

ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

**Minera Penmont S. de R.L. de C.V –
Noche Buena Mine
Sonora, Mexico**

**Submitted to:
The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA**

2026 Audit Cycle



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NOCHE BUENA MINE
ICMC SUMMARY AUDIT REPORT

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Mining Operation: Noche Buena Mine

Mine Owner: Fresnillo Plc

Mine Operator: Minera Penmont S. de R.L de C.V

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Location and description of the operation

The location of the Noche Buena mine is presented in the picture below.



The Noche Buena Mine Unit is located in the municipality of Caborca in the state of Sonora, northwest of Mexico. Specifically, it is located on the immediate land to the following ejidos (communities): Juan Alvarez, El Bajío, Cerro de La Herradura and Los Norteños. Noche Buena is a gold deposit that is mined as an open pit. The ore extracted from the pit is transported in haul trucks to the heap leach pads. No additional ore has been placed on the leach pad as Noche Buena is getting ready for the closure phase. Lime is added directly on the leach pad using gondolas.

Once the deposited ore generates a certain surface, the preparation of the drip irrigation system is carried out, which is known as cell preparation. Through this system, the ore is leached with a solution containing sodium cyanide, dissolving the gold and silver along with other metals present in the rock. It is worth mentioning that in this process it is possible to extract only a certain

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percentage of the gold and silver contents, this mainly due to the mineralogical characteristics of the ore, as well as the absence of an additional mechanical preparation of the ore.

By percolation, the leachate goes down and is collected by the geomembrane of the leach pad. This resulting solution with dissolved values of gold and silver is conducted by pipes to the process solution ponds. The solution obtained from the leach pad can have different denominations depending on the concentration of gold it presents, so when the concentration is relatively high it is known as “pregnant solution” and when the concentration is not so high it is called “barren solution”.

From the process solution ponds, pregnant solution is pumped into the train of activated carbon columns. When the solution with dissolved gold and silver passes through the activated carbon bed in the columns, by means of a physicochemical process called adsorption, these metals are fixed to the surface of the activated carbon; in this way, the gold and silver that were present in the solution are partially removed, which are now contained in the activated carbon. For this operation, there are five tanks in series or “cascade” which each contain between 6 to 8 tons of activated carbon in the form of granules measuring between 1.6 and 3.5 millimeters, through which the solution flows in one direction, decreasing the concentration of gold when passing from one tank to another. The process leaves the gold concentration of the solution practically exhausted, that is, it removes almost entirely the gold that was in the original solution with an efficiency of up to 99.5%. The solution that comes out of the last column is sent to the barren solution tank where sodium cyanide is added to be pumped back to the leach pad and start the leaching process again.

After a certain time, the activated carbon adsorbs a certain amount of gold, and similarly to a sponge that absorbs water, at a given moment it becomes saturated and it is no longer possible to retain more water. The same happens with the carbon that adsorbs the gold and silver molecules, which in turn causes the efficiency to decrease gradually until it is determined that it is not feasible to continue processing solution with saturated carbon. It is at that moment that it is decided that the discharge of saturated or loaded activated carbon should be carried out, and new or sterile activated carbon replenished. Due to the arrangement of the columns train, the activated carbon that is first saturated is the one that receives the solution with the highest concentration of gold, in this case is column 1 as it is the one that receives the solution directly from the ponds. Column 2 is fed from the solution exiting from column 1, and under this same logic, column 3 is fed from column 2, column 4 from column 3 and column 5 from column 4.

The loaded activated carbon discharge operation consists of separating the activated carbon granules that are at the bottom of the column. For this, a vibratory screen is used so that all these solids containing the gold and silver values that have already been processed from the solution are collected. Once all the activated carbon has been discharged from column 1, it is necessary that the carbon found in the other columns moves one position in the circuit. For this, the carbon is pumped from one column to the previous one, that is, from column 2 to column 1, from column 3 to 2, from column 4 to 3 and from column 5 to 4. When the activated carbon has been

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transferred, new activated carbon is added to column 5. By performing these transfers, the adsorption efficiency is again sufficiently acceptable, starting a new processing cycle.

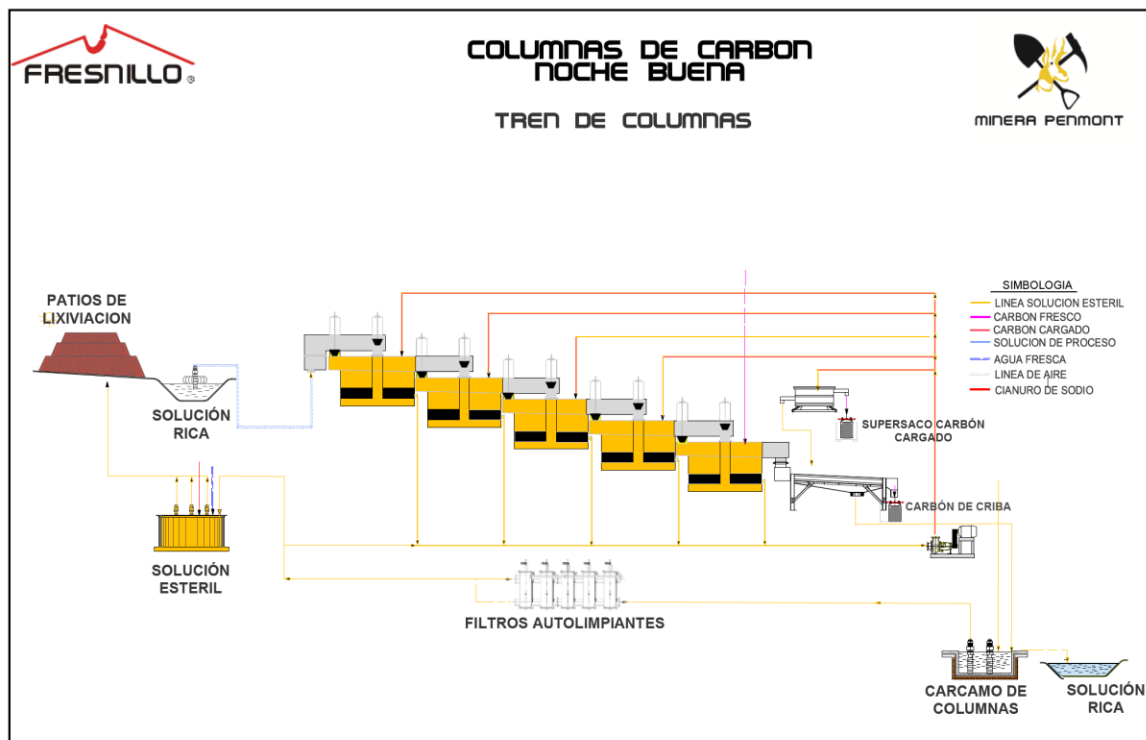
The scope of the recertification audit includes the following cyanide facilities: The heap leach pad (Stages 1-7), solution channels, two process solution ponds and two contingency ponds, the Carbon in Column (CIC) train, the barren solution tank, and the cyanide preparation area consisting of a dilution tank, a storage tank, and two dosification tanks.

The Merrill Crowe facilities are outside the scope of the audit as they were not in use for the recertification period. There is no cyanide treated water discharges at Noche Buena.

No new facilities have been constructed for the recertification period, as Noche Buena mine is getting ready for the closure phase.

Sodium cyanide is transported to Noche Buena in solid briquettes in an 18-ton isotainer truck. The isotainer is connected to the cyanide offloading tanks; freshwater is added and recirculated between the isotainer and the tank until the solid cyanide is completely dissolved.

The Noche Buena ore processing flowsheet is presented below:



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Auditor's Finding

The International Cyanide Management Institute (ICMI) approved Audit Team verified that Noche Buena mine operation is in **FULL COMPLIANCE** with ICMI Cyanide Code requirements for Gold Mining operations.

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

Noche Buena mine has experienced zero significant cyanide incidents during this 3-year recertification audit cycle.

This operation was determined to be in FULL COMPLIANCE with the International Cyanide Management Code.

Auditor's Attestation

Audit Company:	SmartAccEss Socio Environmental Consulting, LLC
Lead Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Mining Technical Auditor:	Bruno Pizzorni Email: bpizzorni73@gmail.com 
Date(s) of Audit:	March 9 th – 12 th , 2026

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

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

Noche Buena Mine
Name of Operations


Signature of Lead Auditor

June 26th, 2026
Date

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SUMMARY AUDIT REPORT

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

Standards of Practice

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 1.1

Discuss the basis for this Finding/Deficiencies Identified:

Noche Buena sources its cyanide from Covoro Mining Solution Mexicana, S. de R.L. de C.V. (Covoro), a subsidiary of Draslovka Mining Solutions (formerly known as The Chemours Company). Throughout the recertification period, the site exclusively used sodium cyanide provided by this supplier. These purchases are facilitated under an agreement between Draslovka and Minera Penmont S. de R.L. de C.V., the operating entity for Noche Buena. The existing contract governing the supply and transportation of cyanide remains valid until December 31, 2026. During the site audit, auditors confirmed through the International Cyanide Management Institute (ICMI) website that the Draslovka Mining Solutions Memphis Production Plant certification under the International Cyanide Management Code (Cyanide Code) was last updated on May 24, 2023. This certification is deemed current as it adheres to the required three-year recertification cycle. The audit included a review of the purchasing agreement with Draslovka, along with relevant purchase orders and shipping records corresponding to the recertification audit period. All documentation was found to be complying.

2. TRANSPORTATION: Protect communities and the environment during cyanide transport.

Standards of Practice

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 2.1

Discuss the basis for the Finding/Deficiencies Identified:

The operation ensures the maintenance of chain of custody records, clearly identifying all transporters and supply chains involved in moving cyanide from the producer to the site. For this recertification period, contracts, purchase orders, and shipping records were thoroughly reviewed. Draslovka remains the sole supplier to the mine, producing cyanide at its Memphis plant. From there, it is transported via rail and truck to the Covoro Hermosillo Bag-to-Bulk Transloading Facility before being delivered to Noche Buena.

Chain of custody records were meticulously reviewed to identify each transporter and supply chain component involved in the transportation of cyanide from the producer to the operation. The review confirmed that all parties participating in the supply chain are either individually certified or part of a certified supply chain. Auditors examined the chain of custody for cyanide transport from Draslovka's Memphis, Tennessee plant to Penmont in Caborca, Sonora, Mexico. This route encompasses the delivery of cyanide to Noche Buena operations via isotankers. The comprehensive chain of custody for Draslovka's sodium cyanide, covering La Herradura, Noche Buena, and Dynamic Leaching mines, is structured as follows: At Draslovka's plant in Memphis, Tennessee, sodium cyanide is packaged into Ecopaks®. These containers are then securely placed inside railway boxes, with their doors sealed for transportation. This on-site packaging process is covered under the certification of the Cyanide Code as detailed in the "Draslovka North American Solution Cyanide Production & Packaging Operation Re-Certification Audit." The corresponding audit document is accessible on the official Cyanide Code website under the Memphis Plant section <https://cyanidecode.org/sig-directory-type/draslovka-mining-solutions/>. The Canadian National Railway (CN) oversees the handling of railroad boxes at the Memphis plant, transporting them to the main terminal for handoff to the Union Pacific Railroad (UP). CN has undergone an audit by a certified cyanide code auditor and is fully compliant with all requirements. For additional details, refer to the Draslovka US/Canada Rail & Barge Supply Chain section <https://cyanidecode.org/sig-directory-type/draslovka-mining-solutions-czech-republic-transportation-operations/>. The Union Pacific Railroad (UP) delivers railcars to the U.S.-Mexico border at Nogales, Arizona, where they are handed over to the Mexican railway company, Ferromex. Following an audit conducted by a certified cyanide code auditor, Union Pacific has been confirmed to be in full compliance with required standards. For further information, refer to the Draslovka US/Canada Rail & Barge Supply Chain section <https://cyanidecode.org/sig-directory-type/draslovka-holdings-transportation/>. Ferromex

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facilitates the transportation of railroad containers from Nogales to the Covoro warehouse located in Hermosillo, Sonora, Mexico. The company has undergone an audit under the Cyanide Code conducted by a certified auditor and has achieved full compliance. Additional details can be found in the Draslovka Mexico Supply Chain section <https://cyanidecode.org/sig-directory-type/draslovka-holdings-transportation/>. Upon arrival in Hermosillo, the Ecopaks® are utilized to fill isotankers, which are subsequently dispatched to the mine. The Draslovka facility in Hermosillo has undergone an audit by an accredited cyanide code auditor and is fully compliant with the established standards. Additional details can be found in the Covoro Hermosillo Bag to Bulk Transloading Facility section <https://cyanidecode.org/sig-directory-type/draslovka-mining-solutions/>. Transportes Especializados Segutal S.A. de C.V. is the transport company responsible for collecting the isotankers from the Draslovka terminal and delivering them to the mine. Segutal underwent an audit conducted by a certified Cyanide Code auditor and was found to be fully compliant. For more details, refer to the Draslovka Mexico Supply Chain section. This ensures that the Chain of Custody to the Noche Buena mine fully adheres to the Cyanide Code standards.

3. HANDLING AND STORAGE: Protect workers and the environment during cyanide handling and storage.

Standards of Practice

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 3.1

Discuss the basis for this Finding/Deficiencies Identified:

The unloading, mixing, and storage facilities for reagent-strength cyanide at the Noche Buena Process Plant have been expertly designed and constructed. Evidence supporting this includes design specifications and as-built drawings endorsed by certified professional engineers, as verified during previous ICMI audit reports, which confirmed compliance with Code requirements. The reviewed design and construction documents provided sufficient detail to demonstrate that the facilities were developed according to sound and widely accepted engineering practices for this type of infrastructure. During the recertification audit, auditors verified that Noche Buena keeps all construction records on site, organized and readily accessible for review. Since the

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prior certification audit, no modifications have been made to the facility. Additionally, the auditors observed the reagents area to be in good condition.

The Noche Buena reagents area, designated for cyanide unloading, mixing, and storage, is situated within the secure perimeter of the Process Plant, ensuring isolation from populated areas and surface water sources. There are no office spaces or worker congregation points in close proximity to this area. The closest community, Ejido El Diamante, lies approximately 28 kilometers southwest of the mine in a separate basin. Due to the extreme aridity of the Altair Desert at Sonora, surface water in and around the mine site is non-existent, with any surface water being strictly ephemeral. There are no permanent surface water bodies such as springs, streams, rivers, or lakes in the vicinity.

Noche Buena transfers the isotankers onto a concrete ramp specifically designed to reduce the risk of seepage into the subsurface. The concrete surfaces used for offloading and the high-strength tanks remain unchanged since the initial certification audit, ensuring that the original findings are still applicable. The entire cyanide offloading area is built with a reinforced concrete slab-on-grade structure, which includes pads, curbs, parapets, footings, and tank foundations. This setup creates an effective barrier against any potential seepage. During this onsite verification audit, the concrete area was observed to be in good condition.

Noche Buena has established a procedure to manage the level control and alarm settings for high-strength cyanide tanks, aimed at preventing overfilling. These tanks are equipped with level sensors that communicate with the control room, with high alarms configured at 85 percent capacity and high-high alarms set at 90 percent. Throughout the recertification period, the instrumentation team has conducted monthly maintenance on the sensors, as documented in the maintenance records. Additionally, auditors confirmed the functionality of the sensors by reviewing the control room screens.

Since the previous certification audit, no changes have been made to the cyanide mixing and storage tanks at the plant. The cyanide mixing tank, storage tank, and distribution tank are positioned on a sturdy pedestal made of reinforced concrete, which is integrated into the concrete flooring of the entire offloading area. These tanks rest on a metal grate placed over the solid concrete base of the secondary containment system. The auditors noted that all the concrete foundations and containment structures were in acceptable condition.

Noche Buena has equipped the facility with high-strength tanks housed within robust concrete secondary containments designed to effectively prevent leaks. These containments remain unchanged since the initial certification audit, ensuring that the original findings continue to hold true. The dissolution, dilution, second dilution (currently inactive), and storage tanks share a single secondary containment, whereas the two dosification tanks are situated within their own separate containment structure. During the audit, the concrete containments were noted to be in good condition.

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Noche Buena does not store solid sodium cyanide on its premises. Solid cyanide is not held onsite; isotankers transport it to the facility, where it is offloaded and depart on the same day. After being offloaded, high-strength cyanide is stored in outdoor tanks equipped with proper ventilation systems to avoid the accumulation of hydrogen cyanide (HCN) gas. The cyanide offloading zone is situated within a securely enclosed mining property that is monitored by full-time security personnel. This area is further secured within a fenced and gated plant site, which also maintains round-the-clock security. Clear warning signs prohibiting unauthorized access are prominently displayed. Dissolution, dilution, secondary dilution, and storage tanks are housed in dedicated areas with their own secondary containment systems. No incompatible materials are stored nearby. High-strength cyanide is strictly segregated from substances such as acids, strong oxidizers, explosives, and items like food to ensure that no cross-contamination occurs between containment areas. Additionally, the cyanide dosing tanks are kept separate from incompatible materials, with physical barriers in place as needed to prevent accidental mixing.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 3.2

Discuss the basis for this Finding/Deficiencies Identified:

Empty isotankers are returned to the manufacturer to ensure their use remains exclusively for holding cyanide and not repurposed for any other applications. Noche Buena receives solid cyanide in isotankers, a process that does not involve or generate rinse water during offloading. Isotankers are promptly returned to the supplier after offloading is completed. Noche Buena has adopted the Operating Procedure PO-PL 19 regarding cyanide discharge from isotankers. This protocol dictates that once offloading is finished, the upper portion of the isotanker must be rinsed with water, valves closed, and a check conducted to ensure the isotanker is no longer pressurized. Auditors confirmed adherence to this procedure through field interviews with personnel tasked with performing these activities. They also observed the initial phase of an offloading at the reagent area. Subsequently, a completed checklist was obtained and reviewed to validate compliance with procedural requirements.

For unloading and mixing activities, Noche Buena has established documented procedures and maintains evidence affirming their proper implementation. These protocols include Standard Operating Procedures (SOPs), training materials, and checklists. Implementation was confirmed through direct observation and interviews with personnel responsible for carrying out these tasks.

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The cyanide preparation procedure, titled Cyanide Discharge from Isotanker, outlines detailed instructions for operating and maintenance of the valves, couplings, and pumps associated with the dilution tank and the isotanker. A checklist accompanies this process, which is co-signed by both the isotank driver and the mine operator. Auditors reviewed completed checklists and observed an actual unloading operation and maintenance records as part of the site visit to ensure compliance with these procedures. Procedure PO PL 12 for Handling Cyanide and Cyanide Solution stipulates that area personnel must conduct daily inspections to verify the condition of the infrastructure of tanks containing cyanide, along with their associated components, such as valves, couplings, and pumps. For this purpose, the logbook PO-PL-15-R01, "Inspection of Infrastructure of Tanks Containing Cyanides," is used. This logbook includes a detailed checklist to identify signs of corrosion, deterioration, or potential leaks and spills (such as cyanide salts) in any of this equipment. Any anomaly detected during these inspections is reported to the maintenance area through a local work order that must be executed immediately. It is important to note that all infrastructure has a comprehensive preventive maintenance program within the Máximo system, which includes the valves, couplings, and pumps connected to the cyanide dilution tank. Additionally, before performing any cyanide dilution operation, the ISO tank operator conducts a thorough inspection of the unit's valves and fittings. If any defects or problems are found, they are reported for repair, either at the mine site or at their main base. As stipulated in Section 6 of the procedure for Handling Cyanide and Cyanide Solution, an inspection of the area using checklist PO-PL-19-R01 is required. Before initiating any activity related to cyanide unloading, a properly trained operator thoroughly checks elements such as valves, fittings, piping, receiving tank pumps, gaskets, flexible hoses, and other relevant components. If any faults or anomalies are detected, they must be immediately reported to the shift supervisor via radio, and the operation will be suspended immediately until the issue is resolved. The sparge operation with isotanks allows for the preparation of the cyanide solution without the need to handle the isotank from the truck, thereby eliminating the risk of rupturing or puncturing the isotank. These containers are not handled separately under different circumstances. Isotankers are not subjected to stacking. The protocols for dealing with spills of solid cyanide or cyanide solutions mandate prompt and effective cleanup during offloading operations to avoid potential hazards. The cyanide preparation procedure specifies the use of comprehensive personal protective equipment (PPE). This includes a face shield worn over safety glasses, a hard hat, a respirator, a Tychem suit, steel-toe rubber boots, and rubber gloves. Additional required equipment includes a safety harness for working at heights, a two-way radio, and a portable hydrogen cyanide (HCN) monitor. During the isotanker offloading process, a second operator monitors activities from an adjacent observation room to ensure safety and efficiency. Draslovka applies a red dye to the isotanker during the loading of cyanide briquettes. In line with this practice, Noche Buena incorporates the same dye into its cyanide solution to facilitate easy identification. The resulting high-strength cyanide solution is distinguishable due to its dyed appearance, allowing for clear differentiation from other liquids such as rainwater and ensuring visual recognition for better handling and monitoring.

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

Standards of Practice

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 4.1

Discuss the basis for the Finding/Deficiencies Identified:

The recertification audit covered the following cyanide-related facilities: the cyanide preparation area, which includes a dilution tank, a storage tank, and two dosage tanks; the heap leach pad spanning Stages 1 to 7; solution channels; two process solution ponds and two contingency ponds; the Carbon-In-Column (CIC) plant, which commenced operations at the end of 2019; the barren solution tank; as well as associated pipelines, pumps, valves, and related infrastructure such as run-on diversion channels. It is worth noting that the Merrill-Crowe facility was not operational during the audit, as its usage gradually declined and was replaced by the CIC system. Noche Buena has implemented several management systems focused on cyanide safety, workplace safety, and environmental protection, aiming to prevent or mitigate releases into the environment and potential exposure to workers and surrounding communities. These systems include certifications in ISO 14001 for Environmental Management, ISO 45001 for Occupational Health and Safety Management, and participation in the Clean Industry Program. During the audit, the reviewers examined Noche Buena's Health, Safety, Environment, and Community Relations System Manual (SSMARC), dated July 2026. They also reviewed the equipment maintenance software, mine emergency response plans, and Standard Operating Procedures (SOPs). Interviews were conducted with plant operators, maintenance staff, environmental personnel, and supervisors. These evaluations demonstrated that the operation has a clear understanding of cyanide management practices that effectively prevent environmental releases and minimize exposure risks to workers and local communities.

The mine's process flow diagrams, engineering designs, operating plans, and standard operating procedures (SOPs) have been developed to outline the assumptions and parameters supporting the design, while ensuring compliance with regulatory requirements aimed at preventing cyanide releases and exposures. These guidelines enable the operation to function effectively according to established plans. Key parameters specified in the operating plans and procedures include high-strength cyanide: A minimum pH of 10.2 and final cyanide concentration between 20 and 30 percent; heap Leach Facility (HLF): Barren solution with pH above 10, an application rate of

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6–10 liters per hour per square meter (l/h/m²), and free cyanide concentrations of 80–120 mg/L after additional dosing in barren solutions. During the audit, the operation was irrigating the leach pads with a diluted cyanide solution, maintaining a concentration range of 80 to 140 ppm, as specified in the corresponding procedure; cyanide plant: pregnant solution returning from the HLF with a minimum pH of 7 and barren solution containing 5–20 mg/L of free cyanide prior to additional dosing; pregnant and intermediate ponds operating at approximately 75 percent capacity, with contingency ponds maintaining freeboards of 0.8 meters (Pond 1) and 1 meter (Pond 2); Carbon-in-column train where columns are equipped with 8 tons of carbon, permitting pregnant solutions containing 20–30% solids to flow without causing pipe obstructions. The operational procedures also address and account for the design storm event affecting the process solution pond system. They take into consideration the volume of water generated over a 24-hour period by a design storm with a 100-year return period. During the audit, the operational plans and procedures were thoroughly reviewed, including critical documents such as the SOP for PO-PL-19 Cyanide Discharge from Isotankers, SOPs associated with the carbon column train, The Engineering Design Report for the carbon columns, and the Engineering Design Report for Phase 7 of the heap leach pad were reviewed in the previous audit. Interviews were conducted with facility personnel responsible for operations and maintenance, who demonstrated a solid understanding of program requirements and protocols.

The standard operating procedures (SOPs) for the operation outline critical measures necessary to safeguard workers, surrounding communities, and the environment. These procedures cover various aspects, including water management protocols detailing how and when solutions in the heap leach facilities (HLF) must be handled to maintain the designed storage capacity of the ponds. Additional considerations include inspection programs for process tanks, pipelines, ponds, and the HLF itself. A preventive maintenance program for essential equipment is supported by automated work orders generated through the maintenance software. At Noche Buena, comprehensive inspection and preventive maintenance programs have been developed and implemented for all cyanide-related facilities. Inspections are conducted at intervals ranging from daily to monthly, depending on the location and inspection type. Furthermore, Noche Buena routinely reviews and updates its SOPs every two years. To confirm compliance, auditors have examined a detailed set of SOPs and plans as part of the verification process.

Noche Buena has the Procedure for Change Management PS-HE-20. This procedure outlines a systematic approach to implementing changes in a planned manner at Minera Penmont. It considers the objectives of changes, their potential consequences, the integrity of SSMARC (Health and Safety, Environment, and Community Relations), resource availability, and the assignment of responsibilities and authorities. The procedure is applicable to all types of changes occurring within the mining company as specified, ensuring that process risks, environmental aspects, and Occupational Health and Safety (OHS) hazards are identified, assessed, and controlled prior to any changes being implemented. The procedure emphasizes the identification and assessment of process risks, OHS hazards, environmental aspects, and potential impacts. It ensures that appropriate control measures are devised and implemented for significant changes. The scope includes any modifications to infrastructure and facilities, equipment upgrades, new or existing projects, adjustments to the management system affecting operations

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or processes, as well as compliance with new legislation or legal requirements that necessitate changes to current operations or activities. Approval for managing these changes rests with the SSMARC Coordination Team and the Leadership Team. All relevant information and analysis are documented in the procedure, which also outlines control measures, timelines, and responsible parties.

The operation's management system incorporates contingency plans for handling non-standard operating scenarios. These plans outline the actions to be taken in response to issues identified through facility monitoring or inspection and address temporary shutdowns or cessation of operations due to circumstances such as work stoppages, shortages of essential materials, financial considerations, civil unrest, or legal and regulatory actions. These contingency measures are documented within the operational plans and standard operating procedures (SOPs). Detailed responses to potential emergencies are outlined in Appendix PS-HE-07-A01, titled "Contingency Plan for Minera Penmont," which forms part of the procedures for emergency preparedness and response. In situations where an upset in the operational water balance risks exceeding the containment design capacity, the procedure PO-PL-02 Emergency in Contingency Ponds provides guidance. This includes protocols to follow if the Intermediate Pond overflows into the Contingency Ponds or if the latter spills onto natural ground. For challenges identified through facility monitoring or inspections, the procedure PO-PL-07 Leach Pad Irrigation includes provisions for managing disruptions such as slope failures, pipeline ruptures, and spills from secondary pipeline containment. Additionally, PO-PL-17 Attention to Cyanide Solution Spills outlines immediate response steps for cyanide spills, cleanup methods for affected soil, verification sampling, and final reporting. The procedure PO-PL-48 Start-up and Shutdown of CIC Plant addresses both planned and unexpected plant shutdowns, including equipment malfunctions like pump, valve, or pipeline failures. It incorporates protocols for safely managing cyanide during operational pauses and ensures environmental protection throughout the process. For scheduled shutdowns due to maintenance, equipment upgrades, or electrical substation servicing, the procedure specifies gradually reducing the supply of pregnant solution to the plant until pumping is completely halted. The document also includes detailed actions to manage unforeseen stoppages caused by power outages, low solution levels in ponds, equipment breakdowns, pipeline ruptures, or tank leaks. During any plant stoppage, runoff from the heap leach facility (HLF) is rerouted to the pregnant solution pond. In the rare event that this pond fills, an intermediate solution pond and two interconnected contingency ponds serve as additional capacity. This scenario is specifically addressed in PO-PL-02 Emergency in Contingency Ponds. Furthermore, Start-up and Shutdown of CIC Plant provides protocols for safely managing cyanide during extended shutdowns, which may arise from work stoppages, material shortages, economic conditions, civil unrest, or regulatory actions. The relevant procedures were reviewed by auditors to confirm compliance with established safety and environmental standards.

The operation conducts inspections across various cyanide-related installations to ensure their integrity. Inspection forms guide inspectors by providing detailed instructions on what to examine and the acceptable conditions to look for. At the Noche Buena facility, specific inspections have been completed for unloading, storage, mixing, and processing areas as outlined next. High-

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strength cyanide tanks, barren tanks, and other storage tanks undergo weekly visual inspections to detect signs of corrosion or leakage. These checks are documented using Form PO-PL-15-R01. Additionally, corporate staff conduct annual ultrasonic testing to measure the shell thickness of high-strength cyanide tanks and process vessels, ensuring they remain fit for continued use. Secondary containment systems are visually inspected monthly for any indications of solution leaks, precipitate accumulation, cracks, unsealed joints, or debris. Form PO-PL-15-R01 is used for this purpose. It is noted that none of these secondary containment areas are equipped with drains that lead to the environment. The HLF (Heap Leach Facility), Pregnant Pond, and Intermediate Pond are inspected weekly for the presence of solutions, as recorded on Form PO-PL-15-R05. If any solutions are found, they are pumped back to the source, and the duration of pumping is documented. The operation inspects leak detection and collection systems at leach pads and ponds, as required in the design documents. Pipelines, pumps, and valves within the plant are inspected monthly for signs of wear, deterioration, or leakage, with findings recorded on Form PO-PL-15-R01. Similarly, pipelines, pumps, and valves at the HLF are checked daily for similar issues using Form PO-PL-15-R02. Ponds are assessed weekly to monitor their condition using Form PO-PL-15-R04. The Pregnant Pond, Intermediate Pond, and Contingency Pond 1 are equipped with level sensors that relay data to the control room. Meanwhile, Contingency Pond 2 does not have level sensors and requires visual monitoring of water levels.

The operational inspections are conducted with sufficient frequency to identify potential issues before they pose a risk of cyanide release or exposure. Regular inspection of cyanide facilities at Noche Buena occurs according to established procedures for inspections and monitoring. These procedures specify daily, weekly, monthly, and event-driven inspections are summarized next. Weekly: Plant staff inspect cyanide-related tanks, associated secondary containments, pipes, and pumps using Form PO-PL-15-R01. Daily: Leach staff inspect the HLF, pipelines, perimeter berms, channels, and the irrigation system using Form PO-PL-15-R02. Weekly: Plant staff check showers and eyewash stations using Form PO-PL-15-R03, pond and plant conditions as well as wildlife mortality are assessed using Form PO-PL-15-R04. The leak detection and collection systems for the HLF, Pregnant Pond, and Intermediate Pond are inspected by plant staff with Form PO-PL-15-R05. Per Event: Inspections of the isotanker offloading facility and isotankers occur prior to unloading operations using Form PO-PL-19-R01. The auditors verified these practices during field inspections conducted during their site visit. They confirmed the condition of key equipment such as tanks, secondary containments, pipelines, pumps, valves, and cyanide unloading, mixing, and storage facilities.

Noche Buena has maintained thorough documentation of its inspections, including completed forms that detail the inspection date, inspector's name, checkboxes for specific items, and additional space for observations regarding any non-conforming conditions. The inspection reports and preventive maintenance system records shows evidence of documenting the nature and date of corrective actions and maintains such records. Noche Buena provided inspection records for the emergency shower and low-pressure eyewash station, which highlighted noted deficiencies including work orders, along with an Excel table used to track inspection findings until resolution. The table also identified the party responsible and documented the closure date.

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The operation has implemented a preventive maintenance program for its cyanide-related facilities to mitigate the risks of cyanide releases or exposures caused by equipment failure. Maintenance activities are scheduled and tracked using a maintenance software. In occasion of the audit the operation was migrating its maintenance software from Maximo to MAS 9 software. The software provide documentation for each task, including the rationale for setting maintenance intervals based on factors like operational hours and predetermined time frames. The software organizes maintenance activities into four classifications: preventative, unprogrammed, corrective, and basic. The “basic” category includes daily area inspections conducted by maintenance personnel. The workflow prioritization is guided by the potential risk of harm or contamination, using a four-tier system. Cyanide-related repairs are categorized as the highest priority (Priority 4) and are addressed immediately. Auditors reviewed the maintenance records of five randomly selected pieces of cyanide-related equipment to confirm compliance with the program. They also observed that Noche Buena maintains lists of standby pumps deployed in the field, reserve pumps stored in the warehouse, and critical spare parts available on-site. Additionally, auditors assessed maintenance histories for fixed cyanide monitors, pH sensors, and specific tank level sensors to ensure adherence to the established protocols.

Noche Buena receives its electricity via a powerline linked to a substation located roughly 20 kilometers away. This substation is interconnected with federal powerlines coming from two separate routes—Caborca and Puerto Peñasco in Sonora—providing redundancy to enhance the reliability of power supply. To mitigate the risk of power outages, Noche Buena has stationed four portable generators near the plant to help prevent unintended releases or exposures during disruptions. Of these, two larger generators, with capacities of 175 kW and 125 kW respectively, are capable of powering the pumps required to transfer materials from the ponds or plant to the heap leach facility (HLF). Additionally, there are two smaller portable generators, each with a capacity of 20 kW, along with a portable diesel pump. Biweekly startup tests and regular maintenance for these backup systems are conducted, with all activities documented in the maintenance software’s logs.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 4.2

Discuss the basis for this Finding/Deficiencies Identified:

Noche Buena lacks both a mill and a tailings storage facility.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 4.3

Discuss the basis for the Finding/Deficiencies Identified:

The operation has developed a water balance system that accounts for relevant factors to ensure long-term functionality. It incorporates practices necessary to maintain the balance effectively, preventing pond overtopping. Noche Buena has engaged a consultant to create a detailed, probabilistic water balance for the Heap Leach Facility (HLF). This model has been structured as an Excel spreadsheet with a monthly time interval. The model comprehensively covers all phases of the HLF up to Cell 2 of Phase 7, including the Pregnant and Intermediate Ponds, Contingency Pond 1, and the expanded Contingency Pond 2. Key inputs such as leach application rates, precipitation, evaporation, and pond stage-storage curves are incorporated into the analysis. Additionally, the model is designed to handle probabilistic scenarios, accounting for both normal and wet years combined with a 100-year 24-hour storm event, ensuring robust planning under varying conditions.

The core principles of the water balance have remained consistent since the previous certification audit because operating conditions have not changed. Nevertheless, the water balance model accounts for various factors in a manner appropriate for the facilities and their surrounding environment. Next, the aspects that have been considered: solutions are applied to leach pads at a rate of 10 liters per hour per square meter; the design includes a 100-year, 24-hour storm event with a precipitation level of 185.4 mm. This ensures a high level of confidence that overtopping will not occur throughout the facility's operational lifespan; comprehensive precipitation and evaporation data are sourced from government weather stations located in Quitovac (43 km away) and Sonoita (94 km away). These stations are in relatively close proximity, share similar elevations, and have comparable topographical features, making them reliable references for site-specific conditions; the water balance excludes precipitation from surface run-on originating in upgradient watersheds. This is because the perimeter of the heap leach facility (HLF) is elevated above ground level, and diversion channels on the north and east sides effectively redirect run-on, preventing any such input into the ponds; freeze-thaw cycles are not applicable due to the hot and arid climate of the Altair Desert; evaporative losses are accounted for in both active and inactive cells, as well as for irrigation via drip systems. Additionally, water loss due to wetting newly placed ore is included. No losses are attributed to decanting, drainage and recycling, seepage into the subsurface, or discharges into surface water; The model also calculates the available storage in process ponds and estimates the time until overtopping in the event of pump or power failures. During a 100-year, 24-hour storm

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applied to actual on-site conditions, the time to overtopping was determined to be as follows: 46-55 hours in 2016; 43-55 hours in 2017; 37-43 hours in 2018; and 30 hours during January and February of 2019. These durations provide sufficient time for restoring power or repairing pumps as needed; there are no discharges into surface water from treatment, destruction, or regeneration systems. No other design elements have been identified that could impact the water balance. Groundwater remains at significant depth, and both the HLF and associated ponds are lined with geomembranes to ensure containment.

Noche Buena has developed and managed its process ponds with sufficient freeboard to accommodate storage capacity beyond the design threshold. The Pregnant and Intermediate ponds are designed to automatically overflow into the Contingency Ponds via spillways, making freeboard considerations particularly relevant for the Contingency Ponds. Contingency Pond 1 is maintained with a freeboard of 0.8 meters, while Contingency Pond 2 operates with 1.0 meter of freeboard. Data collected during the extreme weather event of October 2018, including a hurricane, revealed that Contingency Pond 1 was only 5 percent full at the height of the storm.

The operating plans for the facility outline the necessary inspections and monitoring activities to ensure compliance with its water balance requirements. These activities encompass tasks such as monitoring pond freeboard levels and inspecting surface water diversion structures to manage run-on effectively. Verification of these measures has been carried out through a review of the facility's operating plans, procedures, and inspection records, confirming that the required monitoring and inspections are being performed. The operation provided the water balance data in the updated Excel spreadsheet Integral and Probabilistic Water Balance for the Leach Pad. This data set featured meteorological information with a monthly resolution for the years 2024, 2025, and 2026. The model thoroughly addresses all phases of the HLF, extending to Cell 2 of Phase 7. It also includes the Pregnant and Intermediate Ponds, Contingency Pond 1, and the expanded Contingency Pond 2. Key factors such as revised leach application rates, precipitation, evaporation, and pond stage-storage curves have been integrated into the analysis.

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

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 4.4

Discuss the basis for the Finding/Deficiencies Identified:

The operation has taken steps to limit wildlife and livestock access to the process ponds, even though Weak Acid Dissociable (WAD) cyanide levels are well below 50 mg/l. A chain-link fence topped with razor wire has been installed around the process plant for added security. Additionally, an unbarbed fence with wire mesh at the base has been set up along the channel

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lined with HDPE, which directs water from HLF Phase 4 to the ponds. This channel also serves as secondary containment for the pipelines draining from the HLF.

Noche Buena presented both internal and external analytical data demonstrating that open water in the ponds maintained cyanide concentrations below 50 mg/l during the recertification audit period. Water sampling is conducted monthly by an external laboratory, ALS, which evaluates free cyanide, WAD cyanide, and total cyanide levels. Additionally, mine personnel perform weekly water sampling to test WAD cyanide concentrations through titration methods in the mine's internal laboratory. Both data sets consistently confirmed WAD cyanide concentrations below 50 mg/l. ALS results indicated WAD cyanide levels ranging from approximately 0.4 to 15–20 mg/l in the pregnant solution found in the ponds and plant.

Noche Buena has successfully minimized significant wildlife mortality in open water process ponds by keeping WAD cyanide concentrations below 50 mg/l. The mine conducts daily inspections to monitor for any wildlife fatalities. According to these inspections, which follow a written procedure, no wildlife mortalities occurred during the recertification period. This finding was further validated through a review of monthly safety and environmental incident summaries from the same timeframe. The auditors determined that the implemented measures effectively prevent wildlife, cattle, and bird mortalities.

Noche Buena has established and implemented documented procedures to minimize significant ponding and control overspray. These include PO PL 05 Installation of HDPE Pipes, PO PL 07 Leach Pad Irrigation—outlining the specific actions required when excessive ponding is identified in irrigation areas—and PO PL 11 Leak Prevention in Leaching Pads. The operation primarily relies on drip irrigation for the HLF, with a few low-profile sprinklers used on the internal side slopes of Cell 7B and 6. The auditor also examined completed records from the PO-PL-15 R02 Sheet of Leaching Area Control. These records detail incidents of ponding, along with corrective actions taken to address the issue. In many cases, the underlying cause was traced to leaks in connections or branches of irrigation hoses.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 4.5

Discuss the basis for the Finding/Deficiencies Identified:

Noche Buena has no direct discharges to surface water due to the site's extremely arid conditions.

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The Noche Buena site does not directly or indirectly discharge into surface water. As outlined in the Environmental Impact Manifest (MIA) for the Noche Buena Project, the area experiences a very dry desert climate, with average annual rainfall around 100 mm. The nearest significant watercourses are Arroyo El Coyote, located approximately 20 km to the south, and the Gulf of California, about 36 km to the west. Any regional or onsite runoff is limited to seasonal, ephemeral streams that only flow during rainfall events. The project site, situated within the Altar Desert Basin, does not have any significant bodies of water susceptible to contamination. Due to the area's highly permeable sandy soils, rainwater is absorbed directly into the subsoil, with nearly all water infiltrating locally. Additionally, runoff beyond the site is minimal because of the desert's permeable ground, brief rainfall events, and low overall precipitation. The hydrographic system in the region consists mainly of intermittent streams with small and poorly defined channels. This is primarily due to the minimal annual rainfall, rapid evaporation rates, and the high permeability of surface materials, which facilitate water infiltration into deeper ground layers. These observations have been detailed in the Geohydrological Study conducted by Geoservices and Groundwater Studies for Minera Penmont in February 2013. To ensure environmental safety, the operation includes a network of monitoring wells around the leach pad. These wells regularly assess groundwater quality before, during, and after operations to ensure compliance with environmental standards and safeguard against contamination.

Noche Buena has no indirect discharges into surface water. The operation conducts annual inspections of the diversions in and around the site to check for any seepage into these typically dry channels.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 4.6

Discuss the basis for the Finding/Deficiencies Identified:

Noche Buena has adopted a comprehensive water management strategy to safeguard groundwater quality beneath the site and in adjacent downstream areas. Key infrastructure, such as plant zones and pump stations, has been equipped with concrete secondary containment systems and flooring, while pipelines are encased in secondary containment structures. Additionally, the Heap Leach Facility (HLF) is lined with a geomembrane to minimize the risk of leachate infiltration. Groundwater in this area resides at a depth of approximately 90 to 100 meters, adding a natural protective buffer. The HLF, including the Phase 7 expansions, boasts a robust design. Its central section comprises a prepared subgrade combined with structural fill, a geosynthetic clay liner (GCL), a 60-mil high-density polyethylene (HDPE) liner, a protective sand overlayer, and a layer of drain gravel with solution collection piping. Along its perimeter, the

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design includes a prepared subgrade/structural fill, fine bedding soil, a secondary 60-mil linear low-density polyethylene (LLDPE) liner, a sand layer outfitted with a leak detection and collection system (LCRS), a primary 60-mil LLDPE liner, a protective sand overlayer, and another drain gravel/solution collection piping layer. HDPE pipelines linking the HLF to the ponds are confined within either the HLF boundary or geomembrane-lined channels for additional safety. In the plant area, including sections dedicated to mixing and storage, the facility features concrete-lined surfaces. The secondary containment channel connecting this area to the pregnant solution pond is also lined with concrete for enhanced containment. The Pregnant and Intermediate Ponds have been constructed with multiple protective layers, including a prepared subgrade, fine soil layer, secondary 60-mil HDPE liner, geonet drainage (part of the LCRS), and a primary 60-mil HDPE liner. When relining these ponds, the original design specifications were upheld. As for the Contingency Ponds, including the expansion of Contingency Pond 2, the lining system consists of a prepared subgrade, fine soil layer, and an 80-mil HDPE liner from bottom to top for maximum durability and environmental protection.

The primary use of groundwater in the Arroyo El Sahuarito Aquifer, located near the mine, is for industrial purposes. Instead of comparing groundwater sampling results to a regulatory standard, as stipulated by the Environmental Impact Statement for the project, Noche Buena evaluates potential groundwater releases by comparing pre-mining data with semi-annual sampling results. According to the Official Mexican Standard NOM-001-SEMARNAT (Ministry of Environment and Natural Resources) - 2021, permissible pollutant limits for wastewater discharges, including wastewater infiltration into rivers, streams, canals, and drains, are set at 1.0 milligram per liter (mg/L) for total cyanide. Noche Buena conducts groundwater monitoring every six months, sampling wells located upgradient and downgradient near the heap leach facility (HLF), plant, and ponds. The groundwater gradient generally flows westward, with water depths in the vicinity of the mine ranging from 90 to 100 meters below ground surface.

During the recertification period, Noche Buena submitted laboratory data sheets detailing semi-annual sampling results. As noted in the initial certification audit report, pre-mining results showed non-detectable levels of total cyanide. Operational sampling during the recertification period indicated non-detectable total cyanide levels. In 2023, monitoring was conducted in July, with measured total cyanide levels below 0.02 mg/L, which is the detection limit. Subsequent monitoring was performed biennially in 2024 and 2025, with additional sampling conducted in January 2026. Throughout this recertification period, total cyanide levels consistently remained at or below detection limits. Auditors reviewed the monitoring chain of custody and reported full compliance. The data showed no clear temporal trends.

Noche Buena does not use mill tailings as underground backfill. Noche Buena does not have seepage that has caused cyanide concentration of groundwater to rise about levels protective of beneficial use and therefore no remedial activity is currently required.

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

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- in full compliance
- in substantial compliance
- not in compliance with Standard of Practice 4.7

Discuss the basis for the Finding/Deficiencies Identified

Noche Buena has provided secondary containment measures for cyanide unloading storage, mixing, and process solution tanks. The secondary containments have not changed since the initial audit and therefore they achieved compliance at that point in time. The Process Plant has secondary containment systems for all tanks and piping's, consisting of concrete walls and floors and sump pumps that reports to the barren tank. In addition to the concrete wall, the secondary containment system for the process tanks and vessels also consists of concrete floors sloping to an interconnected series of grated concrete channels throughout the plant. The process tanks and vessels have pipes extending to these grated concrete channels to direct overflows such that solutions do not accumulate on the plant floor. The largest vessel reports directly to the Pregnant Pond rather than to the system of concrete channels. The channels combine into a single channel that then flows to the Pregnant Pond. Along the route to the Pregnant Pond, this channel also collects possible overflows from the two concrete sedimentation cells. Design drawings showed that the tanks on concrete bases included an impermeable barrier between the tank base and the underlying ground. The tanks area is installed on a concrete ring beam with a reinforced concrete top supported by compacted structural fill within the ring beam. The concrete top within the ring beam provides a competent barrier to leakage. The other vessels at the plant are elevated over the concrete floor of the plant.

All secondary containment systems are designed with sufficient capacity to accommodate the volume of the largest tank within their bounds, along with any solution that could backflow through piping to the tank, plus additional space for runoff from a design storm event. The adequacy of the containment's capacity was evaluated as part of the previous cyanide audit, where it was determined to meet conformance standards. Additionally, a visual inspection confirmed there were no stored materials within the containment area that could reduce its effective capacity.

The operation has the operating procedure PO-PL-17, which details the response to spills of cyanide solution. According to this procedure, if a spill occurs in the area containing tanks with cyanide solution, the liquid will remain within the secondary containment of the reagents area and be pumped into the barren solution tank. To prevent further spills, the barren solution tank is equipped with a system of gutters, which directs the solution through a pump to the rich solution ponds. The secondary containments remain unchanged since the initial audit and were deemed compliant at that time. The secondary containment system for the four high-strength tanks includes a sump with a float-operated pump that directs liquid to the barren tank. These containments, along with the sump, are routinely inspected, and the pump is operated as required. For the rest of the plant, secondary containment drains to the Pregnant Pond through a grated concrete channel via gravity flow. The entire system undergoes regular inspections and preventive maintenance to ensure proper operation. Procedures are in place to regulate the

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functioning of sumps, which include both manual and automatic pumps, as well as gravity-flow connections, all designed to prevent environmental discharge. All liquids collected in secondary containments are treated as process solutions and are reintroduced into the process circuits. Given that any liquid within the containments, whether precipitation or process solution, is directed back into the system, no formal written procedures are deemed necessary.

All cyanide process tanks at Noche Buena have concrete secondary containment.

Noche Buena has established comprehensive spill prevention and containment measures for its cyanide process solution pipelines to mitigate potential leaks and safeguard the environment. High-strength cyanide pipelines connecting the storage area to the addition points are secured over metal trays or concrete floors, functioning as secondary containment systems. Similarly, pipelines carrying process solutions are installed over concrete surfaces and supported by metal trays for the elevated reclaim water pipeline. During the recent audit, high-strength cyanide was exclusively added to the barren tank. Containment measures have remained consistent since the previous audit, which included the extension of pipelines and containment ditches to accommodate the final Phase 7 of the Heap Leach Facility (HLF). At the time of inspection, Noche Buena was actively HLF 6, 7, and the slopes of pads 1, 2, and 3. The pipeline extending from the plant to the HLF is secured within a geomembrane-lined ditch, which has not changed along the southern perimeter of Phases 1 and 2. However, the ditch along the southern and eastern boundaries of Phase 3 was expanded and extended to encompass Phase 7. Additionally, other pipelines within the HLF perimeter are incorporated into the geomembrane-lined footprint of the facility.

There is no natural surface water in the vicinity of the mine due to the extreme aridity.

Noche Buena has manufactured tanks, columns, vessels, and pipelines using materials specifically selected for their compatibility with handling cyanide and high pH environments. These structures are constructed from stainless steel, mild steel, and high-density polyethylene (HDPE). Since the initial audit, no substantial changes have been made to these installations, and any updates or expansions have adhered to the use of the same materials. The pipelines, in particular, are composed of (HDPE, stainless steel, and mild steel coated with industrial-grade protections, chosen according to the pressure demands within the system. Auditor observations verified that these materials continue to be in solid, well-maintained condition.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 4.8

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Describe the basis for the Finding/Deficiencies Identified:

Quality assurance/quality control (QA/QC) programs were implemented during the construction and extension of the cyanide facilities. Compliance with this question was achieved during the initial audit and subsequent recertification audits for all cyanide installations built before this recertification period. All major installations were built with QA/QC programs. For this audit certification period 2023 to 2026, no new cyanide installation were built or modified. During last certification audit, the HLF Phase 7 construction, the Process Plant CIC installations and extension of the Emergency Pond 1 QA/QC programs implemented were evaluated and found in compliance. These were under quality assurance and quality control programs.

Noche Buena has finalized its QA/QC programs, which evaluated material suitability, compaction quality, geomembrane liner installation, and other critical aspects. As verified in previous audit reports, the operation had comprehensive QA/QC documentation in place for facilities built before this current audit cycle.

QA/QC documentation for the constructed facilities. Noche Buena has securely preserved both electronic and physical copies of these QA/QC documents for the cyanide-related facilities. Access to electronic files in the company intranet is available for the Plant supervisors, among others. The operation retains comprehensive QA/QC records for various construction phases, including the heap leach facility (HLF), emergency ponds, CIC plant, and Merrill-Crowe system, among others. These QA/QC reports encompass assessments of material suitability, earthworks placement and compaction, laboratory testing, liner installation, and as-built drawings. Project specifications clearly outline the requirements and procedures for material selection, handling, installation, construction, and testing. Furthermore, the QA/QC plans adequately specify testing frequencies, methodologies, and minimum acceptable results for critical components such as earthworks, geosynthetics, piping, valves, tanks, and steel plates. Auditors reviewed digital records on-screen and inspected boxes of physical documents to confirm compliance with requirements.

Noche Buena engaged appropriately qualified personnel to review the QA/QC documentation, ensuring that initial constructions and modifications to the cyanide facilities were constructed in line with the approved designs and specifications. The company provided turnover forms endorsed by the site project manager, the corporate engineering and construction head, and the operator overseeing the completed works. For instance, the completion reports for the CIC plant, prepared by Ingenieria Geomex S.A. de C.V. (Geomex) and CIMSA, were signed by certified engineers and representatives from the responsible companies.

Noche Buena has as-built drawings/certification for all cyanide facilities which are properly stamped by a qualified engineer.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 4.9

Describe the basis for the Finding/Deficiencies Identified:

Noche Buena has established documented standard operating procedures for monitoring wildlife and groundwater at the site. Due to the site's extreme aridity, surface water monitoring is not applicable. A detailed procedure has been put in place to conduct daily wildlife monitoring and outline the steps for reporting any observed mortalities. During the certification period, the mine engaged ALS-INDEQUIM SA DE CV, the Monterrey-based analytical laboratory and a subsidiary of ALS Laboratory Group (ALS), to carry out monitoring activities. ALS has created a comprehensive procedural manual for various water monitoring processes, including those relevant to the site's groundwater. For wildlife monitoring, Noche Buena continues to follow the same procedure used during the initial certification audit. This process includes daily assessments and detailed protocols for reporting incidents involving wildlife mortalities.

Sampling procedures have been carefully developed by qualified individuals, both internal personnel and external experts, with a focus on creating environmental monitoring and analysis plans. These individuals hold relevant degrees in scientific disciplines and possess significant experience in sampling and analytical techniques. The sampling plan was organized by ALS. ALS holds accreditation from the Mexican Accreditation Entity (EMA). Its procedure, PT-40-01 for Sampling Water and Wastewater R-11, was designed by Arturo Jáuregui Mancera, ALS's Sampling Coordinator, who has a professional register number 3395235. He is a Bachelor of Industrial Chemistry with 21 years of experience in the field. The document was endorsed by ALS Quality Manager Josefina Pérez Treviño, who has a professional register number 1453058. She holds a degree in Pharmaceutical Chemistry and Biology and brings 30 years of experience to her role.

The sampling and sample handling procedures developed by the contracted laboratory, ALS, outline the required equipment, methods, containerization, preservation techniques, and shipping instructions. These procedures also include blank field forms and a chain-of-custody form template. Laboratory staff are responsible for collecting the samples and transporting them to the laboratory for analysis, which focuses on total and WAD cyanide levels. Groundwater sampling is conducted by ALS under the supervision of mine personnel. During the recertification audit, the auditors examined completed chain-of-custody and field forms, confirming their proper use. Additionally, they reviewed a map detailing the locations of groundwater monitoring wells around the mine site.

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Field reports from the operation document various sampling conditions that could impact analysis, including weather, livestock or wildlife activity, and human-related influences. ALS samplers record weather and other relevant conditions on field data sheets at the time of sampling. These forms also include details such as service requests, chain-of-custody information, sample containers, preservatives used, sampling equipment, calibration of field instruments, field parameters during purging, wellhead conditions, weather details, a list of constituents, and any additional observations that might affect sample integrity. Auditors reviewed the completed field forms for groundwater sampling to confirm that this information is accurately recorded by the operation.

Noche Buena has implemented regular monitoring to assess cyanide levels in groundwater located up and down-gradient of its cyanide facilities. The monitoring frequency, conducted every six months, is adequate for effectively characterizing the groundwater conditions and promptly identifying any changes. Given the site's deep groundwater—occurring at depths of 90 to 100 meters below the surface—and the westward horizontal gradient, this schedule is well-suited to the local conditions. Additionally, surface water monitoring is unnecessary due to the absence of surface water discharges and the extreme aridity of the area.

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

Standards of Practice

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 5.1

Describe the basis for the Finding/Deficiencies Identified:

The auditors confirmed that the operation has a Conceptual Decommissioning Plan for the entire operation (closure plan) including the cyanide facilities which is within the closure plan in Section 5.11. This closure plan was developed by Golder Associates 2020 from which updates are made every 3 years. The closure plan addresses the cyanide remaining on site upon cessation of production activities and prepares the site for its closure and post closure period, treating and managing cyanide and cyanide containing process solutions remaining in storage and production facilities in preparation for closure so that they do not present a risk to people, wildlife or the

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environment due to their cyanide content. In addition, the operation has written plans to conduct the necessary activities, as applicable to its cyanide facilities. Noche Buena decommissioning plan, among others, includes activities such as decontamination of equipment; removal of residual cyanide reagents; neutralization of process solutions; and installation of measures necessary for control or management of surface or groundwater such as pumping and treatment systems that would operate during the facility's closure period. The life-of-mine plan includes the process plant, process ponds, and HLF. The plan covers the appropriate decommissioning activities: use or return to vendor of residual cyanide; recirculation of cyanide solutions to the HLF and gold recovery in carbon columns until WAD cyanide is less than 0.2 mg/l; and washing and decontamination of cyanide equipment prior to demolition.

The closure plan and procedures for the operation include a general timeline outlining the sequence and duration of the proposed activities. This schedule specifies the order in which tasks will be carried out, beginning when the operation ceases production or when an individual cyanide facility is no longer in use. A list summarizing these activities can be found in Section 1.0 of the progressive closure plan, covering the period from 2017 to 2041. The key phases outlined include progressive closure, definitive closure, final closure, post-closure maintenance and monitoring, as well as post-closure monitoring. Decommissioning activities are planned to take place during the definitive closure phase within this timeline.

The decommissioning plan has been regularly reviewed and updated throughout this certification period to ensure it stays relevant and aligned with the evolving operations over time. The plan is revised every three years to account for changes in operations that impact decommissioning, as well as updates to decommissioning techniques and approaches.

The mine's decommissioning strategy includes a provision mandating periodic review and revision. During the audit, the auditors examined previous versions of the closure plan alongside the latest version from 2024. Their review confirmed that the current plan adequately incorporates all expansions and modifications to the operation that significantly influence the plan and its associated cost estimates.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 5.2

Describe the basis for this Finding/Deficiencies Identified:

The operation includes a cost estimate to ensure financial assurance. This estimate reflects the expenses required to fully fund the closure plan, which encompasses the mobilization,

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execution of planned activities, and demobilization by a third-party contractor. The estimate prepared by Golder is based on rates relevant to an external contractor, as outlined by the Mexican Chamber of the Construction Industry. It outlines specific line items related to site decommissioning activities involving cyanide and their associated costs. The most recent update to the closure plan, detailed in a memorandum from the external contractor Servicios Geológicos IMEX, is dated 2024. This update provides an estimate for the full cost of implementing all closure activities at Noche Buena by a third-party contractor. The plan addresses the closure requirements for the Process Plant, process and emergency ponds, and heap leach facilities. The estimated cost covers tasks such as decontamination, residual solution disposal, and other decommissioning measures for all cyanide-related facilities.

Noche Buena conducts a review and updates its decommissioning cost estimates every three years. The auditor has examined past versions of the cost estimates outlined in the closure plan.

Mexico has implemented a range of financial mechanisms to facilitate mine closures, including financial guarantees, compliance audits, and plans for monitoring and managing residual risks. Among these, self-insurance serves as the financial guarantee established by the mine for closure obligations. During an audit, the financial auditor's evaluation of the mine's financial strength—based on audited financial statements—reflected data as of December 31, 2024. Additionally, the mine submitted documentation from Ernst & Young (EY), a qualified external financial auditor, dated August 29, 2025. This documentation confirmed that Penmont possesses the financial capacity to meet its closure commitments. The financial assessment was prepared in line with the compliance requirements outlined in Section 40 CFR 264.143(f) of the United States Code of Federal Regulations.

Self-insurance serves as the financial assurance mechanism established by the mine to address its closure obligations. A financial auditor assessed the mine's financial stability based on its audited financial statements, reflecting data as of December 31, 2024. Furthermore, the mine provided documentation from Ernst & Young (EY), a certified external financial auditor, dated August 29, 2025. This report verified that Penmont has the financial capacity to fulfill its closure responsibilities. The financial assessment was conducted in accordance with the compliance standards set forth in Section 40 CFR 264.143(f) of the United States Code of Federal Regulations.

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

Standards of Practice

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 6.1

Describe the basis for the Finding/Deficiencies Identified:

Noche Buena has developed operating procedures that describe the steps, controls and precautions to be taken in facilities where cyanide is used, that are aimed to minimize worker exposure to cyanide. These procedures provide detailed information on risks involved with each task and adequately describe safe work practices. Documented procedures have been prepared for cyanide offloading; operation of the Carbon in Column (CIC) train; entry into confined spaces; equipment decontamination prior to conducting maintenance activities; stoppage and restart of the CIC circuit; among others. There are approximately 15 procedures related to cyanide management. In addition, Noche Buena has renewed in 2025 the ISO14001:2015 certification of its environmental management system and ISO 45001 certification for its safety management system. Both certifications are valid for three years. The procedures are reviewed every two years and updated, as necessary. All procedures include a section related to PPE (Personal Protective Equipment) requirements, considerations of safety hazards, potential impacts to worker exposure and the environment, permits needed to conduct the task, and a reaction plan in case of upset conditions. Procedures were reviewed and found to be sufficiently detailed to enable safe operation and to minimize worker exposure.

Noche Buena has standardized the development of procedures which includes a section with required personal protective equipment (PPE) for each activity. Noche Buena developed an in-house risk matrix to define required PPE for each activity. This risk matrix was updated in 2024, meets local requirements, and is updated every two years or when a new activity is added or removed. The procedures include the following sections: Objectives, scope, definitions, responsibilities, tools/equipment to perform the task, personal protective equipment (PPE) required for each task, considerations of safety and health risks and environmental aspects, work permits, description of the tasks, reaction plan, registers, appendices and log of changes to the procedures. Prior to conducting an activity, pre-work inspections are completed when applicable to help identify PPE required for that activity. The auditors verified that a pre-work inspection was completed prior to the cyanide offloading event. Pre-work inspections for cyanide offloading were reviewed for the recertification period and were found to be complete. The auditors also reviewed examples of permits to work in confined spaces. In addition to the use of general PPE, such as hard-hat, steel toe shoes, and safety glasses throughout the mine site, areas and/or tasks where personnel may encounter cyanide have additional PPE requirements. It was verified during the audit that several procedures require the use of special PPE in activities or tasks where personnel may come into contact with cyanide. For example, it was confirmed that hard hat,

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hearing protection, rubber boots, rubber gloves, chemical suits, approved full-face respirator and HCN gas monitors were in use for tasks that were performed at the cyanide offloading area.

Noche Buena has implemented several mechanisms to take into account worker input for the development of health and safety procedures. Among those, the ones to highlight are: i) Beginning of Shift Meeting (RIT meetings), which consists of 5-minute safety talks, where safety and occupational health matters are discussed with the workforce prior to starting daily activities. ii) Safety weekly meetings, where workers can provide opinion about safe work practices and procedures. iii) Hazard Identification and Risk Evaluation (IPER, by its acronym in Spanish), which are developed and completed by the operators prior to executing a task and are reviewed by the supervisors. iv) Review/training on procedures meetings, where the supervisor discusses the procedures with workers and operators, and they can provide feedback before the procedure is finally approved. Workers are trained in these procedures annually. Procedures are reviewed and updated as necessary every two years. v) Incidents/accidents investigation, where operators and unionized workers participate and can provide feedback related to safety.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 6.2

Describe the basis for the Finding/Deficiencies Identified:

Noche Buena has determined the appropriate pH for limiting the generation of HCN gas during cyanide mixing and other process activities. Specifically for the cyanide offloading activity, the procedure PO-PL-19 "Cyanide unloading from isotanker" indicates that during cyanide offload the pH should be in the range of 10.2 – 11 standard units to avoid generation of HCN gas. Observation of the cyanide offloading event confirmed that pH in the cyanide mix tank was checked prior to initiating the activity. The pH values are monitored in the Delta V screen and from the control room. Procedure PO-PL-07 "Leaching in heap leach pads" indicates that solutions during leaching activities requires that pH is to be maintained at a minimum of 10 standard units to maintain cyanide in alkaline solution and limit the generation of HCN. Lime is added to the ore to maintain the required pH levels during leaching. Procedure PO-PL-13 "Monitoring of pH on leach solution from leach pads" indicates that pH values of solution collected at the bottom of the heaps needs to be above 7 standard units. Samples are taken daily and analyzed at the mine lab. The auditors confirmed this through interviews with process personnel, and review of pH logs for cyanide offloading, during pH monitoring of solutions collected at the bottom of the heaps and pH values recorded at the barren tank before cyanide solution is sent to the leach pad. Historical data was reviewed showing pH levels for the recertification period. Generally, measured pH was meeting the values specified in the procedures mentioned above,

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with a few exceptions at the barren tank, where some values were reported below 10 standard units, but were promptly corrected by adding lime in the leach pad. The online pH meter at the cyanide offloading area is maintained on a monthly basis as part of the preventive maintenance program. The auditors also reviewed calibration records for the pH meters to verify that Noche Buena has maintained them in proper working order. Operators are required to register pH levels in the checklist during cyanide offload events. The checklists reviewed for the last three years indicated that cyanide was offloaded with pH levels that were generally above 10.2 standard units, except for a few isolated events that were promptly corrected by the operation.

Noche Buena has identified areas where workers may be exposed to cyanide in excess of 10 parts per million on an instantaneous basis and 4.7 parts per million continuously over an 8-hour period. Noche Buena updated its risk assessment in 2022 to review existing conditions and identify the areas of potential worker exposure to cyanide and to evaluate the need for installing new fixed HCN monitors and/or relocating the existing monitors. The risk assessments were conducted using ambient air data and HCN concentration values measured with a portable HCN monitor in the areas where cyanide is used. No changes in the location of the fixed HCN monitors have been identified for the recertification period as there have been no changes to the cyanide facilities. Noche Buena has installed fixed HCN monitors at areas where workers may be exposed to HCN gas (cyanide offloading area and barren tank). Fixed monitors are monitored continuously in the process plant control room. In addition, portable HCN monitors are used by operators and maintenance personnel where HCN gas can be present. Procedures for cyanide handling during cyanide offloading and leaching processes identify the potential for worker exposure to cyanide and require the use of the portable HCN monitors as part of the required PPE. Signage listing the PPE requirements to enter a cyanide facility has also been installed at appropriate locations. Fixed HCN sensor alarms are set at 4.5 ppm (notification alert) and 10 ppm (evacuation alarm). Notification means an alert in the control room and response / attendance by an operator to determine the appropriate actions. This requirement was also verified through observation of a cyanide offloading event, and interviews with process personnel.

Noche Buena has 2 fixed MSA HCN monitors. These fixed monitors are located at the cyanide offloading area and the barren tank. Fixed HCN monitors are checked by process personnel and calibrated every three months to ensure that the equipment is working properly. According to recommendations of the manufacturers, these fixed HCN monitors should be calibrated every six months. The auditors sampled HCN data of fixed monitors for the recertification period at the cyanide offloading area and verified that values recorded were generally below 4.7 ppm. Historic data for the recertification period at the barren tank was not available for review. Portable HCN monitors MSA brand (12 in total) are in use during operations where cyanide is present. These monitors are for the use of plant operators, safety staff, the emergency brigade and the clinic. The Instrumentation area is in charge of maintaining and calibrating these portable monitors. Personal protection equipment (PPE) requirements defined in cyanide handling procedures and maintenance procedures call for the use of a personal HCN monitor during specific operations where there is a potential for exposure to HCN gas. Operators and maintenance personnel were observed using these monitors throughout the audit. Fixed and portable HCN monitors are set

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up to produce visual and sound alarms at 4.5 ppm and 10 ppm, respectively, to limit worker exposure to HCN.

HCN fixed and portable monitors are calibrated on a regular basis and records are kept in the maintenance system called MAXIMO until mid-2025, and since then in the new maintenance system called Mas 9. Fixed cyanide monitors are calibrated every three months to ensure that the equipment is working properly. According to the manufacturer, this monitoring equipment should be calibrated at least every six months. There are 12 portable HCN monitors that are inspected every month and calibrated every three months to ensure that the alarms at 4.5 and 10 ppm are set and working properly. According to the manufacturer, this monitoring equipment should be calibrated at least every six months. Noche Buena has conducted a complete review of the maintenance and calibration system for fixed and portable monitors, including a process to ensure that no monitors are used in the field if they are not calibrated; generation of calibration certificates for each monitor; a revised inventory of all monitors on site; a thorough review of the calibration programs; and evidence that all fixed and portable monitors have been calibrated and were operational.

Warning signs are posted in all areas where cyanide is present, advising workers that cyanide is present and that smoking, open flames and eating and drinking are not allowed, and that, if necessary, suitable personal protective equipment must be worn. The signs are in Spanish, which is the language of the workforce. The PPE requirements are also posted in each area. Pictograms indicate the required PPE. The auditors completed visual inspections of signage at the cyanide offloading area, CIC train and solution ponds and found that signage was adequate. There are signs at the entrance of the leach pad alerting workers to the presence of cyanide and reminding them of the various prohibitions regarding its use. Induction training for employees includes information on typical warning signage used at Noche Buena for cyanide.

High strength cyanide solution is dyed in red color for clear identification. Noche Buena uses sodium cyanide from Draslovka. Draslovka sends the dye mix inside the isotainers together with the cyanide briquettes so that during the mixing operation, the high strength (>20%) cyanide solution turns into a red color solution.

Noche Buena has installed showers, eyewash stations and fire extinguishers at strategic locations throughout the process facilities in all areas where there is a potential for exposure to cyanide. Additionally, portable eyewash stations were found in certain areas. There are 9 fixed showers - eyewash stations and 4 portable eyewash stations throughout the process facilities. Showers and eyewash stations are inspected weekly by process personnel to ensure that they are operational and that water flows are adequate. The auditors checked showers and eyewash stations during the site tour to verify functionality and verified that they were inspected to ensure they were operational prior to cyanide offloading. The auditors also reviewed records of checklists and inspections of showers and eyewash stations. To protect against fire, dry chemical powder fire extinguishers are used where cyanide is present to prevent generation of HCN gas whilst extinguishing a fire. Fire extinguishers were inspected and tested monthly by site

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personnel. The auditors randomly checked fire extinguishers to confirm they are an acceptable type for use with cyanide.

Noche Buena has identified tanks and pipelines that contain cyanide solution to alert workers of their contents. Pipes containing cyanide are marked as containing cyanide solution, and flow direction is indicated. Labeling is typically located at places to easily identify and track the lines to identify contents. For pipelines, flow direction arrows for cyanide bearing lines are used to allow personnel to understand the flow and possible exposures and/or response requirements to leaks and/or maintenance work. Cyanide mixing, cyanide storage, cyanide distribution and process tanks are marked as containing cyanide. Signage warning of confined spaces in tanks has also been placed. The auditors followed the cyanide solution circuit from the cyanide mixing area to the process facilities. During the visual inspection of the cyanide facilities and interview with operators, there is evidence that workers are aware of the meaning of signage applied in the operation to identify cyanide presence. The auditors consider that signage used to identify cyanide tanks and piping is adequate.

Noche Buena has available Safety Data Sheets (SDS) and first aids procedures at critical areas where cyanide is managed. Binders with this information were available at locations where cyanide is used. The information was found to be in Spanish, the workforce language at the site. The SDS was provided by Draslovka and the auditors verified that it corresponds to the latest version provided by the manufacturer. In addition to the SDS sheets, signage is available to alert personnel from chemicals and required emergency response requirements in the high-risk cyanide areas. The auditors found evidence of SDS and first aid procedures located at the observation room by the cyanide offloading area and at the clinic. Verification was conducted by visual verification of materials included in the binders.

Procedure PS-HE-10 "Incidents" details the process to report, investigate and evaluate all accidents and incidents, including cyanide exposure incidents. This procedure documents the requirements to report and investigate health, safety and environmental related incidents to determine the basic causes of the incident and provide corrective and preventive actions to ensure that a similar incident does not recur. Accidents and incidents/near misses are classified according to their severity. Preliminary report forms are used to initially communicate the accident/incident. The accident/incident report is distributed within management staff. The incident investigation procedure was reviewed during the audit and was found to be comprehensive. Examples were available to show that several minor incidents had been appropriately investigated, and corrective actions taken and followed up until they are closed. No cyanide related emergencies occurred during this recertification cycle requiring the implementation of the emergency response procedures, or notification to ICMI.

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

The operation is:

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- in full compliance
- in substantial compliance
- not in compliance with Standard of Practice 6.3

Summarize the basis for this Finding/Deficiencies Identified:

Noche Buena has made available necessary safety equipment including antidote kits, fresh water, oxygen, resuscitators, radios, telephones, and alarm systems at the cyanide mixing area, and at the clinic. Cyanide kits are stored at two key locations: observation room by the cyanide offloading area, and the clinic. The kits consist of oxygen, activated charcoal, water, masks, and gausses. Operators are required to carry a radio while performing their tasks in the most critical areas where cyanide is handled, such as the cyanide mixing facilities. Emergency notification would be via cellular phone or internal radio frequency and by telephones located within the process facilities. Cyanide antidote sodium thiosulfate/sodium nitrate, oxygen bottles and resuscitators are also available at the clinic. Noche Buena recently acquired Cyanokit antidote for us at the operation. One ambulance is also located in the clinic. Automated External Defibrillator (AED) resuscitator equipment and artificial manual breathing units (AMBU) are located at the site's clinic and in the ambulance. The ambulance also carries oxygen bottles. The locations of the emergency equipment were deemed to be appropriate for the operation.

First aid equipment is regularly checked by both Process personnel and medical personnel. This includes inspections of cyanide antidote kits, first aid kits, eyewash stations and emergency showers. Inspections include checks of expiration dates of cyanide antidote kits and storage at the recommended temperature range. Medical personnel periodically inspect the sodium thiosulfate/sodium nitrate antidotes. The medical area is in charge of replacing cyanide antidotes when required. Oxygen tank pressure and cyanide antidotes expiration dates were checked during the audit. Oxygen tanks were adequately pressurized. At the clinic, the auditors reviewed inspection records of first aid equipment for the recertification period. The daily inspection forms included the storage temperature of the cyanide antidotes, which area maintained at the recommended range at all times. Cyanide first aid equipment (oxygen and activated charcoal) in the process area is inspected prior to cyanide offloading events. Cyanide antidote kits, oxygen bottles and emergency kits are inspected at the clinic on a monthly basis to verify that they are in good condition. Inspection records were available for review during the audit and were found to be complete.

Noche Buena has procedure PO-SM-03 "Treatment of worker intoxicated with cyanide" that describes what is to be done in the event of a cyanide exposure. Specific instructions are provided to treat victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes. Instructions detail the steps to be taken for first aid using oxygen and subsequent treatment of the victim with the cyanide antidotes and evaluate the need to evacuate the victim to a local hospital once stabilized. Emergency contact information is also included. Operational procedures and medical procedures at Noche Buena indicate actions to be taken when HCN concentrations reach 4.5 ppm (i.e. remove workers from immediate area) and higher than 10 ppm (i.e. evacuate the area and call Emergency Response). Procedure PO-PL-11 "Leakage

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prevention from leach pads” includes instructions on how to evacuate a victim that has been exposed to cyanide at the leach pad area.

Noche Buena has its own onsite capability (infrastructure, equipment and medical resources) to provide first aid and medical assistance to workers exposed to cyanide. The site has a complete medical facility (clinic) located at the mine site. Medical staff for each shift include a doctor and two paramedics. The paramedics are at the clinic 24 hours, while the doctors stay overnight at the nearby La Herradura mine, which is located 40 minutes away and is also owned by Penmont, and can provide support if required. The clinic is well-equipped for dealing with many types of medical emergencies, including cyanide exposure. The clinic has one ambulance in case victims need to be evacuated to local hospitals. Procedures are in place for treatment of cyanide exposure, for determining the need to evacuate a victim to a local hospital, and for evacuating victims using the ambulances.

Cyanide treatment is provided on-site by company medical staff at the clinic. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Fe Clinic in the city of Caborca is required to provide additional medical care. One ambulance is maintained at the clinic to transfer victims if needed. Procedure PO-SM-03 “Treatment of worker intoxicated with cyanide” describes what is to be done in the event of a cyanide exposure, including determination of the need to evacuate a victim to Santa Fe Clinic (located approximately 1 hour drive from the mine site), and procedures to evacuate victims using the ambulances. The cyanide antidote will be transported along with the patient to the clinic. For life, critical scenarios that exceed the Santa Fe Clinic capabilities, victims would be transferred to the Hermosillo hospital.

Cyanide treatment is provided on-site by company medical staff in the clinic. Noche Buena would manage any cyanide exposures without involving offsite facilities. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Fe Clinic in Caborca is required to provide additional medical care. Therefore, the offsite facilities do not necessarily treat victims directly for cyanide exposure. Noche Buena has determined that its medical facility has qualified staff, adequate equipment and expertise to respond effectively. Regardless of this, Noche Buena has established formal arrangements with the Santa Fe clinic regarding the potential to treat patients that have been exposed to cyanide. The auditors reviewed a letter from the Santa Fe clinic dated February 2026 indicating that they have qualified medical physicians, infrastructure and equipment to respond to cyanide exposures. The letter also stated that the hospital has medical and paramedic staff trained to provide care to patients with a diagnosis of cyanide poisoning and has adequate equipment to determine cyanide levels in blood. Noche Buena organized in May 2025 a training session provided by Draslovka on medical treatment of cyanide intoxicated patients with participation of doctors, nurses and paramedics from the site.

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

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 7.1

Describe the basis for the Finding/Deficiencies Identified:

Noche Buena has developed an emergency response plan to address accidental releases of cyanide, that is included in procedure PS-HE-07 “Emergency Response and Preparedness” (ERP) that identifies potential emergency situations including cyanide releases, and the activities and components that must be prepared before the emergency, such as emergency brigades, training, mock drills and communications during an emergency situation. The ERP, dated April 2025, also addresses the actions to be taken, first responders, responsibilities, emergency telephone contact list with both emergency staff numbers and external support, and recovery after the emergency. The ERP applies to Noche Buena mine and La Herradura mine, both of them operated by Penmont. In addition, there is a Contingency Plan, dated August 2024, that provides detailed incident response procedures and requirements, including contact information, declaration of emergency, notifications, and other information for a number of emergency scenarios. The ERP is complemented by approximately 18 procedures of emergency response, each of them addressing a specific emergency scenario. Cyanide scenarios considered include cyanide solution spills and treatment of worker intoxicated with cyanide. A complete list of scenarios is included in section 6 of the ERP. These procedures and plans have been implemented through specific training to personnel working in areas where cyanide is present as well as through mock drills, and equipment checklists throughout the recertification period.

The ERP, Contingency Plan, emergency response procedures, and process plant procedures provide response procedures for all potential cyanide failure scenarios required by the Code, including catastrophic release of hydrogen cyanide, transportation accidents, releases during unloading and mixing, releases during fires and explosions, equipment failure (valve, pipe or tank ruptures), overtopping of ponds and impoundments, power outages, and uncontrolled seepage. Failure of cyanide treatment systems and failure of tailing impoundments are not addressed because Noche Buena does not have a cyanide destruct circuit nor tailings facilities. Scenarios related to catastrophic releases of hydrogen cyanide from storage or process facilities are included in each cyanide related procedures (Section 7 – Reaction plan) and also in emergency general procedure PO-BE-07 “Spill of cyanide, cyanide solution, and overflow of solution ponds”. Scenarios related to transportation accidents are covered by the ERP of

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Draslovka cyanide transporter Segutal. Noche Buena does not assume responsibility for cyanide until it is transferred from the isotainer into the dilution tank. In case of a transportation emergency (on-site or off-site), Segutal is responsible for the emergency response as well as for the remediation and clean-up of any cyanide release. Noche Buena would provide necessary assistance in coordination with the transporter; this assistance may include emergency communications, medical aid, spill containment, and clean up. The ERP includes a section that details the actions that Noche Buena would take in case of an accident during cyanide transport. The ERP also indicates that the mine will offer and provide support to the transporter in case of any accidents occurring during transportation from the city of Hermosillo to the mine site. Releases during unloading and mixing are addressed in procedure PO-PL-19 "Cyanide unloading from isotainer". Releases during fires and explosions are addressed in procedure PO-BE-4 "Fire at the plant", and in the Contingency Plan. Both documents include the prohibition to use water in case of fire at the cyanide facilities to prevent generation of HCN gas. Scenarios related to pipe, valve and tank ruptures are addressed in procedure PO-PL-17 "Response to cyanide solution spills". Scenarios related to overtopping of ponds and impoundments, such as the process solution ponds are also addressed in procedure PO-PL-17 "Response to cyanide solution spills". Scenarios related to power outages and pump failures are addressed in procedure PO-BE-07 "Spill of cyanide, cyanide solution, and overflow of solution ponds". Scenarios of uncontrolled seepage are also addressed in procedure PO-PL-17 "Response to cyanide solution spills". Scenarios related to failure of cyanide treatment, destruction or recovery systems do not apply to Noche Buena as there are no cyanide destruction system at the operation. Scenarios related to failure of heap leach facilities and other cyanide facilities are addressed in procedure PO-BE-07 "Spill of cyanide, cyanide solution, and overflow of solution ponds", and procedure PO-PL-11 "Leakage prevention from leach pads".

Transportation of cyanide by truck from the Hermosillo warehouse to Noche Buena is addressed in Segutal ERP. Noche Buena does not assume responsibility for cyanide until it is transferred from the isotanker into the dilution tank. Segutal would have primary responsibility for a spill of solid cyanide during transportation from Hermosillo but could draw on resources from Noche Buena for support if the spill occurs close to the mine site. Noche Buena has a copy of the Segutal ERP, which was also reviewed by the auditors. Segutal ERP includes actions to respond to cyanide spills and intoxication. The ERP of Noche Buena includes a section that details actions that the mine site would take in case of a cyanide spill during transportation.

The Emergency Response Plan, the Contingency Plan, and the emergency response and process plant procedures describe the specific actions to be taken in case of emergencies, such as the use of cyanide antidotes and first aid measures, first responders, responsibilities, telephone contact lists, call for external help, and recovery after the emergency. Any emergency that has the potential to affect the surrounding communities will trigger the notification requirements outlined in the ERP and in procedure PS-HE-09 "Internal and External Communication". Clearing site personnel and potentially affected communities from the area of exposure is considered in the ERP, where actions to be taken when an emergency arise are described. Initial response, first aid and the use of cyanide antidotes by trained medical personnel is included in procedure PO-SM-03 "Treatment of worker intoxicated with cyanide".

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The ERP also provides responses to cyanide spills or leaks from the process facilities, and makes provision for initial response, first aid, and spill reporting control and cleanup. Control and mitigation measures of a cyanide related incidents is covered in the ERP and also in procedure PO-BE-07 "Spill of cyanide, cyanide solution, and overflow of solution ponds". Containment measures are covered under operational procedures as well as in the ERP and supporting emergency response procedures. Noche Buena incident reporting and investigation procedure will trigger the evaluation of root causes from an incident involving cyanide release and will include preventive actions to avoid future events.

7.2 Involve site personnel and stakeholders in the planning process.

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 7.2

Describe the basis for the Finding/Deficiencies Identified:

Noche Buena involves its workforce in cyanide emergency response planning. During training of the Emergency Brigade (EB), and after emergency mock drills, staff and the workforce can provide feedback. Workers can also provide feedback during the review of emergency response procedures in 5-minute safety talks (RIT meetings). The auditors verified that Noche Buena maintains sufficient medical resources, infrastructure and equipment that would not require to treat exposed patients to cyanide in off-site medical facilities. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Fe Clinic in Caborca is required to provide additional medical care. The ERP does not provide specific functions to outside responders and communities as Noche Buena has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility. If required, Noche Buena can request support from the nearby La Herradura, which is also owned by Penmont, to respond to emergency scenarios. Noche Buena has made potentially affected communities aware of the nature of the risks associated with accidental cyanide releases even though these communities would not be affected by any cyanide release. Noche Buena maintains regular engagement meetings with communities (ejidos) that are in the influence area of the operations such as Ejido Juan Alvarez (35 km away), Ejido Sahuaro (52 km away) and the city of Caborca (80 km away). Mine workers and contractors, many of them from Caborca, Juan Alvarez, and Sahuaro, have received cyanide-related training as part of the general training provided by Penmont for both Noche Buena and La Herradura operations.

Noche Buena has made potentially affected communities aware of the nature of the risks associated with accidental cyanide releases even though these communities would not be affected by any cyanide release. These communities include Juan Alvarez, Sahuaro and Caborca. Noche Buena has, however, established communication channels through community

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engagement meetings and through their contractors, brigade members, and workforce who live in these communities, as documented in the Contingency Plan. Communities are not expected to play any response role in case of a cyanide incident other than staying away from the area of the incident and reporting any accidents to the authorities and the mine. In case of an emergency, Noche Buena will communicate the event to the authorities and the communities through the Industrial Relations Superintendent, who is the authorized spokesperson for such events. Mine personnel participated in mock drills conducted in the recertification period. All drills conducted in the recertification period considered only internal personnel. Some of Penmont (Noche Buena and La Herradura operations) brigade members are also members of the Caborca Fire Department. Mine workers and contractors, many of them from Caborca, Juan Alvarez and Sahuaro, have received cyanide-related training as part of the general training required by Penmont.

The ERP does not provide specific functions to outside responders and communities as Noche Buena has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility. Regardless of that, Noche Buena has established formal arrangements with the Santa Fe clinic regarding the potential to treat patients that have been exposed to cyanide as it has qualified medical physicians, infrastructure and equipment to help respond to cyanide exposures. The auditors verified that Noche Buena maintains sufficient medical resources, infrastructure and equipment that would not require to treat exposed patients to cyanide in medical facilities off-site. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Fe Clinic is required to provide additional medical care. Noche Buena ERP does not designate any responsibilities to outside responders and communities. Communities are not expected to play any response role in case of a cyanide incident other than staying away from the area of the incident and reporting any accidents to the authorities and the mine. Regardless of that, Noche Buena has made potentially affected communities aware of the nature of the risks associated with accidental cyanide releases even though these communities would not be affected by any cyanide release. These communities include Juan Alvarez, Sahuaro and Caborca. The mock drills completed at the mine for this recertification period have not involved external stakeholders. However, the ERP includes current contact information for notifying regulatory agencies, offsite medical facilities, the media, and other stakeholders. As stated in the ERP, the plan is reviewed and updated every two years. The most recent update was in April 2025.

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

The operation is:

The operation is:

☒ in full compliance

☐ in substantial compliance

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☐ not in compliance with Standard of Practice 7.3

Describe the basis for the Finding/Deficiencies Identified:

The Contingency Plan includes an operational structure to respond to emergencies and is led by the General Manager, and the alternates can be the Safety and Ecology Manager for fires, rescue and hazardous materials scenarios; or the Occupational Health leader for medical attention and first aid scenarios. Emergency Brigade (EB) responsibilities are described in the Contingency Plan and in the internal regulations brigade document. The amount of personnel at Noche Buena has decreased in the last three years as the mine is getting ready to enter the closure phase. As a result of that, Noche Buena has only 7 brigade members (4 from the emergency response area and 3 from different areas of the mine) and are divided into 3 groups (one per shift). Additional support from La Herradura mine could be provided is required. There is a minimum of 8 brigade members available per shift (including La Herradura emergency response personnel). Some of the brigade members are firemen from Caborca and Puerto Peñasco. The auditors reviewed the brigade list contained in the Contingency Plan with information for its team members and other responders (doctor, paramedics, and security) including complete name, contact number, and working area. Procedure PO-HE-09-R02 "Brigade training program" includes an annual training program for the EB. It is the responsibility of the Emergency Response Leader to ensure that training is provided and maintained. The training program includes weekly training for EB members. EB members are trained in response to hazardous materials incidents, including cyanide training. The auditors reviewed training evidence for the recertification period. The ERP includes call-out procedures. Main way of communication is by radio, which is used and available 24-hours a day. Contact information for the EB is managed and maintained up to date. The functions and responsibilities of the Emergency Response Leader and brigade responders are detailed in the brigade internal regulations document. There is an Integration Emergency Brigade Act dated 2018 that provides details on roles and responsibilities. This document complements general information on roles and responsibilities included in the Contingency Plan. There is also a list of EB responsibilities that defines names of brigade members for the implementation and follow up of the operational controls of the brigade. Emergency response equipment including PPE's is provided in the ERP. The list includes among others: clothing for fire intervention, equipment for rescue at heights, transportation and vehicle rescue, hazmat and support equipment. Portable HCN gas monitors are also included in the emergency response equipment. Emergency response equipment is checked monthly as indicated in the ERP. Records of completed inspection checklists were available for review by the auditors. The ERP does not provide specific functions to outside responders as Noche Buena has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility.

The ERP does not provide specific functions to outside responders as Noche Buena has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility. It is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Fe Clinic on Caborca is required to provide additional medical care. Therefore, the

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offsite facilities do not necessarily treat victims directly for cyanide exposure. Noche Buena has determined that its medical facilities have qualified staff, adequate equipment and expertise to respond effectively. Regardless of this, Noche Buena has established formal arrangements with the Santa Fe clinic regarding the potential to treat patients that have been exposed to cyanide. Current contact information for fire, police, and hospitals is included in the ERP and supporting documents.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 7.4

Describe the basis for the Finding/Deficiencies Identified:

The ERP and Contingency Plan include procedures to notify management, regulatory agencies, outside response providers and medical facilities in case of an emergency. Contact information for internal personnel, outside responders and medical facilities from Caborca and Puerto Peñasco are included in the ERP. The contact list includes the names of management staff, internal first responders, security, medical services, regulatory agencies, and the Emergency Brigade. Procedure PS-HE-09 "Internal and External Communication" provides details on how to notify external parties in case of emergencies.

The ERP includes procedures to notify potentially affected communities and the media in case of an emergency. Procedure PS-HE-09 "Internal and External Communication" provides details on how to notify external parties in case of emergencies. The Community Relations department maintains contact information of the members of the local communities and the media in the management information system Borealis. In case of an emergency situation, Noche Buena will communicate the event to the authorities and the communities and media through the Industrial Relations Superintendent, who is the authorized spokesperson for such events.

Noche Buena has established a requirement to notify the ICMI (International Cyanide Management Institute) in case of a significant cyanide incident. Section 6 of the ERP includes the ICMI definition of a "significant cyanide incident" and states that communication to ICMI should occur within 24 hours of occurrence. The Emergency Response Leader would be in charge of such communication to ICMI. Noche Buena has not had any significant cyanide related incident during this recertification period.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 7.5

Describe the basis for the Finding/Deficiencies Identified:

The ERP and supporting documentation include remediation measures for liquid cyanide spills, including materials to be used for clean-up and for disposal of contaminated spill clean-up materials. Solid cyanide spills are not considered as Noche Buena does not have solid cyanide on site. Procedure PO-PL-17 "Response to cyanide solution spills" provide details on how to clean contaminated soil. In those cases, sodium hypochlorite, that is stored in the observation room, will be used in a solution at 10% for neutralization purposes. Procedure PO-PL-17 "Response to cyanide solution spills" indicate how to prepare the sodium hypochlorite solution at 10%, the depth at which impacted soil must be excavated and how samples should be taken to determine that the area is clean. The procedure also indicates that WAD Cyanide concentrations in soil should be below 0.5 mg/l to consider that the release has been completely cleaned up. All cyanide-contaminated material is disposed of in the heap leach area as indicated in procedure PO-PL-17 "Response to cyanide solution spills". Noche Buena confirmed that the operation only uses bottled water for drinking water supply and stated that well groundwater is brackish and undrinkable. By interview with environmental personnel, they confirmed there is no surface water at Noche Buena and that the groundwater table is located at a depth of approximately 90 to 100 meters. There are no nearby communities with water supplies likely to be affected by releases at Noche Buena.

The ERP does not specifically prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. By interview with environmental personnel, they confirmed there is no surface water at Noche Buena and that groundwater table is located at a depth of approximately 90 to 100 meters. Therefore, any use of chemicals (including sodium hypochlorite, ferrous sulfate, or hydrogen peroxide) is at no risk of release into surface waters.

Procedure PO-PL-17 "Response to cyanide solution spills" provides information on environmental monitoring in case of cyanide leakages into groundwater, including sampling and analytical methodologies to be followed, and sampling locations. Noche Buena has a groundwater monitoring program including groundwater wells located upgradient and downgradient of cyanide facilities. The Environmental Department would manage the characterization, extent and remediation of a spill, and is responsible for reporting any spills to the regulatory agencies. Noche Buena monitoring plan includes groundwater sampling and a regulatory reporting program that must be initiated if cyanide is detected in groundwater wells downstream of process facilities. Noche Buena monitoring program includes the analysis of soil

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to identify the extent and effects of a cyanide release. Procedure PO-PL-17 "Response to cyanide solution spills" indicates how samples should be taken to determine that the area is clean of cyanide. The procedure also indicates that WAD Cyanide concentrations in soil should be below 0.5 mg/l to consider that the release has been completely cleaned up.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 7.6

Describe the basis for the Finding/Deficiencies Identified:

Noche Buena ERP latest review was conducted in April 2025. The most recent Contingency Plan is dated August 2024. The emergency response procedures are dated August 2024. According to document control procedures, the ERP and other documents should be reviewed and updated every two years to ensure that information is kept up-to-date and that the plan remains appropriate for the mine. The ERP and supporting documentation are reviewed to identify any required changes, and to test and review the adequacy of emergency procedures with drills and exercises. Also, the ERP and supporting documents are reviewed after significant changes, new projects, incorporation of new hazardous materials, new significant aspects or after a significant unwanted event occurs.

Noche Buena conducts mock emergency drills according to an annual emergency drills program. The auditors reviewed evidence of emergency response drills during the recertification period which included scenarios with cyanide intoxication and cyanide releases that required testing the full hazardous materials response protocol. Drills for other identified emergency events are also completed on a routine basis to maintain an adequate level of emergency response preparedness. The emergency drill reports identified improvement opportunities, lessons learned and corrective actions. The drills reviewed included scenarios of cyanide solution releases and HCN gas exposure for 2023, 2024 and 2025, with the participation of employees. The scenarios included both cyanide spills and cyanide intoxication. All drills conducted in the recertification period considered internal personnel only. Drills are developed to include a variety of locations and exposure responses and are developed in advance and risk assessed to minimize potential impact of event unpreparedness. Drill reports including corrective actions were available for review by the auditors. Lessons learned are incorporated into its emergency response planning after a mock drill, if required.

There have been no cyanide-related emergencies during the recertification audit period requiring the implementation of the emergency response procedures. Periodic reviews of the ERP and supporting documentation are completed at least every two years. The auditors reviewed updates of the major components of the ERP, Contingency Plan and procedures, such as the emergency

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equipment list and its location, the names of the brigade members, and the emergency contact list. The ERP would be reviewed as part of the corrective action completed following any cyanide-related emergency. The ERP includes a requirement to evaluate and revise the emergency response procedures, as necessary, following emergency mock drills. Noche Buena also conducts formal revisions of emergency responses after real emergencies scenarios, including identification of lessons learned and corrective actions.

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

Standards of Practice

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 8.1

Describe the basis for the Finding/Deficiencies Identified:

All new hires, contractors and visitors at Noche Buena receive an initial general induction training course on health, safety and environmental matters before they can start working or enter the mine. This induction includes a “Cyanide Module” that provides information about the production process and the use of cyanide, its characteristics, health effects, risks, controls, storage and handling, PPE, signage, areas of risk, fires, spills, HCN monitors, symptoms, first aid, and emergency response. The auditors received this training prior to entering the mine and confirmed that the topics covered are comprehensive. Each area of the mine is responsible for managing its own annual training program, known as a training matrix, which covers topics related to cyanide. These programs have a duration of one year and employees must take the courses within this timeframe. The auditors reviewed the 2023, 2024, 2025 and 2026 annual training programs for Noche Buena to verify implementation. Training materials are available for induction training for all employees. Interviews with employees working at the cyanide offloading area, and personnel from Health & Safety, the clinic and emergency response were conducted, showing knowledge on cyanide management. 5-minute safety talks (RIT meetings) are also provided to workers including cyanide management and health effects of cyanide; these are provided by supervisors. Sign in sheets are used to record attendance. RIT meetings are the primary means used to provide refresher training in recognition of cyanide hazards. The annual training matrix for the recertification period was reviewed to validate training received by operators and supervisors interviewed during the field visit. During the review, the auditors

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verified that all critical procedures related to cyanide management were included in the training program.

Annual refresher training of the “Cyanide Module” course is provided in Noche Buena for personnel that would enter the plant site. Training includes chemical and physical properties of cyanide; hazards of cyanide; symptoms of cyanide exposure; emergency response; and first aid, including use of oxygen. The training includes a written test. Process workers also receive refresher training in cyanide management during review of operational procedures. In addition, 5-minute safety talks are provided to workers including cyanide management and health effects of cyanide. The 5-minute safety talks are the primary means used to provide refresher training in recognition of cyanide hazards. The auditors reviewed refresher training records which were offered at different times to cover all shifts, covering the recertification audit period. The auditors verified that Noche Buena retains copies of training records by randomly requesting information of the workers interviewed during the field visit. Training is recorded on sign-in sheets with training records signed by both trainer and trainee.

Training records, including refreshers and cyanide hazard training for Noche Buena personnel, are retained by the Process training coordinator in the form of hard copies and also in electronic version stored in Excel spreadsheet format. Training records were reviewed for the audit recertification period and were found to be complete. Training records identify the trainer, trainee, topics covered, date and sign off sheet.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 8.2

Describe the basis for the Finding/Deficiencies Identified:

New employees and any contractor worker that will perform cyanide related tasks in Noche Buena receive orientation training, including the “Cyanide Module” that covers elements specific to the handling and use of cyanide in the operation. Employee specific training includes a detailed annual program that covers operational procedures in the cyanide offloading area, the CIC train, and leach pad facilities. Aspects such as cyanide awareness, response, process information, hydrogen cyanide monitor and alarm operation, and location of cyanide safety equipment are included. This training program covers key operating procedures: cyanide offloading, operation of CIC facilities, leach pad facilities, HCN monitoring systems, among others. Each area of the mine manages its own annual training program (training matrix), which covers topics related to cyanide. The Process annual training matrix for the recertification period was reviewed to validate

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training received by operators and supervisors interviewed during the field visit. The Maintenance annual training matrix was also reviewed. This matrix includes critical cyanide related procedures, decontamination of equipment and response to workers intoxicated with cyanide. Experienced supervisors provide training on cyanide hazards, work procedures and PPE in classroom sessions and in the field using the operating procedure documents. Supervisors are trained to provide this training to workers. Refresher training on procedures is tracked, and records are signed by both the supervisor and the trainee. Refreshers training is provided according to the training program or more often if there is a change in the procedures. Workers are also instructed on the use of risk assessments and area inspections, which are carried out within work areas.

Noche Buena has developed a comprehensive list of procedures for its operations that define the steps required to complete a task that involves cyanide handling in a safe manner. The annual training program is prioritized based on tasks and risks with sign off required from both the trainer (process trainer or supervisor) and the trainee. Training elements required for a task or area are recorded on a training sheet. The auditors verified that procedures used at Noche Buena operations that involve the use and handling of cyanide are included in the training program. Training elements such as required personal protective equipment (PPE) and decontamination requirements are included in the training materials used to train operators and maintenance personnel. Training materials were available for review. On-the-job training by a senior operator or supervisor is also conducted prior to allowing a new employee to work alone. The trainee receives training for 90 days prior to being approved to work at the Noche Buena plant. After that, the trainee works under direct supervision of the supervisor, and once the trainee has acquired experience, is allowed to work on his own. This process can take several months. To verify that the worker is following the established procedures in the field, supervisors use the IPER coaching tool that allows to have interaction with the worker and provide feedback. The training sessions include written evaluations to verify understanding by the workers and define if they are qualified to conduct the task.

Training on specific tasks is provided by the process/maintenance trainer or by supervisors or lead operators that have successfully passed a “train-the-trainers” course. In some cases, supervisors are also considered qualified to provide training based on their experience managing cyanide facilities. Draslovka provided a train-the-trainer course called “Cyanide Trainer” in June 2025. This training also included topics such as cyanide risks; health effects; cyanide controls; and emergency response; among others.

All new employees and contractors that will work or might encounter cyanide during their tasks, are trained on cyanide before being allowed to operate onsite. Training includes cyanide awareness training and, for those that will be working within the plant facilities, review and understanding of operating procedures related to their tasks is mandatory. Some of the aspects covered include cyanide alarms and monitors, first aid and use of cyanide safety equipment. 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

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further training for the personnel on job activities and cyanide safety. New trainees are assigned to work under the supervision of a competent operator/supervisor. These trainees are required to work under direction of these competent operators/supervisors until they demonstrate ability to work without direct supervision in a safe and responsible manner.

Annual refresher training of the “Cyanide Module” course is provided at Noche Buena for personnel that would enter the plant site. Training includes chemical and physical properties of cyanide; hazards of cyanide; symptoms of cyanide exposure; emergency response; and first aid, including use of oxygen. The training includes a written test. Besides the annual cyanide refresher training, Noche Buena also provides re-training to process and maintenance personnel on operating procedures, which includes cyanide hazards and controls. Experienced supervisors provide re-training on cyanide hazards, work procedures and PPE in classroom sessions and in the field using the operating procedure documents. Supervisors are trained to provide this training to workers. Refresher training on procedures is tracked, and records are signed by both the supervisor and the trainee. Training records were reviewed for the recertification period. The auditors verified that Noche Buena retains copies of training records by randomly requesting information of the workers interviewed during the field visit. Training is recorded on sign-in sheets with training records signed by both trainer and trainee.

Task observations by supervisors are used to evaluate competency of workers and effectiveness of training. Evaluation of the cyanide training received is by observation of tasks (IPER coaching tool) performed by workers to ensure they are following appropriate work procedures and using suitable PPE when working with cyanide. The auditors reviewed the checklist used to conduct these task observations, and interviewed process plant supervisors. In addition, written tests are also used to evaluate effectiveness of training.

Training records documenting the training that was received are retained throughout an individual’s employment. Training records include the name of the trainer, trainee, date, subject covered and are signed by both the trainer and trainee. Written and verbal tests are completed to demonstrate the employees’ understanding of the training materials. Samples records were available for review and found to be complete. The auditors verified this requirement by randomly checking records of workers interviewed during the field visit. In all cases the auditors found evidence of training records and evaluations in compliance with this requirement.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 8.3

Describe the basis for the Finding/Deficiencies Identified

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All process operators and maintenance personnel that conduct cyanide related tasks including cyanide offloading and production, are provided with site-specific hazard training including cyanide awareness, HCN monitoring, emergency response, recognition of cyanide exposure symptoms, cyanide exposure first aid, and actions to be taken in the event of a cyanide spill. The Emergency Brigade team members also receive training to respond to cyanide emergencies, including procedures to decontaminate a cyanide exposure victim. Response procedures are covered during hazard and awareness training and during cyanide refresher training. Operators and maintenance personnel in different areas and shifts were interviewed and demonstrated good awareness of what actions are to be taken in the event of a cyanide release. As indicated above, the auditors verified specific training records for randomly chosen workers involved in cyanide offloading, production and maintenance activities, and found Noche Buena in compliance with this requirement.

Noche Buena has an Emergency Brigade (EB) on site. The EB has a total of 7 brigade members consisting of 4 personnel from the emergency response area and 3 from different areas of the mine, and are divided into 3 groups (one per shift). There is a minimum of 8 brigade members per shift (including La Herradura emergency response personnel). EB members are trained through participation in mock drill exercises as well as formal training programs. The auditors interviewed members of the emergency response team and found them to have received training on cyanide hazards and to be knowledgeable on how to manage cyanide releases, including use of response equipment. Mock scenarios and drills are regularly undertaken to test the effectiveness of the EB. The review of drill reports for the recertification period showed that the EB actively participated in emergency drills including scenarios involving cyanide emergencies. Records of training for the EB were reviewed for the recertification period and were found to be complete. Verification included review of training records, mock drill reports and random interviews with the Emergency Response Lead, operators and maintenance personnel.

No outside emergency responders would be included in an emergency response to a cyanide release. The ERP does not provide specific functions to outside responders as Noche Buena has the resources, equipment and first response capabilities to deal with cyanide related releases and exposures during transportation and within the mine facility. In case of cyanide exposures, it is expected that any victim will be treated for cyanide on-site, and once it has been stabilized, the doctor will decide if transfer to the Santa Fe clinic is required to provide additional medical care. Penmont organized in May 2025 a training session on “Medical Emergencies on Cyanide Intoxication” with participation of doctors, nurses, and paramedics from the mine site, as well as the Emergency Brigade and Process plant personnel from both Noche Buena and La Herradura operations. This training session was provided by Draslovka. The auditors verified that Noche Buena maintains sufficient medical resources, infrastructure and equipment that would not require to treat exposed patients to cyanide in off-site medical facilities.

Annual refresher training of the “Cyanide Module” course is provided in Noche Buena for personnel that would enter the plant site. This presentation provides information about the

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production process and the use of cyanide, its characteristics, health effects, risks, controls, storage and handling, PPE, signage, areas of risk, fires, spills, HCN monitors, symptoms, first aid, and emergency response. The training includes a written test. Additional training was also provided in May 2025 by external personnel (e.g. Draslovka). Besides the annual cyanide refresher training, Noche Buena also provides re-training on operating procedures, which includes cyanide hazards and controls, and is performed in an annual training program. Refresher training on procedures is tracked, and records are signed by both the supervisor and the trainee. Personnel interviewed showed a good level of awareness of emergency response procedures in the event of cyanide exposure or release.

Training records, including refreshers and cyanide hazard training for Noche Buena personnel are retained by the training coordinator in the form of hard copies and also in electronic version stored in Excel spreadsheet format. Training records were reviewed for the recertification period and were found to be complete. Training records identify the trainer, trainee, topics covered, date and sign off sheet. This requirement was verified through review of a sample of records for the recertification period of workers interviewed during the field visit. Operators and maintenance personnel in different areas were interviewed and demonstrated good awareness of what actions are to be taken in the event of cyanide release. As indicated above, the auditors verified specific training records for randomly chosen workers and contractors involved in mixing, production and maintenance activities, and found Noche Buena in compliance with this requirement.

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

Standards of Practice

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 9.1

Describe the basis for the Finding/Deficiencies Identified

Noche Buena continued implementing an “open doors” policy in terms of community engagement and continue using established mechanisms to provide opportunities to stakeholders to communicate their concerns related to cyanide management, including engagement programs, meetings, presentations, and tours to the mine site. There is one Community Relations department in charge of community / social / communication matters for both the Noche Buena mine and the nearby La Herradura mine, which is also owned by Penmont. For the recertification period, Noche Buena continued with the program for stakeholders to visit the mine, including

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schools, universities, authorities, medical institutions, journalists, among others. The mine tours include a presentation and explanation of the production process, the use of cyanide and the controls in place to avoid groundwater contamination, which is one of the main points of concern of the surrounding communities in relation to cyanide. The mine usually conducts 2 to 3 mine tours per month. Penmont has developed a video of the production process, including Noche Buena facilities and the use of cyanide. This video is also presented to visitors participating in the mine tours and to new employees arriving on site. Penmont also has a grievance mechanism in place to receive, process, manage and resolve complaints and grievances in a timely and consistent manner. Complaints and grievances are registered and managed in the management information system Borealis. There is an office in Caborca where stakeholders can file a complaint or request information about Noche Buena. There have been no cyanide related complaints for the recertification period. Every two years, Penmont conducts a perception study in the local communities to evaluate its social management programs and includes questions about contamination and management of hazardous materials. The most recent perception study, dated November 2025, included opinions about contamination from the mine, but does not specifically reference cyanide as an issue. The Community Relations department maintains a community engagement plan, including meetings with communities and families, which represents an opportunity to raise questions about any subject, including cyanide management. Penmont, in conjunction with its contractors, implements awareness campaigns in communities on environmental matters, such as Environmental world day, Water world day, environmental awareness campaigns in schools, among others. Penmont also participated in technical forums at the local university to explain the production process including the responsible use of cyanide. In these campaigns and forums, Penmont provides information about the production process including cyanide use. The Fresnillo plc corporate website provides information in English and Spanish on cyanide and the Code, as well as contact links for sustainability personnel through whom concerns or inquiries related to Penmont use of cyanide can be addressed. This information can be found in <https://www.fresnilloplc.com/sustainability/environment/case-study/> Penmont also uses the Human App (property of Fresnillo plc) to communicate relevant information about the operation, including for example the training sessions conducted by Draslovka in 2025, the execution of cyanide mock drills, and the update on cyanide operational procedures, among others. The Human App also includes a flyer called "Cyanide uses" that includes information about the process, the use of cyanide and emergency response.

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

The operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance with Standard of Practice 9.2

Describe the basis for the Finding/Deficiencies Identified:

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Noche Buena has developed written and visual descriptions on how their activities are conducted and how cyanide is managed and has made these available to communities and other stakeholders. These include: Power Point presentations that are provided in the mine tours that include an explanation of the production process, the use of cyanide and the controls in place to avoid groundwater contamination, which is one of the main points of concern of the surrounding communities in relation to cyanide; video of the production process and the use of cyanide that are also presented to visitors during the mine tours; the Fresnillo plc website that includes information about the Cyanide Code; presentations about cyanide (e.g. general induction, others) to the workers and contractors that live in Caborca and close communities. The information mentioned above is made available and distributed in different engagement opportunities with communities and stakeholders in general. Written materials on cyanide management are available to stakeholders if requested. Stakeholders may pose questions or raise concerns to Noche Buena directly during the mine tours, during meetings, and via contact information provided on the website, among others.

Information is disseminated in a variety of forms, including verbal form in community meetings, face to face meetings, mine tours, videos, among others. The people from the communities located around the mine speak and write in Spanish. Noche Buena provides information on cyanide in visual form (i.e. process video) and verbal form (i.e. presentations provided to communities during meetings). The information provided uses diagrams, drawings and photos, and explains aspects in simple language.

Information on cyanide-release scenarios would be made available publicly by means of local community meetings and by reporting to regulatory agencies in Mexico. Information on cyanide releases would also be included in the annual corporate responsibility report, separately identifying any incidents occurring in Noche Buena so that stakeholders would be aware of the nature and location of the release. Noche Buena has provisions in place to make information publicly available regarding potential cyanide releases or exposure incidents, if any such incidents were to occur. No cyanide exposures or incidents resulting in hospitalization or fatality have occurred prior to or since the mine was first certified. In case it occurs, it will be communicated to the Mexican Institute of Social Security (IMSS) and the Work and Social Prevention Secretary (STPS). These federal agencies would make the information available to the public. No cyanide releases off the mine site requiring response or remediation have occurred for the recertification period. In case it occurs, the Environmental department will communicate it within 3 days of occurrence to PROFEPA (Federal Environmental Protection Attorney). Information reported to PROFEPA is made available to the public through its website. No cyanide releases on or off the mine site resulting in significant adverse effects to the environment have occurred for the recertification period. In case it occurs, the Environmental department will communicate it to PROFEPA. No cyanide releases on or off the mine site requiring reporting under applicable regulations have occurred for the recertification period. In case of occurrence, the emergency procedure requires the site to communicate the incident to the PROFEPA following the established protocols, timeframes and reporting forms. No cyanide releases that

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are or that cause applicable limits for cyanide to be exceeded have occurred for the recertification period. In case it occurs, the Environmental department will communicate it to PROFEPA.

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