Cyanide Code Gold Mining Recertification Audit

Summary Audit Report for the International Cyanide Management Institute

Yanacocha Mine Newmont Corporation

Cajamarca - Peru

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

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Mining Operation: Yanacocha Mine

Mine Owner: Newmont Corporation

Mine Operator: Newmont Yanacocha S.R.L.

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Location and description of the operation

Newmont Yanacocha Mine (Yanacocha) is located in Cajamarca 800 kilometers northeast of Lima, Peru. Its area of operations is 35 kilometers north of the district of La Encañada, Baños del Inca, Cajamarca, between 3,500 and 4,100 meters above sea level. Its activity is developed in three basins: Alto Marañón River, Crisnejas River, and Jequetepeque River.

In 1990, the first feasibility studies were carried out to start work on a pilot plant for battery leaching. With the start of operations in an area called Carachugo, Yanacocha produced its first

doré bar on August 7th, 1993. Currently the total shareholder is Newmont Corporation with 100% of the shares.

Yanacocha operations comprise open pit mines, waste rock storage areas, heap leach facilities, cyanide offloading facilities, process plants (carbon in columns and Merrill Crowe), tailings storage facility, comprehensive storm water channel and sedimentation pond network, run-on diversions, acid rock drainage treatment plants, and water treatment plants for cyanide destruction. The auxiliary facilities required for the mining operation include administration offices and buildings, laboratories, warehouses, maintenance shops, emergency facilities, electric power distribution, water supply, roads, fuel and reagent storage tanks, drainage structures, and explosive storage areas.

The Newmont Yanacocha mining operation is currently focused on the exploitation of a single open-pit pit called Quecher Main, from which the ore is obtained and deposited in the Carachugo Stage 14 leach pad, where the leaching process with cyanide solution is carried out, using the drip irrigation technique, which allows the recovery of the gold present in the ore.

During this International Cyanide Management Code (ICMC) audit cycle the operation modified the heap leach operation to incorporate injection leaching and constructed a cyanide storage tank and solution pipelines to the injection wells. Currently Yanacocha applies injection leaching through wells in La Quinua 1-7, Carachugo 1-9, and La Quinua 8.

As for the leaching process, it is carried out in two ways, drip irrigation and injection irrigation. Injection irrigation is carried out in the oldest leach pads in Carachugo and La Quinua, which allows for increased recovery because it facilitates a more efficient distribution of the solution. Currently, and due to injection irrigation, the ponds associated with these leach pads are operational, such as in the West Operations and Minor Wox events, Operations, Minor Events and Storm Water Pond 1 and 4 of La Quinua and in the East zone, operations, minor events 1 and 2 of Carachugo as well as Operations and Minor events of Carachugo 14.

Newmont Yanacocha operates three cyanide preparation plants where the sparge process takes place, which aims to incorporate cyanide into the leach solution.

Yanacocha receives solid sodium cyanide from Orica Australia Pty Ltd (Orica) delivered to the site in the isotanks. The Orica supply chain is certified as compliant with the Code by third-party auditors. The isotanks are delivered by DCR Mineria y Construccion S.A.C (DCR), a trucking company under contract to Orica. The isotanks are staged at a secured parking area on the northeast corner of the La Quinua pad while awaiting sparging or awaiting return to the vendor. DCR provides drivers to deliver the full isotanks to the plants and return the empty isotanks to the staging area. Isotank offloading facilities are located at the Gold Mill, Yanacocha Norte Plant, and the Pampa Larga Plant.

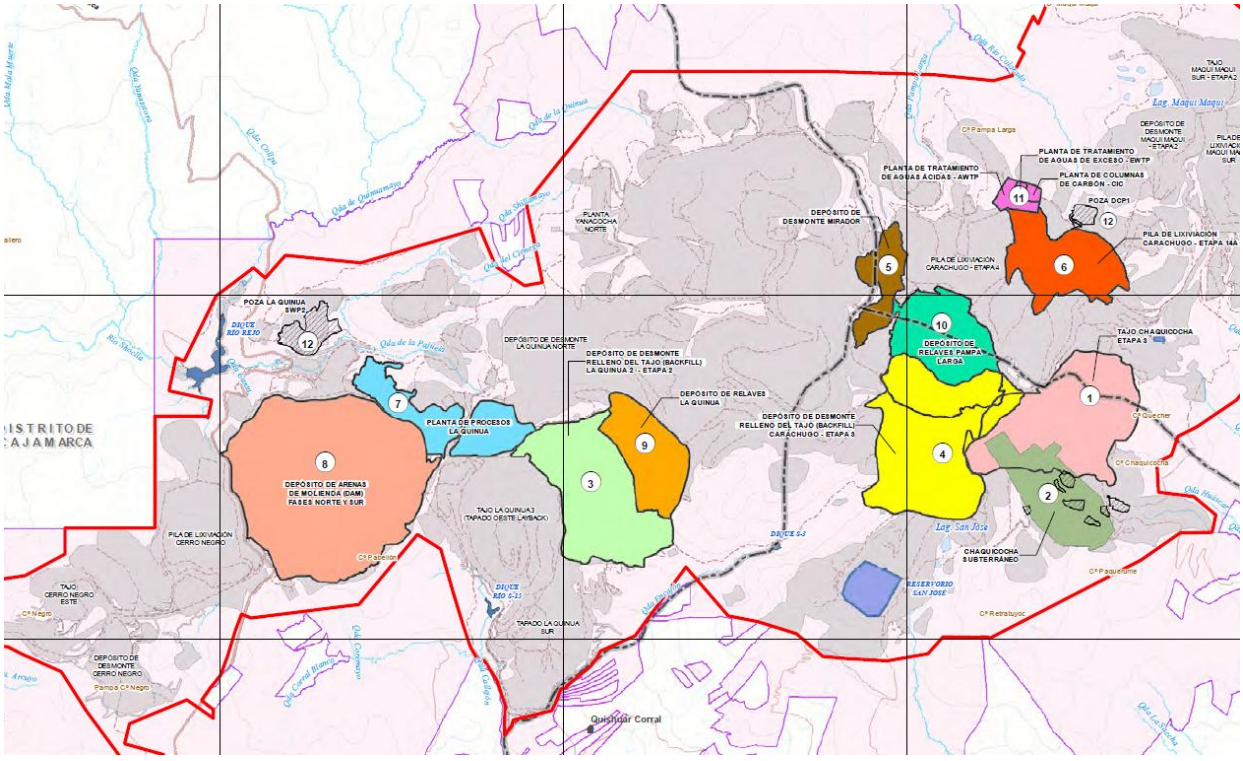
The open pits have been developed by conventional mining methods using trucks and loaders to extract gold-bearing ore. The waste is transported by trucks to adjacent waste rock storage

areas designed specifically for this purpose. Ore is blended with lime and placed on the heap leach facilities by truck.

LEACHING PROCESS

The heap leach piles are stepped pyramid-like structures where the extracted ore accumulates. To this material is applied, through a drip system and injection, a cyanide solution of 70 milligrams per liter of water, which dissolves the gold. Using a system of pipes placed at the base of the heap leach piles, the dissolved solution of gold and cyanide – called rich solution – passes into a leach or process pond, from where it is pumped to the process plant. The base of the heap leach piles are covered by geomembranes, which are high-strength plastic material that prevents the contact of chemicals with the soil, taking care of the quality of the water.

Yanacocha operations are divided into four major areas known as (from west to east) La Quinua, Yanacocha Norte, Pampa Larga (the leach facilities adjacent to the Pampa Larga process facilities are referred to as the Carachugo pad). The heap leach facilities at Yanacocha are all constructed with similar components including the fully lined geomembrane heap leach pads, operational ponds for collection of rich leach solution (PLS), and minor event ponds to collect and store storm water related to a 100-year, 24-hour storm. The operations ponds at each heap leach facility are constructed with triple geomembrane liners with two leak collection and recovery systems (LCRS). All the heap leach facilities are constructed with underdrain systems to collect and convey shallow groundwater. The underdrain flows are collected in sumps for identification and control of any process solution leak. The general site layout is shown below.



Newmont Corporation
Yanacocha Mine

Bruno Pizzorni
Lead Auditor

March 14, 2025

CARBON COLUMNS

Yanacocha operates three separate recovery systems to recover the gold and silver from the rich leach solution: 1) a Carbon Plant at La Quinua, 2) a Carbon Plant and a Merrill Crowe Plant at Yanacocha Norte, and 3) a Carbon Plant at Pampa Larga. The Maqui Maqui pad is about to close, no mineral leaching is taking place. The Gold Mill is stopped, only it is sparge system operating to send rich solution to the La Quinua Plant.

Carbon columns process that allows to concentrate the amount of gold that is in the rich solution, to then recover it in the Merrill Crowe process, which occurs in two stages. The first is the desorption stage, in which by circulating a cyanide solution, the gold trapped on the surface of the activated carbon is removed. The second stage is adsorption; in it the rich solution (with the gold in liquid state) is passed through columns loaded with activated carbon, so that the gold is trapped in the pores of the carbon.

MERRILL CROWE

The solution rich in gold and silver is filtered and cleaned. Then the oxygen is removed and zinc powder is added to precipitate the metal and make it solid. The product of Merrill Crowe is the one that then passes to the refinery process.

The spent solution is sent back to the pad first passing through a tank to add the cyanide that was consumed during the process. In this way a closed circuit is completed where the solution used does not go out into the environment but is constantly reused.

REFINERY

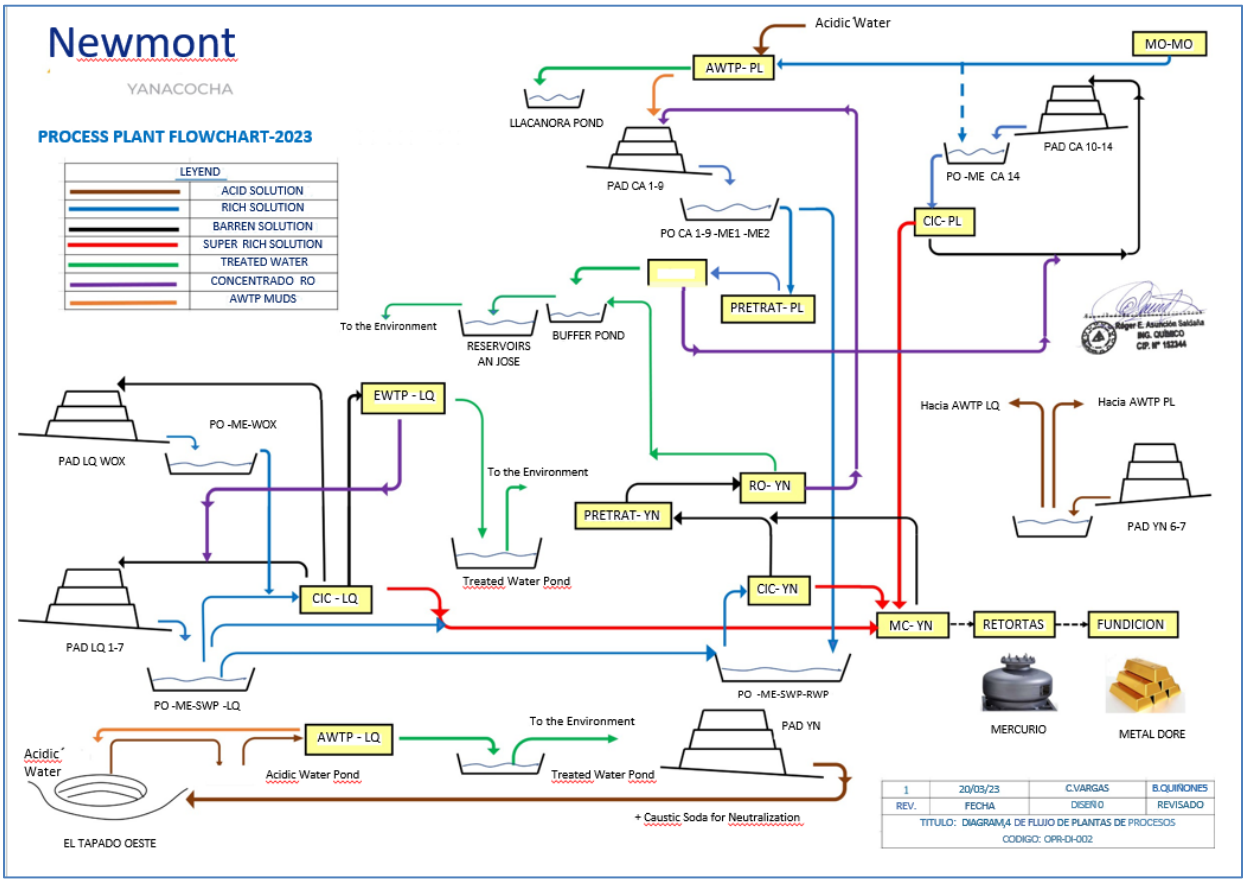
The gold obtained in the Merrill Crowe process is subjected to drying operations in retort furnaces at 650º C. Finally, the product obtained goes through a process of smelting in electric arc furnace at 1,200º C to obtain the Doré, which is a bar made of a mixture of gold and silver.

WATER MANAGEMENT

Managing the process water balance is a critical function at Yanacocha because of the relatively high precipitation occurring in a well-defined rainy season. Yanacocha has integrated the water management process between the four separate operating units by interconnecting the different operational process ponds and processing plants with pipelines. Yanacocha has a water monitoring system that includes real time automated flow and level monitoring and telemetry to report the information on an hourly basis to the Water Management Group within the Process Department. The system allows real time data collection from process ponds, leach rates, recirculation rates, inter-operational pump flow rates, and climatic data from onsite weather stations. All changes in process water flow rates must be reviewed by the Water Management Group to prevent the potential for overtopping. Yanacocha has the ability to convey process solutions between all four operations enabling them to balance their water use more effectively. Operators have information from the operations plan related to response actions required as the pond levels rise.

To manage the positive water balance during the rainy season, Yanacocha operates two Excess Water Treatment Plants (EWTPs) and seven reverse osmosis (RO) units to destroy cyanide and remove metals. The plants are located at Yanacocha Norte, La Quinua and Pampa Larga. The treated water is conveyed to the Buffer Pond located at Pampa Larga for monitoring prior to discharge to environment. The EWTPs use a multiple step treatment system for cyanide destruction, for metals precipitation, and for coagulation. Yanacocha Norte and La Quinua also has an acid water treatment plant (AWTP) to manage acidic drainage from mine water facilities.

PROCESS PLANTS FLOWCHART



Bruno Pizzorni
Lead Auditor

Auditor's Finding

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

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

Auditor's Attestation

Audit Company:	RDZ Consulting	
Lead Auditor:	Bruno Pizzorni bpizzorni73@gmail.com	
Mining Technical Auditor 1:	Dr. Jorge Chávez Blancas jchavez@envphys.com	Signature: 
Mining Technical Auditor 2:	Graciela Rojas Diaz graciegard@hotmail.com	Signature: 
Date(s) of Audit:	September 22nd – 26th, 2024	

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

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

Bruno Pizzorni
Lead Auditor

Newmont Corporation
Yanacocha Mine

March 14, 2025

DETAILED AUDIT FINDINGS REPORT

PRODUCTION AND PURCHASE: Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

Standard of Practice

1.1 Purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

The operation is: ■ in full compliance with Standard of Practice 1.1
□ in substantial compliance
□ not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Yanacocha has a current agreement with Orica Mining Services Perú to purchase and transport of sodium cyanide isotanks to the mine site valid for the period January 1, 2022, to December 31, 2026. The agreement requires the facility to be certified as following the Code. Orica is an Australian-owned, publicly listed company with global operations, and one of the world's largest producers of cyanide.

Yanacocha purchases cyanide produced in Orica´s Yarwun Production Facility, which is located 9 km north-west of Gladstone, Queensland, Australia. The production plant was found in compliance with the Code, achieving its initial certification in 2006, then recertificated the Code in 2010, 2013, 2017, 2020 and the last recertification was on October 31, 2023, which is valid for the next 3 years, in accordance with the provisions of the. International Cyanide Management Institute (ICMI). The current full certification status of this facility was verified by review of the ICMI website.

The auditor reviewed purchase orders, commercial invoices, and goods of receipt for the recertification period. The contract, shipping documents, reception and purchasing records were available and reviewed with Yanacocha' s Supply Chain Officers.

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: ■in full compliance with Standard of Practice 2.1
□in substantial compliance
□ not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

The auditors reviewed the chain of custody of the sodium cyanide isotanks purchased and transported by Orica during the recertification period. The chain of custody identifies the sodium cyanide isotanks transporters responsible:

- Transport from Orica´s Yarwun Production Facility in Australia to the Port of Callao in Lima Peru is madding by Orica Latin America Supply Chain. Within Peru transport is by the certified transporter DCR Mineria y Construccion S.A.C. (DCR).
- Transport from to the Port of Callao in Lima Peru to the sparge tank transfer in process plant in Yanacocha Mine is madding by DCR Mineria y Construcción SAC (DCR), Peru.

Yanacocha maintains records of the chain of custody documents from the producer, the maritime transporter and land transporters that handle the cyanide brought to its site, all identifying the parties in the supply chain. The auditor reviewed the bill of lading documentation covering the recertification audit, identifying all transporters certified in compliance with the Code. The chain of custody records were available and reviewed with Yanacocha' s Supply Chain Officers.

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: ■ in full compliance with Standard of Practice 3.1
□ in substantial compliance
□ not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

The cyanide unloading, storage, and mixing facilities have not been modified since the previous recertification audit.

Yanacocha designed and constructed cyanide unloading, storage and mixing facilities in accordance with guidelines, environmental and sectorial permits in Peru and accepted engineering practices. The cyanide facilities are the same as for the 2021 recertification audit, located away from people and surface waters. It is important to mention that during this recertification period, Yanacocha implemented the line from the CN storage tank to of Pampa Larga Sparge to the spent solution pump suction going to PAD Carachugo 14 and another one for injection leaching. Yanacocha keeps copies of the original design drawings of the cyanide sparge plants and cyanide distribution systems which are properly signed by a certified professional engineer and management of change documents during the recertification period.
During this recertification period Yanacocha has only managed cyanide in isotanks, unloading and mixing them through a sparge process located at Gold Mill, Yanacocha Norte and Pampa Larga Plants.

The La Quinua Plant receives cyanide solution from the Gold Mill Sparge Plant via a pipeline.
Yanacocha continues temporary parking the isotanks in the storage area located in La Quinua leaching facility. This is a fenced open platform at La Quinua Leach Pad. From there Orica sends the isotanks to the different plants upon request by operations. The temporary park has perimeter ditches installed to prevent the risk of rainwater entering the platform.
To prevent the overfilling of cyanide storage tanks, Yanacocha' s cyanide mixing and storage tanks area at Pampa Larga, Yanacocha Norte and Gold Mill have the following controls:

- Tank level sensors set up at high (90%) and high-high (95% capacity)
- Alarms installed on both tanks at the preparation area.
- Control Room at each plant with operator monitoring the preparation activities
- CC Camera connected to the Control Room

The Cyanide facilities are located on concrete floor and secondary containment berms. Secondary containments are formed of reinforced concrete painted with epoxy sealant paint as

per maintenance program. All construction and movement joints are sealed as per maintenance program. These materials are suitable to provide a competent barrier to leakage.

The Isotanks Storage Area or cyanide temporary parking and the mixing and storage areas at all three separate plants (i.e., Gold Mill, Yanacocha Norte and Pampa Larga Plant) is well ventilated. Impermeability of cyanide storage is guaranteed as being stored in isotanks, which are designed for outdoor use, certified to prevent contact of solid cyanide with water. The platforms at temporary parking and plants provide appropriate sloping to avoid inundation of the area due to run off water from rain or any other source, in a secure area with a fence, closed gate, 24-hour security and isotank valves with certified locks in place and separated from materials storage or incompatible materials such as acids, strong oxidizers, explosives or any other materials. Good housekeeping practices were maintained in cyanide storage areas.

3.2 Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

The operation is: ■ in full compliance with Standard of Practice 3.2
□ in substantial compliance
□ not in compliance

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Discuss the basis for this Finding/Deficiencies Identified:

The Standard Safe Work Procedure O PR-G-PETS-003 Preparation of Cyanide Solution by the Sparge System, applicable to Pampa Larga, Yanacocha Norte and Gold Mill plants regarding empty cyanide isotanks provided by Orica in Yanacocha are reusable containers but only to transport sodium cyanide. Once empty, the isotanks are rinsed following the Standard Safe Work Procedure prior to removal from the mixing area and returned to the Isotanks Storage Area or temporary parking in the storage area in La Quinua leaching facility, labelled accordingly and then removed from site and shipped back to Orica.

The auditor reviewed the following plans and standard safe work procedure applicable to Pampa Larga, Yanacocha Norte and Gold Mill plants regarding the prevention of exposures and releases during cyanide unloading and mining.

- PR-G-PETS-003 Preparation of Cyanide Solution by the Sparge System.
- OPR-FO-001 Cyanide Solution Preparation Checklist - Sparge System
- P-IN-003 Actions taken in case of emergencies while operating the Sparge System
- YAN-ENV-SOP-1166 Cyanide Spill Management
- YAN-HS-STA-008 Hazardous Materials Management
- YAN-HS-STA RO-021-01 Safety and Health Manual
- STI-PE.EC-01 Emergency Plan - in case of exposure to cyanide
- YAN-HS-STA RO-040 Management and Treatment in case of Cyanide Exposure

Procedure PR-G-PETS-003 Preparation of Cyanide Solution by the Sparge System describe the operation of valves and couplings at all three plants. Yanacocha is responsible for hoses, valves and couplings maintenances of the sparge system when is required by OPR-FO-001 Cyanide Solution Preparation Checklist - Sparge System, visual inspection or the Maintenance Program. The auditor observed the preparation of one isocontainer at La Quinua Plant and verified checklists were adequately completed.
Operational procedures mentioned above have cross references to emergency procedures P-IN-003, YAN-ENV-SOP-1166, YAN-HS-STA-008, STI-PE.EC-01 and YAN-HS-STA RO-040. Any spill during cyanide mixing activities must be timely clean up. Any liquid spills or leaks within the concrete containments are washed to the sump pit and pumped back into the process circuit. Procedures PR-G-PETS-003 requires personnel during sparging to wear PPE including safety helmet, Tychem suit, leather gloves, neoprene gloves, full face mask with tricolor filters for cyanide gases, rubber boots, personal HCN gas monitor and communication radio. . The procedure describe that sparging activity is developed by an operator and/or technician and the control room operator who is observing the activity by video in a safe area and has communication with the operator and/or technician by radio. The auditors observed 2 field operators during the preparation of cyanide solution by the sparge system.

Orica´s solid sodium cyanide in isotanks comes with Carmoisine, the red colorant incorporated, which allows cyanide solution to turn colored during the cyanide-sparging process.

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

Standard of Practice

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

The operation is: ■ in full compliance with Standard of Practice 4.1
□ in substantial compliance
□ not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

Yanacocha has its own management systems in place that support the implementation and maintenance of cyanide-related practices and controls with the goal of preventing environmental issues and affecting workers health and safety.

These systems are based on identifying risks and opportunities, develop Standard Operation Procedures (SOP) and Safety Standard Work Procedures (PETS by its Spanish acronym) and provide training to employees to ensure they carry out their tasks in an environmentally responsible way and in a safe manner while monitoring and evaluating effectiveness of programs for continuous improvement.

Yanacocha developed several PETS to the areas that were identified as having CN solutions greater than 0.5 ppm WAD (Weak Acid dissociated) cyanide.

Yanacocha has maintained documents that support the SOP´s as manuals, plans, instructions and forms that are used by logistics, process team, environmental, health and safety and other supporting departments.

Plant procedures and solutions management control philosophy have been maintained and kept updated which also include parameters for design criteria developed by SNV-Lavalin for the Carachugo 14 Leach Pad and the Pregnant Solution Ponds System (system built during this recertification period).

Civil Design Manual for Carachugo 14 defines the freeboard for process operation pond, minor events pond, and major events pond. A minimum of 0.5 meter is required for freeboard. The design storm event is 100-year 24-hour event and a 10-hour power outage. The design also considers geotechnical criteria, piping and electrical as-built drawings.

Critical design parameters are referenced in the original design criteria; however, these are adjusted based on water balance updates. The model was updated by an external consultant that manages the model for Yanacocha this year, and previously by WSP in 2021. The water

balance incorporates a 100-year 24-hour design precipitation event. This criterion has been updated on recent climatic information from site meteorological stations. Yanacocha has developed General Specifications for Design – Environment (DP-IN-ES-002) describing the specifications and parameters for the construction of facilities with interaction with the environment including ponds and channels. This document considers the requirement of the Cyanide Code. The capacity ponds criteria include the 100-year/24 hours storm event in addition to the monthly average operating volume (including 2 h runoff and water treatment). The stablished free border is at least 0.5 m. The updated Water Balance which includes the design storm events for containments systems and pounds, considering the interconnections between the various plants, leaching pads and ponds.

Regarding WAD Cyanide concentrations in all leach pads, solution ponds and process plant, the following considerations were reviewed by the auditor:

- The maximum WAD CN concentration allowed for facilities based the protective measures for birds and wildlife at a maximum concentration of 50 ppm.
- The operation has 16 approved discharge points with environmental certification and sectorial permits. The registered values comply with the ICMI and the Peruvian regulations for effluent discharge and environmental quality standards at the receiving water body.
- Peruvian legislation has not established quality standards for groundwater, as a reference the surface water quality standards for irrigation water is used (CN WAD 0.1 mg/l).
- Yanacocha has 16 compliance points at the receiving water bodies. The compliance points are determined and approved by the Environmental Impact Assessment (EIA). Yanacocha´s compliance points were established before the Peruvian authorities published a methodology to establish the mixing zone. All the results over the recertification period for free cyanide are lower than 0,22 mg/l, actually free cyanide could not be detected
- The updated Water Balance includes the design storm events for containments and impoundments, considering the interconnections between the various plants, pads and ponds.

Yanacocha has developed and implemented a YAN-HS-STA-RO-027 Management of Change to identify and evaluate changes in the operation including the changes related to safe management of cyanide. The procedure addresses potential EHS impacts of proposed changes, follow up requirements and monitoring of approved changes. The process plants personnel have been trained about of the YAN-HS-STA-RO-027 Management of Change.

Yanacocha has developed various standards and plans that address contingency procedures for situations when inspections and monitoring identify a deviation from design or standard operating procedures. Yanacocha has developed an Emergency Response Plan titled “Readiness and Emergency Response Plan,” which is a compendium of emergency plans to facilitate the flow of information, support, and assistance during emergencies including

accidental releases of cyanide at the mine or during transportation. At a corporate level, Yanacocha has implemented Newmont´s Rapid Response System (RRS). The RRS aims to mitigate and prevent the escalation of adverse consequences in the event that existing risk management controls fail. The Contingencies Plans and Emergency Response Plan. cover emergency response tied to the leach pad and other cyanide handling areas; these define discharge levels, use of equipment like sump pumps, alarms, safety equipment, antidotes, environmental aspects, contacts, and possible scenarios (such as catastrophic release of HCN from storage or process facilities, transportation accidents, releases during unloading and mixing, fires and explosions, pipes, valves and tanks rupture, overtopping of ponds and impoundments, power outages and pump failures, uncontrolled seepage, failure of cyanide treatment, destruction or recovery systems, failure of tailings impoundments, heap leach facilities and other cyanide facilities, or seismic events). These documents specify actions for differing pond water elevations and describe where process solutions need to be conveyed to prevent discharge to the environment. Protocols and procedures related to cessation of operations have been reviewed in the latest Closure Plan . Yanacocha has a Mine Closure Plan for the entire site, which includes the decommissioning measures of the cyanide-related facilities. The Mine Closure Plan has been developed according to the Peruvian legislation and is developed by a third-party consultant registered by the Peruvian Ministry of Energy and Mines. Yanacocha has to follow also the corporate Methodologic Guide for Mine Closure and corporate standards.

The Mine Closure Plan establishes the temporary, progressive and final closure activities, and its costs. According to the Peruvian regulation, the Mine Closure Plan includes the decommissioning, demolition, and disposal of all processing facilities. The closure and rehabilitation of heap leach, waste dumps and pits are also described and the cost estimated. Post-Closure costs are also considered. Protocols and procedures related to cessation of operations have been reviewed in the latest Closure Plan.

Yanacocha Process Plant Maintenance team made annual inspects the structural integrity and corrosion state of tanks by specialized contractor as per non-destructive testing (NDT) conducted by external contractor *Consorcio SGS NDTI* (2022 and 2024) of tanks, valves and pipes at la Quinua, Gold Mill, Pampa Larga and Yanacocha Norte Processing Plants. This inspection also includes valves and pipes for the isocontainers sparging system. SGS/NDTI used the American Petroleum Institute (API) 653 standard for corrosion, ultrasound by American Society for Nondestructive Testing Recommended Practice 1A (ASNTTC-1A), magnetic particles and visual verification for potential leaks. A sample of inspections records was reviewed during the audit.

Yanacocha process plants operators inspect secondary containment and the drain valves control. The process plants departments visually shift inspects the secondary containments to look for the presence of fluids and their available capacity, and verifies that drains are closed and locked, to prevent accidental releases to the environment. Monthly Inspections are registered, and the template/check list includes secondary containment and presence of fluids. The auditor visited all process plants and inspected the secondary containment and these was in maintenance process.

Leach Collection and Recovery Systems monitoring (as called Yanacocha LCRS) continues to be part of the inspection program and an important engineering control for minimizing risk of cyanide infiltration in Leach pads and pond systems. There are 33 LCRS and 17 underdrains with flow and volume sensors. The auditor reviewed the PI data and graphs for the recertification period, not finding abnormal flow conditions in the LCRS that could indicate major leakages in the first geomembrane liner of pads or ponds.
Yanacocha also conducts daily and shift visual inspections on solution pipeline corridors.

Yanacocha also inspects pond systems 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. The Water Management Department performs visual inspections of all ponds, daily during the rainy season and weekly during the dry season. Specific inspections are conducted after significant precipitations. Level sensors, cameras and constant inspections have been implemented as engineering controls to ensure the operation under the designed parameters. Using a GoldSim model Yanacocha evaluates the future performance of the ponds and establishes maximum operational levels and actions to avoid ponds levels outside the design criteria. In addition, he Environmental team performs a monthly inspection to cover the physical integrity of the water management facilities. All process ponds were checked to ensure level sensors were installed and functioning, which were verified by reviewing the Python (PI) software system reports with pond level graphs. Telemetry data of cyanide solution pond levels is obtained using the PI program. The auditor reviewed Water Balance weekly reports 2021, 2022, 2023 and 2024, verifying that pond levels are constantly monitored and reported. Yanacocha maintains inspections for volume levels and also for stability, which includes piezometers and prisms, both surveyed on a monthly basis. Yanacocha frequently conducts inspections, enough to identify potential problems before they present a risk of cyanide release or exposure, according to the auditor reviewed inspections records covering the recertification period. Yanacocha keeps inspections records with the dates, name of inspector and corrective actions. The corrective actions and their priority are documented. Yanacocha Process Plants established visual shift and daily inspection and monthly checklist. These inspections are documented in shift logbooks and inspection forms. The inspection forms with identified deficiencies are reviewed by shift supervisors and sent to the maintenance-planning department to issue work orders through the SAP based maintenance program. The Maintenance Department has developed maintenance procedures by a specialized company. Inspections and subsequent corrective actions identified are documented including the nature and date of the corrective actions. Corrective actions from inspections are logged in the ENABLON System. Due dates and responsibilities for corrective actions are assigned.

Yanacocha has an established program to conduct inspections of cyanide facilities with frequencies that varies from daily, weekly, per shift and monthly, depending on the area that performs the inspection.

Process Plants teams conduct visual daily, shift and monthly cyanide facility checklist. This form is applicable to Pampa Larga, Yanacocha Norte and Gold Mill Plant and include tanks, valves, pipes, secondary containment ponds, their integrity, signs and accessories. Also, Yanacocha

implemented a monthly checklist to the different cyanide facilities identifying the dosing system, sparge system, critical tanks, pumps, valvules and pipes.

The Water Management team also conduct weekly inspections, using this time an inspection template/form. These inspections template consider (among others) the integrity of containment areas, presence of solutions in containments, presence or wildlife mortality, signs of corrosion or leakage, checking pipelines, valves, pumps for leaks, checking for presence of cyanide salts or deterioration and emergency response equipment.

Maintenance inspections are carried out on a routine basis according to the scheduled preventative maintenance system. Work orders are generated by the maintenance system for the various plant facilities and equipment.

The series of inspection programs followed at Yanacocha was found to be sufficient to assure that all relevant CN facilities are functioning within design parameters. The documentation showing inspections records for the recertification audit showed that these were done on a consistent manner.

The Yanacocha preventive maintenance programs are designed to ensure the continuous and safe operation of the equipment for cyanide management. Preventive maintenance (PM) schedules are generated in the SAP system which is then automatically issued at the prescribed date and/or frequency as a work order. Maintenance schedules are determined according to the level of risk associated with the equipment and/or manufacturer recommendations and specifications. Yanacocha has started a contract with a specialized contractor to perform the maintenance of the electric generators for the next 2 years.

Yanacocha has shown evidence to have 2024 Non routine inspections records of the emergency power supply emergency sources to operate pumps and prevent releases and exposures if by any situation its primary power source is interrupted.

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

The operation is: ■ in full compliance with Standard of Practice 4.2
□ in substantial compliance
□ not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Not applicable. Yanacocha does not have any cyanidation milling or flotation facilities using cyanide

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The auditor verified that Yanacocha developed and maintains a robust probabilistic Water Balance model developed in GoldSim. The model was updated by an external consultant that manages the model for Yanacocha this year, and previously by WSP in 2021.

The water balance includes components on operation, as well as infrastructure that is active in terms of water management, like leach pads, process rich solution ponds, minor event ponds, major event ponds, tailings storage facility, run-off from waste storage facilities, pit dewatering and effluent water treatment systems.

The water balance also includes inflow calculations from precipitation and water makeup. The considered outflows include evaporation, ore moisture, soil moisture, effluent discharge, and non-contact runoff water. The model simulates scenarios up to 2028.

The GoldSim model is calibrated monthly (last calibration August 2024) with on-site collected data. The model generates precipitation scenarios to include uncertainty and the variability inherent in precipitation, specifically the extremes and variations. The model uses estimates based on statistical analysis of reliable historical rainfall data.

Results of the model are used in the weekly reports of the water department to upper management. The auditor verified how the predictions of the water balance were used at the end of 2021 to establish measures to avoid releases of acid water during Q1 2022.

The water balance consider the following:

a) *The rates at which solutions are applied to leach pads and tailings that are deposited into tailings storage facilities.*
   Currently Yanacocha applies cyanide solutions using two methods, standard leaching in Carachugo 14 and injection leaching though wells in La Quinua 1-7 and Carachugo 1-9 and La Quinua 8.
   The model considers the solution application rates, including the solution injection rate in Carachugo and La Quinua Pad for secondary leaching. The model considers the depth of the solution injection as well as the time that the solution takes to reach the process ponds. Precipitation falling on the facilities, diverted water, evaporation and seepage are considered in the model.
b) *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 incorporates a 100-year 24-hour design precipitation event. This criterion has been updated on recent climatic information from site meteorological stations. Yanacocha has developed General Specifications for Design – Environment (DP-IN-ES-002) describing the specifications and parameters for the construction of facilities with interaction with the environment including ponds and channels. This document considers the requirement of the Cyanide Code.

The capacity ponds criteria include the 100-year/24 hours storm event in addition to the monthly average operating volume (including 2 h runoff and water treatment). The stablished free border is at least 0.5 m.

c) *The quality of existing precipitation and evaporation data in representing actual site conditions.*

Yanacocha maintains a robust and reliable system for collecting precipitation data from local and regional meteorological stations that has been working during the mine operation. The registers extend for more than 25 years captured by more than 8 meteorological stations and several rain gauges distributed along the site.

The data is reviewed by a consultant and is used to calibrate the water balance. The registers for the last three years could be verified by the auditor.

d) *The amount of precipitation entering a pond or impoundment resulting from surface run-on from the upgradient watershed, including adjustments as necessary to account for differences in elevation and for infiltration of the runoff into the ground*

The Goldsim model uses percolation coefficients based on pad cells height, ore density, ore moisture and runoff coefficients. The model considers the precipitation in the catchment area of the facilities that are captured and introduce into the water inventory of the system.

e) *The effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and the upgradient watershed.*

Freezing and thawing is not applicable to Yanacocha environment due to the subtropical climate conditions at site.

f) *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.* The GoldSim model considers not only evaporation, the water required to achieve impregnation to start leaching is also considered in the model, as well as the effluent discharges and the amounts of the non-contact water runoff.

The recycling system in addition to the recirculation of the spent solution includes the leak detection and recovery system of the solution ponds and leach pads (LCRS), and their underdrain systems.

g) *The effects of potential power outages or pump and other equipment failures on the draindown from a leach pad or the emergency removal of water from a facility*

The GoldSim considers the potential power outages or pump failures. There are backup generators on site to provide with energy to critical pumps that allow to maintain the recirculation to the leach pad of process solution if necessary. The GoldSim model is capable of simulating the consequences of a power outage or other equipment failures.

h) *Where solution is discharged to surface waters, the capacity and on-line availability of necessary treatment, destruction or regeneration systems*.

Yanacocha has three Excess Water Treatment Plants (EWTP) for CN destruction. The EWTP Pampa Larga and the EWTP Yanacocha Norte in the East Sector, and the EWTP La

Quinua in the West Sector of the site. All treatment plants have reverse osmosis as final treatment stage. The Pampa Larga EWTP has a capacity of 1,400 m^3/h, Yanacocha Norte EWTP 1,350 m^3/h, and La Quinua EWTP 450 m^3/h since January 2021.
The water management system has the capacity to transfer solution to any plant with available treatment capacity. The GoldSim model calculates the volume of effluent to be treated and compares it with the treatment capacity. If necessary, the model can evaluate different options if necessary.

i) Other aspects *of* facility design that can affect the water balance, such as the assumed phreatic surface in a tailings storage facility
The Tailings Storage Facility (TSF) is not operating anymore; nevertheless, the GoldSim model considers the infiltration and seepage of the TSF and surrounding facilities.

All ponds are designed considering a 100-year, 24-hour storm and a 10-hour drain down period based on power outage, and a minimum freeboard of 0.5 m. These requirements are established in internal specifications (DP-IN-ES-002).

Level sensors, cameras and constant inspections have been implemented as engineering controls to assure the operation under the designed parameters. Using a GoldSim model Yanacocha evaluates the future performance of the ponds and establish maximum operational levels and actions to avoid ponds levels outside the design criteria. The water management system is interconnected and has the capacity to transfer the excess solutions to any treatment plant with available capacity.

A system with alert levels has been implemented. A yellow alert level indicates the need to optimize the water treatment systems and solution handling between the systems. A red alert scenario indicates the need to take immediate contingency actions of managing flows and solutions between the interconnected systems to allow for a quick reduction of volumes during a high precipitation period.

Yanacocha controls the ponds level online (sensors) and using a system of cameras. In addition, the Water Management Department performs visual inspections of all ponds, daily during the rainy season and weekly during the dry season. Specific inspections are conducted after significant precipitations. Weekly reports are presented by the Water Management Department including ponds level graphics. The auditor could review the registers and have access to the online information.

Yanacocha operates meteorological stations in the mine that provide information on precipitation, pan evaporation, temperature, wind direction, pressure, wind velocity and radiation. The precipitation registers extend for more than 25 years and are captured by more than 8 meteorological stations and several rain gauges distributed along the site.

The water balance is maintained and updated monthly with the meteorological information by a dedicated external consultant.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Currently all the solution ponds show values below 50 ppm WAD cyanide; however, Yanacocha has maintained the fencing in place and no incidents with wildlife or livestock entering the ponds have been reported during the recertification period.

The auditor has reviewed Cyanide WAD analytical results for all these ponds since 2021, and the cyanide concentrations in the operational ponds are below 50 mg/L WAD CN. A set of random samples of the laboratory certificates was checked, confirming the values registered in the system.

Yanacocha maintains an inspection plan on all the ponds, no wildlife mortalities have been reported during the recertification period.

Currently Yanacocha applies cyanide solutions using two methods, standard leaching in Carachugo 14 and injection leaching though wells in La Quinua 1-7 and Carachugo 1-9, and La Quinua 8.

The injection through wells is performed under the surface of the leach pad, at different depths. No ponding on the surface of the leach pad is possible at controlled injection rates.

The cyanide solution application in Carachugo 14 is the same method used in the past. Yanacocha uses pumping systems, raiser pipes, distribution lines to each leach zone and direct irrigation to ore surface by drip pipelines with a controlled irrigation rate. The ore is placed and ripped according to Yanacocha's leaching procedure (OPR-LX-IN-004) to promote infiltration.

In addition, daily inspections of active cells are performed. In case ponding is identified, Yanacocha applies its ponding elimination procedure on leaching cells (YAN-HS-STA-006-01). The procedure in case of ponding determines the immediate reduction the irrigation rate, and the modification of the surface material to promote infiltration (Procedure CLQ-PETS-09).

4.5 Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

The operation is: ■ in full compliance with Standard of Practice 4.5
□ in substantial compliance
□ not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

The operation has 16 approved discharge points with environmental certification and sectorial permits. The results of the last three years register are below 0.5 mg/l WAD cyanide. The registered values comply with the ICMI and the Peruvian regulations for effluent discharge and environmental quality standards at the receiving water body. No registered value is higher than 0.1 mg/l WAD cyanide.

The auditor reviewed the records for effluent discharges and also did a random review of the laboratory certificates to confirm the numbers in the database.

Yanacocha has 16 compliance points at the receiving water bodies. The compliance points are determined and approved by the Environmental Impact Assessment (EIA). Yanacocha´s compliance points were established before the Peruvian authorities published a methodology to establish the mixing zone.

The auditor reviewed the results of following monitoring stations: CP1 (Quebrada Honda), CP-10 and CP-11 (Quebrada La Shacsha), CP-6 (Rejo), CP-3 (Mashcon river), CP-5 (Quebrada San José) and CP-14 (San José Reservoir). All the results over the recertification period for free cyanide are lower than 0,22 mg/l, actually free cyanide could not be detected (Detection Limit: 0.008 mg/l) in the receiving water bodies downstream to the discharge.

Yanacocha has not had any indirect discharges to surface water. The TSF within the La Quinua Pad, which is lined (geomembrane with leak detection system and underdrains). Seepage is being collected within the contained pad and stored in the operations pond to be later treated or reused. Underground water quality monitoring in water basins downstream of all Yanacocha operations showed no detectable free cyanide.

The monitoring of groundwater did not detect free cyanide in the groundwater. Therefore, Yanacocha is not currently engaged in any remedial activities.

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

The operation is: ■ in full compliance with Standard of Practice 4.6
□ in substantial compliance
□ not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

As engineering control, all leach pads and the TSF are lined facilities. The base of the leach pads and TSF is composed of low-permeability compacted soil layer underlying geomembrane liners.

All process operation ponds have been designed with three liners and double leak detection systems (LCRS). The major and minor event ponds have double geomembrane liner with a leak detection system (LCRS).

All the cyanide containing pipelines are located within a geomembrane channel, any solution that is collected in the channels would be directed to the operation ponds.

The stablished monitoring plan contains groundwater monitoring downstream of the leach pads and ponds.

Peruvian legislation has not established quality standards for groundwater, as a reference the surface water quality standards for irrigation water is used (CN WAD 0.1 mg/l). Yanacocha has to report the results quarterly to the Peruvian Authorities. No cyanide could be detected in the groundwater samples during the recertification period.

There is no beneficial use of groundwater downgradient of Yanacocha, Farmers and peasants use traditionally surface water.

Yanacocha does not use mill tailings as underground backfill.

Yanacocha has not caused cyanide concentrations in groundwater to rise above levels protective of this standard. Cyanide has not been detected in groundwater during the period of certification. Therefore, Yanacocha is not engaged in any remedial activity.

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

The operation is: ■ in full compliance with Standard of Practice 4.7
□ in substantial compliance
□ not in compliance

Discuss the basis for the Finding/Deficiencies Identified:

Yanacocha has maintained all tanks used for mixing, storing, and/or processing of cyanide and/or cyanide solutions with adequate secondary containment. Level indication, operator inspections, secondary containment and sump pumps help to prevent releases to the environment. These includes tanks at La Quinua, Yanacocha Norte, Gold Mill and Pampa Larga process plants.

Yanacocha purchases cyanide in isotanks which due to their construction characteristics and technical specifications provide a competent barrier for spill prevention. Isotanks are stored in an isolated area of La Quinua Pad (inactive area), on a platform made up of compacted earth and provided with suitable slopes to collect any leached product or surface runoff.

All four Process Plants at Yanacocha are contained within a concrete platform, including the sparge area and process solution tanks surrounded by containment walls, providing a competent barrier to seepage. Process plants also have an emergency pond in case of major spills.

The secondary containment systems are inspected every shift as part of the process facilities inspection system. The auditors observed that the concrete containment systems were in good condition at the time of the audit.

The auditors visited all plants in Yanacocha: Pampa Larga, Yanacocha Norte, La Quinua, Gold Mill and Maqui Maqui, even though the last two are currently not in operation. The mixing and storage tanks are secured to solid, reinforced concrete foundations, which prevents any seepage from the tank bottoms from entering the ground. Cyanide mixing and storage tanks are located inside concrete secondary containment systems. The auditor observed that all these concrete foundations and containment systems were in good condition.

All tanks at Yanacocha' s La Quinua, Pampa Larga, Yanacocha Norte and the inactive Maqui Maqui and Gold Mill plants, were designed with adequate storage to contain at least 110% the capacity of the largest tank in the bunded area plus additional capacity for the design storm event.

Maqui Maqui and Gold Mill Plants were not in operation at the time of audit, however, their contention system is connected to the adjacent operation and major events pond through pipes that drain by gravity in lined channels, providing enough containment volume.

Pampa Larga and Yanacocha Norte Process Plants have containments with sufficient capacity for 110 percent of the largest tank plus a connection to adjacent emergency ponds in each process area, also by mean of pipes that drain by gravity in lined channels.

All tanks and cyanide facilities in Yanacocha are located inside concrete secondary containment systems with dedicated pumps that remove solutions and return them into the process circuit. Although the La Quinua, Pampa Larga, Gold Mill, Yanacocha Norte and Maqui Maqui have a secondary containment, any spillage outside of containment will ultimately report to an emergency pond or drains to the operations ponds.

Yanacocha has in place a cyanide cleaning spill procedure which includes actions of what to do in case of major process spillage out of containment that reports to the emergency pond. Yanacocha has also implemented emergency procedures for potential spill events in the interconnected process solutions pipelines and channels. The cyanide cleaning spill procedure for Excess Water Treatment Plants at La Quinua, Yanacocha Norte and Carachugo, which states that spillage of any sort must be cleaned up to ensure the containment area has capacity to accommodate for events and to prevent any process solution from entering the environment.

All cyanide process tanks at Yanacocha have a concrete secondary containment.

Yanacocha has maintained a series of spill prevention and containment measures for cyanide pipelines including secondary containments, routine inspections and preventative maintenance.

Pipeline corridors transferring solution from pad and plants are all within geomembrane-lined channels. The auditors observed flange covers used to minimize the impacts from any spray that may occur on high-risk pipelines. Spent solution pipeline from La Quinua to EWTP or recirculation is also within a geomembrane-lined channel.

Routine inspections are conducted on a per shift basis to identify and report any leaks or damage to containment structures. These routine inspections are supported by scheduled preventative maintenance on spill prevention and leak detection equipment.

The auditors verified that Yanacocha has maintained this best practice for the new pipelines associated with the Carachugo 14 Leach Pad and solution management ponds, which includes transferring rich solution to the Pampa Larga Plant through a geomembrane lined channel.

Yanacocha has several risk evaluations processes that include a 5 by 5 risk matrix to identify potential cyanide related effects in their operations. The auditors reviewed evidence of the risk assessment conducted for Carachugo 14 Leach Pad and solution management system (operation pond, major events, and minor events ponds). For his case, the conclusion was that there were no surface water bodies requiring special protection beyond the secondary containment measures already provided by ponds, channels and geomembrane-lined pipelines.

Yanacocha has installed flange and valve lining with caps (protectors) where cyanide pipelines could present a risk of splashing to workers.

All Yanacocha cyanide tanks have been designed and constructed using carbon steel materials which are compatible with site´s cyanide and pH conditions. In the same way cyanide pipelines have been constructed with carbon steel and high-density polyethylene HDPE. The design criteria for the plant specifies the materials to be used as outlined in the QA/QC documents. In

the case that changes to cyanide solution tanks or pipelines are required, a management of change shall be followed to ensure that compatible materials are used for the installation works.

The operation provided documentation of the material's compatibility with cyanide and high pH conditions. Material specifications and construction material testing records for cyanide-containing equipment were reviewed and found in compliance.

4.8 Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

The operation is: ■ in full compliance with Standard of Practice 4.8
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

The only change implemented during the recertification process is the injection leaching and the construction of a direct cyanide solution line to the wells. Yanacocha performed a Management of Change for the injection leaching project.

The design was reviewed by the Engineer of Register (EoR) of the Leaching Pad, Knight Piésold (KP). KP reviewed the proposed Injection Leaching process, performed geotechnical and slope failure analyses, and a risk assessment; and did not find a fatal failure under certain conditions and on areas located away from the exterior face of the heap.

The construction of the piping and installation of the facilities of the Injection Leaching were performed by CONFIPETROL contractor. For the construction Yanacocha established the standards to follow for materials, inspections, welding and brazing, and quality management.

The auditor had access to the inspection and quality control reports of the welding of the cyanide pipeline made by ADEMINSAC contractor.

No new ponds, leach pads, storage facilities or process tanks were installed for the injection leaching.

Yanacocha has a repository of the facilities documentation that includes design and QA/QC records. The records with the exception of the old facilities are in digital format. The older records are being digitalized, and a database system is being completed.

The QA/QC documents for the injection leaching are in the system in digital format and were accessible for the auditors.

The EoR of the Leach Pad (Kight Piesold) reviewed the proposed Injection Leaching process and conducted an assessment and did not find any fatal failure. The inspection and quality control of the welding of the cyanide pipeline was made by ADEMINSAC.

The auditors did not find any evidence of missing QA/QC assurance documentation of the injection leaching, only change in the facilities during the recertification period.

Yanacocha requires that all designs contain specifications, drawings, QA/QC dossiers, construction reports, and other documents. Previous recertifications reports checked the previously constructed facilities.

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

The operation is: ■ in full compliance with Standard of Practice 4.9
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

Yanacocha has developed and implemented an Environmental Monitoring Plan according to the approved Environmental Impact Study (EIA). A several of procedures have been prepared for the monitoring activities. The procedures cover biological, soil, surface water and groundwater. The procedures are updated every two years. The monitoring program is managed in the Discovery system.

The Procedure YAN-ENV-SOP-1174 describes the actions for Protection and Management of Biodiversity that includes planning, implementation, management, monitoring and restrictions actions to preserve and protect biodiversity, which complies with the in the EIA approved monitoring program.

The Procedure YAN-ENV-SOP-1206 defines the program for water quality monitoring, locations and sampling methodologies and frequencies, which complies with the in the EIA approved monitoring program.

The Procedure YAN-ENV-SOP-1206 is based on a Corporate Monitoring and Measurement Standard (IMS-013, Monitoring and Measurements), the Soil Monitoring Protocol (Peruvian Ministry of Environment), the Standard Methods for the Examination of Water and Wastewater (American Public Health Association) and the Peruvian National Water Authority Water Monitoring Protocol.

The protocols have been prepared by internal personnel and external consultants and is reviewed by the Environmental team.

The Water and Soil Monitoring Procedure (YAN-ENV-SOP-1206) describes the preparation actions for the sampling, the QA/QC samples (blank, duplicate and counter sample) to be taken, specific procedures for sampling, field parameter measurements, preservation of samples, labeling, storage and shipping.

Monitoring points, frequency, parameters to be analyzed, including CN species are described in Appendices of the Water and Soil Monitoring Procedure (YAN-ENV-SOP-1206), as well as a model of the chain of custody to use. CN species analysis marked on the chain of custody document dependent on the type of sample.

Section 5.1.5 of the Water and Soil Monitoring Procedure (YAN-ENV-SOP-1206) describe the sampling conditions to be registered. According to the procedure, the sampling conditions have to be registered for each monitoring point. All the records are maintained by the Environmental Department.

Biodiversity monitoring includes flora, fauna and aquatic life every six months capturing dry and rainy seasons. The Protocol of Biodiversity Monitoring (YAN-ENBV-SOP-1162) describes the methodology and requirements.

The monitoring frequency is based on risk, legal requirements, permits obligations, and operational needs. Surface water monitoring is monthly and ground water monitoring is quarterly; soils are monitored twice per year. The auditor considers that the monitoring frequencies are adequate to characterize the medium being monitored and to identify changes and trends in a timely manner.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Yanacocha has a Mine Closure Plan for the entire site, which includes the costs of the decommissioning measures of the cyanide-related facilities. The Mince Closure Plan has been developed according to the Peruvian legislation and is developed by a third party registered by the Peruvian Ministry of Energy and Mines. Yanacocha also has to follow the corporate Methodologic Guide for Mine Closure.

The Mine Closure Plan establishes the temporary, progressive and final closure activities, and its costs.

According to the Peruvian regulation, the Mine Closure Plan includes the decommissioning, demolition, and disposal of all processing facilities. The closure and rehabilitation of heap leach, waste dumps and pits are also described and the cost estimated. Post-Closure costs are also considered. The current Mine Closure Plan was submitted to the Peruvian authorities in March 2021.

Newmont internally requires annual updates for consistency with planning, which include a cost estimate for Asset Retirement Obligations reporting and financial audits.

The Mine Closure Plan establishes a closure and post-closure schedule. The schedule includes the implementation of progressive closure activities, final closure activities and post-closure monitoring and maintenance activities, as well as its associated costs.

According to the Peruvian regulations, Yanacocha has to update the Mine Closure Plan every five years, the next update is being prepared and will be submitted to the Peruvian authorities by Q1 2026. Yanacocha has also prepared modifications of the Mine Closure Plan every time a new facility was incorporated as required by Peruvian legislation. Newmont internally also requires annual updates for consistency with planning, which include a cost estimate for Asset Retirement Obligations reporting and financial audits.

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

The operation is: ■ in full compliance with Standard of Practice 5.2
□ in substantial compliance
□ not in compliance

Describe the basis for this Finding/Deficiencies Identified:

According to the Peruvian legislation, the cost calculation of the Mine Closure Plan should use third-party costs, because it has to cover the costs to close the mine in case the mining company cannot perform the mine closure, and the Peruvian government has to do the closure. Therefore, the estimated cost is to fully fund a third party to implement the closure activities, including the decommissioning measures of the cyanide-related facilities, and post-closure monitoring and maintenance.

According to the Peruvian regulations, Yanacocha has to update the Mine Closure Plan every five years, including the closure costs; Therefore, the costs of the cyanide-related decommissioning activities are also updated. The last cost update of the Mine Closure Plan was prepared in March 2021. Yanacocha is developing the next update of the Mine Closure Plan including the costs, it will be submitted to the authorities Q1 2026. In addition, Newmont internal annually updates the closure cost for the Asset Retirement Obligations reporting and financial audits.

Peruvian legislation establishes a financial assurance through a diversity of mechanisms for the amount of the final closure cost. The financial assurance has to be implemented yearly according to the mine life. Yanacocha has posted letters of guarantee to comply with this obligation. Letters of guarantee are the most used mechanism to establish the financial assurance in Peru.

In addition, the estimated Asset Retirement Obligation (“ARO”) of Newmont includes the Yanacocha mine and the cyanide-related decommissioning measures. External contractor audit company *EY* also audited the financial aspects of the ARO as part of the annual financial audit and concluded that the company has the capability of fully funding cyanide related decommissioning activities.

Yanacocha as Peruvian regulations require financial guarantees for closure. Yanacocha has established approved financial mechanisms to cover the estimated costs as required by local regulations.

Yanacocha no longer has a self- guaranteed mechanism in place. Yanacocha has established approved financial mechanisms to cover the estimated costs as required by local regulations of the Energy and Mines Ministry (MEM).

6. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.

Standard of Practice

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

The operation is: ■ in full compliance with Standard of Practice 6.1
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

The operation has written procedures for the tasks such as unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination prior to maintenance that should be conducted to minimize worker exposure, as well as others that require management of cyanide. Procedures are in the form of Standard Operating Procedures (SOP), Written Safe Work Standards (PETS due to its acronym in Spanish), that provide the general framework of safety standards, the Occupational Health & Safety Manual, Emergency Response procedures, Work Instructions, training materials and posted signs, among others. The same operational procedures reviewed under Standard of Practice 4.1, which focused on operations, also explicitly address operational safety issues as they describe safe practices. In addition, the operation has developed work permit systems and other safety-related procedures for more general activities which apply across various areas. These include, for example, lock out/ tag out, hot work and confined space entry permits. The level of detail in these procedures are commensurate with the risks involved with the tasks.

Site operational SOPs are derived from the risk assessment process called Hazard Identification, Risk Assessment and Controls (or IPERC in Spanish acronyms), which is applied by operational area managers to all routine and non-routine activities which are under their responsibility before they are executed. The risk assessment results are entered into the relevant operational area risk register. The risk assessment procedure requires a team-based process to assess task activities in a structured way. Where risk levels are determined to be unacceptable, the hierarchy of controls is utilized to ensure personal safety. SOPs are updated as necessary based on the results of the risk assessment.

The auditors reviewed these procedures confirming they describe cyanide-related safe work practices. The procedures detail task specific requirements, minimum training requirements to conduct the task, and procedures to follow in case of a contingency. Verification of the written procedures included review of the specific task, plans and worker interviews. Procedures were found to be sufficiently detailed to enable safe operation and to minimize worker exposure.

The written procedures include the use of appropriate personal protective equipment (PPE) such

as respirators, personal hydrogen cyanide gas monitors, eye protection, protective gloves, coveralls or suits. The use of personal protective equipment is addressed in the operating procedures, the safety policies, safety training programs and signs posted in specific work areas. Section 5.0 of all procedures addresses the selection and use of proper PPE. In addition, Yanacocha has the specific SOP for personal protective equipment detailing the type and standard of protective equipment required for each type of work, including inspections to detect signs of wear and tear to replace the PPE.

The procedures also include provisions for conducting pre-work inspections to identify safety issues or concerns, as appropriate and necessary for the operation. During pre-works inspections, operators are required to identify whether they have the required PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures. In situations where the task is non-routine, a job hazard analysis may be required to identify any risks associated with the work. The hazards associated with the task and the PPE required form an integral part of the procedures.

During the site visit the auditors checked that in areas where cyanide is present the operation has signs listing the PPE requirements. Also, during the site visit, the auditors observed that Yanacocha personnel used the PPE as prescribed by the procedures. Observations during the audit confirmed that hard hat, rubber boots, rubber gloves, chemical suits, face shields, handheld two-way radio, and HCN monitors were in use for tasks that were performed at the cyanide sparge/mix area.

Workers at the operation are given the opportunity to provide input to procedures via a variety of mechanisms including pre-shift meetings. Comments for improvement are directed to supervisors and/or management for consideration. New and revised documents go through a review procedure which may include feedback from area operators with significant experience in that area. Comments are incorporated and then updated procedures are disseminated to the supervisors for review with the crew for final review and implementation.

Every day workers have 5-minute meetings daily to discuss health and safety matters at all process areas of the mine. Any hazard reported the previous day are discussed and an opportunity for attendees to raise any additional issues is provided, including procedural changes. The auditors reviewed examples of these meetings records including examples concerning cyanide management and exposure.

The operation has weekly Health and Safety (H&S) meetings for supervisors to review the H&S statistics, and if necessary, propose modifications / improvements to written work procedures, as stated by the H&S Superintendent. There are monthly H&S Committee meetings, made up of workers and on the other hand the mine general manager, the doctor, the H&S manager and representatives of human resources and process areas. Workers participate and among others discuss health and safety issues related to new task-specific or procedural changes. Another opportunity to require and consider workers area the quarterly Crew Meetings and the Quarterly Safety Stops. By other side, the operation updates annually their safe standard operating procedures, performed with review of the H&S Committee.

Bruno Pizzorni
Lead Auditor

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

The operation is: ■ in full compliance with Standard of Practice 6.2
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

The operation's target pH is above 10, as stated in the plants SOPs for cyanide solution preparation. The auditor should also confirm that the operation implements its procedures to maintain the necessary pH of its process solutions. This may include monitoring pH at various points in the production process and adding reagents as necessary to maintain the proper pH conditions.

Yanacocha monitors the pH of the solution in-line pH meters located at the operational areas. This equipment report to the control rooms but can also be read manually at their locations. The in-line equipment are calibrated periodically. For each operation, the pH is measured automatically at key locations within the processing circuits and the results are displayed to operators via the Distributed Control System (DCS) at each process plant. Manual checks are conducted by operators as a check against the automatic monitors.

The auditors reviewed examples of the results recorded on daily operator log sheets covering the 3-year audit period that show the pH has been maintained above a value of 10 as recommended in the operating procedures. The auditors reviewed calibration records for the pH meters to verify that Yanacocha has maintained them in proper working order throughout the recertification period.

The operation has identified those areas and activities that may expose its workers to harmful cyanide concentrations in gas or dust above 4.7 and 10 parts per million (ppm) on an instantaneous basis and that cyanide-specific personal protective equipment should be worn where process, engineering, or administrative controls are not practicable or effective in limiting worker exposures to these levels. Yanacocha has established a number of high-risk areas where exposure to hydrogen cyanide (HCN) gas could occur, including areas within the cyanide mixing areas, carbon plants, Merrill Crowe systems and refinery areas. In 2010 Yanacocha undertook a risk assessment to identify high risk areas where workers have the potential to be exposed to HCN gas which was then used to select the number and location of fixed HCN monitors and then in 2014 updated this evaluation. Maps for each processing area were viewed highlighting the areas and activities where workers may be exposed to cyanide.

Workers have been alerted to need personal protective equipment through use of signage, operating procedures, and training. Process plants personnel are responsible for ensuring that adequate levels of signage and alarms are maintained throughout the plant to protect against HCN exposure. Workers are not allowed to work in areas or to perform activities that will be anticipated to continuously expose them to more than 4.7 ppm cyanide.

Yanacocha uses stationary and portable monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide gas in areas and tasks that may typically present a risk of exposing workers to concentrations of hydrogen cyanide (HCN) gas or cyanide dust exceeding 4.7 and 10 ppm on an instantaneous basis. HCN alarms are set to visually and sound alert operators at 4.7 ppm and 10 ppm. The alarm for 4.7 ppm activates a flashing strobe locally and an alarm shows in the control room alerting of possible high HCN gas in the area. At the activation of the alarm at 4.7 ppm, personnel must immediately leave the area until the area is safe to return work and the alarm is reset. Although HCN detectors alarms are set at 4.7 and 10.0 ppm, all actions such as evacuating the area are set for the low level first alarm; the higher alarm triggering at 10 ppm will find all personnel out of the area evaluating the situation. Alarm thresholds (4.7 ppm & 10 ppm) are hardcoded in the Programmable Logic Controller (PLC). These alarm thresholds will trigger an alarm in the control room.

The stationary HCN monitors are located at the cyanide mixing areas, carbon plants, and Merrill Crowe systems, these continuously monitored from the process plants control rooms. The risk assessment carried out in each plant identified where workers have the potential to be exposed to HCN gas which was then used to select the number and location of stationary HCN monitors. In addition, operators in high-risk areas wear personal HCN gas monitors. Personal HCN monitors have identical alarm thresholds as fixed HCN gas detectors. Operators and maintenance personnel were observed using these monitors throughout the audit. The operations has identified in its written procedures the actions that will be taken in the case that an alarm is triggered, such as evacuations, wearing of appropriate personal protective equipment, restrictions on entry, and investigations of cause. The auditors confirmed this by observation of monitoring equipment, employee interviews and review of records of monitoring results.

The operation maintains, tests and calibrates its stationary and personal hydrogen cyanide monitoring equipment as recommended by the manufacturers. HCN stationery and portable monitors are calibrated on a regular basis and records are kept for at least three years. Stationary HCN monitors are calibrated and maintained by the operation every 6 months, according to frequency and instruction of the manufacturer. Portable monitors are calibrated by a bump test every 24 hours, and according to schedule are sent to the supplier for maintenance and calibration according to the manufacturer directions, the supplier delivers a certificate.

Records of these activities for the last three years were available and reviewed by the auditor. Records included the actual calibration information in addition to the completed work order for equipment calibration.

Signage is displayed at the plants entrances and throughout the various facilities to alert personnel to the presence and/or possible presence of cyanide, access restrictions and the requisite PPE. Signs are placed, among others, on doors and entrances leading to the process buildings, posted at process tank installations, at heap leach pads, ponds and on gates entering to the operations.

The adequacy of posted signs was also evaluated with the overall safety training program at the operation and the educational level of the workforce. Signs prohibiting eating is mainly posted in reagent grade cyanide areas as eating is allowed only in designated areas of the operation and this prohibition is part of the operation's written training program. Similarly, signaling with the prohibition on open flames is in the vicinity of high-strength reagent cyanide, as hydrogen cyanide gas is highly flammable.

Verification was through visual inspection around the facility of the signs posted in Spanish the language of the workforce located in areas where cyanide is present. The auditors observed signs 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. Interviews with site personnel and review of the overall safety and training programs with respect to cyanide safety also confirmed the workforce has been adequately alerted to the presence and risks of cyanide.

High-strength cyanide solutions contain colorant dye for clear identification when observed out of proper containment and for clear differentiation with other solutions or rainwater that may be present. Red dye carmoisine) is added at a concentration that provides a clear visual indicator of the presence of high-strength cyanide solution. Dye is sent with the cyanide briquettes inside the isotanks so that at the sparging operation, the high strength cyanide solution results colored in red.

Safety showers, eyewash stations and fire extinguishers are available in different strategic locations throughout the operation. This equipment is available at reagent cyanide off-loading, mixing and storage areas, and other areas where personnel may be exposed to cyanide in the normal course of their work. The process plants are equipped with a number of stationary and portable safety showers/eyewashes to provide emergency rinsing in the event of chemical exposure. Safety showers and eyewashes are checked as part of daily inspection checklists to ensure that they are operational and that water streams and flows are adequate. In addition to the daily checks, routine preventative maintenance on the showers is completed by the Process Maintenance personnel no less than quarterly.

The auditors spot-checked the safety showers and eyewash stations confirming they were operating properly and confirmed that the water pressure at eyewash stations was not too high. Dry powder fire extinguishers are available where necessary.

The operation was able to present maintenance, testing and/or inspection records, including annual records of fire extinguishers inspections and maintenance to the auditors, demonstrating that this safety equipment has been routinely evaluated to ensure it is available if needed.

The operation has identified all tanks and pipes that contain cyanide solution, using adequate specific terminology, size of signs and labels, location and frequency, to ensure that individuals that may come into contact with cyanide solutions be alerted to its presence. Labeling provides workers with notice that cyanide is present as necessary to protect their health and safety. Pipelines and tanks that contain cyanide solution are labeled to enable plant personnel to identity the contents. Likewise, pipelines with high-strength cyanide solution between the distribution

tanks and the plants are properly labelled with their contents and direction of flow to allow personnel to understand the flow and possible exposures and/or response requirements for leaks and/or maintenance work. Pipelines to and from the pads are also labelled as containing cyanide with the direction of flow.

The site inspection showed that cyanide lines were painted purple, contained a process description such as spent solution and had the direction of flow indicated. Those lines containing high concentration of cyanide area, in addition are labelled with a red dot. In some instances, the entire lengths of pipelines were not painted or labeled, however it was possible to ascertain the contents by tracing the line a short distance.

During the walkthrough to the process plants, the auditors observed the operation was in painting process and scheduled maintenance. It still needed to complete the work painting and signaling the pipelines with CN. The operation was required to complete painting works, flow signaling, and identification on cyanide-containing pipelines. After the audit, the operation sent pictures showing evidence of pipes painting in channel CIC PL – from October 15 to 17, 2024. Previously they also showed painting and marking of pipes with cyanide in areas of cyanide solution preparation according the maintenance plan. No additional information was required to find this in compliance with the Code.

All tanks containing cyanide solution were labeled with a tank number and labelled as to its contents or use. Verification was by visual inspection. Storage and preparation areas, process tanks and piping containing cyanide are properly identified to alert workers of their contents.

The auditors visually inspected the cyanide piping and tanks at the facility, which included following the reagent pipeline from the off-loading tank to the locations that the cyanide is added to the production circuits. The auditors also reviewed analytical data to confirm that unlabeled pipes or tanks, and those without the flow direction indicated, containing process solutions with cyanide concentrations do not represent a threat to worker health and safety, finding it in compliance.

Employees have access to Material Safety Data Sheets (MSDS) and other information on cyanide first aid in areas where cyanide is used, this information is available where reagent-strength cyanide is managed. All safety information provided by the operation is in Spanish the language of the workforce. Hard copy documents are maintained locally in areas such as the cyanide offloading and storage areas. First aid instructions for cyanide exposure are located in each first aid kit/emergency response cabinet, which are placed in areas where reagent grade cyanide is handled and in the process control rooms. MSDS are located in cabinets near them.

The auditors observed that safety and warning signage, MSDS, first aid procedures and other safety information as emergency response requirements was to alert personnel in the high-risk cyanide areas. The need and availability of this information was according to the context of the operation’s overall safety and training programs.

The operation has a written procedure for investigating and evaluating incidents that is designed to determine if the operation’s policies and programs are adequate to prevent such incidents or

if they need to be revised. The procedure applies to all mine workers, and is applicable to all types of incidents, including cyanide-related incidents.

The auditor reviewed the written procedure Newmont Corporation Safety and Sustainability Event Management Procedure NEM-RMS-PRO-010 dated August 2024, as well as records of past investigations. As there was no cyanide-related incidents during this recertification period, records of other accidents and incidents were reviewed to confirm that the operation is implementing the general program for incident investigation. The auditor reviewed the incident report documents in the Enablon Platform software with detailed information.

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

The operation is: ■ in full compliance with Standard of Practice 6.3
□ in substantial compliance
□ not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The operation has the necessary equipment for emergency response to a worker exposure to cyanide. The auditors verified that the operation has Auxiliary Manual Breathing Unit (AMBU), Automated External Defibrillators (AEDs) and Cardiopulmonary Resuscitation (CPR) face masks available that can be used with medical oxygen to attend patients that are not breathing. Water, oxygen, emergency response equipment, radios, cell phones, and alarms are available in the process plant and medical units. Oxygen bottles, emergency response equipment and first aid kits are located throughout all the places at the process plants where cyanide in reagent grade is present and at the mine´s medical facilities.

The content and location of the emergency cabinets is indicated in Annex 1 and 2 of the Emergency Response Plan (ERP) for Cases of Cyanide Exposures. They are located at each facility near the unloading and mixing areas, containing 3 oxygen cylinders of one cubic meter capacity, 3 masks with non-recirculating reservoir, a valve mask type AMBU bag, 6 pairs of latex gloves, gauze dressings, packages of activated carbon of 50 grams, bottles of water, disposable cups and teaspoons, isothermal blankets and the Standard Handling and Treatment Procedure for Cyanide Exposure. Yanacocha is used as cyanide antidote the Cyanokit (hydroxycobalamin), stored at the medicals units of Yanacocha kilometer 37 and kilometer 52. The auditors confirmed that the antidote kits are stored at the correct temperature and that they have not expired.

Antidotes available on site are maintained within the prescribed temperature range and labeled expiration date. The oxygen cylinders are maintained full and the oxygen casing kept free of cracks, dirt, grease and oil.

The operation inspects its cyanide first aid equipment regularly. Both H&S personnel and plant operators periodically inspect the emergency cabinets at the process plants and document these inspections. Cyanide antidote kits are inspected by paramedical personnel at the medical units.

Inspection records were available for the auditor's review. The auditor observed the dates on antidotes to ensure they have not expired and confirmed that they are stored within the temperature range specified by their manufacturer. Oxygen tank pressures were checked during the audit. Verification was through visual examination of the antidote kits expiration dates, interviews with onsite doctor and nurse personnel, and review of inspection records. The medical personnel inspect the ambulances and their contents on a weekly basis using a checklist. The auditors inspected an ambulance to ensure that they started, gas tanks were full, sirens/horns/lights worked, radios functioned, and emergency equipment was present and in good condition.

The operation has the written procedure Standard Handling and Treatment Procedure for Cyanide Exposure detailing the necessary response to cyanide exposure through ingestion, inhalation and absorption through the skin and eyes. This procedure is included in the cyanide first aid cabinets. The first responder in the place initially will aid the victim securing the area and administrating oxygen, then will come the Emergency Response Team (ERT). Specific instructions are given for treating victims who are exposed to hydrogen cyanide and cyanide solutions via inhalation, ingestion, and dermal routes. Instructions detail the steps to be taken for conscious versus unconscious victims. Then the medical services will receive the victim decontaminated by the ERT to receive treatment, if necessary.

Yanacocha has onsite capability to respond with first aid and medical assistance to cyanide exposures. With respect to equipment, Yanacocha has two medical units attending emergencies 24 hours per day. If transfer to a hospital for intensive medical care is needed, Yanacocha has a specialized medical care unit (UCE) available at Limatambo Clinic in Cajamarca city, approximately 45 minutes from the mine. Yanacocha has three ambulances 24 hours per day at the mine site, eight resuscitators (defibrillators) distributed among their medical units and ambulances, an electrocardiograph, a mechanical blowhole, a rescue truck and a fire truck for the brigades. The auditors reviewed examples of the maintenance records for medical equipment including defibrillators (resuscitators), electrocardiograph, mechanical blowholes and checklists of ambulance operation covering the 3-year audit period.

Equipment for the brigades and first responders includes Tyvek suits, firefighting suites, fully encapsulated suits, SCBAs, rubber boots/gloves, face shields, fall harnesses, traffic cones, shovels, spill cleanup kits, decontamination supplies, spray washers and air compressors.

In terms of staffing, Yanacocha clinics are staffed with one doctor and one nurse on day shift and a clinic technician on night shift. The doctor resides at the La Quinua medical unit. The clinic technician role is to assist in the clinic and drive the ambulance. The clinic staff is engaged by Clinica Limatambo under contract to Yanacocha. In addition to treating workers, the doctors and nurses actively train staff in first response capabilities. Every process shift has a first responder trained to administer oxygen at each process area. Only on-site medical professionals are expected to administer the hydroxycobalamin cyanide antidote. The auditors reviewed training records demonstrating that designated response personnel have received specific training in cyanide first aid, including administration of oxygen.

The operation has a written procedure in the event that an exposed worker requires treatment at an off-site medical facility. The procedure “Medical transfers from level I to level II specialized health care” describe the actions to transfer patients from site to offsite medical treatment facilities at Cajamarca. Clinica Limatambo, Yanacocha’ s subcontractor, also has its own procedures for patient transfer. Yanacocha has a contract with Clinica Limatambo for evacuation service and onsite medical service. Yanacocha also has a contract with the Clinica Limatambo to assist workers exposed to cyanide. In case of an emergency, Clinica Limatambo will provide an evacuation service using a Yanacocha ambulance. Specialist staff from Clinica Limatambo will accompany the worker exposed to cyanide to Clinica Limatambo for intensive medical care in the specialized medical care unit (UCE) in Cajamarca, located less than one hour away. Yanacocha maintains three ambulances which are available for transporting patients where required. The clinic technicians double as ambulance drivers.

Yanacocha has formalized arrangements with the local hospital, Limatambo Clinic. These providers are aware of the potential need to treat patients for cyanide exposure. The operation is confident that the medical facilities have adequate, qualified staff as they have been trained by Yanacocha’ s medical personnel and is confident about its equipment and expertise to respond to cyanide exposures. The auditors reviewed the contracts with Clinica Limatambo to verify compliance.

7. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

Standard of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

The operation is: ■ in full compliance with Standard of Practice 7.1
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

Yanacocha has developed an Emergency Response Plan titled “Readiness and Emergency Response Plan,” which is a compendium of emergency plans to facilitate the flow of information, support, and assistance during emergencies including accidental releases of cyanide at the mine or during transportation. At a corporate level, Yanacocha has implemented Newmont´s Rapid Response System (RRS). The RRS aims to mitigate and prevent the escalation of adverse consequences in the event that existing risk management controls fail. When an incident or issue occurs that can have the potential to seriously threaten Newmont's operations, reputation and the safety and well-being of its employees a decision is made by the Site Emergency Controller whether to implement the RRS.

The Yanacocha Emergency Response Plan (ERP or Plan) contains guidelines and policies established to preserve the safety of employees. This Plan deals with the general information for the coordination of emergency responses including the types of emergencies, communication flowcharts, responsibilities, and response team structures. The emergency procedures in the ERP have been prepared for different scenarios: management of a fire, hazardous material, medical, rescue, or other emergency incident.

The Plan is an adequate document that addresses the potential release scenarios at the site in a realistic manner and with an appropriate degree of specificity. The Plan adequately describes how response actions are to be accomplished, and that response actions are site specific and described step by step. The Plan and associated documents consider a number of cyanide failure scenarios appropriate for the operations site-specific environmental and operating circumstances. The emergency procedures have been referenced against each of the potential cyanide failure scenarios:

a) Catastrophic release of hydrogen cyanide from storage or process facilities. The emergency level will be evaluated according to the Newmont´s Rapid Response System (RRS) severity matrix, the ERT will act. Emergency plans related to this scenario are the Contingency Plan for Hazardous Material and Chemical Spills, Contingency Plan for Injuries or Medical Emergencies, and SOP Emergency Response.

b) Transportation accidents. Yanacocha purchases its sodium cyanide from Orica under a Purchase Agreement. Orica is both the cyanide producer and transporter. Orica´s cyanide transporter will be first responder to an emergency on the road; secondary response will be by Rescue Tech contractor; tertiary response will be the Newmont SSR response system. Yanacocha has contracted Rescue Tech to coordinate any emergency response in the event of a transport accident en route to the mine. The auditors reviewed records of coordination meetings for emergency response between Rescue Tech and emergency response authorities along the route. In addition, Yanacocha has also developed and implemented the following contingency procedures for transportation accidents: Contingency Plan for Vehicle Accidents, Contingency Plan for Off-Site Emergencies, Contingency Plan for Transporting Hazardous Materials, and Contingency Plan for Sodium Cyanide Transportation.

c) Releases during unloading and mixing. SOPs for cyanide preparation at each process plant address cyanide releases; in addition, this issue is addressed in other ERP documentation: SOP Cyanide Solution Preparation – Sparge System Pampa Larga, Cyanide Solution Preparation – Sparge System Yanacocha Norte, Cyanide Solution Preparation – Sparge System Gold Mill, Contingency Plan for Hazardous Material and Chemical Spills, Cyanide Exposure Instruction and Spill Management.

d) Releases during fires and explosions This emergency has been evaluated in the risk identification and hazards evaluation matrix. Temporary cyanide storage in sparge tanks and handling facilities are located away from incompatible chemicals and ignition sources. Nonetheless, Yanacocha has developed and implemented the ERP Firefighting Plan.

e) Pipe, valve and tank ruptures. Pipes, valves, pipelines and tanks have secondary containment. Leakage from the process or reclaim water pipeline would be contained within the HDPE-lined secondary containment corridor. The pipelines would be shut down and repairs would be completed to the ruptured pipe(s). Any process solution would gravity drain to the containment pond. The pipeline and tanks are designed to drain back to the ponds. Nonetheless, the following contingency plans have been developed: ERP Contingency Plan for Hazardous Materials and Chemical Spills, Contingency Plan for Cyanide Solution Ponds Overflow.

f) Overtopping of ponds and impoundments. Section 4 of the ERP Contingency Plan for Cyanide Solution Ponds Overflow describes the measures corresponding to overtopping. The plan establishes procedures for alerting, containing, controlling, evacuating, and sheltering people. The plan defines responsibilities and provides procedures designed to identify unusual and unlikely conditions that may endanger the ponds and impoundments, as well as corrective actions and public notifications.

g) Power outages and pump failures. There are backup generators to power the equipment necessary to contain and control process solutions. If there was a spill due to power failure, then the Contingency Plan for Hazardous Material and Chemical Spills would be used.

h) Uncontrolled seepage. Section 2 through 4 of the ERP Contingency Plan for Emergencies in Tailings Storage Facilities (TSF) describes the measures corresponding to emergencies due to uncontrolled seepage and failure of tailings impoundments and heap leach facilities. The Plan

defines responsibilities and provides procedures to identify unusual and unlikely conditions that may endanger structures. The plan identifies corrective actions and public notifications.

i) Failure of cyanide treatment, destruction or recovery systems. Yanacocha has excess water treatment plants (EWTPs) to destroy cyanide and remove metals prior to direct discharge during the rainy and wet season. These plants are located at the Yanacocha Norte and Pampa Larga process areas. Additionally, Yanacocha operates two acid water treatment plants (AWTPs) to manage acidic drainage from mine water facilities. The AWTPs are located at the La Quinua and Pampa Larga mine areas. The following contingency plans have been developed: ERP Contingency Plan for Hazardous Material and Chemical Spills, and Contingency Plan for Cyanide Solution Ponds Overflow. In addition to the evidence above, Yanacocha supported the design philosophy of the system, where through a set of procedures they have alternatives for cyanide destruction systems in case of failure of any of them. The auditor reviewed the following information in this regard: Memo WP 082024 Operational Water Balance Rev. B; Spill Management Procedure (4); YAN-HS-STA-ERP- 12.02 Contingency Plan for Cyanide Spills or Leaks V.01; YAN-HS-STA-ERP-31.01 Contingency Plan for Overflow of Pools with Cyanide Solution (1).

j) Failure of tailings impoundments, heap leach facilities and other cyanide facilities Section 2 of the ERP Contingency Plan for Emergencies in TSF describes the measures corresponding to emergencies due to failure of tailings impoundments and heap leach facilities. The plan establishes procedures for notifying, evacuating, and sheltering of people at risk. It also covers actions in case of flooding caused by failures.

Yanacocha works together with Orica and with DCR – an ICMI certified transporter- to ensure that all transportation-related emergencies are considered and that emergency response plans for such incidents are on file and up to date. DCR is responsible for the cyanide delivery from Orica´s transfer plant in Ventanilla, Callao to Yanacocha' s cyanide sparge mixing areas in the mine site. Cyanide is transported to site in isotanks.

DCR considers the transportation route, physical and chemical form of the cyanide, method of transport (trucks), the condition of the roads and the design of the transport vehicle during the development of their emergency response plan. DCR will be responsible in the event of an emergency in route (spills, accidents, etc.). DCR has an emergency response vehicle that escorts every cyanide delivery convoy.

The lines of responsibility for safety, security, release prevention, training and emergency response as they relate to transportation of sodium cyanide are outlined in the agreement for sodium cyanide purchase and transport to Yanacocha with Orica. All cyanide transporters are certified transporters under the Code and are required to comply with the Code's Cyanide Transportation Verification Protocol. In case an emergency occurs prior to the delivery of the cyanide to Yanacocha mine site, then Orica and DCR are responsible for emergency response as well as the remediation and cleanup in case of a cyanide release. Verification was conducted by reviewing the Code's certifications of the cyanide providers' supply chain of cyanide to Yanacocha and review of DCR and Orica Emergency Response Plans.

Cyanide response plans and procedures have been developed to provide a suitable level of detail to ensure that effective response can be completed in an emergency situation. The ERP sections describes specific response actions (as appropriate for the anticipated emergency situations) such as clearing site personnel from the area of exposure, use of cyanide antidotes and first aid measures. The emergency response procedures and contingency plans describe the organization and specific response actions to be followed in the event of an emergency. These plans describe specific management, Emergency Response Team (ERT) and employee actions to be followed for the identified scenarios.

Yanacocha ERP includes a list of telephone numbers with the name of the contact to be reported in the communities downstream of the Rio Rejo and Rio Grande in case of overflow of the facilities with cyanide solution. Communication and interaction with these people is in charge of the Community Relations Area.

Yanacocha has also developed a procedure to guide the onsite treatment of cyanide exposure victims. The procedure covers the process to follow for cyanide ingestion, eye contact, skin contact, and inhalation. The cyanide antidote procedure is also detailed. The mine has developed a site instruction detailing the process to transfer patients from site to offsite medical treatment facilities, as well as a procedure describing the process for transferring patients to offsite primary and secondary health care facilities.

The plans define team member responsibilities, communication procedures for notifying outside emergency response resources, government agencies, the community, other stakeholders and the press. Detailed emergency responses (i.e., critical valves, switches, pumps) for reagent strength cyanide are found in the specific individual work procedures.

7.2 Involve site personnel and stakeholders in the planning process.

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

Describe the basis for the Finding/Deficiencies Identified:

The Emergency Response Plan and procedures developed for Yanacocha involve cross-functional teams from the Process, Health, Safety, Security, Environmental, Community Relations and other departments as needed. This helps to ensure that adequate consideration is given to the various impacted stakeholders and ensures that personnel understand and are aware of their roles in an emergency.

Yanacocha' s workforce is regularly approached by the operation through meetings held after each emergency drill, the monthly meeting of the H&S Committee and the monthly H&S meetings with contractors. The ERP is updated annually during a staff meeting where the input received from the workforce is taken into account. The auditors reviewed examples of the H&S meeting records where emergency response is discussed. In addition, Yanacocha solicits the input of their workforce via direct communication to supervisors or during daily meetings where

emergency response issues can be discussed. Monthly meetings are also scheduled to discuss health and safety issues related to new task-specific changes. Changes to the ERP are discussed at this meeting.

Yanacocha is part of the Civil Defense committee in Cajamarca and as such is in permanent coordination with the authorities, including the emergency responders. The firefighters and police have received the contingency plan for cyanide spills, informing them that for level three emergencies their response capacity is required. They have shared the emergency response plan with them, requesting that it be disseminated among the firefighters of the city of Cajamarca. There are several brigade members working at the mine. The medical responders are contractors of the Clínica Limatambo. The communities do not have responsibilities assigned in the emergency response plan.

Potentially affected communities along the cyanide transportation route are informed by the contractor Rescue Tech, who meet periodically with authorities and emergency response agencies such as the police and firefighters, to explain the ERP and ask for their input. The auditors reviewed meeting reports covering the 3-year audit period. Verification was conducted by reviewing records of meetings, topics and attendance records of community meetings, power point presentations and the course attendance records

The operation has informed potentially affected communities about the nature and risks associated with accidental cyanide spills. The operation showed records of the communications made about the emergency response plan to 15 locations, and among them to the following communities: Caserío Cince; Las Vizcachas; Hualtipampa Alta and Hualtipampa Baja.

Yanacocha has periodic meetings with communities and emergency response agencies such as firefighters and hospitals along the transportation route. Besides explaining the ERP, they inform about the mine activities, hazards and control measures, , Yanacocha provides them with 2- and 3-day instruction in different emergency topics: APELL (Guidance for the Mining Industry in Raising Awareness and Preparedness for Emergencies at Local Level), ERT training, first cyanide aid, confined spaces and HAZMAT. Also, information to communities on cyanide (including risks and emergencies) is provided in written format by means of reports available online to the public. During the years 2023 and 2024, the operation held informative workshops with the surrounding communities on the failures in could occur due to strong earthquakes.

Yanacocha has involved outside responders such as firefighting companies and local authorities along the cyanide transportation route, by means of Rescue Tech, a specialized emergency response company who is communicating and training outside responders along the cyanide transportation route to the mine. Yanacocha' s onsite medical provider is Clinica Limatambo at Cajamarca. The auditors reviewed the contract between Yanacocha and Clinica Limatambo for onsite medical service covering the 3-year audit period. The auditors also reviewed the reports on Yanacocha' s training in cyanide response to Cajamarca´s Limatambo Clinic and local response agencies.

Yanacocha actively solicits the input of their workforce to keep the ERP current, via direct communication to supervisors or during daily meetings where emergency response issues can be discussed. Monthly meetings are scheduled to discuss health and safety issues related to new task-specific changes. Changes to the ERP will be discussed at this meeting. For emergencies in inland cyanide transport, Yanacocha has involved outside responders, such as firefighting companies and local authorities along the cyanide transportation route, by means of Rescue Tech who is communicating with and training outside responders along the cyanide transportation route to the mine. Yanacocha also solicits the input of various stakeholders during the emergency response mock drills evaluation process. The ERP is a controlled document and has been reviewed and updated annually according to Yanacocha' s Document Control Procedures. Yanacocha sends a copy of the emergency response plan to the fire department and police after each annual update and then calls a meeting where the changes are communicated.

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

The operation is: ■ in full compliance with Standard of Practice 7.3
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

The cyanide-related elements of the Emergency Response Plan and associated documents:

a) Designate the Incident Commanders and the establishment of an Emergency Operations Center (EOC). The Incident Commander has the authority to commit the necessary resources. Primary and alternate Emergency Response Team (ERT) Coordinators are specified on the ERT Roster.

b) Identifies the ERT members, their contact details including mobile phone numbers, and the ERT team they belong to. First responders are the workers in the area where the event occurs. The second responders are contractors Rescue Tech emergency response team (ERT) and Limatambo medical services. Rescue Tech has 10 brigadists on site per shift and Limatambo medical personnel. In the event of an event, the Control Center is called and they communicate with the second responders.

c) Require appropriate training for emergency responders. The annual emergency response training program details the training program required for all employees, managers and officials, transport carriers, and ERT members. All employees are required to take first aids and firefighting courses; managers and supervisors: incident management including Newmont RRS; transport carriers HAZMAT course; and ERT members firefighting course, advanced first aid, vehicle rescue course (vehicle extrication), rope rescue, HAZMAT and incident management.

d) Include call-out procedures and 24-hour contact information for the coordinators and response team members The ERP Communication in Case of Emergency, details the communication process and general 24-hour contact numbers. The ERT Roster identifies the ERT members, their contact details including mobile phone numbers, and the ERT team they belong to.

e) Specify the duties and responsibilities of the coordinators and team members. The ERP Responsibilities Before, During and After an Emergency, details the duties and responsibilities for the incident commander, the brigade members, supervisors, managers, and security control center personnel. The ERP Emergency response system organization details the emergency response system organizational chart.

f) List emergency response equipment, including personal protection gear, available onsite The ERP 90-01 Appendix shows the emergency equipment list for the ERT. The ERT Leader maintains inventory list.

g) Include procedures to inspect emergency response equipment to ensure its availability. The SOP PP-E 11.01 Inspections specifies the type of inspection, responsible department, and inspection frequency. In addition, it contains blank versions of the inspection forms. The operation conducted routine inspections of its emergency response equipment over this ICMC recertification period.

h) Describe the role of external responders, medical facilities and communities in the emergency response procedures. The ERP Newmont Rapid Response System and the ERP Introduction and Policies consider the roles of external responders. For emergencies Level 3 or "High Level" that exceed the resources available at the site, Yanacocha may consider external support offered by the government, industry and/or other companies. The ERP Contingency plan for off-site emergencies indicates which public entities will support in a transport emergency.

Verification was through interviews with the Health and Safety Superintendent, medical staff and review of the ERPs.

The operation has made external entities included in the Plan aware of their involvement and has included them as necessary in mock drills or implementation exercises. The ERP Drills procedure and annual plan details the types and schedule of emergency drills. Limatambo Hospital´s personnel participates in the drills and training provided by Yanacocha through the mine´s health safety work area. The medical staff of the clinic visits the mine operations annually. They receive courses in firefighting, first aid and emergency response. Orica has conducted trainings along the route from Ciudad de Dios to the operation.

The auditors reviewed records of meetings and confirmed that these entities sent copies of the Emergency Response Plan and interviewed on- site personnel confirming this interaction.

Yanacocha is part of INDECI (Institute the Civil Defense) committee in Cajamarca and as such is in permanent coordination with the authorities, including the emergency responders. The Regional Government of Cajamarca, through INDECI, coordinates and trains with Yanacocha, especially on the issue of bush fires, where there are also opportunities to review cyanide issues, if necessary.

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

The operation is: ■ in full compliance with Standard of Practice 7.4
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

Yanacocha emergency response plans include procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities in the case of a cyanide emergency. The ERP-02.01 Communication in Case of Emergency and the ERP-02.02 Newmont Rapid Response System detail the communication process and contact numbers for emergency response. The Security Control Center, available 24-hour, maintains a detailed emergency contact list of all stakeholders. The ERP-02.03 Emergency response system organization details the emergency response system organizational chart. In the event of any emergency, workers should all the Control Center where all the emergency telephone contact lists are available. For level 2 and level 3 emergencies, the Newmont rapid response system will be activated.

The auditors reviewed the Emergency Response Plans documentation verifying that contact information for the entities listed was available and randomly checked if it was up to date, finding this in conformance.

The Emergency Response Plans provide clear lines of responsibility for relevant departmental personnel to contact and notify community members of emergency situations. The Control Center maintains a detailed emergency contact list of all stakeholders including a listing of key community leaders and potentially affected people in the nearby communities. The Newmont rapid response system provides a protocol and contact information to ensure that media inquiries and communications are adequately handled and communicated in an appropriate manner by authorized personnel. The ERP-02.01 Communication in Case of Emergency details the communication process and general 24-hour contact numbers for emergency response. The ERP-02.03 Emergency response organization details the emergency response system organizational chart. The Environmental and Social Responsibility Department is listed on the organizational chart for the purposes of notifying communities and liaising with the media. The transportation company is responsible for any transportation related cyanide releases. The necessary information was available for the auditor’s review in the Emergency Response Plans.

Newmont Corporation´s document Safety and Sustainability Event Management Procedure NEM-RMS-PRO-010 requires in Section 3 that within a period of time less than 12 hours from the potentially significant event, the company's Health and Safety team is responsible for

reviewing all cyanide-related events to determine if notification to the International Cyanide Management Institute (ICMI) is required based on "Significant Cyanide Incidents" as defined by ICMI.

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

The operation is: ■ in full compliance with Standard of Practice 7.5
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

The ERP sections and associated environmental procedures describe specific information on cyanide event remediation activities including control and containment of any spilled/released material. Specifically, the plans include guidance on:

a) Recovery and/or neutralization (if required) of solids and solutions for final disposal. The ERP-40.01 Contingency Plan For Sodium Cyanide Transportation and the ENV-PR-001 Spill Handling Procedure provide information on the recovery and disposal of spilled solid cyanide and solution, as well as the neutralization and decontamination of soils and equipment. The Contingency Plan (ERP-401), Section 3.12 Spill on soils, describes the procedure to clean contaminated soil due to cyanide solution spills as applicable for transport, pads, and process plants. The procedure specifies that spills be swept or shoveled into designated containers and that the material is kept dry. Berms or dikes are to be constructed, as necessary, to prevent wider spread of the spill and prevent it from reaching watercourses. According to Table 3 of the Spill Handling Procedure , the cyanide solution spill kits are stored at four different areas of the mine: Carachugo, Yanacocha Norte, Gold Mill, la Quinua and at the General Warehouse.
b) For decontamination and remediation of the affected areas, Section 5.3.3 of the Cyanide Management General Plan (MA- DI-015) addresses the procedures for decontamination of soils and water. The contaminated area must be evacuated and soil impregnated with cyanide disposed of in the nearest leach pad cell, after coordination with the corresponding supervisors. Section 5.3.2 addresses cyanide spills neutralization for each scenario according to Table 1 Dosing Parameters for Neutralizing Cyanide Spills. Decontamination of soil is also addressed in the Contingency Plan for Sodium Cyanide Transportation (ERP-40-01). The Spill Handling Procedure addresses monitoring the affected area once the cleaning tasks in the area have been completed. It should be verified by taking one or more soil samples in the absence of cyanided solution. Final cyanide concentration allowed in residual soil as evidence that the release has been completely cleaned up is required by the Environmental Quality Standards (ECA) for Soil local regulations. If the spill has reached water courses, water samples will be taken at the downstream impacted area to verify the presence of cyanide.

c) Management and/or disposal of spill clean-up debris. As noted in the Spill Management Procedure (Env. PR-001), spilled cyanide solutions within the process plants will be returned to the process circuit. Spill clean-up materials are to be disposed of on the heap leach pad.

d) Provision of an alternate drinking water supply. The water source at Yanacocha is bottled water. As such, there is minimal risk of cyanide contamination to drinking water. As a precaution, Yanacocha has placed signs above the water faucets in cafeteria and bathrooms to not to drink that water. Although it does not specify how Yanacocha would provide an alternate drinking water supply, Section 7.5 of the Cyanide Management General Plan (MA-DI-015) includes the commitment to provide drinking water to nearby residents if their supply is contaminated with cyanide.

Section 5.4 of the Spill Management Procedure (YAN-ENV-SOP-1166) describes the requirements and precautions for cyanide spill cleanup which prohibits use of neutralizing agents as sodium hypochlorite and hydrogen peroxide to treat cyanide that has been released in areas where it could reach storm water collection or surface water bodies. The YAN-HS-STA-ERP-26.01 Contingency Plan for Sodium Cyanide Transportation prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The procedures also note that these chemicals may be used in an emergency only, when concerns with protection of human health outweigh the risk to aquatic life and an engineered system to introduce these chemicals into a surface water body has been designed.

The Spill Management Procedure (YAN-ENV-SOP-1166) addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release. The Water And Soil Monitoring Procedure (YAN-ENV-SOP-1206) describes the sampling methods, parameters and, where practical, possible sampling locations. The procedure specifies response actions consisting of investigating the migration of the release; having trained personnel stop the release when safe to do so; collection of a sample of the release to determine concentrations, treatment, clean up and remediation; collection of analytical information on released material; and confirmation samples from the cleanup. The procedure describes where samples should be obtained, proper sampling methodologies, and parameters.

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

The operation is: ■ in full compliance with Standard of Practice 7.6
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

The operation reviews and evaluates the cyanide-related elements of its ERP. The YAN-HS-STA ERP-01.01 Introduction, Policy, Objective and Definition of an Emergency, requires the plan to be reviewed annually or reviewed after cyanide emergencies level three. Yanacocha also provided versions of the ERP for the recertification period, supporting that this document is reviewed and updated periodically.

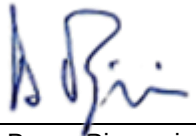
Yanacocha conducts cyanide emergency drills periodically as part of the emergency response plan evaluation process to test the emergency readiness and response of Process Plant, ERT, Environmental, Security and other relevant departments and personnel. The operation's program for conducting cyanide emergency drills includes conducting drills at least annually. Drills are developed to include a variety of locations and scenarios including environmental release and exposure responses. Drills are developed in advance and risk assessed to minimize potential impact of event unreadiness. Verification was through interviews with the Health and Safety Superintendent and review of the drills reports performed during the recertification period.

In September 2024, they carried out an emergency drill for cyanide poisoning. The drill included the participation of 18 workers. After the drill, a feedback meeting was held where opportunities for improvement were found and the necessary actions are being taken. Also in September 2024, they carried out another drill for a solution spill for Injection Leaching activities in La Quinua 8 leach pad. 17 workers participated in this drill. Another drill was carried out in November 2023 at the Pampa Larga process plant, where they simulated a cyanide leak with two unconscious intoxicated workers. On this occasion, 24 workers participated. All these drills were field exercises, testing the entire cyanide emergency response process from initial notification to close-out.

The auditors reviewed the reports and attendance records as well as completed actions for which this aspect was found in compliance.

Provisions are in place to evaluate and revise the emergency response plan after any cyanide-related emergency. Yanacocha requires that all cyanide related emergencies are investigated and drills evaluated to develop corrective actions and continuous improvement opportunities. Yanacocha requires the ERP to be reviewed annually and reviewed after of cyanide emergencies level three. Events and mock drills will be debriefed to identify and document improvement opportunities and actions for assignment to appropriate personnel. During the 3-year audit period the ERP was not activated for any incidents, so no changes to the ERP were made as a result of an emergency. The auditors reviewed the operation's incident reports; all incidents were reported as minor environmental spills.

Events and mock drills will be debriefed to identify and document improvement opportunities and actions for assignment to appropriate personnel. During this recertification period there was no event needing to activate the ERP, no reviews to the ERP have been performed due to this reason.



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

Standards of Practice

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

The operation is: ■ in full compliance with Standard of Practice 8.1
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

All personnel and visitors to the site attend a site induction training which discusses cyanide hazards present on the site. In addition to the general site induction, a Process Plant Induction is required for all personnel with process plant access. This training provides a plant overview and includes environmental, health, and safety standards tor working inside the plant area inclusive of cyanide risks and sate operating practices. The training covers but is not limited to locations where cyanide is present, alarm response, PPE requirements, safe handling and management guidelines, symptoms of exposure, cyanide first aid and emergency response. Training is in charge of ALCOMEX contractors and Metallurgical Training and Consulting.

Yanacocha's procedure "Management of Training HRM-PR-03" and YAN-HS-STA RO-018-01 which describes: Establish the guidelines for Yanacocha employees and its Contractors to receive training and training, based on the competencies of each job and the identification of needs associated with health and safety risks and the development of continuous improvements. The procedures establish the guidelines for employees and contractors to receive training based on the risks associated with safety, occupational health and management. The annual training program is approved by the Health and Safety Committee.

Yanacocha trains its workers to recognize cyanide hazards, intoxication symptoms, and first aid, including how to use the cyanide kits. Among others, the auditors reviewed training records of the course First Emergency Response with Hazardous Materials Containing cyanide, Cyanide Management course and records from the First Response course. The auditors reviewed the training programs, spreadsheets for training follow-up, the power point presentation on the cyanide general induction, examples of the tests results and workers certificates approving the general induction in cyanide handling and cyanide poisoning. Interviews with site personnel confirmed they had completed hazard awareness training and knew how to identify hazards.

In addition to the site induction training programs, the mine also provides a number of additional hazard identification training courses and inspections to ensure that personnel are able to identify and report hazards that they observe in their respective work areas. For personnel and visitors requiring infrequent plant access, escorts are used to ensure their safety whilst inside the plant facilities.

Cyanide hazard recognition refresher training is conducted annually at Yanacocha for all personnel. The Training Procedure YAN-HS-STA RO-018-01 addresses annual refresher instruction. The auditors reviewed the annual training program and spreadsheets for data induction where refresher training is also documented, as well as examples of the attendance lists. Interviews with site personnel confirmed they had completed hazard awareness training and that refresher training was completed.

Yanacocha retains the cyanide training records throughout an individual's employment documenting the training each worker receives. The records 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. The auditor reviewed examples of initial induction training and refresher training covering the audit period to verify compliance. The auditor was able to review both electronic and hard copy records, including records for those employees that were interviewed during the site visit. Employee training requirements and completion records are maintained and managed.

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

The operation is: ■ in full compliance with Standard of Practice 8.2
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

All personnel that work in the plant must undergo training prior to being allowed to work at the process plant. The Guidelines For Specific Work Training (YAN-HS-STA RO-018-01) require instruction on the SOPs to be performed by the supervisor of each new or transferred employee, or when new work methods, equipment, machines and materials are introduced.

All personnel in job positions that involve the use of cyanide and cyanide management receive training on how to perform their assigned tasks with minimum risk to worker health and safety. Individual training is provided for each specific task an operator will perform related to cyanide management. By observation, the supervisor evaluates the operator worker performance. Task-specific training include cyanide preparation, cyanide solution dose rate, washing procedures for filters with cyanide solution, clarification filter preparation, maintenance and washing procedures for clarification filters, gold precipitation, Merrill Crowe plant start-up, cyanide spill inspections after cyanide preparation, equipment operation and maintenance, safety procedures, emergency response procedures, waste disposal, chemical product management, communication and reports, and inspections.

Training progress is reported quarterly to area managers, superintendents and plant chiefs by means of the excel spreadsheet (tracker chart). The auditors reviewed the quarterly training programs and examples of employees' job charts. The job chart is a form filled out by a supervisor to verify compliance with training requirements. After successful completion of these training sessions, operators are assigned to a specific circuit and work under the direction of a competent operator until they have been deemed competent to work without direct supervision.

Determination of competency is based on test score and observations by qualified and/or experienced plant operators and/or maintenance personnel.

Training includes On the Job Training, which is conducted by a qualified trainer who shows in the field how to safely conduct tasks related to cyanide management; and Planned Task Observations, which is conducted by the supervisor of the trainee. Verification was reviewing training records covering the recertification period and interviewing field personnel.

The training elements necessary for each job involving cyanide management are identified in the Employee's Job Chart For Task Training (YAN-HS-GUI-018), where the supervisor identifies the training requirements, notes the job hazards, and lists the PPE required. The supervisors use the work procedures (SOPs) as training materials. The auditors reviewed examples of the job charts for task training covering the 3-year audit period to verify compliance.

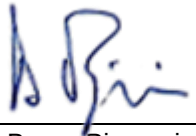
The mine has developed a series of training programs designed to build awareness and competency for various plant activities and programs. Each training module includes a training plan which outlines the course objectives and expected competency testing requirements for the module. Training elements for each specific job are identified in the work procedures and presentations that are used as training material. Personnel are trained following the work procedures, which include the step-by-step process to perform the job. These work procedures include the objective of the procedures, photos of the task/activity to be conducted, required PPE, decontamination requirements, risks associated with the cyanide task, contingency plans and the individual task specific steps.

Appropriately qualified personnel provide task training related to cyanide management activities. Yanacocha' s Training Procedure Guidelines (YAN-HS-GUI-018) requires supervisors to give the specific work training. Training is provided by experienced supervisors in each area of the process plants. Rescue Tech is in charge of the training in "Cyanide Kit Management."

Process supervisors with several years of experience in the processes provide task specific training to operators. Verification was through interviews with process people and review of training records to verify compliance.

All personnel in job positions that involve the use of cyanide and cyanide management are required prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety. After completing the pre-requisite training, employees complete a classroom-training program prior to working with cyanide.

Individual training is provided for each specific cyanide related task that an operator will perform and includes cyanide work procedures. A senior/junior on-the-job training approach is used to further training for the personnel on job activities and cyanide safety. Yanacocha provides task training to staff prior to working with cyanide and the staff must successfully complete the training before they work independently. Before that time, new staff must be accompanied by more experienced staff. New trainees are assigned to work in one of the circuits under the supervision of a competent operator. These trainees are required to work under direction of these competent operators until they demonstrate ability to work without direct supervision In a safe and responsible manner.



Annually refresher training on cyanide management has been provided to all employees that work with cyanide. Yanacocha' s annual training program includes four hours of instruction in cyanide handling, cyanide poisoning and task training for all workers. The auditors reviewed the excel spreadsheets for data induction where refresher training is documented and examples of the attendance records for these refreshers covering the 3-year audit period.

Interviews with site personnel confirmed they had completed cyanide management training and that refresher training is undertaken. Training records and test results covering the recertification period were reviewed by the auditors and were found to be complete.

To evaluate the effectiveness of task specific training related to cyanide, tests are usually taken after a classroom training session while planned task observations are conducted by the supervisor of the trainee after on-the-job training sessions. Training programs include an assessment component to ensure that personnel are able to understand the training that they have completed. Testing can be done either via a written exam or practical assessment by qualified Process Plant trainers.

The operation evaluates the effectiveness of cyanide training by testing and observation. Section 4.0 of Yanacocha' s Training Procedure requires human resources staff and supervisors to evaluate training effectiveness. Yanacocha has written tests to evaluate the effectiveness of cyanide training, before and after the training. The auditors reviewed examples of these tests, covering the 3-year audit period. In addition, operators who perform cyanide-related tasks are observed by their supervisors to evaluate their performance. Yanacocha' s supervisors, after 3 months working with the new employee, must report to Human Resources about the employee´s performance, including the worker´s understanding in specific task training. The auditors reviewed examples of these supervisor reports to verify compliance.

Records of training are retained throughout an individual's employment documenting the training they receive, as are general induction records and job charts for task training. The records 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. Since then, they use the excel spreadsheet database "Tracker Chart." In addition, process areas retain task-specific training records of their employees, as advised by the Senior Instructor. Training records were reviewed for the recertification audit period.

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

The operation is: ■ in full compliance with Standard of Practice 8.3
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

Employees working in areas where cyanide is present are trained in what to do if they observe a cyanide release or exposure. Yanacocha employees who have the potential to come into contact with cyanide are required to be trained in the sodium cyanide handling and sodium

cyanide poisoning first responder courses. The sodium cyanide handling course summarizes the procedure to be followed in the event of a cyanide release including decontamination of equipment and facilities, while the sodium cyanide poisoning course summarizes the procedure to be followed in the event of cyanide exposure including procedures for decontamination of a cyanide exposure victim and information on cyanide antidotes. Personnel have taken part in drills to test and improve their response skills.

The Annual Emergency Response Training Program (YAN-HS-STA ERP24.01) requires that all personnel receive training in first aid, among others, within 15 days of starting at the mine. The Training Procedure in Section 4.0 requires supervisors to receive H&S specific training within 3 months of being appointed as supervisor and to familiarize workers with the requirements for the preparation for and response to emergencies.

The auditors reviewed the operation's Annual Emergency Response Training Program (YAN-HS-STA ERP24.01), the ERP and SOPs, verifying the operation's response program is structured to have first responder among this cyanide reagent area workers and that the personnel involved in unloading and mixing cyanide, cyanidation processes, and maintenance of cyanide facilities have received training regarding roles in response to cyanide releases and exposures. Verification of the implementation of this provision was through interviews with field personnel and review of training records. The auditors reviewed the quarterly process plant training programs and examples of training records on cyanide handling and response to cyanide poisoning via the tracker charts covering the 3-year audit period. Operators were interviewed and demonstrated good awareness of what actions are to be taken in the event of cyanide release. Records of training attendance were reviewed by the auditors and found them complete.

Yanacocha trains the Emergency Response Team members in the use of necessary response equipment. The operation has a full-time Emergency Response Team (ERT) trained to the Yanacocha Emergency Management Plan requirements. The brigade is capable of responding to all types of mine emergencies, not just cyanide-related emergencies. Section 2.3 of the Emergency Response Training Program (YAN-HS-STA ERP24.01) details the annual training program required for ERT members: Fire Fighting, Advanced First Aid, Vehicle Rescue, Rope Rescue, Hazardous Materials, Incident Command Search and Rescue Course. (BREC). Water Rescue Confined Spaces The training consists of videos, assignments, readings, written exams, practical exercises, discussion table and simulations based on potential incidents.

The ERT members are trained through participation in mock drill exercises as well as formal training programs. Formal brigades are in place for fire, first aid, spill, and evacuation. Emergency responders are available on all shifts. Fire wardens (emergency coordinators) are also trained in how to react in emergencies situations, including cyanide related events. Training incorporates emergency response plans, pre- incident plans, rapid response program, standard work procedures, and equipment installation. The auditors reviewed the ERT training records and confirmed that training was conducted for the 3-year audit period.

Yanacocha has made the off-site emergency responders familiar with the elements of the ERP related to cyanide. Community members, firefighters, civil defense, police and medical providers are familiar with the ERP, although for onsite emergencies, Yanacocha does not anticipate the involvement of other local response agencies for cyanide emergencies as Yanacocha has onsite

capabilities for firefighting and HAZMAT. For emergencies in inland cyanide transport, Yanacocha has involved outside responders such as firefighting companies, hospitals and local authorities along the cyanide transportation route, by means of Rescue Tech, a specialized emergencies response company who is communicating and training outside responders along the cyanide transportation route to the mine.

Refresher training for cyanide events is conducted as part of the site training and mock drill programs. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required, which include hazmat technician, HAZMAT and Cyanide Awareness. At Yanacocha, refresher training for response on cyanide is conducted annually. Section 2.0 of the Annual Emergency Response Training Program (ERP-19.01) details the training program required for all employees, managers and officials, transport carriers, and ERT member.

Yanacocha retains the cyanide training records throughout an individual's employment documenting the training each worker receives. The records 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. Samples of records were reviewed and found to be complete. The name of the employee, the name of the trainer, the date of the training, the topics covered, and the result of the testing are maintained as part of the record files. Verification was through interview with training and process personnel and review of training records.

9. DIALOGUE AND DISCLOSURE: Engage in public consultation and disclosure.

Standard of Practice

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

The operation is: ■ in full compliance with Standard of Practice 9.1
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

Yanacocha made the Diffusion of the Cyanide Transportation Contingency Plan was carried out between November and Decembre of 2023 to the locations: Chilete, San Pablo, Tembladera, Granja Porcon.

The Cyanide Transportation Company DCR Mineria y Construcción SAC also participated in the diffusion to the communities of the Cyanide Transportation Contingency Plan has the fundamental objective of improving people's ability to respond to critical situations, reduce the impact response capacity to critical situations, reduce the impact of emergencies, and promote a culture of safety and preparedness.

Yanacocha prepared brochures with information relevant to cyanide management and compliance with the Cyanide Management Code at the operation, office and website contacts, and delivered them to the communities in the area of direct influence.

Yanacocha has the NEM-SER-GLD-006 Complaints and Grievances Guide and the Yanacocha' s Social Responsibility Department has assigned Social Coordinators to attend to the complaints and concerns of the people. Yanacocha summarizes the complaints and concerns received during the year in an annual report, which is available to the public at Yanacocha' s website. The auditors reviewed the series of complaints for the re-certification period and there are no cyanide related grievances included. Yanacocha' s Cultural and Information Center (Centro de Información y Cultura) in Cajamarca City was reopening.

Yanacocha' s social networks: Instagram, Facebook and Twitter, continue to have a growing use by urban and rural stakeholders, which can also be used to interact with the mine. The Yanacocha website provides information on the use of cyanide for gold extraction and has provisions for stakeholders to communicate issues of concern. The site is provided with a "Contact us" and "Questions and Answers" tabs that allow an individual to contact the company via email and review previous questions and answers related to the operation, respectively.

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

The operation is: ■ in full compliance with Standard of Practice 9.2
□ in substantial compliance
□ not in compliance

Describe the basis for the Finding/Deficiencies Identified:

Yanacocha provides opportunities to interact face to face with 14 communities around the site by the Community Liaison Officers, Community Information Centers (which are closed at the moment). Yanacocha is now prioritizing specific Social Coordinators in local communities maintaining social distance, a dedicated phone line, social networks, and the Yanacocha and Newmont websites. For internal stakeholders, Yanacocha continues to provide opportunities during workers and contractors meetings and during training. The interaction provide information to communities and other stakeholders in the programs described above (point 9.1.1). The written materials (i.e., the brochures and information provided on the operation's website), regarding the management of cyanide, are available to communities and stakeholders in Spanish and in a way that can be easily understood.

Yanacocha' s Sustainability and External Relations department stated that the illiteracy level is 20% in the Illiteracy Report - Cyanide Code Diffusion of November 6, 2023, and they concluded that "*there is no specific percentage of illiteracy that determines the need to adapt oral diffusion mechanisms according to principle 9. In this sense, it is considered that less than or equal to 20% is not significant for the preparation of special diffusion mechanisms".*

Nonetheless, a workshop on the verbal diffusion of Cyanide Management Practices at Minera Yanacocha SRL has been conducted with the 4 localities with the highest percentage of illiteracy according to the report, considering the localities identified as stakeholders related to the use and management of cyanide in Minera Yanacocha's operations.

During the recertification audit period no cyanide releases and any worker exposure resulting in hospitalization or fatality have not occurred, however Yanacocha maintains a mechanism to report them. Yanacocha would report any cyanide exposure resulting in hospitalization or fatality to the Provincial Police, Ministry of Health and the Ministry of Labor. This information will be made available to the public on reporting to both ministries.

Yanacocha has not had any cyanide-related releases incidents above cyanide releases off the mine site requiring response or remediation, cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment, cyanide releases on or off the mine site requiring reporting under applicable regulations, Releases that cause applicable limits for cyanide to be exceeded but would report them to the corresponding entities in case of their occurrence. The auditors verified that no cyanide related environmental releases have occurred during the recertification period.

Information regarding cyanide release and exposure incidents made available in the Newmont Annual Sustainability Report, would separately identify any such incidents occurring at the Yanacocha operation, so that stakeholders would be aware of their nature and location.

Reports of significant cyanide releases or spills will be reported to the OEFA (Environmental Assessment and Oversight Agency) at www.oefa.gob.pe, a Peruvian regulatory agency, according to its procedure: https://www.gob.pe/923-reportar-emergencias-ambientales-al-oefa. OEFA reserves the right to publish them on its website.

Bruno Pizzorni
Lead Auditor