialogue (DDS), which is carried out daily before work begins the suggestion boxes and incorporate the necessary worker protection measures, that were developed by the work force (operators & supervisors) and approved by the responsible manager. All operators and supervisors have been trained in the pertinent operational procedures and, at least, annually (as refreshment), the work forces review the risk profile, the operational procedures and, when necessary, these ones are updated. Planned job observations are also part of the operation management system. Interviewed operators and supervisors' personnel reported MRDM's management personnel to give suggestions and comments in order to improve health and safety procedures have solicited them. Evidenced duly implemented.

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
☐ X in full compliance with
☐ in substantial compliance with Standard of Practice 6.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

MRDM defined, documented, established, implemented and maintains Internal documented in the ore and the same adsorbed on activated carbon (CIL).During the field audit and reviewing pertinent process records it was evidenced that the pH have been effectively controlled and monitored (through calibrated pH meter) in the operation. Alarm systems are in place. The pH is controlled through the online addition of soda solution using a calibrated flow meter. Interviewed field and control room operator and supervisors showed to be aware

of this matter Interviewed field and control room operator and supervisors showed to be aware of these matters. MRDM has been identified areas and activities where workers may be exposed to hydrogen cyanide gas or cyanide dust in excess of 10 parts per million (ppm) (11 mg/m^3) on an instantaneous basis and 4.7 ppm (5 mg/m^3) continuously over an 8-hour period, as cyanide, and require use of appropriate personal protective equipment in these areas or when performing these activities. MRDM defined, documented and clearly communicated to all employees and contractors that it does not allow the employees and contractors to be exposed to cyanide concentrations. The storage, distribution and dosage areas are monitored by fixed HCN gas meter. In case of a chemical reaction unleashing the formation of HCN exist several resources such as autonomous respirators, mobile and fixed HCN detectors, Reviewing pertinent records the auditor evidenced that the parameters have been maintained as stated (below exposition limits). In the event of alarm situation, the operators are ordered to leave the area, only returning when allowed by the supervision, after technical checking. It is defined and documented the necessary PPE to be used. Sampled examples were: PVC boots; protective goggles; helmet with jugular; panoramic mask with gas filter; shell-type noise damper; *Long-length PVC gloves,* cowhide glove; nitrile rubber glove; tyvek or tychem coverall, radio communication. During the field audit and interviewing involved personnel, it was observed that all the operators use adequate PPE. During the field audit it was evidenced that MRDM uses monitoring devices in process areas and for activities involving management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas or cyanide dust exceeding 10 ppm on an instantaneous basis or 4.7 ppm continuously over an 8-hour period, as cyanide. The fixed and portable hydrogen cyanide monitors have set alarm level at 4,5 ppm. MRDM's defined, documented, established, implemented and maintains methodology for maintenance, testing and calibrating hydrogen cyanide monitoring equipment (fixed and personnel HCN gas detector) as well as retaining related records for at least three years. Reviewing pertinent documentation, it was noted that a.m. procedure is in accordance with manufacturer instructions. Evidenced calibration and maintenance records of HCN detectors duly established and retained. MRDM defined and documented that warning signs shall be where cyanide is used advising workers that cyanide is present, of any necessary personal protective equipment that must be worn, and that smoking, open flames and eating and drinking are not allowed. Evidenced during the field audit that the signage is effective, covering the presence of cyanide, that eating, drinking and smoking is not allowed and also open flames are prohibited as well as the needed PPE in all cyanide areas are indicated. The operation places cyanide warning signs on storage tanks, distribution tank, pipelines, dam. During the field audit evidenced duly established and maintained. Evidenced that Purchase orders valid from September 01, 2019 until December 31, 2025 for 35% sodium cyanide solution signed between MRDM (buyer) and Proquigel (seller) that , establishes "According to current guideline, published on the ICMI website for the International Cyanide Code, which indicates the need to add dye to cyanide solutions with a concentration above 15% and that, in this case, the dyeing of the solution must occur before the delivery of the product at the destination, Proquigel is responsible for such procedure and thus delivering to MRDM a 35% sodium cyanide solution already with the dye added. Additionally, MRDM defined and documented a cyanide solution receipt inspection system, which defines the Demand for filling out a record for liquid cyanide reception inspection in which there is a specific item for

checking if the color of the cyanide solution is reddish. Evidenced duly implemented as stated. Reviewing training records, it was noted that operators have been trained in the above-mentioned .m. procedure. Additionally, interviewed personnel showed to be aware of this matter and the reason to do this addition. During the field cyanide it was evidenced duly implemented. Besides, As already indicated in Principle 1, MRDM currently only uses liquid cyanide. In the past, approximately 53 tons of cyanide in briquettes were purchased by MRDM, which it keeps properly stored. It will use is only applicable if occurs some logistical problems with the supplier to supply sodium cyanide in solution. For this reason, MRDM has demonstrated that MRDM has defined, documented, implemented documented internal procedures PG - PL - 001 - Operations with Cyanide and POP - PL - 022 - Receiving Cyanide in Briquettes, which clearly specify that the carmoisine dye must be added during the preparation of sodium cyanide. The review of this procedure found that the addition of carmoisine is clearly identified in internal documented procedure Reviewing the training records, it was noted that the operators were trained in the morning procedure. Furthermore, the interviewees demonstrated that they were aware of this subject and the reason for making this addition. During the audit it was not verified that MRDM have been used briquettes of sodium cyanide in its process. MRDM defined, documented, implemented and maintains methodology for maintaining, inspecting and testing showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi- carbonate fire extinguishers located at strategic locations throughout the operation. Sampled examples were: RS - SEG - 113 Emergency Shower and , low-pressure eyewash stations Inspection Checklist; RS - SEG - 049 - Fire Fighting System Inspection Checklist - Pump Room; RS - SEG - 050 - MRDM Extinguisher Inspection Checklist. During the field audit, it was evidenced that showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi- carbonate fire extinguishers; are clearly identified as well as they are at strategic locations throughout the operation based on the records obtained from the implementation of internal documented procedures PG - SEG -001 - Assessment of Hazards and Risks to Occupational Health and Safety and Environmental Aspects and Impacts and PG - SEG - 023 - Emergency Response Plan. During the field audit, it was evidenced that MRDM has showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi- carbonate fire extinguishers located at strategic locations throughout the operation and are maintained, inspected and tested on a regular basis. Sampled examples of dry powder or non-acidic sodium bi- carbonate fire extinguishers were EXT-084 - Leaching, EXT-085 - Leaching, EXT-092 - Lower floor reagents, EXT-093 - Upper floor reagents, EXT-094 - Upper floor reagents, EXT-095 - Lower floor reagents, EXT-227 - Cyanide discharge, EXT-228 - Cyanide dosage, EXT-229 - Briquette storage, EXT-177 - ADR, EXT-178 - ADR lower floor, EXT-179 ADR lower floor, EXT-182 - Upper floor leaching, EXT-183 - Upper floor leaching, EXT-184 - Upper floor leaching, EXT- 185 - Upper floor leaching, EXT-186 - Upper floor leaching and EXT-192 - Detox. Evidenced that showers and low-pressure eyewash stations have been inspected and tested in accordance with Brazilian legislation such as NBR 16291:2014. Records assessed demonstrated it is duly implementedDuring field audit the auditor tested the a.m. equipment and all of them were functioning as required. During field audit, it was evidenced that storage, and process tanks and piping containing cyanide solution have been identified to alert workers of their contents, as well as the direction of cyanide flow in pipes designated. Sampled examples were: Cyanide Preparation Tank - 4010TQ01;

Cyanide Preparation and Distribution Tank - 4010TQ02; Leach Tank 01 - 2030TQ01; Leach Tank 02 - 2030TQ02; Leach Tank 03 - 2030TQ03; Leach Tank 04 - 2030TQ04; Leach Tank 05 - 2030TQ05; Leach Tank 06 - 2030TQ06; Leach Tank 07 - 2030TQ07; Leach Tank 08 - 2030TQ08; Leach Tank 09 - 2030TQ09; Leach Tank 10 - 2030TQ10; Detox Tank 01 - 2035TQ01; Detox Tank 02 - 2035TQ02; TQ01 Transfer Valve – V02; TQ01 Transfer Tank Drain Valve – V03; TQ02 Cyanide Briquette Shed Drain Valve to Leach Containment Basin – V04; TQ02 Dosing Valve – V05; TQ02 Dosing Valve – V06; TQ2 Dosing Tank Drain Valve – V07; Cyanide Leach Dosing Pipeline Check Valve – V08; Cyanide Leach Dosing Pipeline – TUBU0015; Cyanide Leach Dosing Pipeline Check Valve – V09; Pipeline from Process plant to MRDM Tailings Dam. MRDM labels the tailings delivery and return pipelines to alert workers of cyanide, including the direction offflow. The waste pipelines, are labeled too. Evidenced that MRDM defined, documented, implemented and maintains an emergency program inside the plant where all cyanide related information is available in Portuguese. It contains information on health, safety, environment, chemistry and physics related to cyanide such as Safety Data Sheet (FDS) issued by Proquigel (cyanide producer). It was evidenced the availability of the FDS for the product sodium cyanide in solution revision 7, as well as the FDS for the product sodium cyanide in powder or briquette revision 11. Both comply with NBR 14725:2023. Noted that above-mentioned FDS includes information such as: Product and Company Identification; Hazards Identification; Composition and Information about ingredients; First Aid Measures; Fire-Fighting Measures. Control Measures for Spills or Leaks; Handling and Storage; Exposure Control and Chemical Properties; Stability and Reactivity; Toxicological Information; Ecological Information; Final Disposal Considerations; Transportation Information; Regulatory Information and Others Information. Observed the existence FDS of other chemicals existing at MRDM. Evidenced that MRDM defined internal documented procedures PG - PL - 001 - Cyanide Operations, PG - SEG - 005 - Emergency Involving Cyanide, RS - SEG - 077 - Annex 3 PAEC - Initial Information for Simulated or Emergency Care, RS - SEG - 078- Annex 4 PAEC - Illustrated Scheme for Activating the Emergency Brigade, PG - SEG - 036 - Occurrence Record, RS - SEG - 116 - Annex 13 PAE - Main Emergency Scenarios and PAEBM regarding potential operational risks mapped by the company within the scope of application and relevant to Cyanide. (FEAM and IGAM), Civil Defense and communities in the area of influence of the enterprise. Besides, MRDM defined internal documented procedure PG - SEG - 004 - Communication and Analysis of Accidents and Incidents and RS - SEG - 004 - Accident and Incident Analysis Form which define methodology for accident classification and analysis to investigate and evaluate cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety, and to respond to cyanide exposures.They apply to accidents involving MRDM employees or talk about work services on the company's premises or in areas owned by them or on the company's service path (including going to or returning from work to home), or even during the performance of services under the responsibility of MRDM outside its facilities. It defines that when occur cyanide exposure incidents MRDM must: a) react to non-compliance and, as applicable: b) take action to control and correct it; c) deal with the consequences, including mitigating adverse environmental impacts; d) assess the need for action to eliminate the causes of non-conformity, in order that it does not repeat itself or occur elsewhere: 1) critically analyzing non-conformity; 2) determining the causes of non-

compliance; 3) For the raw causes analysis determination MRDM can uses several technique such as 5w1H and 6M'S (Environment / Human Resource / Method / Equipment / Raw Material / Measure) 4) determining whether similar conformities do not exist or could be possible to occur; c) implement any necessary action; d) critically analyze the effectiveness of any corrective or preventive action taken; e) make changes to the environmental management system, if necessary. Corrective actions must be accompanied by the significance of the effects of non-conformities findings, including environmental impact(s) as well as MRDM must retain documented information as evidence: - the nature of the non-conformities and any subsequent actions taken; - the results of any corrective action. The classification of accidents in which there is injury is the exclusive responsibility of the occupational physician. Near misses will be classified only according to their category and their potential severity. Accidents will be classified according to their category (personal, environmental or material), according to their real severity, into five categories such as catastrophic, Bigger, Moderate, Minor or Low. During the field audit interviewed personnel showed to be aware of this matter. During field audit, through analyzing actual physical conditions of MRDM's plan, reviewing several records and interviewing operational, maintenance, engineering and process personnel it was not evidenced that have been occurred cyanide related accident. Interviewed several personnel all of them reported that no cyanide-related incidents or lost time / near- miss incidents occurred in the last three years. For statistical MRDM uses the following indicators: (Lost Time Injury Frequency Rate (LTIFR). Total Recordable Injury Frequency Rate (TRIFR), Lost Time Injury Severity Rate (LTISR) and All Injury Frequency Rate (AIFR);

Standard of Practice 6.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

During the field audit it was evidenced that MRDM has a Health Care Center fully equipped with emergency shower, potable water, ambulance, resuscitator, oxygen, antidote kits, telephone, cell phone, radio channel, specific care center and e-mail. During the field audit evidenced an alarm system readily available for use at cyanide unloading, storage, locations and elsewhere in the plant. The antidotes used are Sodium thiosulfate, Sodium nitrite, Methylene blue and hydroxocobalamin. MRDM defined, documented, established, implemented and maintains methodology for inspect its first aid equipment regularly to ensure that they are available when

needed, and that materials such as cyanide antidotes stored and tested as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed. Evidenced that routine inspections of first aid equipment include the oxygen kits. Reviewing MRDM's Health Area documentation it was noted they clearly define the 5W1H related to first aid equipment inspection It is defined that for Visual Inspection through checking whether the packaging is intact, with no signs of damage, moisture or tampering and confirming that all items on the checklist are present, with validity data, conservation status, as recommended in the inspection forms located as mentioned above as well as for Organization through verifying whether items are organized so they are easy to access in an emergency. Evidenced that MRDM defined, established and maintains documented internal procedures that define methodology for use, handling, storage, preservation, inspection and preventive and corrective maintenance. Sampled examples were: MN - MED - 001 – Health Care Manual; RS - MED - 013 - Health Care t Equipment, Medication and Ambulance Inspection Checklist; RS - MED - 012 - Emergency Bag Inspection; RS - MED - 029 - Cyanide Antidote Control; RS - MED - 031 Defibrillator Daily Checklist; RS - MED - 032 - Sphygmomanometer Daily Checklist Inspection; RS - MED - 033 - Oxygen Cylinder Checklist Inspection; RS - MED - 034 - Diphoterine Kit Checklist Inspection; RS - MED - 035 - Autonomous Panoramic Mask Checklist Inspection; RS - MED - 036 - TYVEK Coverall Checklist Inspection; RS - SEG - 111 - Ambulance Checklist; RS-SEG-008 - 008 Personal Protective Equipment Inspection Checklist – PPE. Reviewing several inspection records the auditor evidenced that this requirement have been duly implemented by MRDM. MRDM defined, established, documented, implemented and maintains PAEC which aims establishing methodology to be observed and followed in eventual emergency situations, with sodium cyanide, preserving worker health and safety as well the environmental media restoring operational normality in order to eliminate/minimize possible damages which applies to all areas of MRDM that work directly or indirectly, as well as in internal and external emergencies with Sodium Cyanide. Responsibilities and authorities are clearly defined and documented. Evidenced that item 7.12 of the PAEC defines that in case of human exposure that requires action by an emergency response team, such as decontamination or treatment, it is essential that there are oxygen cylinders in the unit to administer to the poisoned person, resuscitation equipment and treatment kits (Sodium Nitrite, Sodium Thiosulfate, Methylene Blue and Hydroxocobalamin). Actions to be taken: Call for help; Remove the victim to a place with fresh air; Quickly determine the victim's condition; Provide first aid as indicated, immediately; Seek specialized medical assistance; important note: To administer the antidote solution, consult the supplier's specific procedure: Administration of Sodium thiosulfate, Sodium nitrite, Methylene blue and Hydroxocobalamin; Supplier Uningel – PP.SGI.SOC.100.0006, version 07, dated June 26, 2024 , Administration of Sodium Nitrite, Sodium Thiosulfate and Methylene Blue; the Supplier Uningel PP.SGI.SOC.100.0002, version 16, dated September 27, 2024. Medical oxygen, Hydroxocobalamin, sodium nitrite, sodium thiosulfate and methylene blue are stored in the MRDM medical outpatient clinic, under the supervision of the health team. Storage is done safely, also ensuring a quick response time, since the building is close to the processing plant's operating areas. The health team has an ambulance available to transport the victim to external hospitals, if necessary. For the administration of intravenous antidotes at MRDM, the company follows the medical prescription of the in-house physician, Dr. Délio Coelho Junior, with the support of the nursing team, composed of Aparecida Vaneandria Sousa Batista (occupational nursing technician), Raquel Silva Fernandes (occupational nursing technician), Elaine Gabriela Silva Miranda (occupational nursing technician) and Julia Vitória Silva Lima (occupational nursing technician). If it is necessary to administer an intravenous antidote outside

of MRDM, the victim will be referred to the pre qualified hospitals. In case of inhalation/consumption: Administer oxygen when the victim is conscious; Administer oxygen and Sodium Nitrite, Sodium Thiosulfate, Methylene Blue when the victim is unconscious; Administer oxygen and Sodium Nitrite, Sodium Thiosulfate, Methylene Blue or artificial respiration when the victim is not breathing and Call a doctor. In case of skin contact: Follow the same procedures as in case of inhalation; Remove contaminated clothing and wash the skin with plenty of water; Keep the victim covered; Keep the victim under observation for two (2) hours. During field audit it was evidenced that MRDM has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide. The MRDM Health technical team is made up of the Occupational Medicine Physician with the support of the nursing team, has an emergency facility, fully equipped with antidote, first aids drugs and materials, oxygen, resuscitator, as well as the existence of adequate human resources to provide first aid and medical assistance to workers exposed to cyanide. Evidenced that MRDM's Health Care is located in the Plant with Installation composed of infirmary beds, dressing room, archive room, storage of materials and medicines, occupational administrative room, reception and medical office. The first aid kit contain: • 5L portable oxygen, • Attachable oxygen catheter,• High concentration mask with reservoir,• Ambu Resuscitator Full Manual Adult Resuscitator • Difphoterin (LPMD Individual eye wash, 500ml),• Diphoterin 500ml (Spray, 200 ml).as well as hydroxocobalamine. Evidenced that Health Care Manual in item 5.3 defines the duties and responsibilities of the Occupational Physician. Examples were: Perform medical regulation of the system; − Know the company's activities and occupational risks, maintaining permanent contact with the areas of occupational health and safety, industrial management and human resources; − Prepare, coordinate and develop the Occupational Health Medical Control Program, (PCMSO) for the company's employees, based on legal, scientific and ethical; Be responsible for carrying out the occupational medical care provided for in the PCMSO, in order to identify early health changes in the employee, resulting from work; Implement and develop actions to promote health in the collective sphere; − Promote interest in healthy lifestyle habits in contact with workers; Provide support to administrative and human resources departments in developing general and specific actions aimed at preserving health and physical integrity; − Guide and direct employees in seeking treatment for various pathologies; − Decide whether or not employees need to be absent from work or change their job due to health reasons; − Guide technicians in the process of occupational adaptation of workers with physical disabilities, or those returning to work with after-effects or limitations; − Perform professional activities with permanent monitoring of the employee's health status and their exclusion from the job performed; − Adopt appropriate administrative measures immediately after identifying potentially occupational health changes, triggering, together with the competent departments, corrective and preventive actions to prevent progression and prevent occupational illnesses; − Issue service reports and technical opinions; − Know the local and regional service network; − Establish an agreement, contract or arrangement that guarantees the existence of at least one hospital unit of choice for emergency referrals; − Maintain a global and permanently updated view of the resources available for pre-hospital care and emergency doors, periodically checking their operational capacity; Receiving calls for assistance, analyzing demand, classifying care priorities, selecting means of care (best response), monitoring local care, determining the patient's destination, providing telephone guidance; − Providing direct assistance to employees in emergencies, performing possible and necessary medical procedures at the pre-hospital level, and supervising other health professionals involved; − Carrying out quality control of health services provided at the Unit; − Evaluating team performance and providing support to those

responsible for the service's continuing education program; − Complying with ethical and legal prices and local and corporate standards relevant to the Service. Evidenced that the Health Care Manual in item 5.4 defines the duties and responsibilities of the Occupational Health Nurse. Examples were: Supervise and evaluate the nursing actions of the team in Mobile Pre-Hospital Care; − Participate in training and improvement programs for emergency health personnel, especially in continuing education programs; − Perform quality control of the service in aspects inherent to their profession; Plan, execute and evaluate care for the entrepreneur, in addition to promoting their health and ensuring their safety; − Support those responsible for developing human resources for the continuing education needs of the team; − Comply with the Professional Practice Law and the Nursing Code of Ethics.. Besides, the Health Care Manual define clearly the roles for activities to be performed in accoradance with Brazilian legislation. The drug treatment is based on the natural way in which the body detoxifies cyanide. Cyanide has a layer of Fe+++ of Methemoglobin (HbF3), therefore the body increases the production of Methemoglobin which, reacting chemically with cyanide, generates Cyanomethemoglobin, thus releasing the respiratory chain that is blocked by the binding of cyanide (CN-) with a cytochrome oxidase enzyme. This irreversible reaction with the cyanide present in Methemoglobin and, more weakly, with the cyanide present in the cytochrome oxidase enzyme of the respiratory chain, generating Thiocyanate, a metabolite with almost no side effects to humans, which will be eliminated through urine in the form of Urinary Thiocyanate. With the application of Nitrites we can accelerate the formation of Methemoglobin and with the application of Sodium Thiosulfate we can increase the supply of the element sulfur (S), which has a small reserve in the human body, and in this way greatly reduce the time of detoxification of cyanide. Sodium Nitrite - Medication administered exclusively under medical supervision with the following dosage: Sodium Nitrite 30% (300 mg/ml): the necessary dose will be 300 mg (01 ml), diluted in 10 to 100 ml of Distilled Water or 0.9% Saline Solution or 5% Glucose Serum intravenously, slowly between 5 and 20 minutes, depending on the victim's response it is necessary to apply another 300 mg (1 ml).

Sodium thiosulfate - Medication administered exclusively under medical supervision with the following dosage: Sodium thiosulfate 25%, 10 ml (2.5 g) ampoule: start with 12.5 g (50 ml), diluted in 100 ml of distilled water or 0.9% saline solution or 5% glucose solution intravenously, slowly over 10 to 15 minutes. Sodium thiosulfate 10%, 10 ml (1.0 g) ampoule: start with 12.5 g (125 ml), diluted in 200 ml of distilled water or 0.9% saline solution or 5% glucose solution intravenously, slowly over 10 to 15 minutes. NOTE: The children's dose should start at 300 to 500 mg/kg.

Methylene blue - Medication applied exclusively under medical supervision with the following dosage: Accelerates the return of methemoglobin to hemoglobin. It should be used when cyanosis is observed in an individual or when there is a quantity of methemoglobin 30% with the following dosage: Methylene Blue 1%, 10 ml ampoule (100 mg) or Methylene Blue 5% with 10 ml (500 mg): Start with doses of 1 to 2 mg/kg of weight, intravenously, slowly, between 5 to 10 minutes. The effects should be distributed between 30 to 60 minutes. If necessary, repeat a dose.

Cyanokit - Presented in the box containing the Kit consisting of: 1. 01 ampoule bottle containing 05g of Hydroxycobalamin powder. 2. Dosing device to be used during dilution 3. Serum equipment for intravenous application 4. Gelco 24 for venous access 5. Instruction manual in 24 languages (Portuguese on page 229) Medication applied exclusively under medical supervision . Cyanokit is administered as an infusion over 15 minutes. In adults, the

initial dose is 5g.A second dose may be administered, depending on the severity of the poisoning and the patient's response. The second dose is administered over a period of between 15 minutes and two hours, depending on the patient's condition. In children, the initial dose is 70 mg per kilogram of body weight, up to a maximum dose of 5g. The maximum total dose is 10 g in adults and 140 mg/kg in children up to a maximum of 10 g.
evidenced that PAEC item 7.12 clearly establishes methodology for land transporting from site to hospital. As already mentioned MRDM has its own ambulance. Besides, if necessary MRDM can use Mobile Emergency Care Service(SAMU) ambulances. According to the need and degree of urgency, the responsible doctor will direct the victim to reference hospitals. MRDM informed local medical facilities of the potential need to treat patients for cyanide exposure. Evidenced duly implemented. Evidenced the existence of a formalized arrangement between MRDM and a.m hospitals in which they are aware of the potential needs that may be asked to treat a victim of cyanide poisoning. Evidenced that MRDM's Health Area received training provided by a qualified Medicine Doctor expert in chemical intoxication mainly in cyanide intoxication. Besides, MRDM's Health Team performed technical visits at a.m. hospitals and attested they have adequate and qualified staff, equipment and expertise to provide treatment for cyanide exposure.

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
☐ X in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 7.1

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM defined, documented, implemented and maintains several document for Emergency Response Plans to address potencial accidental releases of cyanide and cyanide exposure incidents such as: PG-SEG-037 (1.1) - Crisis Management; PG-SEG-023 (1.7) – Emergency Plan (PE); PAEC and PG-BAR-001 - Mining Dam Emergency Plan (PAEBM) and Crisis Management Plan (PGC) for MRDM Tailings Disposal System. Noted that the Above-mentioned emergency plans are in accordance with Brazilian regulations such as • Federal Law 12,334 of September 20, 2010, • Law 14,066 of September 30, 2020, • Resolution No. 95 of February 7, 2022, Resolution No. 130 of February 24, 2023 and ANM Resolution No. 95/2022, • State Environmental Council (CEPRAM) Resolution No. 3,183/03, • Decree No. 16,302 of August 27, 2015, • GM Ordinance no. 3,214, of June 8, 1978, • ABNT NBR 15219:2005, • ABNT NBR 14276:2006, • Technical Instruction (IT) of the Fire

Department of the State of Minas Gerais (CBMG) # 12 edition 3 of July 1, 2020; •Federal Law 11901 0f 2020. Evidenced that PAEC describe specifically the response for all cyanide related emergencies such as Catastrophic release of hydrogen cyanide from storage, process or regeneration facilities; Transportation accidents occurring on site or in close proximity to the operation; Cyanide releases during unloading and mixing; Cyanide releases during fires and explosions; Pipe, valve and tank ruptures; Overtopping of ponds and impoundments; Power outages and pump failures; Uncontrolled seepage; Failure of tailings impoundments, and other cyanide facilities. MRDM does not have heap leach facilities. MRDM has a Cyanide Destruction System. The use of cyanide in the leaching process is controlled online and by routine sampling at pre-defined points, ensuring that cyanide is consumed in the circuit and that there is no need for a treatment system to reduce the amount of cyanide discarded. in the dam met the maximum allowed by the International Cyanide Code. Evidenced that planning for response to transportation-related emergencies has been considering, transportation route(s), physical and chemical form of the cyanide, method of transport (e.g., rail, truck), the condition of the road or railway, and the design of the transport vehicle (e.g., single or double walled, top or bottom unloading, by Confins as well as Ergotrans (Transchemical Transporte e Logística). As already mentioned, Confins as well as Ergotrans (Transchemical Transporte e Logística). are ICMI certified. (Please see Principles 1 and 2 for additional information). Evidenced that MRDM defined transportation accidents occurring on site or in close proximity to the operation through PAEC item 7.3. Reviewing this procedure noted that it covers cyanide transportation and operations at MRDM. Evidenced that there is sharing of documentation, training and effective communications day by day of transport conditions, route conditions among MRDM, Proquigel I and Confins as well as Ergotrans (Transchemical Transporte e Logística). Evidenced that MRDM defined, documented, established and maintains internal documented procedure MRDM's PAEC that establishes at item # 6.14 methodology for evacuation of employees and contractors from the MRDM site for emergency reasons. It is defined to proceed with the partial or total abandonment of the area, when necessary, according to pre-established communication, removing the occupants from the risk areas, structure or risk area for local safety, at a safe distance from the accident site, remaining until the final definition of the emergency. The person most responsible for the emergency (general coordinator or brigade chief/leader) determines the beginning of the abandonment, and must prioritize the affected areas, the upper floors to these, the nearby sectors and the highest risk locations. Whenever the emergency communication system (siren/radio) is activated, in cases where the Emergency Coordination or chief/leader determines, the area must be evaded, and the instructions described below must be followed:. Evasion covers all employees, partners and visitors, except those directly involved in controlling the emergency, even then, after ensuring their protection. 14.3.2. Evasion actions: people must go to the PE – Safe Meeting Points, (surface) and survival cells and underground chamber. Note: In the event of an accident, all employees (regardless of the area) must go to the meeting point in the internal area, Description of the general functioning of the alert system for the downstream community establishes that MRDM maintains the Control and Operations Center (CCO) by monitoring, in real time, the conditions of its dams. The CCO has technicians trained to operate the Alert System, through which it is possible to activate all sirens without the need for an operator to be present on site. The MRDM Alert System consists of 5 fixed emergency sirens, remotely activated and integrated with the CCO. The

sound warning towers are installed downstream of the Waste Supply System (SDR), in strategic locations to provide a minimum coverage of 70 dB throughout the Self- Rescue Zone (ZAS), as recommended in current legislation. It is worth noting that the alert system is evaluated daily through silent tests. These make it possible to detect faults in all siren components. The main alert system has a redundant communication system, with primary and secondary channels. In case of failure of this system, the secondary alert system will be activated, made up of support vehicles with signaling devices, visual and audible alert (siren, light signaling bars and megaphone). In addition, the community will be communicated through the dissemination of information in newspapers, radio and television. After activating the alert system, workers who carry out activities in the SDR region and in communities located in the ZAS must travel through the escape routes to the meeting points previously defined, documented and duly communicated to all interested parties. Noted that the escape routes were defined as established in accordance with NBR 9050:2004 - Escape route and rescue area - General conditions. For emergencies, situations that can affect potentially affect communities as already mentioned that PAEBM defines the methodology for communities' evacuation. Interviewed personnel showed to be aware of this matter. MRDM defined, documented, established and maintains internal documented procedure MRDM's PAE which defines at item # 16.2 the flowchart of medical care protocol in case of cyanide emergency situation, at item 17 establishes the removal and emergency logistics and at item 22 the **c**ontingency actions in emergency scenarios. Additionally, it defines at item 8 first aid procedures. Reviewing the above mentioned noted that it is it is specific for MRDM' operations. Besides, evidenced that MRDM's Safety and Environmental Action Plan (PASE) include step by step for first aid measures for cyanide emergencies situations such as: Person poisoned with cyanide; Rescue procedure; Symptoms of HCN poisoning and treatment flowchart according to symptoms: for Degrees (mild, moderate, severe and very serious); Symptoms (headache, weakness, change in smell and taste, shortness of breath; Headache, vomiting and airborne cardiac toxicity; delirium, convulsions and severe shortness of breath and loss of consciousness and respiratory and/or cardiorespiratory arrest); and Treatment (Apply 100% oxygen 15 L per minute; Drive to the nearest Medical Service or Hospital. PAE also defines what to do in case of: Inhalation; Ingestion; Contact with the skin; Person poisoned with cyanide during chemical analysis activity on cyanide solutions. The use of oxygen therapy is clearly defined. The protocol for using Diphoterine (or which is a product used for the emergency treatment of chemical injuries to the skin and eyes caused by corrosive or irritating substances, containing Instructions for the correct use of Diphoterine washing solution, chemical decontaminant for first aid in Anticipated cases with chemicals that are corrosive or irritating to eyes and skin are clearly predicted and documented. Interviewed pertinent personnel showed to be aware of demonstrating that that personnel know the specific actions they are expected to take in response to the emergency. The antidotes used by MRDM are Sodium thiosulfate, Sodium nitrite, Methylene blue and hydroxocobalamin. MRDM defined, documented, implemented and maintains several procedures in order to assure a control of releases at their source. During the field audit it was evidenced the very good conditions of the MRDM' site.

MRDM did not have cyanide releases but in case of occurrence, there are specific documented procedures and personnel duly qualified to implement the necessary actions for containment, assessment, mitigation and future prevention of releases. As already mentioned, during the field audit it was evidenced the very good conditions of the MRDM'

site. Interviewed personnel showed to be aware of this matter.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

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

Summarize the basis for this Finding/Deficiencies Identified:

*I*nterviewing personnel of several areas and reviewing meeting records it was evidenced that MRDM has been involved the operation involved its workforce such as areas of: process, engineering, production, maintenance, social responsibility, environmental, health and safety occupational safety, dam and design personnel as well as external stakeholders, including potentially affected communities, in the cyanide emergency response planning process. Evidenced health authorities (public and private hospitals and clinics) were duly involved in MRDM's cyanide emergency. Sampled examples were National Agency for Mining (ANM); Brazilian Institute of Environment and Resources Renewable Natural Resources (IBAMA); National Center for Risk Management and Disasters (CENAD); National Secretariat of Civil Protection and Defense (SEDEC): Management of Risks, Management of Disasters, Department of Protection and Restoration Works and Reconstruction; State Secretariat of Justice and Public Security (SEJUSP); Operation Center of the Military Fire Department of Minas Gerais (COBOM); Public Safety (SP) of Porteirinha, Riacho dos Machados and Janauba; Brazilian Army Montes Claros; Riacho dos Machados Health Center; Porteirinha Santa Casa Hospital; Janaúba Regional Hospital and Montes Claros Santa Casa Hospital; Federal Public Ministry (MPF), Civil Defense (DC), Military Firefighter (CBM). MRDM has been made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions. MRDM has been identified external entities having emergency response roles, and involved those entities in the cyanide emergency response planning process. Sampled examples were: Porteirinha City Hall; Riacho dos Machados City Hall; Montes Claros City Hall; SAMU; Riacho dos Machados Health Center; Porteirinha Santa Casa Hospital; Janaúba Regional Hospital and Montes Claros Santa Casa Hospital, ANM, CENAD, MPF, State Public Ministry (MPE); Porteirinha; Road Police; Civil Police: Federal Police; CBM. Evidenced that MRDM engages in consultation (where applicable) and communication with stakeholders to keep PAEBM and PAEC currents. Sampled examples were: Proquigel (the cyanide producer), Confins and Ergotrans (the cyanide transportation companies), and Ambipar (for accident prevention, response to emergencies disinfection of environments, waste management and recovery and waste collection), MRDM engages security and health authorities, emergency response suppliers, and community representatives. MRDM invites specific stakeholders to participate mock emergency drills. Another implemented control is to perform periodic meetings with stakeholders, communities in order to discuss and updated (if necessary) the emergency response plan. Evidenced duly implemented.

Standard of Practice 7.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM's PAEC defined and documented primary and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the Plan. In this way, reviewing MRDM's PAEC, the auditor verified the appointment of the Health and Safety Coordinator as Primary PAEC Coordinator and the Occupational Safety Technician as Alternate PAEC Coordinator. Besides, it was evidenced that MRDM's PAEBM defined and alternate emergency response coordinators who have explicit authority to commit the resources necessary to implement the Plan. In this way, reviewing MRDM's PAEBM, the auditor verified the appointment of the Plant and Processing Manager Natal Bolentine Neto as Primary PAEBM Coordinator and the Environment Coordinator as Alternate PAEBM Coordinator. Interviewing pertinent personnel showed to be aware of this matter. evidenced that MRDM's PAEBM has been identified and documented Emergency Response Teams related to PAEBM Sampled examples were: PAEBM Primary Coordinator the Plant and Processing Manager PAEBM Substitute Coordinator the Environment Coordinator Rodrigo; Corporate Advisory -; Technology -; Operation, Maintenance and Plant Infrastructure - Dam Safety - Safety and Emergency Brigade Social Communication - Administrative Area. Evidenced that Annex E Section I of MRDM PAEBM defines that a team that must act in case of emergencies that occur at the dam must be permanently trained, this being the responsibility of MRDM's Senior Management. Such training becomes essential for the recognition of emergency situations at all levels of severity, equally enabling the team's readiness when necessary to provide response actions to emergency situations with agility and capacity. It defines two kinds of trainings (internal and external). Internal training - aims to contribute to maintaining the state of readiness, as allow greater familiarization of those involved with their elements and responsibilities inherent to the PAEBM completing the operational evolution of the aforementioned Plan. Such trainings are carried out at most every 6 months, with them being duly registered and monitored by the team who will carry out the Assessment and Declaration of Conformity and Operationality of the PAEBM. They include: Internal expository exercises - These are expository presentations in training rooms, where the procedures described in the PAEBM are explained. These are exercises based on discuss, and aim to familiarize participants with the plans, policies, agreements and current procedures; Internal Notification Flow Exercises - Prolonged exercise by the entrepreneur with the objective of testing the internal notification

procedures presented in the PAEBM; Internal Simulation Exercises Hypothetical - It is a playful test of the effectiveness and operability of the PAEBM carried out in a classroom training, with time situations close to the actual forecast. It is done to evaluate the capacity and response time of the entrepreneur in case of emergency, and counts on the presence of key personnel discussing simulated scenarios; Internal Simulation Exercises Practical - It is a test that comprises field exercises simulating a situation of emergency occurred the activation and mobilization of international operations centers of emergencies, personnel and resources available, including evacuation procedures internal. It is noteworthy that the internal practical simulation must be carried out at least once a year, as per pertinent legislation. External trainings - The team that makes up the PAEBM of the MRDM Tailings Dam must provide annually Guidance Seminar, with the participation of city halls, civil defense organizations, of the dam, other employees of the project and the population involved in the safety of the ZAS. If formally requested by civil defense, the population involved in the Safety Zone (ZSS) can also be included in such a seminar. External training exercises promote prevention, preparedness and response to incidents and emergencies, and can even be extended to include recovery operations. Therefore, the orientation seminars must understand the flood map exposure involved Internal and external participants engage in discussion of security procedures. Such communication must ensure that local authorities and the community have due understanding crucial information associated with the dam in question, events such as rescue of lives. Therefore, the communication of such information must be properly configured in order to being easily received, digested and innovative. The purpose of the Orientation Seminar is to help people understand the potential dangers associated with the structure. Therefore, risk communication is a critical component of risk management. effective decision-making based on risk associated with dams and must be integrated into all aspects of the PAEBM management process. Orientation Seminars must ensure that: The entrepreneur and the affected community will be partners and will have the opportunity to participate in the decisions that involve them; and, Communications regarding potential flood hazard, its consequences and solutions shared will be open, transparent and understandable. In summary, the important principles in risk communication are: Improve communication with the public and dam regulatory agencies; Emergency action plans and communication with the public are important and integral aspects to reduce the risk to life. Communication must be open and transparent; an interactive, two-way exchange of information. Present dam safety issues. Integrate risk communication strategies early and frequently. Focus communication on actions to be carried out by individuals/organizations. Discuss uncertainty in risk estimates and implement a risk management culture. Signs and warnings on infrastructure must be legible and visible. MRDM performed simulated emergency situations in conjunction with city halls, civil defense organizations, dam security team, other employees of the project and the population especially in ZAS and other external stakeholders. Furthermore, Civil Defense may include the population of the ZSS. Such simulated exercises provide the opportunity to evaluate the effectiveness of the PAEBM in a situation real and demonstrate personal key readiness levels.

Periodic exercises result in a improved PAEBM as lessons learned are incorporated into the updated document. Tests of Notification and Alert Systems are carried out at least annually, the objectives essentially being to confirm telephone numbers, verify the operability of means of communication as well as notification flowchart functionality. In the case of alert tests, these are carried out at least every six months through functionality tests of the sirens without the audible warnings are properly activated. The test has the following specific objectives: Test the notification system and in particular: i) test telephone numbers; ii) determine the ability to establish and maintain communications during an emergency; iii) verify the PAEBM Coordinator's ability to mobilize and activate an operational team and emergency response means. Test the alert system: i) test the operability of the alert means and verify the notification capacity quickly the population in ZAS. A highlight are the Community Awareness Raising Actions - The preparation of population communities is a risk mitigation action, being carried out through two types of actions that are, essential: Raising community awareness, promoting clarification sessions and disseminating information related to the risk of living in valleys downstream of dams and the existence of emergency (in the form of leaflets, posters, brochures); Whats App groups, Education and training of population communities, to face the eventuality of a flood caused, promote public information programs in the strictest sense, relating to the zoning of risk, the collection of the meanings of messages and the rules for evacuating populations; These programs must involve the performance of controlled exercises. Citizens residing in a risk area are duly informed about some mitigation practices of the risk that can be broken, in a simple way, as: Be informed about the entity that transmits the news of the imminent emergency, as well as the readiness status order; Know the meaning of the different alerts; Know the evacuation plan and: must be informed about the entity that transmits the news of the imminent emergency, as well as the evacuation order; must know the limits of the flood perimeter; must know the location of meeting points (and make sure that all elements also know you nearby), in the case of living in the ZAS, self-rescue sites; must know the escape routes. Such information is valuable especially for individuals residing in the ZAS, of whom, in emergency situation and given the lack of time that the situation can give, if large levels of autonomy. During field audit, interviewing pertinent personnel, reviewing several pertinent records it was evidenced that appropriate training for emergency responders have been duly implemented. It was demonstrated that the emergency brigade members are in compliance with Brazilian legislation. Evidenced that PAEC and PAEBM include call-out procedures and 24-hour contact information for coordinators and response team members. Evidenced that Annex A - Section 1 of the PAEBM requires that the MRDM be made available contacts and telephone numbers of internal and external agents for emergency response in accordance with the plan planning. The contacts and telephone numbers of internal agents are updated and checked at each document review or when there is any change in load and function. Already external agents are also updated as documents are reviewed or when the exchange of professionals in the appropriate public bodies was identified. Revisions to this annex are forwarded to the State Civil Defense in accordance with Governor's Military Cabinet Resolution (GMG) No. 83, of April 16, 2024, via email or in physical form for legal compliance. Evidenced that item 6.28

of the internal documented procedure PG-SEG-023 (1.7) – Emergency Plan (PE) defines the duties, responsibilities and authorities of the components of the Emergency Brigade (BE). Examples sampled were: BE Coordinator – Responsibilities: Develop procedures for emergency preparation and response; Schedule, record and evaluate the effectiveness of training and mock emergency drills; Ensure the provision of the necessary resources to respond to emergencies; If necessary, inform the competent occupational safety and health or environmental authorities when the occurrence occurs; Promote changes to this procedure and the Emergency Response Plan; Modify the schedule for completing simulated exercises; BE Leader - Responsibilities - Keep the emergency brigade staff updated; Carry out, evaluate and record mock emergency drills; Maintain emergency response equipment in compliance with its functioning; inspection operator and recorder; Coordinate the inspection of fire extinguishers and other devices to prevent and combat emergencies and recorders; Manage and maintain records of fire extinguishers and hydrants; Keep Emergency Brigade employees informed about the PE; BE Leader Substitute - Responsibilities - Replace the Brigade Chief in his absence; Participate in scheduled training and simulations; Provide additional assistance when emergencies occur on the service front; Return to work coordinator; BE Combatant - Responsibilities - Be prepared to cover and rescue victims; If necessary, isolate the area; Use fire prevention and fighting equipment; Contain spills or leaks of chemical products; Provide assistance to external aid; BE First Aid - Responsibilities - Provide first aid to victims; Transport victims; Assist in responding to emergencies without victims; Participate in scheduled training and mock emergency drills; BE Abandonment Coordinator - Responsibilities - Ensure that abandonment routes are always unobstructed; Request and coordinate the departure of Company employees and service information; ; Participate in scheduled training and simulations; BE Coordinator – Authorities - Command the Brigade's activities in emergencies, prevention, training and mock emergency drills; Request employee evacuation; Request external assistance; Request isolation and closure of areas, passages, traffic and activities during or post-emergency; Approve, request permission or dismissal of brigade members as necessary; Carry out external communication regarding possible emergency situations and incidents; BE Leader – Authorities - Coordinate post-accident aftermath work; Request external assistance from the Company when necessary; Request employee evacuation; Request external assistance; Request isolation and closure of areas, passages, traffic and activities during or post-emergency; BE Leader Substitute – Authorities - Request employee evacuation; ▪ Request external assistance; Request isolation and closure of areas, passages, traffic and activities during or post-emergency; BE Combatant Brigadista – Authorities - Participate in scheduled training and mock emergency drills; Use fire prevention and fighting equipment; Request the presence or departure of the population from the brigade leader or coordinator; Point out procedural or equipment failures during performance (training, mock emergency drills or real); Request isolation or closure of places from the brigade leader or coordinator; BE First Aid Brigadista- Request the presence or removal of people from the service location; Request the presence of a medicine doctor or nurse; Use of first aid kits; Analyze the need and call the emergency brigade; BE Abandonment Coordinator - Remove employees from sectors; Indicate the routes that employees must follow; Coordinate the return of employees to the sector. Furthermore, item 10 of Section I of the PAEBM clearly specifies the duties and responsibilities of

coordinators and team members related to the emergency at the MRDM tailings dam. Reviewing MRDM PAEBM, the auditor evidenced that it is in accordance with ANM Resolution No. 95/2022. PAEBM activities are divided into two levels: • Internal: the action is carried out by MRDM employees, whose responsibilities are: detection, evaluation and classification of the emergency, as well as decision-making, execution of corrective actions, alerting the population of the self-rescue zone and notification/communication to external agents; and • External: action of external agents (authorities and public bodies) whose formal responsibility is to act during the occurrence of emergency situations in municipalities, through coordinated action between them at different spheres (municipal, state and/or federal). There are emergency situations that can be controlled internally by using resources already available in the system or even by mobilizing resources external to it, whether from MRDM itself or outsourced. However, in the event of the occurrence of more critical emergency situations, which could lead to a dam rupture, there is a need for action in the areas surrounding the project and, if the rupture occurs, in the area located downstream, in order to minimize the impact on the affected properties and the environment. In these situations, in accordance with the relevant Brazilian legislation, the actions will not be carried out only by the MRDM, requiring the action of different bodies and public authorities in establishing contact and taking measures regarding the affected impacts. Part of the actions provided for in this PAEBM will not depend solely on the MRDM, but will be carried out and coordinated under the responsibility of public bodies (e.g. Civil Defense or another competent public body). Public bodies and authorities already have the formal responsibility to act during the occurrence of emergency situations in municipalities, through coordinated action between these bodies at different levels (municipal, state and/or federal). The rupture or potential rupture of a dam, as it constitutes an emergency situation of great impact, must be included in the system already required by public administration bodies to mitigate the effects of emergency situations in general. MRDM must submit to the system already required by public bodies, contributing to them in addition to permanently supplying updated information related to the dam, monitoring the performance of these external bodies. It will therefore be necessary for MRDM to act in accordance with the emergency situations procedures of local public bodies located in areas potentially affected by a possible rupture of the MRDM Tailings Dam. Preferably, Civil Defense, as soon as possible, should be responsible for activating and coordinating the actions of other public bodies involved in responding to an emergency situation involving the Tailings Dam, based on communication of the emergency situation by MRDM. The execution of emergency actions with the execution of notifications provided for in the notification flowchart is described in item 6 of the PAEBM and the classification of emergency levels must be carried out by the Entrepreneur, PAEBM Coordinator or his/her substitute. Internal and external notifications will be made in the event of an emergency situation, whether Level 1, 2 and 3. The evacuation of the population downstream within the risk zone is the responsibility of Civil Defense and other public entities, except in the case of imminent rupture, in the self-rescue zone. The responsibility for evacuation in the ZAS, in the event of an imminent rupture, lies with the dam developer or the PAEBM coordinator. MRDM is responsible for alerting the potentially affected population in the self-rescue zone, as there is not enough time for the competent authorities to intervene in emergency situations. The entrepreneur's obligation in the ZAS area is only to warn, and he is not responsible for removing the population, whose

role, in principle, belongs to the local public authority. MRDM's main duties and responsibilities are: • Provide the preparation of the PAEBM, including the study and flood map; • Promote internal training, at most every six months, and keep records of activities; • Support and participate in mock emergency drills carried out in accordance with Article 8, item III, of ANM Resolution No. 95/2022, together with city halls, civil defense organizations, the dam's security team, other project workers and the population found in the ZAS, developing records of these activities in Volume V of the PAEBM; • Ensure the dissemination of the PAEBM and its knowledge by all entities involved; • Make technical information available to Civil Defense, city halls and other institutions requested by the municipal government when formally requested; • Formally designate the PAEBM coordinator and his/her substitute; • Have a dam safety team capable of detecting, evaluating and classifying potential emergency situations, according to the emergency levels, described in Article 8, item VI, of the aforementioned legislation; Assess, together with the dam safety technical team, the severity of the identified emergency situation; • Declare an emergency situation and carry out the actions described in the PAEBM; • Monitor the progress of actions taken in response to the emergency situation and check whether the necessary procedures were followed; • Notify the state, municipal and national civil defense, the city halls involved, the competent environmental bodies, Institute of Water Management of the State of Minas Gerais (IGAM), State Environmental Foundation (FEAM) and ANM in case of an emergency situation; • Install, in communities included in the ZAS, an alarm system, including sirens and other warning mechanisms for the appropriate alert in the ZAS, based on item 5.3, of the "Booklet of Guidelines to Support the Elaboration of Municipal Contingency Plans for Dams". Alert the affected population in the ZAS, if Emergency Level 3 is declared, without prejudice to other actions provided for in the PAEBM and the actions of the competent public authorities; • Establish, together with Civil Defense, alert, communication and guidance strategies for the potentially affected population in the ZAS on procedures to be adopted in emergency situations, assisting in the preparation and implementation of the action plan in the zone addressed; Provide municipal civil defense bodies with the necessary elements for the preparation of Contingency Plans across the entire extent of the flood map; • Provide technical support to municipalities potentially impacted in the preparation and development of Municipal Contingency Plans, carrying out simulations and public hearings; • Have full knowledge of the PAEBM content, namely the flow of notifications; • Make resources available (when there is a need for resources beyond the autonomy of the coordinator of this PAEBM; • Manage legal matters; • Coordinator of official communication with the company's partners (shareholders); • Issue and send via Integrated Mining Dam Safety Management System (SIGBM), the Emergency Closure Declaration within five days after the end of the emergency; • Provide for the preparation of the Report on Causes and Consequences of the Accident (RCCA), in accordance with Article 2, item XLIII, of the aforementioned resolution, which must be prepared exclusively by a multidisciplinary external consultancy team 6 (six) months after the occurrence of the accident, with the knowledge of the legal responsible for the dam, the civil defense organizations and the municipalities involved. In accordance with Article 39 of ANM Resolution No. 95/2022, the PAEBM Coordinator is defined as the agent, designated by the dam entrepreneur, responsible for coordinating the actions described in the PAEBM, and must be available for accessible action in emergency situations at the dam. This is the professional with autonomy and authority to mobilize equipment, materials and

labor to be used in corrective and/or emergency actions, trained and qualified to perform the function. Must be a professional who has leadership capacity, total control and authority to mobilize equipment, materials and labor to be used in corrective and/or emergency actions, having at the same time managerial ascendancy over the team and total knowledge about the Tailings Dam. The PAEBM Coordinator must be able to motivate and ensure the collaboration of everyone involved in the Plan. Its main responsibilities are: Have full knowledge of the PAEBM content and, in particular, the notification and action flow; • Ensure constant updating of the names and telephone numbers of internal and external PAEBM agents; • Guide, monitor and support the execution of actions described in the PAEBM related to operational procedures; Perform the actions described in the PAEBM related to operational procedures; • Analyze dam inspection reports; • Detect emergency actions and classify them according to Emergency Levels; • Execute the notifications provided for in the communication flowchart; • Communicate to the Entrepreneur, through the Declaration of Start of Emergency Situation the occurrence and its classification, regarding the Level of Emergency; • Declare an Emergency Situation and carry out the actions described in the PAEBM; • Once an Emergency Situation is declared, the PAEBM coordinator must communicate and be available to civil defense organizations through the telephone number listed in the PAEBM for this specific purpose; • Schedule review meetings after emergency events; • Alert or warn the population in the self-rescue zone; Activate the Crisis Committee in the event of an extreme event that could result in the rupture of some of the system's masses; • Officialize the emergency both within the company and externally; • Detect, evaluate and classify, together with the dam safety technical team (Geotechnics), the severity of the potential emergency situation, according to the emergency levels, Level 1 to Level 3, as previously described; • Trigger internal evasion, when necessary (it should be noted that external evasion is the responsibility of the public body with the function of civil defense); • Authorize blocking of MRDM roads and vehicle exits; • Maintain contact with the Crisis Committee, informing and being informed about the evolution of the incident; • Maintain contacts at institutional level with the public body responsible for municipal civil defense and, if necessary, with other public bodies and service companies; Ensure the availability of the necessary resources to respond to the emergency situation, including those to provide first aid to potential victims; • Liaise with the Administrative Section (ADM) and the Entrepreneur in order to make relevant decisions; • Maintain contact with the Operation, Dam Safety and Administrative depots, being informed of the measures taken and checking whether the necessary procedures were followed; • Interciewes, when necessary, in the measures taken to control and eliminate/mitigate the emergency; Coordinate the preparation of the emergency event closure report; • Ensure the updating and dissemination of the PAEBM and its knowledge by all participants, on a permanent basis; • Participate in the investigation and analysis when an accident occurs; • Maintain updated database containing inspection records; • Constantly update the names and telephone numbers of those responsible for the plan indicated in Annex A – Identification and Contacts; • Forward all amendments and updates to the plan to those involved (respecting the level of access to information); • Coordinate the Closure of the Emergency Situation and the completion of the Emergency Closure Declaration Form), when it is nearing completion. The PAE Coordinator must appoint a replacement, who will be locally responsible for the document. This person in charge, in the absence of the Coordinator, has the autonomy to

take the measures described in the previous item, assuming responsibility for the Crisis Committee and the emergency situation. Evidenced that PAEC and PAEBM list emergency response equipment, including personal protection gear, available on- site.: PAEBM Section I Table 22 shows of List of materials/vehicles available in case of emergency. Evidenced that MRDM's PAEC defined methodologies for periodic inspections of emergency response equipment. Periodic inspections are carried out objectively which aims detect possible failures in the system, ensuring the performance of emergency tools/structures, when necessary. Evidenced that a.m. Plan includes a flowchart that clearly indicates the step-by-step inspection procedures using the tool 5W1H. Information about items to be inspected, how to perform the inspections, the frequencies of each inspection and the acceptance criteria are clearly defined. Evidenced that inspectors has been qualified in accordance with qualification criteria previously defined and documented. Reviewing training records it was evidenced that inspectors have been trained in pertinent MRDM's inspection procedures. Evidenced that MRDM defined, implemented and maintained several internal documented procedures related to inspection and testing emergency response equipment to ensure its availability , Sampled examples were: RS - SEG - 113 - Emergency Shower Inspection Checklist; RS - SEG - 008 Personal Protective Equipment - PPE Inspection RS - SEG - 114 Chainsaw Inspection Checklist; RS - SEG - 115 - Weekly Light Vehicle Inspection Checklist; RS SEG - 124 Forklift Inspection Checklist - Monthly; RS - SEG 131 - Monthly Vessel Inspection Checklist; RS - SEG - 132 - Lifejacket Inspection; RS - MED - 030 - First Aid Kit Checklist; RS - MED - 031- Daily Defibrillator Checklist; RS - MED - 032 Daily Sphygmomanometer Checklist; RS - MED - 033 Oxygen Cylinder Checklist; RS - MED - 034 Diphoterine Kit Checklist; RS - MED - 035 - Autonomous Panoramic Mask Checklist; RS - MED - 036 TYVEK Coverall Checklist; RS - MED - 012 - Emergency Bag Inspection; RS - MED - 013 Ambulance Equipment/Medication Inspection Checklist; RS - MED - 029 - Cyanide Antidote Control; MN -MED - 002 Defibrillator Storage ManualRS-MA-004 - Mitigation Bag Checklist containing inspections for inputs such as: Absorbent Blanket - 0.40m x 0.50m x 0.004m; Absorbent Pillow - 0.23m x 0.23m x 0.05m; Absorbent Cord - 0.0076m x 2.4m; Plastic Bag for Disposal - 100 liters; Absorbent Peat; Bag Plastic Duster and Shovel Set; Nitrile/PVC Glove; Tychem Coverall; Snake Box; Snake Catching Tongs; Herpetological Hook; Padlock with Key; Vaqueta Type Glove; Cleaning and Organization of Input Container; Zebra Tape; Hand Wash; Sawdust Package; Hook with Loop; RS - SEG - 012 - Cargo Transportation Vehicle Inspection Checklist; Reviewing PAEC, PAEBM and Crisis Plan it was evidenced that all of them clearly define the responsibilities and authorities for external responders, medical facilities and communities. As already mentioned MRDM during the preparation and revision of a.m.-documented plans involves all interested parties. After formalization of MRDM's Emergency Plan, a controlled copy of MRDM's Emergency Plan is provided to each external stakeholder including environmental, security and health authorities, public authorities, emergency response suppliers, community representatives and medical facilities, the cyanide producer and the cyanide transporter. This system is carried out at each review of the plan in such a way that they are perfectly knowledgeable and aware of how they should act in the event of cyanide emergencies. Reviewing meeting records evidenced another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. Sampled examples were: Proquigel (cyanide producer), Confins and Ergotrans (cyanide

transporters), ANM, FEAM, IGAM, CEDEC, SEMAD, SEJUSP, COBOM, Firefighting Department; Ambipar (company specialized in crisis management and emergency response), Civil Defense; ; Communities (Ouro Fino, Mumbuca, Ribeirão), Military Police; Federal Road Police; SAMU; Riacho dos Machados Civil Defense, Porteirinha Civil Defense, Montes Claros Civil Defense, Nova Porteirinha Civil Defense; Janaúba Civil Defense, Hospital Santa Casa de Porteirinha, Hospital Regional de Porteirinha, Hospital Santa Casa de Montes Claros, Posto de Saúde de Riacho dos Machados. Additionally evidenced other important aspect is that evidenced that MRDM's always invite specific stakeholders to participate in the drills. Reviewing Mock Emergency Drill evidenced the participation of external responders (when applicable) duly implemented. Evidenced that the emergency response plans were reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers, community representatives. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan. Sampled examples were: ANM, FEAM, IGAM, CEDEC, State Secretariat for Environment and Sustainable Development (SEMAD), SEJUSP, COBOM Riacho dos Machados Civil Defense, Porteirinha Civil Defense, Montes Claros Civil Defense, Nova Porteirinha Civil Defense; Janaúba Civil Defense, Hospital Santa Casa de Porteirinha, Hospital Regional de Porteirinha, Hospital Santa Casa de Montes Claros, Posto de Saúde de Riacho dos Machados.

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

The operation is
- ☐ X in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 7.4

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that PAEBM, PAEC as well as Crisis Plan clearly include procedures and contact information for notifying management, regulatory agencies, external response providers and medical facilities of the cyanide emergency. During the field audit, it was evidenced the existence of an available list containing the above-mentioned information. Reviewing this list it was noted that it contains the necessary contact information and that is updated. which includes for instance the following phone numbers: PAEBM members, PAEC members, Brigade Emergency Members, Crisis Plan members leaders, managers, general manager, public authorities, hospitals, cyanide supplier (Proquigel), cyanide transporter (Confins and ERgotrans) regulatory agencies FEAM, IGAM, CEDEC, SEMAD, SEJUSP, COBOM and CENAD, Regional Labor Office of Minas Gerais State (DRT). Evidenced that the emergency response plans have been reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers(Ambipar) , community representatives. When performing emergency drills, the operation invites specific

stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the emergency response plan). The emergency communication loop is clearly defined, tested and implemented as required. Besides, reviewing the mentioned Plans it was evidenced that for external responders, the Plan it is clearly provided contact information for those responders with designated responsibilities to implement the Plan. Evidenced that MRDM's PAEBM, MRDM's PAEC as well as MRDM's Crisis Plan include procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures, and for communication with the media. During the field audit, it was evidenced the existence of an available list containing the above-mentioned information. Reviewing this List it was noted that it contains the necessary contact information. Evidenced that MRDM defined, documented internal documented procedure that establishes methodology for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. . Reviewing the a.m. procedure verified that it requires that Significant incident with cyanide whose consequences are serious in terms of the environment, occupational safety, health or which affect directly interested parties, it is necessary to communicated to ICMI - International Cyanide Management Institute. For this determination, "Significant incident with cyanide" is considered; any of the following confirmed events: a) Human exposure requiring action by a response team to emergencies, such as decontamination or treatment b) An unauthorized release or discharge that enters surface waters natural, on or off site; c) An unauthorized release that occurs off-site or migrates off-site local; d) An on-site release that requires action by an emergency response team emergencies; e) A transport incident requiring an emergency response due to release of cyanide into the environment; f) A multiple wildlife kill event in which it is known or believes that cyanide is the cause of death; It is g) Theft of cyanide. Communication with the Institute must be made through the following communication channel: 1400 I Street, NW, Suite 550 Washington, DC 20005, USA Telephone: +1-202-495-4020 Email: info@cyanidecode.org. IMPORTANT - It is worth noting that if there is any doubt about whether or not the incident is significant, it should be communicated to ICMI. Initial notification is requested within 24 hours of its occurrence and must include the details and nature of the incident, and the name and contact information of a company representative to respond to transfers of information additional. Other relevant information, such as root cause, health, safety and environmental impacts, and any mitigation or remediation, must be provided within seven days of the incident. Reviewing pertinent records as well as during the field audit, interviewing personnel of various levels and areas it was not evidenced that have occurred significant cyanide incidents .The internal documented procedure that MRDM implements to notify ICMI of any significant cyanide incidents is identified as PG-SEG-005.

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

Standard of Practice 7.5

MRDM Mine
Name of Operation

Signature of Lead Auditor

07/18/2025
Date

Summarize the basis for this Finding/Deficiencies Identified:

Yes. Evidenced that PAEC and PAEBM Emergencies Plans describe recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media, management and/or disposal of spill clean-up debris as well as provision of an alternate drinking water supply. MRDM's operational procedures define, and document methodology that clearly establishes that all water collected in secondary containments is pumped back to the process irrespective of whether it is contaminated or not. PAEC and PAEBM clearly state that use of sodium hypochlorite and ferrous sulphate for cyanide neutralization is strictly prohibited where there has been a release into a natural surface water body due to the toxic nature of those chemicals to aquatic life. MRDM does not have a sodium metabisulfite cyanide destruction. PAEC and PAEBM determine that MRDM ensures to supply mineral water and other sources of potable water for domestic consumption or similar, Reviewing PAEBM it was noted that it defines specific measures, in coordination with Public Administrations, for the rescue of victims, people and animals, to mitigate environmental impacts, to guarantee the supply of drinking water and for the rescue and safeguards of cultural heritage. Evidenced that Section II of PAEBM revision 003-06 dated November 12, 2024, defines the Evacuation and Rescue Plan as well as the Drinking Water Supply Plan (PFAP) related to the MRDM Tailings Sampled examples of actions were: Activation of PAEBM and Crisis Committee; Contact with direct suppliers to supply bottled water and tents Installation of emergency support points and supply of mineral water to the population on a rotating basis; Management of logistical support; Distribution of material to ZAS homes; Distribution of material to ZSS homes and Management of emergency actions and demobilization of temporary facilities, support and teams. The resources identified required were: Bottled mineral water; Munck trucks for transporting bottled water with operator and assistant; Support tents for distributing mineral water in the municipality; Support/inspection teams for delivery to the support point with 02 people.. The minimum recommended volume of water to be made available after a dam collapse as determined in Annex D of Resolution GMG 83/2024, the National Health Foundation (FUNASA) protocol for disaster situations was used as a reference to calculate the volume of water to be provided. These volumes provide basic access to the population, i.e., sufficient water for human consumption, food preparation, dishwashing and basic hygiene. Evidenced that PAEC defines methodology for control measures for spills or leaks including: a) Personal precautions for non-emergency services personnel: such as: Do not smoke, Do not touch damaged containers or any spilled material without wearing appropriate clothing, Avoid exposure to the product; Use PPE as described in the PA and b) For Emergency service personnel such as Use complete PPE with self-breathing protective equipment (EPR) self-contained breathing equipment, Tychem overalls, Neoprene, butyl rubber or polyethylene type protective gloves and 7-league waterproof boots with composite toe cap. The material used must be waterproof. In case of large leaks, where exposure is high, it is recommended to use a respiratory protection mask with a filter against vapors and mists. Isolation of leakage from ignition sources; Evacuate an area within a radius of at least 50 meters. Keep unauthorized people away from the area; Stop the leak if it can be done without risk. Environmental precautions: Prevent the product from being spilled into waterways and sewage systems. .Evidenced that Environmental Monitoring

Plan (PMA) defines methods and materials to contain cleaning such as: Do not allow water to enter containers; Use natural barriers or spill containment. Collect spilled product and place in appropriate containers. Adsorb the remaining product with dry sand, earth, vermiculite, or any other inert material. Place adsorbed material in protected, removable containers for local safety. For final destination, proceed as stated. MRDM PAEC addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and include sampling methodologies, parameters and, where practical, possible sampling locations. Prohibitions: The use of chemical products in the treatment of cyanide leaks in surface waters, such as: sodium hypochlorite, ferrous sulfate and hydrogen peroxide, is not permitted. For the Scenario - Catastrophic emissions of hydrogenated cyanide gases. If any catastrophic emission of hydrogen cyanide gas is detected by cyanide detectors carried by operators in the area or through suspected symptoms observed in people, an immediate evacuation of people from the area must be carried out at distances of no less than 200 meters, isolating the access points with zebra tape. To resolve emissions: Correct the pH in tanks, eliminate contact of acidic solutions or water with sodium cyanide. For the Scenario Accidents during transport: Check that there are no injuries. If there is one, request that they be attended to immediately or sent to the nearest hospital. Request: • Police/Firefighter to keep the area clear of people and vehicles.• Isolation of the area below the Policies of the nature of the product in case of mixing with water or acidic substances. • Ask the Police to prevent vehicle traffic and people from entering the danger area. In case of rainy weather or threat of rain, if the product spills on the ground or pavement, it is necessary to place a truck cover or another tarpaulin over the spilled load. • Cover with sand or earth and prevent water from canals, plantations or watercourses from being close to the area contaminated with sodium cyanide. • If the product comes into contact with water, small amounts of hydrocyanic gas may be blocked. Therefore, work with your back against the wind. • Once contained, as many cyanide briquettes as possible must be placed, using waterproof gloves and “non- metallic” shovels or brushes, storing them in plastic bags until they are properly disposed of. • If the product reaches slopes, contaminated land and/or soil must be removed and deposited in a suitable location. Internal documented procedure Management of Chemical Products defines how sodium hypochlorite should be stored in a restricted, isolated location, protected from rain and sun, identified with signage and information signs equipped with soil waterproofing and containment basin. A soil sample is collected and sent to the laboratory for cyanide analysis according to internal documented procedure POP-LAB-013 - Determination of Free, Total and Wad Cyanides in Solid and Liquid Samples for preparation of the solution addressed according to procedure PAEC. As the contaminated soil is to be removed, samples of the material must be provided and sent to the laboratory for cyanide determination. After these measures and verifying that there is no presence of contamination, stop the removal and arrange for the site to be filled with uncontaminated soil to restore the area. • All material contaminated with sodium cyanide must be discarded at the Dam. • At the end of the emergency action, all contaminated PPE and EPC can be decontaminated using the emergency shower, where the water flow will be directed to the Reagents Area Containment Basins and in the case of unused PPE, after decontamination, it must be discarded in the hazardous waste container. Contain sound cyanide that reaches the

ground, preventing it from reaching rivers, water, canals, and plantations by making physical barriers with earth or sand. All contaminated material must be disposed of, including or only after the contained spill using waterproof gloves and shovels, storing them in plastic containers or drums. Identify the extent of possible contamination caused by leakage into waterways near the site. Monitor the watercourses following the methodology/parameters practiced at MRDM during and after removal, until you ensure that there is no presence of cyanide in the water. For the Scenario - Emissions during unloading and mixing of sodium cyanide. Standard cyanide unloading and preparation practices were developed through risk analysis of tasks in order to ensure safety measures capable of neutralizing any risk of emission from this product. However, if any failure in the system allows cyanide to be sent during these activities, the emergency procedures will be the same as those reported in the items on “Accidents during transport” and “Person poisoned with cyanide”. Scenario - Emissions during fires and explosions. a) On days without rain, isolate an area as far as possible within a radius of at least 100 meters. If it is necessary to isolate the area in all convenient areas within a radius of 200 meters, trying to evacuate people up to a distance of 1500 meters downwind. b) Keep all emergency support people with the wind at their backs, away from low areas. (Check the windsock). c) If the fire is a small occurrence, only use chemical powder to control it – never use water, foam or carbon dioxide (CO2). In the event of a large fire, it will leave radiation until it is possible to control it with the use of chemical powder. Provide emergency responders with thermally protective clothing and self-contained breathing. d) Once the fire extinguisher is used and authorization for the immediate aftermath has been given, attendants must start wearing PVC or similar clothing that offers total protection, providing autonomous breathing. The readjustment operation can be carried out in two ways: using chemical powder, as well as pouring virgin heat on the area, to avoid humidity and inhibit hydrocyanic gas and, in this way, control the possibility of remaining outbreaks. e) Until work begins to collect any spilled material, cover the affected area with PVC tarpaulin, in order to avoid the aerial dispersion of cyanide dust and contact with water. f)) Do not use water to wash the floor before all leaked material has been collected. When the collection operation is complete, wash with plenty of water. g) Prevent the product from contaminating rivers or other sources, using sand or earth for containment and neutralization through the addition of sodium hypochlorite or ferrous chloride. In cases where contamination has occurred, immediately inform the police, public water supply bodies and rural properties in the affected watercourse. Cover the affected area to avoid aerial dispersion of cyanide and contact with water. Cover the affected area with PVC tarpaulin. Collect the product that was released in the accident, including earth or other materials contaminated with cyanide. Neutralize the affected area using sodium hypochlorite. For Scenario - Uncontrollable leaks of solution in the metallurgical plant, ruptures of tanks, valves and pipes. Tank rupture: • The metallurgical plant's tanks are all located within containment basins capable of containing leaks during possible periods of hydraulic imbalance in the circuit, where they can be returned to the original tanks. • If these spills are sufficient to overflow these containments, the entire solution flow will be directed to the unit's containment basin through the rainwater channels distributed throughout the plant, after neutralization with sodium hypochlorite, an abundant sample for WAD cyanide analysis

(result <0, 20 mg/l) directed to the dam. • If the solution cyanides on slopes, the contaminated vegetation and/or soil must be removed. As the contaminated soil is removed, every 10cm in depth, samples of the material must be taken and sent to the laboratory to determine the cyanide until it is certified that there is no further contamination. After these measures and verifying that there is no presence of contamination, stop the removal and arrange for the site to be filled with uncontaminated soil to restore the area. At the end of emergency action, all contaminated PPE and Collective Protection Equipment (EPC) must be decontaminated using the emergency shower. Rupture of valves and pipes.• It must be stopped immediately at the source of the solution flow. A protective drum must be placed to contain the protection and avoid soil contamination. • If the flow of solution reaches the streets and storm drains, proceed as in the case of a tank rupture. Remove the product that may have reached areas without waterproofing. Remove the soil and land, pack, and neutralize them in suitable containers, which will later be sent to the waste lake. Analyze the soil to ensure its correct neutralization Monitor the soil following the methodology/parameters practiced at MRDM during and after removal, until you ensure that there is no presence of cyanide in the soil. Scenario - Lack of electricity and stoppage of the pumping system. If there is a power outage, immediately cut off the pulp flow for leaching and pumping. The tanks have sufficient volume to accumulate the pulp in flow after the supply is cut off. If electricity takes a while to return, a reduction in the pH in the CIL tanks may occur due to the lack of addition of milk of lime that is pumped. The areas must be monitored using the HCN detector as well as the pH of the tanks, which must be corrected with the addition of lime milk. Monitor the pH of the tanks. Correct the pH Add powdered lime. Monitor the formation of hydrocyanic gas using a portable HCN meter. Check the water level in the containment basin Visual inspection on site. If necessary, turn on the pumps. Activate the panel. Monitor the level of the containment basin. For the Scenario - Uncontrolled infiltrations. The metallurgical plant's tanks are all located within containment basins capable of containing leaks during possible periods of hydraulic imbalance in the circuit, where they can be returned to the original tanks. In the case of seepage that is not collected in the containments and perhaps reaches the ground, then the contaminated vegetation and/or soil must be removed and deposited in bags for disposal. As the contaminated soil is removed, every 10cm deep, samples of the material must be taken and sent to the laboratory for cyanide determination until make sure there is no more contamination. After these measures and verifying that there is no presence of contamination, stop the removal and arrange for the site to be filled with uncontaminated soil to restore the area. Visual inspection on site against leakage Close the supply valve or plug it. Neutralize the affected area apply sodium hypochlorite. Absorbent spilled material Apply blanket or sand/earth covering the affected area with PVC tarpaulin covering the affected area. Collect contaminated soil by digging the contaminated area and placing it in drums or bags for disposal. Discard contaminated disposal direct drums to tailings dam accompanied by cyanide Security Data Sheet (FDS). Wash affected area with plenty of water. For the Scenario - Person poisoned with cyanide: During the process of chemical analysis of cyanide solutions or samples from emergencies, if there is cyanide poisoning, the witness must check before entering the cyanide preparation site, audible and visual alarms from the gas detector. The portable

HCN detector will alarm at 4.5 ppm. If the detector is alarmed, proceed as follows: Against leaks Close the supply valve or cover it. Neutralize the affected Area. Report the incident immediately to the emergency team saying the word EMERGENCY three times on band 01 of the radio. Employee who witnesses an emergency. Radio assess the situation and remove the victim to the health unit Team of rescuers carry out the victim's decontamination procedure and then lower the victim through the hoist that will be attached to the safety belt along with a backup rope to ensure descent to the ground floor. Team of rescuers and emergency driver Anchor straps, semi-static rope, decontamination showers and oxygen bullet, Assess the victim of poisoning Carry out primary assessment Occupational Medicine Oximeter, sphygmomanometer and multiparameter monitor. Forwarding to the reference hospital will be scheduled in the ICU ambulance, together with a nurse on duty Occupational Medicine ICU Ambulance. Collect another sample three hours after increasing the dosage and report the result. If the WAD cyanide concentration remains above the permitted limit, the circuit must be stopped, and only after new analyzes within the safe limit should the operation be restarted. If the spills are sufficient to overflow the existing containments, the entire flow of solution will be directed to the containment basin and directed to the tailings dam. Isolate the area of the tank(s) with high cyanide content Installing signage, zebra strips and ropes. Inform department management contacting the Metallurgy Manager Coordinate the entire emergency process, defining priority actions Obtaining information about the overflow and the actions already taken. Leaked material returning to the process or directing to the tailings dam. During the audit, the occurrence of an event that justified the demand to implement the actions of the procedures mentioned in this item was not evidenced. PAEC defines that contaminated material must be collected and sent to the tailings dam. PAEC and PAEBM clearly defines that is prohibited the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. Besides, during the field audit, it was evidenced that MRDM's emergency brigade does not have these kinds of chemicals in their emergency response kit. Besides, it was evidenced that Ambipar has a copy of the MRDM's procedure prohibiting use of these chemicals in surface waters, as well as it includes this prohibition in its own procedures. During the field audit interviewed personnel showed to be aware of this matter. MRDM's PAEC, PAEBM and PMA address the potential needs for environmental monitoring to identify the extent of and effects of cyanide release including sampling methodologies, parameters as well as where practical, possible sampling location. Please for additional information see Principle 4 related to sampling methodologies, parameters where practical, possible sampling locations. Reviewing a.m. plans it was noted that they clearly defines all kind of information about sampling such as the sampling locations, sampling frequency, sampling quantity, sample preservation, and cyanide reference values in order to identify the extent and effects of cyanide release. All equipment used have been calibrated against standards nationally or internationally recognized such as National Institute of Standards and Technology (NIST) and INMETRO. MRDM has a Detox process that uses ammonium bisulfite to destroy or reduce residual cyanide ions present and not rejected before final disposal. The pulp from the CIL feeds the Detox circuit in a 2035-CX02 tailings box at the discharge of the last tank in the leaching process (2035-TQ-

02), where ammonium bisulfite is added at a rate of 0.35 kg/t. This process occurs automatically based on the mass processed in the Grinding Unit. Data is monitored via supervision in the Control Room. After this step, the tailings are sent to the Tailings Dam. There is no environmental waste disposal.
Sodium hypochlorite is not included in the emergency response kit. The brigade will act in accordance with the control measures outlined in item 6.3 of POP-MA-19 Control for Environmental Cyanide Emergencies. For minor incidents, the brigade team will remove contaminated soil and vegetation using appropriate tools, such as antistatic shovels. For medium and major incidents, this removal will be performed by the operational team using machinery. In both situations, these activities must be carried out under the guidance and supervision of the Environmental team. Item 6.2 of POP-MA-19 – Control Measures for Contamination in Watercourses – does not permit the use of hypochlorite in cases of surface water contamination, as this can lead to the accumulation of contaminants in the watercourse.
Sodium Hypochlorite is used in the Metallurgical Plant to neutralize parts, big bags, and materials, if necessary, within the Metallurgical Plant's containment basin. According to POP-PL-023 - Neutralization of Cyanide Waste.

Standard of Practice 7.6

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

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

Summarize the basis for this Finding/Deficiencies Identified:

MRDM defined, documented, implemented and maintains methodology in order to review and evaluate the cyanide related elements of its Emergency Response Plan for adequacy on a regular basis since it is defined that MRDM's PAEC, PAEBM and PGC are at least annually reviewed, evaluated and updated when necessary. Besides, it is defined that after all mock emergency drills as well as after real emergencies PAEC and PAEBM shall be reviewed, evaluated and updated when necessary. Evidenced duly implemented. MRDM has been conducting mock emergency drills periodically as previously planned. Evidenced that MRDM's PAEC item 8.1 – Annex 8.1 – RS-SEG-075 defines a Tri Annual Mock Emergency Drill Plan. Evidenced duly implemented. Sampled examples were 2023 Mock Emergency Drill Plan, 2024 Mock Emergency Drill Plan and 2025 Mock Emergency Drill Plan. Evidenced that the Mock Emergency Drill Plan is in accordance with Brazilian Regulation Laws and ICMI requirements. Evidenced that MRDM has been performed mock emergency drill as stated. Besides it was evidenced that MRDM has been performed mock

emergency drills related to PAEBM in accordance with ANM requirements. Evidenced that MRDM have been conducting cyanide field emergency drills at least annually and besides include all the items discussed in the *Guidance for Use of the Mining Operations Verification Protocol*, such as whether field drills address cyanide exposure scenarios in addition to release scenarios appropriate for the operation, and involve on-site and external personnel that may be expected to respond to cyanide incidents. Evidenced duly implemented. MRDM has been evaluating after each emergency drill, the drill results. They are reviewed and discussed among the participants and when necessary, the opportunities of improvement raise-up during the drill are considered as corrective or preventive actions and managed adequately. Reports related to the drills and their reviewed were found in place. There have been no actual cyanide-related incidents since MRDM became a signatory of Cyanide Code program and filed I out the Signatory Application Form which describes the signatory's obligations as a participant in the Cyanide Code program. Evidenced that the records of the simulated were duly evaluated and the pertinent actions to be done were defined, documented and implemented necessary, the opportunities of improvement raise-up during the drill are considered as corrective or preventive actions and managed adequately. Reports related to the drills and their reviewed were found in place. Evidenced that the records of the simulated reported in item 7.6 were duly evaluated and the pertinent actions to be done were defined, documented and implemented. Sampled examples were Mock Emergency drills dated on December 06, 2022, February 22, 2023, May 24, 2023 and September 06, 2023. There have been no actual cyanide-related incidents since MRDM Mine Signatory Date: August 11, that required implementation of emergency response procedures. Additional information for drills conducted 2022, 2023 and 2024 were: The operator simulates opening a valve in the cyanide preparation area when the valve leaked, causing cyanide to be sprayed all over the operator´s body, causing his contamination due to the gas generated in the humid area and the time of contact with the businessman's body; In the scenario proposed for the simulation, it was stipulated that dermal contamination by cyanide would occur during the process of filling the collection tank. An employee not directly involved in the task would go beyond the isolation area and be hit by the product due to a ruptured hose. After the contamination simulation, an emergency brigade would be activated by radio and directed to the area of the incident, where they would begin first aid, including using the emergency shower to decontaminate the employee. Operator care continues at the MRDM's Medical Service. In addition to medical care, soil decontamination was also simulated, with the installation of absorbent blankets and the removal of the contaminated part of the soil; Internal Practical Simulation at the Tailings Dam. The purpose of this Practical Simulation, according to Art. 47 of ANM Resolution 95, in conjunction with Art. 38, is to simulate an emergency situation with the population of the area affected by a possible dam rupture, which includes the activation and mobilization of internal emergency operation centers and available resources, both human and material, in addition to applying internal evacuation procedures in practice. The Practical Internal Simulation exercise must be carried out, mandatorily, at least once during the calendar year and aims to contribute to maintaining the state of readiness, External Practical Simulation at the Tailings Dam with the participation of communities and other external stakeholders such as State Civil Defense, Municipal Civil Defense, testing, among other aspects, the 28 meeting points (4 internal meeting points, 20

points located in the ZAS areas downstream of the Rodeador Tailings Dam and 4 meeting points located in the ZAS of the Rodeador Dam;); tested communication systems (alarm sirens which consists of 6 sirens interested in the course of the ZAS priority service zone, communication via radio stations, Signaling of escape routes; control of the relative quantity of the population that participated in the simulated exercise; Drinking Water Supply Plan including the Estimate of the number of days that the municipality's water collection and treatment system did not compromise: 9, Total number of people that will be affected: 11 and the Nominal list of buildings of public interest that will be affected 11; Notification Flow and Internal Simulation for Dam Break 2022 External Practical Simulation for Dam Break; area, Simulation for fire and explosions.

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

Standard of Practice 8.1

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM has been trained all personnel who may encounter cyanide in cyanide hazard recognition**.** Evidenced that MRDM established, documented, implemented and maintains internal documented procedure PG-RH-001(0) Training and Development Management that defines methodology for planning, performing, recording and evaluating effectiveness of training for all personnel who may encounter cyanide in cyanide hazard recognition the cyanide materials present at the operation, the health effects of cyanide, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure. Reviewing training material, it was evidenced that they contain items such as Uses and Application, Chemical Reactions (Reactions of Sodium Cyanide with water, with oxidizing agents, and with acids), Risk to Health and Safety, Safety precautions, Specific PPE to be used while handling sodium cyanide as well as Safety during storage. The above-mentioned documented procedure clearly identifies the responsibilities and authorities involved such as Managers and Coordinators, Supervisors, Contracted Companies, MRDM Employees, Occupational Safety and Health Manager, Business Partner Dam Coordinator, Human Resources Manager, as well as Training Instructors. It was noted that MRDM has been used his own materials and materials supplied by Proquigel (cyanide producer). Besides, it is documented in

PG-RH-002(0) - Integration Program that every new employee must undergo training on cyanide containing at least the topics mentioned above. It is defined that annually the Human Resources Area must identify the Training Needs for the following year. Evidenced duly implemented. MRDM's internal documented procedures PG-RH-001(0) - Training and Development Management and PG-RH-002(0) - Integration Program establishes that cyanide recognition refresher training shall be performed at least yearly for all MRDM's workers and contractors who may encounter cyanide. During the audit, the auditor reviewed several training records and comparing the pertinent dates concluded that MRDM has been provided refresher training about cyanide hazard recognition as stated. Evidenced duly implemented. Evidenced that cyanide-training records have been retained as stated. Evidenced that MRDM internal documented procedure PG-RH-001(0) - Training and Development Management establishes that all trainings shall be recorded. For internal trainings it is used RS-RH-004 Training record - Attendance List as training recording. Reviewing MRDM is training records it was demonstrated that personnel received both initial and refresher training in cyanide hazard recognition. The trainings have been performed in accordance with MRDM's 2024 Training Plan. Sampled examples were: PG-PL-OO1(1.0) - Cyanide Operations; POP-PL-003 (1.2) - Leaching and Detox Operation; POP-PL-004 (1.4) - ADR Operation; POP-PL-008 (1.4) - Receipt of Liquid Cyanide; POP-PL-015 (1.2) Dam Operation; POP-PL-022(1.4) - Receiving Cyanide in Briquettes; POP-PL-023(1.2)- Neutralization of Cyanide Waste; POP-MEP-023 (1.0) - Maintenance of Electric Hoists; POP-MEP-023 (1.0) - Emergency Generators Operation; POP-MEP-021 (1.1) Preventive inspection of equipment; ; POP-MA-019(1.0) - Control for Environmental Emergency with Cyanide; POP-MA-019(1.1) - Quarterly Water Monitoring; POP-MA-019(1.1) - Monitoring of Groundwater Level and well flow; POP-MA-008(1.0) - Solid Waste Management; POP-MA-006(1.1) - Waste Handling; POP-MA-006 (1.1) - Atmospheric Monitoring Data Collection; POP-MED-005(1.2) - Procedure for using and storing Difhoterine; RS-MED-030 (1.0) - First Aid Kit List - Antidote and Diphoterine Kit

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.

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM has been trained workers to perform their normal production tasks, including unloading, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Evidenced that internal documented procedure PG-RH-001(0) - Training and Development Management establishes methodology for Identification of Training Needs as well as for recording Reviewing above-mentioned documented procedure noted that it clearly defines for each employee and contractor

the required training including for example legal trainings, training in internal documented operational procedures, in PAE, in PAEBM which means the necessary trainings to perform their normal production tasks, including unloading, production and maintenance, with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Reviewing training materials as well as during the field audit interviewing pertinent personnel it was duly implemented. As required by MRDM's internal documented procedure PG-RH-001(0) - Training and Development Management it was evidenced that MRDM's training program clearly identifies the specific cyanide management elements that each employee must be trained in to properly perform the required tasks. Training needs clearly identify for each worker the necessary training in the respective operational procedures. Employees and contractors are trained during the admission period (introductory) and in refresher training held annually. In the general training matrix, there are tabs with the positions and the specific technical training, in which it is possible to see that for all positions the cyanide training is mandatory. During the field audit reviewing training records and interviewing pertinent personnel it was evidenced duly implemented. Sampled examples were: PG-BAR-001 (1.0) - Mining Dam Emergency Action Plan; POP-BAR-001(1.0) - Dam Maintenance and Cleaning; POP-BAR-002 (1.0) - Bathymetry Services; POP-LAB-010 (1.3) - Laboratory Equipment; POP-LAB-014 (1.2) - Preparation of Analytical Solutions; POP-LAB-017 (1.0) - Analysis of ADR and Cyanide Samples by Atomic Absorption Spectrophotometry; PD-LAB-008 (1.0) - Validation of Analytical Methods; PG-SEG-006 (1.1) - Personal Protective Equipment - PPE; PG-SEG-002 (1.1) Permit to Work – PPT; PG-SEG-002 (1.0) - Guide for Confined Space Identification; RS-SEG-006 (1.0) - Chemical Incompatibility Table. Evidenced that local fire brigades have been trained and qualified in accordance with Brazilian legislation such as Regulatory Standard (NR) 23 - Fire protection of the Ministry of Labor and Employment; Technical Instruction (IT) 17/2016 of the Military Fire Department of the Minas Gerais State - Fire brigade; Law No. 12,929/13 – which provides for Fire and Panic Safety and Provides Other Measures; Decree No. 16,302/15 - regulates Law No. 12,929, of December 27, 2013, which provides on Fire and Panic Safety and Provides Other Measures; NBR 14023 – Registration of Leisure Activities; NBR 14276 – Fire Brigade - Requirements; NBR 14277 – Facilities and Equipment for Firefighting Training - Requirements; NBR 14608 – Professional Civil Firefighter; NBR 15219 – Fire Emergency Plan – Requirements. Sampled examples were: Robson Borges Silva; Joao Paulo Santos; Marcelo Antônio Assunção; Douglas Pedro Barbosa; Leidiane Naira Silva Santos; Gabriel Melo; Raquel Silva Fernandes; Elaine Gabriela Silva Miranda; Antônio Carlos Cardoso Pereira; Chiliardo Uessiton Santos; Dionne Rodrigues Freitas; Raissa Mendes; Eloisa Silva; Humberto Ranielly Rodrigues Damasceno; Antonio Silveira Antunes; Herik Jhonatha Silva Souza; André Jesus Honório Silva; Leojaime Martins De Deus Raphael Cailleaux - Instructor and. Private Fire Department - Individual Taxpayer Registry (CPF) 05600745907, on behalf of the company Esfera Soluções em Treinamentos, with a 24-hour workday. with the following programmatic content such as: Fire Prevention and Fighting. Applicable laws, Theory of fire, Means of spreading fire, Firefighting equipment, Abandonment of area, Fire prevention techniques, Introduction, Recognition, use of fire extinguishers and hydrants, Area Abandonment, Scene assessment, Basics of first aid, Cardiopulmonary resuscitation, Convulsions, fainting, burns and electric shock, Sprains, dislocations, bruises, fractures and hemorrhages, Techniques for immobilizing and transporting victims, Practical firefighting simulation. Besides it was verified the effectiveness of the a.m. training through the application of theoretical and practical tests. As already mentioned it was evidenced that MRDM has been provided initial and refresher training in response to cyanide exposures and releases for appropriate personnel; made designated

response personnel familiar with implementation of the Emergency Response Plan; and required designated. Evidenced that task training related to cyanide management activities have been provided by an appropriately qualified person. Evidenced that MRDM's internal documented procedure PG-RH-001(0) - Training and Development Management establishes that training personnel should be familiar with the practices and procedures for which the training is given and experienced in effective communication techniques as required by the document Definitions and Acronyms for The International Cyanide Management Code dated on June 2021. Furthermore, the aforementioned procedure defines the criteria to demonstrate the adequate qualification of training personnel so that they are considered qualified as such. Evidenced duly established. Evidenced that internal documented procedure PG-RH-001(0) - Training and Development Management establishes that all employees shall be trained prior to work with cyanide. Reviewing training records and through interviews during field audit evidenced that employees have been trained prior to working with cyanide are aware of performing theirs tasks including where cyanide can be present. Evidenced duly implemented. There is refresher training on cyanide management provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner in accordance with internal documented procedure PG-RH-001(0) - Training and Development Management establishes that refresher training on cyanide management shall be performed at least yearly. Evidenced duly implemented. Evidenced effectiveness of cyanide training records for the training related to local fire brigades that have been trained and qualified in accordance with Brazilian legislation such as Regulatory Standard (NR) 23 - Fire protection of the Ministry of Labor and Employment; Technical Instruction (IT) 17/2016 of the Military Fire Department of the Minas Gerais State – Fire brigade; Law No. 12,929/13 – which provides for Fire and Panic Safety and Provides Other Measures; RDM's internal documented procedure PG-RH-001(0) - Training and Development Management establishes that training records shall be retained throughout an individual's employment documenting the training they receive as well shall include the names of the employee and the trainer, the date of training, the topics covered, and if the employee demonstrated an understanding of the training materials. During the field audit the auditor reviewed training records as well as interviewed related personnel with the trainings performed. It was noted that workers have received initial task training; the task training addressed the critical elements of safe performance of tasks; qualified personnel provided the training; personnel were trained prior to working with cyanide in an unsupervised manner; and that MRDM evaluated the effectiveness of task training. As already mentioned it was evidenced that MRDM has been provided initial and refresher training in response to cyanide exposures and releases for appropriate personnel; made designated response personnel familiar with implementation of the Emergency Response Plan; and required designated. Reviewing assessed training records it was evidenced that they include the names of the employees trained, the trainer name, the date of training, the topics covered by the training , and if the employee demonstrated an understanding of the training materials. MRDM's internal documented procedure PG-RH-001(0) - Training and Development Management establishes methodology for evaluating the effectiveness of cyanide training by testing and observation. Besides it defines that the result of effectiveness evaluation shall be recorded at the RS-RH-006 Form Training Effectiveness Assessment Record. Evidenced RS-RH-006 records of evaluation of the effectiveness of cyanide training by testing. Evidenced duly implemented.

Standard of Practice 8.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that all cyanide unloading, mixing, production and maintenance personnel have been trained in the procedures to be followed if cyanide is released, including decontamination and first aid procedures as required by internal documented procedure PG-RH-001(0) - Training and Development Management. Evidenced that plant operators and maintenance employees have collaborated to elaborate the pertinent operational procedures as well as the procedures related to emergencies involving cyanide and when applicable PAE and PAEBM. Records of training were reviewed and noted that the operation and maintenance personnel have been trained in the pertinent internal documented procedures which clearly define the actions to be followed if cyanide is released (all have been trained in the operation's response procedures as required). During the field audit interviewing field personnel as well as reviewing MRDM's training records, MRDM's 2024 Training Plan MRDM's 2023 Training Plan; MRDM's Quality, Environmental, Safety and Occupational Health Policy, PAE, PAEBM, Training procedures, Operational Procedures it was clearly evidenced how MRDM has been structured its response program is structured as well as that personnel involved in unloading and storaging cyanide, cyanidation processes, and maintenance of cyanide facilities have received training regarding roles in response to cyanide releases and exposures it was noted that it is implemented as stated by The Code. Besides noted that field personnel are aware of such procedures. Reviewing pertinent training records as well as interviewing Emergency Response Coordinators and members of the Emergency Response Team it was evidenced that Emergency Response Coordinators and members of the Emergency Response Team have been trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment as well as interviewed personnel showed to be aware of this matter. Evidenced that MRDM clearly identify training needs for Emergency Response Team. Evidenced duly implemented. Sampled example was: Fire Brigade Training Course Program: Brigade candidate candidates must attend a course with a minimum workload of 16 hours, covering theoretical and practical aspects, focusing mainly on the risks inherent to the occupation group. Interviewed personnel showed to be aware of this matter. Evidenced duly implemented. Evidenced that internal documented procedures PG-RH-001(0) - Training and Development Management establishes that MRDM shall made external responders, to the extent that they are designated with specific duties or responsibilities in the Emergency Response Plan, such as local fire brigades and emergency medical services familiar with those elements of the Emergency Response Plan related to cyanide. Evidenced that have been retained appropriate records related to notes of meetings and/or correspondence with

external responders. Reviewing pertinent records, it was evidenced that it is duly implemented. Sampled examples were: Note of meetings with: ANM; SEMAD; DRT, Firefighting Department; Civil Defense; SAMU; Communities (Ouro Fino, Mumbuca, Ribeirão e Rodeador) Municipal Hospital, Road Police. Evidenced that local fire brigades have been trained and qualified in accordance with Brazilian legislation such as Regulatory Standard (NR) 23 - Fire protection of the Ministry of Labor and Employment; Technical Instruction (IT) 17/2016 of the Military Fire Department of the Minas Gerais State - Fire brigade; Law No. 12,929/13 – which provides for Fire and Panic Safety and Provides Other Measures; Decree No. 16,302/15 - regulates Law No. 12,929, of December 27, 2013, which provides on Fire and Panic Safety and Provides Other Measures; NBR 14023 – Registration of Leisure Activities; NBR 14276 – Fire Brigade. Evidenced that internal documented procedures PG-RH-001(0) - Training and Development Management establishes that MRDM shall provide to all employees with designated roles or responsibilities in the event of a cyanide exposure or release refresher training for response to cyanide exposures and releases regularly conducted. During the audit through reviewing refresher training records of related to employees with designated roles or responsibilities in the event of a cyanide exposure and releases it was noted that MRDM have been conducted refresher training annually as stated. Evidenced duly implemented. Evidenced that internal documented procedures PG-RH-001(0) - Training and Development Management establishes that MRDM shall retain training records documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials. Evidenced duly implemented.

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

Standard of Practice 9.1

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM defined, documented, implemented and maintains internal documented procedure PG-GG-005 (1.0) - Communication with stakeholders that establishes methodology for providing stakeholders with information on its cyanide management practices and engage with them regarding their concerns. Communities related to MRDM and definitions by municipality are identified as follows: In Riacho dos Machados's Municipality - Bem Querer, Mumbuca, Ouro Fino, Piranga, Ribeirão, Roça de

Mandioca and Rodeador; in Prteirinhas's Municipality - Mocambinho, Mulungu de Minas and Paciência; In Janaúba's municipality - Gorotuba and São José, Being the environmental communities affected by events at the tailings dam are Ouro Fino e Mumbuca while communities potentially affected by the water dam are Ribeirão and Rodeador. Reviewing documented procedure PG-GG-005 (1.0) it was evidenced that MRDM has several communications mechanisms such as Meetings; Speeches; Banners; Booklet; Posters; Whats App Groups and "Open Door" Policy. Based on its "Open Doors" Policy, during the audit it was evidenced that MRDM has a query response system, with designated staff available to answer interested parties' inquiries, a program of visits at MRDM Plant with the aim of allowing interested parties to learn about how cyanide is managed in a way that preserves the integrity of workers, the community and the environment, as well as clarifying doubts about cyanide management itself as well as providing a telephone and email address that interested parties can use to ask questions of site personnel about the operation's cyanide management practices at MRDM. During the audit noted that all mentioned actions have been duly implemented Evidenced the creation and communication of a booklet with information about cyanide written in a simple way and with a layout playful, which prioritizes graphic images that are easy to assimilate. Information consolidated in the booklet serve as the basis for others communication processes. Banner and poster with short and objective information on emergency procedures with cyanide have been available. The printed product is intended for MRDM employees, but the digital material have been can be disseminated with the external public. Evidenced the creation and implementation of communities' WhatsApp groups that are used for communicating several information about cyanide management. .In addition to community groups, MRDM created and implemented WhatsApp groups with public authorities, such as councilors, mayors and municipal departments through electronic messenger.

Standard of Practice 9.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that MRDM have been established, documented implemented and maintains written descriptions, in Portuguese language, how their activities are conducted, how cyanide is managed as well as how these written descriptions are available to communities and other stakeholders. Reviewing the material that was has been used it was evidenced that the information materials such as brochures, newsletters, What Sapp's, Booklet, internal and external meetings, local government offices, on websites etc (please for additional information see 9.1). Evidenced that MRDM established, documented, implemented and maintains internal documented procedure Crisis Plan which was developed based on

MRDM's operational risks within the scope of application and relevant to Cyanide. Evidenced that above documented procedures defines the creation of the crisis committee what is made up of permanent members and floating members and areas that become part of the committee according to the type of crisis. The responsibilities and authorities of Crisis Committee participants are clearly defined and documented. All Interested parties are duly communicated about MRDM's Crisis Plan. Including the communities. The information reported to the noted regulatory agencies, regarding confirmed cyanide release and exposure incidents, are made available to the public by those agencies.

a) Cyanide exposure resulting in hospitalization or fatality - In the event of such incident, the operation shall communicate the Regional Labor Office of Bahia State (DRT) Minas Gerais

b) Cyanide releases off the mine site requiring response or remediation -In the event of such incident, the operation shall communicate with FEAM, Minas Gerais State Water Management (IGAM), Civil Defense and involved communities.

c) Cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment - In the event of such incident, the operation shall communicate with FEAM, IGAM, Civil Defense, DRT Minas Gerais and involved communities.

d) Cyanide releases on or off the mine site, requiring reporting under applicable regulations - In the event of such incident, the operation shall communicate with IGAM, FEAM and DRT Minas Gerais

e) Releases cause applicable limits for cyanide to be exceeded - In the event of such incident; the operation shall communicate with GAM, FEAM and DRT Minas Gerais.

This operation has not experienced any compliance issues since MRDM Mine Signatory Date: August 11, 2020. There have been no incidents in any of these categories occurring during the the previous three-year. No incidents of off-site releases, exposure or other reportable incidents relating to cyanide have occurred during the previous three-year. During the audit it was evidence that MRDM maintains a Safety, Health, Environment and Quality (SHEQ) management system. This system ensures an adequate cyanide management in accordance with the Cyanide Code principles. During the last three years, MRDM did not experience any significant cyanide related incidents nor any compliance problems related to cyanide management. Being usual in all audit process, through sampling, opportunities of improvement (corrective and preventive) may exist and were not identified in this opportunity.

Please for additional information see ICMI *Guidance for Use of the Mining Operations Verification Protocol* (Page 16 of 89) regarding the Compliance Statement.

MRDM Mine		07/18/2025
Name of Operation	Signature of Lead Auditor	Date

Audit team conclusions:

Based on the sampled evidences, the physical conditions of the site (installations), in the interviewed personnel and in the reviewed documentation, the audit team concluded that the cyanide management system is FULLY implemented and maintained in accordance with the ICMI Mining Operation Verification Protocol.

MRDM Mine		07/18/2025
Name of Operation	Signature of Lead Auditor	Date