ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

Barrick Gold Corporation, Veladero Mine

Iglesia, Argentina

Submitted to:
The International Cyanide Management Institute
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USA

2025 Audit Cycle

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Mining Operation: Veladero Mine

Mine Owner: Barrick Gold Corporation

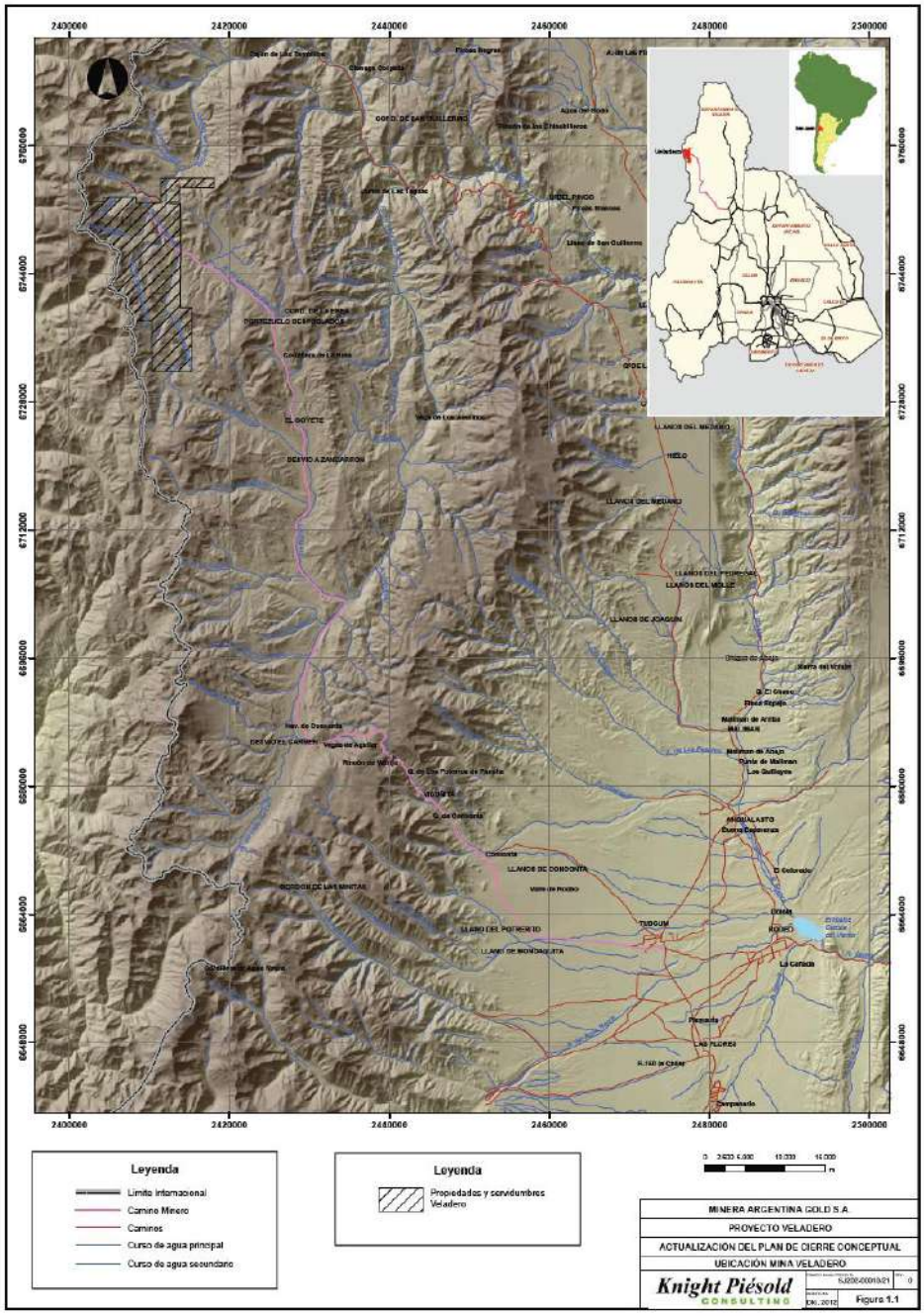
Mine Operator: Minera Andina del Sol S.R.L.

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Location and description of the operation

The Veladero mine location is presented in the picture below



Minera Andina del Sol S.R.L (MAS) is a limited liability company incorporated under the laws of Argentina, governed by a Joint Venture Agreement entered into on June 30, 2017, between Barrick Gold Corporation, which has its headquarters located in the city of Toronto, Canada and Shandong Gold, a Chinese Mining Company whose headquarters are located in the province of Shandong. MAS operates Mina Veladero, located in the province of San Juan, in the Republic of Argentina.

Veladero is located in the northeast of Argentina, in the province of San Juan, in the western watershed of Andean Cordillera, 5 km from the western border with Chile. The site is at an approximate elevation of between 3,800 and 5,000 meters above sea level. The mine is located in the district of Iglesia, approximately 370 km northeast of the city of San Juan by road.

The main activity of MAS is mining, including prospecting, exploration and exploitation of minerals. Veladero Mine (Veladero) includes the exploitation of gold and silver mineral resources by traditional methods including open pit, crushing, heap leaching with buried process solution ponds, Merrill-Crowe type processing plants and supplementary facilities. These methods are used to obtain gold/silver bearing material as a final product.

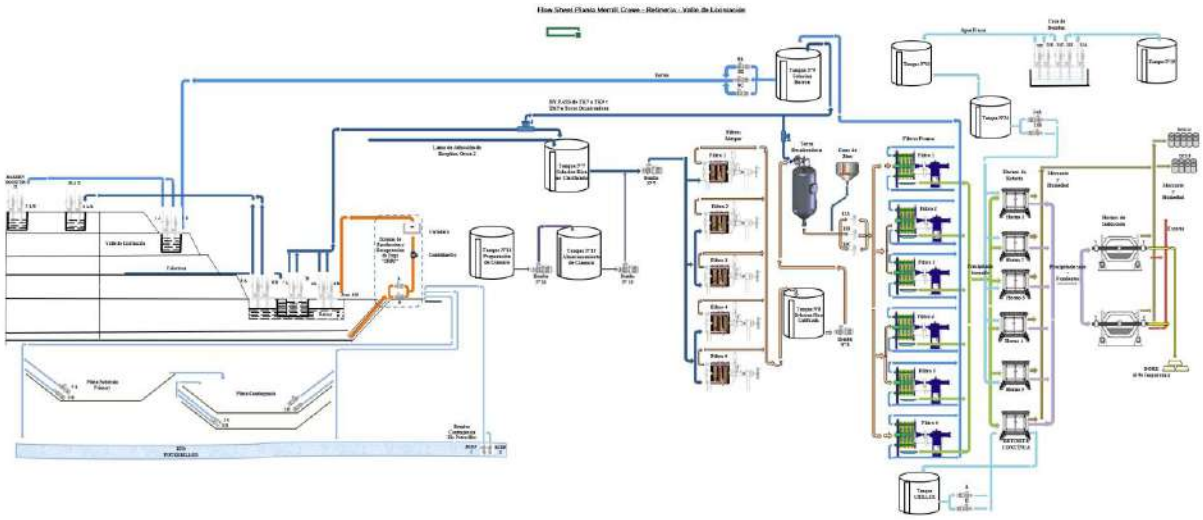
The objective of the Process Plant is to precipitate, retort (mercury recovery) and selectively melt the metals from the cyanide solution to obtain doré metal bars. The metal-rich cyanide solution that enters the plant goes through a first stage of filtering (clarification) to eliminate turbidity from it. Then, once the dissolved oxygen has been eliminated by means of the deaeration tower, zinc powder is added to this clarified pregnant solution for the precipitation of the metals. Basically, in this process called zinc cementation, the metals are separated from the cyanide and added to the zinc. The metals precipitated in the solution (Zinc, Gold, Silver and Mercury among others) are trapped in the filter presses which work in batches (periods of time). When the batch is finished, the filter is taken out of service and the precipitated metals (cake) are collected. This cake of precipitated metals is then introduced into the retort furnaces for the extraction of mercury before the smelting stage to obtain doré metal bars. The barren solution (no dissolved metal content) returns to the leaching process after the addition of sodium cyanide. The processing capacity of the process plant is 76,800 cubic meters per day.

The scope of the recertification audit includes the following cyanide facilities: Leach pad Stages 1-7; two backfilled Pregnant Leaching Solution ponds (PLS ponds) with Leach Collection Recovery Systems (LCRS); operating contingency ponds 1, 2 and 3; three sludge ponds; an underdrain collection pond (SP pond); a contingency pond located downgradient of all leaching facilities; solution channel and pipelines between the leach pad and the process plant; a cyanide mixing area including cyanide mixing and storage tanks; the Merrill Crowe plant; pregnant and barren tanks area; and a solid cyanide storage area. There are no tailings facilities nor cyanide destruction facilities at Veladero.

New facilities constructed since the 2022 audit include an expansion of the leach pad Phases 7A and 7B, which were commissioned in March 2023 and November 2024, respectively, and includes additional leach pad areas with geomembrane, pumping and piping systems.

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

The Veladero ore processing flowsheet is presented below:



Auditor's Finding

The International Cyanide Management Institute (ICMI) approved Audit Team verified that the Veladero 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

Veladero 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:	Fernando Rodriguez Emal: fernando@rdzconsulting.com
Date(s) of Audit:	April 8th – 11th, 2025

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.

Veladero Mine		October 13th , 2025
Name of Operations	Signature of Lead Auditor	Date

Barrick Gold Corporation
Veladero Mine

Signature of Lead Auditor

October 13th , 2025

SUMMARY AUDIT REPORT

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

Standard of Practice

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

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

Discuss the basis for this Finding/Deficiencies Identified:

Sodium Cyanide in briquettes purchased by Veladero during the recertification period was manufactured at facilities that are currently certified under the Code. Veladero purchased Cyanide produced at Orica´s Yarwun Plant in Queensland, Australia, during 2022 and 2023. In 2024 and Q1 2025, the site purchased cyanide from Draslovka Memphis Plant in the USA. Orica Yarwun plant achieved the original certification in 2006 and has maintained compliance in its ICMI certification since then. The latest recertification was on October 31st, 2023. Draslovka Memphis Plant latest certification was obtained on May 24th, 2023. During the last quarter of 2024 and first quarter of 2025, Veladero signed an agreement with the Gualcamayo Mine in San Juan province (Argentina) and received one hundred 1-ton boxes of solid sodium cyanide (40 tons in November 2024 and 60 tons in February 2025) produced from Draslovka Kolin Plant in Czech Republic. This plant achieved the original certification in 2011 and has maintained the code certification since then. The latest recertification was on April 07, 2022; however, the company has demonstrated evidence of a recent re-certification audit (end of January 2025) indicating full compliance.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Veladero maintains records of the chain of custody documents from Orica Australia and Draslovka Memphis, including the maritime transporter and land transporters that handle the cyanide brought to its site, identifying all the parties in the supply chain. The auditors reviewed four chain of custody files for Orica Australia (2022-2024), and two for Draslovka (20224-2025), finding them in conformance. Sodium Cyanide from Orica Yarwun Plant was delivered by a combination of road and rail contractors in Australia to the Brisbane Maritime Terminal. The Global Marine Supply Chain is a consolidation of all marine carriers and ports used by Orica to distribute their cyanide from Australia to their global customers, in this case, the Port of Buenos Aires as its final maritime destination. Transportation of Cyanide from the Port of Buenos Aires to Veladero was conducted by Víctor Masson Transportes Cruz del Sur S.A. Sodium Cyanide from Draslovka has a US/Canada Rail & Barge Supply Chain which includes rail and barge movements using the Intermodal Cartage Company from the plant to the rail station, then the Union Pacific Railroad CSX Railway from the Memphis production plant to US ports of departure, including the Ports of Everglades, Jacksonville, Long Beach, Los Angeles/San Pedro, Miami, New Orleans, Savannah and Seattle in the US. Draslovka Global Ocean Supply Chain includes the ocean carriers which are American Presidents Line (APL), Hamburg Sued, Maersk Line, Mediterranean Shipping Co. (MSC), Seaboard Marine and Hapag Lloyd. The supply chain also includes the following ports in Argentina: Buenos Aires, Puerto Deseado, and Zarate. Transportation of Cyanide from the Port of Buenos Aires to Veladero was conducted by Grupo Cinca (Grupo Cinca S.A. / Capesa & Co. S.R.L. / Transportes Valentin S.A.). Sodium Cyanide from Draslovka Kolin Plant includes road transportation using three subcontractors (Autotransport Benda, Brass Breburda (Brass), HAMR ART (HAMR)) to transport the containers to the Metrans (rail transporters) in Prague by road. Rail transport then transports the containers to the Bremerhaven, Hamburg and Wilhelmshaven Sea Ports. Then Draslovka uses the CMA-South America ocean carrier (included in Draslovka Global Ocean Supply Chain certification). The supply chain also includes the following ports in Argentina: Buenos Aires, Puerto Deseado, and Zarate. Transportation of Cyanide from the Port of Buenos Aires to Gualcamayo was conducted by Víctor Masson Transportes Cruz del Sur S.A.

During the audit, it was verified through the ICMI´s website, letters, and e-mails, that all cyanide transporters involved in Veladero Cyanide supply chain during the certification period were code certified companies or provided evidence of an independent third-party audit within the recertification timeframe. Orica Australia Supply Chain was most recently recertified on October

6th, 2025, resulting in full compliance. Orica Global Marine Supply Chain was last certified in December 2024. It also includes the Port of Buenos Aires as a destination, among others. Orica Latin America Supply Chain was last certified on July 8th,2024. It includes transportation of sodium cyanide within Peru, Argentina, and Colombia. Within Argentina, transport was conducted by the certified transporter Victor Masson Transportes Cruz del Sur S.A. Draslovka transport operations; the Draslovka Global Ocean Supply Chain, the Draslovka US Supply Chain, were most recently recertified on June13th 2025, finding them in full compliance with the Cyanide Code. Draslovka Cyanide transportation once in the port of Argentina to the mine site was conducted by Grupo Cinca, most recently recertified on May 28th 2025, finding them in full compliance. Cyanide transported from Gualcamayo Mine to Veladero in December 2024 and February 2025 was done by using the transportation company Grupo Cinca, which is certified under ICMI.

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

Standards of Practice

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

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

Discuss the basis for this Finding/Deficiencies Identified:

The cyanide unloading, storage, and mixing areas were designed and constructed with solid international engineering practices, as determined by the initial certification audit in 2008, and remain substantially unchanged since that time. Veladero receives solid sodium cyanide briquettes in one ton “bag in box” intermediate bulk container (IBC) plywood boxes and in Ecopacks. The boxes and Ecopacks of solid cyanide are stored in a secure, concrete floor and stem wall contained and covered building. The solid cyanide unloading and storage area as-built drawings dated November 2007 are signed and stamped by a certified professional engineer. These drawings include foundation, concrete, and structure specifications. These drawings were approved by regulatory agencies of the San Juan province and a license for use of the solid cyanide storage area was issued to Veladero. The cyanide mixing area is located inside the Merrill Crowe plant. Veladero maintains design and drawings dated October 2006, for the whole plant area including the cyanide mixing area. These drawings are stamped by a certified professional engineer. These drawings were approved by regulatory agencies of the San Juan

province and a license for use of the plant facilities was issued to Veladero. The field component of the audit confirmed that the cyanide mixing area is located within the internal structure of the Merrill Crowe plant on concrete hardstanding and maintained in good condition. Cyanide mixing and cyanide storage tanks are located within containment concrete berms and is connected with the larger Merrill Crowe secondary containment, which provides additional capacity to contain at least 110% volume of the largest tank.

The solid cyanide storage area is located in a dedicated facility placed on competent concrete hardstanding, which is located far away from communities or surface waters. The storage area is access controlled with appropriate cyanide warning signages and is secured from weather. The storage area has no ventilation features due to inclement weather conditions and to avoid ingress of snow. Procedure ALM-PVL-012 “Sodium Cyanide Handling” indicates that the doors of the storage area have to be opened to ventilate the area prior to entering the facility. The solid cyanide storage area is located approximately 30 meters from the offices in the plant building. There is a contractor maintenance workshop located 15 meters away from the solid cyanide storage area. Veladero has installed an alarm system to alert workers to evacuate the area in case of a HCN release from the solid cyanide storage facility. Inside the plant, the mixing and storage tanks are within a separate, controlled-access room. Access to the cyanide mixing area is strictly controlled and has a lock in place. The cyanide mixing area has two fixed HCN monitors Toxgards 2 with visual and audible alarms to detect any HCN gases and evacuate the area if necessary. In addition, during cyanide preparation, operators are required to have handheld HCN monitors to perform the task. The cyanide mixing area has a ventilation system that operates continuously. In addition, the mixing and storage tanks have vents with exhausts that exit through the roof of the building.

Veladero has a preparation area for cyanide that includes a mixing tank and a cyanide storage tank. There are level indicators and high-level alarms installed on both tanks. These levels are continuously monitored from the process control room. Arrangements remain unchanged since the previous recertification audit. There are both a Hi-level (at 4.4 meters) and Hi-Hi level alarm (at 4.5 meters) on both the cyanide mixing and storage tanks. The maximum height of each tank is 5.5 meters. The interlock valve from the mixing tank to the storage tank shuts off automatically when the Hi-level indicator is reached. The auditors observed screenshots in the control room showing that the level indicators were functioning correctly. Visual alarms are also located in the plant control room. The level sensors are calibrated every 4 months, and the alarms are calibrated on an annual basis. Both the level sensors and alarms are included in preventive maintenance routes. The auditors observed calibration records for the last three years and found them to be complete.

Cyanide mixing and storage tanks are located in a separate room in the Merrill Crowe plant and contained within concrete berms with good condition concrete flooring with epoxy sealing to avoid infiltration. All construction and movement joints are sealed. These materials are suitable to provide a competent barrier to leakage. The berms and containment areas are also subject to regular weekly inspections. Arrangements remain unchanged since the previous recertification

audit. Arrangements remain unchanged since the previous recertification audit. This containment area is also connected with the larger Merrill Crowe secondary containment which provides additional capacity to contain at least 110% volume of the largest tank. In addition, there are automatic sump pumps that maintain the secondary containments free of any fluids. The bermed containment areas have been confirmed both previously as part of engineering specification checks and during the field audit. During the field inspection, the containment area was noted to be in good condition, with no significant damage, spalling or cracking evident.

The solid cyanide storage area is located in a dedicated facility, under a roof, secured from weather, off the ground and constructed over good condition concrete hardstanding. The risk of potential contact with meteoric water is very low. The solid cyanide storage area has no ventilation features due to inclement weather conditions and to avoid ingress of snow. Procedure ALM-PVL-012 “Sodium Cyanide Handling” indicates that the doors of the storage area have to be opened to ventilate the area prior to entering the facility. The operator has to take HCN measurements in three sections of the storage area prior to allowing access to other personnel. In addition, Veladero has installed a fixed HCN monitor inside the storage area with a visual display and an alarm that can be heard outside the storage area. The cyanide mixing and storage tanks are inside a separate, controlled-access room within the plant building, with adequate ventilation features. The cyanide mixing area has an automated ventilation system that operates continuously. In addition, the mixing and storage tanks have vents with exhausts that exit through the roof of the building. The cyanide mixing area also has two fixed HCN monitors Toxgards 2 with visual and audible alarms to detect any HCN gases and evacuate the area if necessary. Access to the solid cyanide storage area is restricted, with the main access door locked when not in use and with no public access. The storage can only be opened with personnel carrying portable HCN monitors to verify that HCN gas concentration is within the safety concentration range before accessing the building. Appropriate warning signage is posted at all access points. Access to the cyanide mixing area and cyanide storage tank is also strictly controlled and the door is locked. The storage area is dedicated to sodium cyanide storage only, with no other materials permitted to be stored. No storage of other materials was observed during the field inspection. Cyanide mixing and storage tanks are located in a separate room in the Merrill Crowe plant and contained within concrete berms with good condition concrete flooring with epoxy sealing to avoid infiltration. Mixing with incompatible materials is unlikely to occur.

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

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Discuss the basis for this Finding/Deficiencies Identified:

Procedures for managing empty cyanide containers are described in procedure PRO-PVL-119 “Final disposal of containers or elements that have been in contact with cyanide”. Veladero receives solid sodium cyanide briquettes in one ton “bag in box” intermediate bulk container (IBC) plywood boxes and more recently in Ecopacks. Procedure PRO-PVL-119 “Final disposal of containers or elements that have been in contact with cyanide” specifies measures undertaken to ensure that cyanide packaging materials are managed in such a manner to prevent their use for any other purposes. The procedure specifies that wood, bags and plastic materials are temporarily stored in dedicated containers located next to the cyanide preparation area and then are transported by an authorized contractor to the city of San Juan for incineration as final disposal. Procedure PRO-PVL-119 “Final disposal of containers or elements that have been in contact with cyanide” requires that empty cyanide bags are rinsed at least three times with fresh water after the cyanide preparation is completed. Rinse water is then sent back to the process. The procedure also requires that a wipe test is conducted to the cyanide bags to ensure they are clean prior to being transported offsite for final disposal. Empty cyanide bags, once rinsed, are folded and placed temporarily, along with the wooden boxes, in dedicated containers located next to the cyanide preparation area and then are transported to San Juan for final disposal. Veladero keeps a register of cyanide bags and boxes sent offsite by an external contractor Eco San Juan. The auditors reviewed the shipment manifests for the last 3 years and found them to be complete. In addition, Veladero conducts periodic audits to the disposal facilities of Eco San Juan in the city of San Juan. Cyanide is not purchased in reusable containers and, as such, no packaging is returned to the supplier.

Veladero has procedure VEL-PO-PRO-116 “Cyanide solution preparation” that outlines the requirements for inspection, maintenance, observation and mixing of cyanide solutions; as well as the operation and function of valves, pumps and various interlocks within the cyanide mixing process. It also includes instructions for the prefill of the cyanide mixing tank with barren and caustic solution. The procedure includes a checklist for cyanide preparation that requires measuring pH levels, inspection of emergency showers and eye-wash stations, and inspection of HCN monitors, among other requirements for safe cyanide management. The auditors reviewed completed checklists for the last 3 years and found them to be complete. Veladero has procedure ALM-PVL-012 “Sodium Cyanide Handling” that provides instructions for the safe handling of sodium cyanide boxes including handling upon receipt, storage and transport to the mixing area. This procedure requires the use of cones to isolate the area from vehicles or personnel during the activity. The auditors also verified that the cyanide boxes in the cyanide storage area did not have any evidence of rupturing and puncturing. The procedure includes a checklist for cyanide management and transportation to the mixing area. The auditors reviewed completed checklists for the last 3 years and found them to be complete. Procedure ALM-PVL-012 “Sodium Cyanide Handling” limits stacking of cyanide containers to a maximum height of three per stack. This practice was also verified in the field. During the field visit it was also observed that the cyanide boxes were stored within marked areas on the floor and separated from the storage walls to allow for inspections. Procedure VEL-PO-PRO-116 “Cyanide solution preparation” includes a requirement for immediate clean-up of any spilled cyanide including

flushing the secondary containment of the cyanide mixing area with fresh water. Flush water is collected in a sump located within the containment area and then it is pumped back to the process circuit. No spills related to cyanide mixing were reported for the recertification audit. Procedure VEL-PO-PRO-116 “Cyanide solution preparation” requires operators to use the appropriate Personal Protective Equipment (PPE) during mixing activities. These include steel-toed rubber boots, rubber gloves, approved respirator, face shield, Tychem coveralls, hardhat, hearing protection, and personal HCN detector. The procedure also requires at least two workers to be present during the mixing activity. One operator is stationed at floor level, helps hook the cyanide bag in the overhead crane and observes the other operator who, working from an elevated deck near the top of the mixing tank, breaks the bag, introducing the content into the mixing tank. Also, the cyanide preparation activities are observed from the control room through a closed video circuit. The cyanide briquettes in the boxes already come with red colorant dye. This was verified by the auditors during the filed visit through interviews with process personnel. A cyanide offloading event was observed during the audit. The review indicated that Veladero has appropriate SOPs and practices to handle and mix cyanide in a safe manner.

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

Standards of Practice

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The scope of the recertification audit includes the following cyanide facilities: Leach pad Stages 1-7; two backfilled Pregnant Leaching Solution ponds (PLS ponds) with Leach Collection Recovery Systems (LCRS); operating contingency ponds 1, 2 and 3; three sludge ponds; an underdrain collection pond (SP pond); a contingency pond located downgradient of all leaching facilities; solution channel and pipelines between the leach pad and the process plant; a cyanide mixing area including cyanide mixing and storage tanks; the Merrill Crowe plant; pregnant and barren tanks area; and a solid cyanide storage area. There are no tailings facilities nor cyanide destruction facilities at Veladero.

Veladero has developed several procedures for the safe operation of cyanide facilities, including unloading, storage and mixing facilities, heap leach operations and Merrill Crowe plant. There are approximately 40 procedures and plans related to cyanide management. In addition, Veladero has achieved ISO14001:2015 recertification of its environmental management system in 2022, and is being revalidated in April 2025, which guarantees the retention of documents and records. All procedures include a description of the tasks to be performed, a section related to PPE requirements, considerations of safety hazards and potential impacts on the environment. Procedures were reviewed and found to be sufficiently detailed to enable safe operation.

Veladero has plans and procedures that include critical parameters for the safe operation of cyanide facilities. The POMM includes maximum operating levels for the PLS ponds. For the PLS East (Phases 1-5), the maximum operating level has been defined by the regulators at 27 meters below the spillway. PLS pond levels are reported on a daily basis to the regulators. For the PLS West (Phase 6-7), the maximum operating level has been defined by Veladero at 2.5 meters below the spillway. There are no discharges of treated water in Veladero; as such, there is no limit for cyanide in water discharges. The document “Update of water balance model for the leach pad at Veladero”, dated April 2025, prepared by SRK, includes the design storm event for solution ponds (Maximum Probable Flood in 24-hour is 300 mm) which is used for water balance purposes. Procedure PRO-PVL-102 “Regulation of pH in case it decreases” indicates that pH levels in the process are to be maintained above 10 standard units to avoid generation of HCN gases and to maximize recovery in the plant. Veladero has not established a maximum level of cyanide concentrations in process solutions (i.e. PLS ponds, contingency ponds) or during leaching activities, as these concentrations largely depend on the operational needs. To protect birds and other wildlife from the adverse effects of cyanide process solutions, Veladero has implemented controls in ponds that could have cyanide concentrations higher than 50 mg/l WAD cyanide, such as netting, perimeter fences, bird deterrent, daily inspections, among others. Additional discussion on this matter is presented in 4.4 below.

Veladero has developed and implemented operating plans and procedures for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide unloading and mixing activities as well as for storage facilities, processing facilities, heap leach facilities and all associated piping and pumps as having contact with cyanide. The POMM includes maximum operating levels for PLS East and PLS West and how to operate them to retain the designed storage capacity in these facilities. The PLS pond levels are monitored online daily. This information is also included in the Veladero water balance document.

There is a Management of Change (MoC) procedure issued from the corporate office that is used at all business units of the company. Veladero has also developed a specific one for the site that is currently being updated. The MoC process includes the identification and review of the proposed changes; analysis and evaluation of the changes by a multidisciplinary team including health, safety and environmental aspects; approval, and subsequent implementation of the

changes. The process includes signed off by all areas that participated in the evaluation of the changes. The management of change process is used consistently at Veladero.

Veladero has implemented contingency procedures for heap leach facilities and the process plant to respond to upsets in the operational water balance, deviations from design conditions, problems identified by monitoring and inspections, and to address temporary closure or cessation of the facilities. Procedures include step-by-step measures for stopping and starting the plant facilities, events of a power outage, providing response measures for emergencies related to failures of cyanide equipment, and response plans to address upsets in the process water balance. The POMM and PADE documents include detailed steps to be followed in case of a risk that could potentially exceed the design containment capacity of the PLS ponds. As mentioned above, Veladero has several plans and procedures for the safe operation of cyanide facilities. These documents include actions to be taken to regain control of the operation in case of upset conditions identified during cyanide facilities monitoring and inspections. In relation to a temporary closure or cessation of operations scenario, Veladero has identified critical activities and personnel required to maintain the water balance of the facilities and avoid potential overflow of cyanide solution , as well as activities related to inspection and maintenance of cyanide facilities. When the stop of operations is due to factors that do not affect the operation of the leach pad, the barren and pregnant solutions are recirculated within the process circuit. In case of an emergency shut down, cyanide addition ceases, and the barren/pregnant solutions continue being recirculated. In case of prolonged stoppages, total energy interruptions or major failures in the pumping systems, the process solution is stored in the PLS ponds.

Tanks holding cyanide solutions are inspected for signs of corrosion every six months by the Maintenance department as part of their preventive maintenance route. Inspection reports for the last 3 years were sampled and found to be complete. Evaluation of wall thickness is also conducted periodically for tanks integrity holding cyanide solutions, including the cyanide mixing tank and cyanide storage tank. Integrity tests were conducted in 2024 for the recertification period. Veladero has generated a maintenance route to conduct these tests every two years. Secondary containments integrity is included in weekly inspection forms considering items to specifically check for its impermeability, the presence of fluids and their available capacity. None of the containment areas has any drains to the adjacent land surface. The LCRSs at both the PLS East and West ponds are monitored several times on a daily basis (every 6 hours) and the results are compared with the online system. Volumes of pumped fluids and WAD cyanide concentrations are recorded daily. Examples of these inspection forms were reviewed for the recertification period. The flows pumped by the LCRSs have been below the regulatory permissible limits for the last three years. Water quality data indicate that there is cyanide concentrations detected between the liners of both PLS ponds. Pipelines, pumps and valves in the Merrill Crowe plant and heap leach area, are inspected on a weekly and daily basis, respectively. Any deficiencies identified are corrected and verified in the following inspection. Inspection forms for the plant and heap leach facilities were verified for the inclusion of items related to deterioration and leakage of pipes, pumps and valves. The auditors reviewed inspection forms for the recertification period and found them to be complete. The heap leach

pad and PLS ponds are inspected on a daily basis for critical aspects, including integrity of surface water diversions and available freeboard. Historical freeboard for the last 3 years at the PLS East and West ponds, were reviewed by the auditors and verified that the ponds were managed at all times according to the design criteria. The auditors conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, water diversions, ponds freeboard and heap leach facilities. These inspections also included cyanide unloading, mixing and storage facilities. Records of the inspections conducted by Veladero to cyanide facilities were reviewed by the auditors and were found to be complete.

Veladero has developed and implemented an inspection program for cyanide facilities with frequencies that vary between daily, weekly, and quarterly. Procedure PRO-PVL-228 “Visual inspections in leach pad” includes 18 inspection forms (annexes) that are used by Leach Pad personnel for daily inspections. These inspection forms include valves, pumps and pipes; venting valves and drainage; underdrains and contingency ponds; contingency pumps; sludge ponds; plant derivation pond; LCRS; diversion canals; leaching cells; operating contingency ponds 1, 2 and 3; contingency canal; among others. Procedure PRO-PVL-410 “Procedure for control of inspections in the process plant” includes 11 inspection forms (annexes) that are used by Process Plant personnel for weekly inspections at the Merrill Crowe area. These inspection forms include HCN gases (on a daily basis); area and equipment prior to cyanide preparation; critical valves; fire extinguishers; emergency showers and eye wash stations; cyanide kit and self-contained breathing apparatus (SCBA) equipment; HCN monitors; emergency activation; cyanide materials safety data sheets (MSDS); valves, pumps and pipes; among others. Quarterly inspections of cyanide facilities with participation of various areas including Environmental, Maintenance, Technical Services, and Leach Pad personnel. Inspections conducted by Supply Chain to the solid cyanide storage area during cyanide unloading, storage and transport to the plant area for mixing. In the case of inspections for wildlife mortalities, process personnel conduct daily visual inspections at the heap leach facilities as part of their routine activities. The inspection program of cyanide facilities including unloading, mixing and storage activities and frequency of inspections were found to be sufficient to ensure that the operation is safe and functioning within design parameters. The auditors reviewed inspections records for the last 3 years and verified that inspections are conducted in a consistent manner.

Records of inspections are retained and were reviewed by the auditors. The inspections are documented and include date of the inspection, the name of the inspector and observed deficiencies. The inspection program also includes cyanide unloading, mixing and storage facilities. Veladero has two mechanisms to document, track and close corrective actions identified during inspections: i) Corrective actions identified that are related to maintenance of equipment at the Merrill Crowe plant or leach pad areas are managed by the Maintenance area. These corrective actions are managed using SAP software, where work orders are tracked, prioritized, planned and closed. The auditors verified that corrective actions related to cyanide facilities were prioritized for prompt implementation. ii) All other corrective actions not related to maintenance of equipment that are identified through inspections conducted by either the Leach

Pad or Process Plant personnel are tracked by each process sub-area, implemented, and followed up until closure. The auditors reviewed examples of items identified during inspections and records of the implementation of the corrective actions until they were closed. Veladero has achieved ISO14001:2015 recertification of its environmental management system in 2022, and is being revalidated in April 2025, which guarantees the retention of documents and records.

The Maintenance area has a mechanic and electric preventive maintenance program (CIMC route, which are the initials of the International Cyanide Management Code in Spanish) for pumps, pipelines, valves, flow meters, level sensors, pH meters, sump pumps, tanks and cyanide facilities in general. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time it is needed to keep equipment and installations working properly. Preventive maintenance routes have frequencies that usually vary between 30, 60, 90, 120, and 180 days. Veladero develops a weekly plan for preventive maintenance using the SAP software. Preventive maintenance plans are generated automatically for each week. Corrective maintenance occurs as a result of work orders based on inspections. Work orders generated from inspection forms are entered into the system, including assigned priority. The auditors observed examples of both preventive maintenance and corrective maintenance records for the recertification period and found them to be complete.

Since late 2022, Veladero gets its power supply from the Chilean electricity grid (Linea Libertador) that provides up to 25.2 MW (Megawatts), which is the same power that is generated by the 4 onsite power plants (28 generators in total, 900 KW (Kilowatts) each generator) that are now in standby and retained as backup. Veladero operations require 12 - 14 MW, which is completely covered by the Linea Libertador power supply, and the backup generators. The backup generators are used when there is a power failure from the Linea Libertador or due to severe climate conditions. Veladero would only use 16 -18 generators at any given time. The additional generation capacity is structured to power emergency equipment necessary to maintain the containment and control of process solutions. The backup generators are part of a regular preventative maintenance program that is included in SAP. Veladero has a contract with the manufacturer of the generators to conduct preventive maintenance programs, including jump start tests. Veladero provided examples of preventive maintenance records for the backup generators for the last three years. Maintenance is conducted according to the number of hours that the generator is running (250, 500, 750, 1,000, 2,000 and 6,000 hours).

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

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

Discuss the basis for this Finding/Deficiencies Identified:

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

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Veladero operates its process facilities as a closed system with zero discharge of solutions. Any precipitation falling onto the leach pad is retained within the solution management system with no discharge or runoff. In the event of a pump or power failure, the heap leach pond system is sized to store draindown volume from the leach pads, and backup generators are available to provide power to the heap leach pumping operations in case of a power outage. At the time of the site visit, Veladero was unable to show evidence of the implementation and use of a comprehensive and probabilistic operational water balance model. Until 2022, Veladero used the probabilistic simulation software Goldsim to run the water balance but suspended its use that year, and it was not replaced with a model with similar features to prevent releases to the environment. Although Veladero has a water balance that is designed for production purposes, for the recertification period, the site did not have a comprehensive and probabilistic water balance model that is used as a tool to make operational decisions related to water management and that meets the requirements of the Code. During preparation of this report, Veladero sent evidence that an operational water balance model in Excel has been developed and is being implemented and used for operational decisions related to water management. This Excel water balance model is being verified and calibrated periodically by an external consultant (SRK) using the probabilistic simulation software Goldsim. This water balance model includes all the parameters required by the Code.

The document “Monthly Water Balance Spreadsheet Upload”, includes the solution rates applied to the leach pads, which is maximum 20 liters/hour/m^2. This information is collected daily from each cell that is under leaching. This information is considered as an input into the new water balance model. The documents “Monthly Water Balance Spreadsheet Upload” and “Update of water balance model for the leach pad at Veladero”, dated May 2025, include the design storm events for solution ponds. The Maximum Probable Flood in 24 hours has been estimated at 300 mm; and the 100-year, 24-hour storm event has been estimated at 80 mm. This information is considered as an input into the new water balance model. There are two weather stations at Veladero (Procesos and Potrerillos) that collect meteorological data including solar radiation, precipitation, wind speed, wind direction, relative humidity and temperature. Evaporation is

calculated using data from the other parameters collected by the weather stations. Potrerillos station has collected data since 2004, and Procesos station since 2007. Veladero sent evidence that the new water balance uses weather data from Procesos weather station only, and that the Potrerillos data is used as reference. In addition, the auditors detected that the weather stations have not been calibrated for the recertification period. During preparation of this report, Veladero sent evidence that the weather stations have been calibrated and there is a program in place to calibrate them every 2 years.

The heap leach facilities at Veladero have a surface water control system for controlling and safely directing runoff generated from upgradient watersheds around the heap leach. As such, upstream precipitation is not considered in the model. The new water balance model includes the effects of freezing and thawing conditions on the accumulation of precipitation within the facility. Precipitation is mainly snow and the most critical parameter in the water balance is accumulation and thawing of snow. The new water balance does not include any solution losses in addition to evaporation. The discharges of water from the underdrains system is non contacted water that is outside the process system. This water will only be recirculated back to the leaching system if cyanide is detected, which has not occured for the recertification period. The new water balance model considers power outage contingency simulations. The model can simulate a certain number of hours of power outage and generate different scenarios. The model considers 100 hours of solution draindown towards the PLS ponds. Veladero has backup generators that automatically start up in case of a power outage that could put at risk the water balance of the operation, however, such scenario is very unlikely and could only occur in case both the primary source of power (Linea Libertador) and the emergency power generators were not operational. Veladero does not have discharges to surface water nor a tailings storage facility.

The POMM includes maximum operating levels for PLS East and PLS West and how to operate them to retain the designed storage capacity in these facilities. The PLS pond levels are monitored online in real time. Maximum operating levels at PLS East and PLS West are 30,984 m3 and 181,544 m3, respectively. Inspection records for the heap leach facilities and PLS pond levels were reviewed for the last 3 years and found to be complete. PLS pond levels are monitored online in real time. The auditors also reviewed monitoring data for the last 3 years and verified that the solution volumes at the PLS ponds were managed according to the design criteria. As Veladero was unable to show a water balance for review during the audit, the verification of this information was done in an indirect manner. A quick calculation of the leach pad area and the pond volumes vs. the design storm event indicated that there has been enough free volume to contain this storm event for the recertification period.

Veladero conducts daily and quarterly inspections and monitoring activities to heap leach pads and ponds to ensure they are operated according to the design criteria and requirements of the POMM. This frequency is considered adequate considering the low precipitation rates in the area (106 mm per year). Inspections include valves, pumps and pipes; venting valves and drainage; underdrains and contingency ponds; contingency pumps; sludge ponds; plant derivation pond; LCRS; diversion canals; leaching cells; operating contingency ponds 1, 2 and 3; contingency

canal; among others. Records of inspection forms for the last 3 years were reviewed and found to be complete. Freeboard and solution volumes in the PLS ponds are monitored online in real time from the control room. The auditors reviewed free volume capacity data for the last 3 years and verified it was managed according to the design criteria.

There are two weather stations at Veladero (Procesos and Potrerillos) that collect meteorological data including solar radiation, precipitation, wind speed, wind direction, relative humidity and temperature. Evaporation is calculated using data from the other parameters collected by the weather station. Potrerillos station has collected data since 2004, and Procesos station since 2007. Veladero sent evidence that the new water balance uses weather data from Procesos weather station only, and that Potrerillos data is used as reference. The information from both weather stations is collected by the environmental area, and once validated, it is included in the water balance model for calibration purposes. The auditors reviewed on-site meteorological monitoring data and found them to be complete. The document “Update of water balance model for the leach pad at Veladero”, dated May 2025, indicates that the water balance model is to be calibrated every year. The auditors received evidence that the water balance has been calibrated in May 2025 by SRK consultants according to the defined frequency.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

The PLS East and West ponds have WAD cyanide concentrations above 50 mg/l, however, these ponds are backfilled and are not accessible to wildlife and livestock. Open ponds that could have cyanide solution at Veladero include the operating contingency ponds 1, 2 and 3, three sludge ponds inside the leach pad, and the infiltration pond located also inside the leach pad. The underdrain collection pond (SP pond) and contingency pond located downgradient of all leaching facilities are open but do not have cyanide solution in them. For those open ponds that could have cyanide solution in them with concentrations above 50 mg/l WAD cyanide (i.e. operating contingency ponds 1, 2 and 3, the three sludge ponds and infiltration pond), Veladero has implemented controls to restrict access of wildlife to open waters including netting above the ponds, perimeter fences, birds deterrent, daily inspections, and in some cases the use of sentry personnel when these ponds have solution in them. The secondary containment of the process pipelines that run from the leach pad to the process plant were free of process solution during the field audit. Procedure PRO-PVL-229 “Ponding control in leaching cells” requires daily inspections to check for ponding and the required steps to handle surface ponding, including manual or equipment excavation to aid drainage and improve infiltration. No wildlife mortalities

associated with cyanide have been reported during the recertification period due to ponding on the leach pad.

Veladero analyzes free cyanide on a daily basis at the backfilled PLS ponds and leach pad facilities. Current operating values are on average 75 mg/l free cyanide (i.e. 160 mg/l WAD cyanide), considering a factor of 2 as a relation between free and WAD cyanide (i.e. WAD cyanide doubles the amount of free cyanide in solution). For those open ponds that could have cyanide solution in them with concentrations above 50 mg/l WAD cyanide (i.e. operating contingency ponds 1, 2 and 3, the three sludge ponds and infiltration pond), Veladero has implemented controls to restrict access of wildlife to open waters including netting above the ponds, perimeter fences, birds deterrent, daily inspections, and in some cases the use of sentry personnel when these ponds have solution in them.

The ponds that could have WAD cyanide concentrations above 50 mg/l under contingency scenarios have controls in place to restrict access of wildlife to open waters. In November 2024 there were mortalities of two birds in contingency pond #2 due to cyanide ingestion. This event was not investigated by Veladero as the site classified the event as low impact according to the environmental incident reporting procedure. The heap leach pad areas are inspected on a daily basis for ponding and wildlife mortalities. No wildlife mortalities associated with cyanide have been reported during the recertification period due to ponding on the leach pad.

Procedure PRO-PVL-229 “Ponding control in leaching cells” requires daily inspections to check for ponding and the required steps to handle surface ponding, including manual or equipment excavation to aid drainage and improve infiltration. In winter months, pregnant solution emitters are buried beneath crushed material to provide cold weather protection. Recently, this practice has also been implemented during the summer months. During the site visit, no ponding was observed on the surface of the heap leach pad. No wildlife mortalities associated with cyanide have been reported during the recertification period due to ponding on the leach pad. In addition, Veladero leaching practices are conducted only with drip emitters to avoid overspray of solution due to strong winds in the area. Leaching in the external slopes of the leach pad is done with buried solution emitters and lower leaching rates (5 liters/hour/m^2).

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:

Veladero does not have direct discharges to surface water. The Veladero mine operates with zero discharge of process solutions. Veladero does not have indirect discharges to surface water that have caused the instream concentration of free cyanide to exceed 0.022 mg/l. Veladero has an underdrain system below the cyanide facilities (3 underdrains) that discharges into the underdrain collection pond (SP pond). The water from this pond is monitored every three days and is only discharged to the environment if there is no presence of cyanide. If cyanide is present, this water is recirculated back to the leaching system. WAD cyanide concentrations of the water discharged from the SP pond for the recertification period were below detection levels (<0.01 mg/l). At Veladero there are no indirect discharges that have caused cyanide in surface water to rise above levels protective of a designated beneficial use of aquatic life.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

There is no designated downgradient beneficial use, nor any actual point of groundwater use, nor any applicable groundwater standard in the area surrounding the Veladero operation. Regardless of that, Veladero has taken measures to manage seepage from cyanide facilities including a composite clay and geomembrane liners with underdrain systems in the leach pads and PLS ponds; leak detection recovery systems between liners of the PLS ponds, pumps to return underdrain waters to the process circuit in case of cyanide presence, secondary containments for cyanide facilities in the Merrill Crowe, standard operating procedures for management of cyanide facilities, among others.

Veladero has a groundwater monitoring network that analyses WAD cyanide concentrations. There are 18 groundwater monitoring wells downgradient of the cyanide facilities; some of these wells have pumping capacity in case cyanide presence is detected. These pumps are inspected every 3 months to ensure they are operational. Monitoring well GWQ22 is located immediately downgradient of the cyanide facilities and is monitored every three days. Data collected for the period between May 2022 and April 2025 indicate no detection levels for cyanide species (WAD cyanide values < 0.01 mg/l). In 2022, Veladero implemented 19 groundwater monitoring wells around the perimeter of the leach pad following geological faults to detect potential leaks that might not be reporting to the lower part of the leach pad. These wells are monitored monthly for Total, Free and WAD cyanide. Data collected for the recertification period indicate no detection levels for cyanide species (WAD cyanide values < 0.01 mg/l). Veladero does not have seepage that has caused cyanide concentration of groundwater to rise about levels protective of beneficial use.

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

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

Discuss the basis for the Finding/Deficiencies Identified:

Spill prevention and containment measures are provided for all cyanide storage, mixing and process solution tanks. Tanks located at the process plant area (cyanide mixing, cyanide storage, pregnant solution, clarified solution, barren, clarifier and sludge tanks, and the deaeration tower) are all within an interconnected concrete secondary containment which is in good condition and provides a large containment area. Secondary containment of the cyanide preparation area is connected with the larger secondary containment of the Merrill Crowe plant. In addition, there is a concrete tunnel that connects the secondary containment of the pregnant and barren tanks with the solution channel that goes to the leach pad area, providing additional containment in case of a tank failure. All tanks have level sensors and alarm systems. The Merrill Crowe plant area is contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to concrete trench drains, where any spills or rainwater will be pumped back to the process. The sump pumps are included in the preventive maintenance routes. The secondary containment systems are inspected on a weekly basis as part of the process facilities inspection program. The auditors observed that the concrete containment systems were in good condition at the time of the audit and free of any fluid.

Veladero has not changed tanks or secondary containments since the initial certification audit. Therefore, the original finding is still valid that the containments can hold 110% of the single largest tank plus precipitation. All secondary containments are interconnected, including the concrete tunnel that connects the secondary containment of the process tanks with the lined solution channel that goes to the leach pad area. The secondary containment volume calculations were reviewed and deemed sufficient. In the process plant area, the maximum tank volume is 2,760 m3 with a secondary containment volume of 800 m3. As mentioned above, additional capacity is provided by the concrete tunnel that connects the process plant with the lined solution channel. Containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. The secondary containment areas are constructed of reinforced concrete. The auditors observed that the secondary containments were maintained empty, with no materials stored inside them.

All containment areas have sump pits with dedicated pumps that return collected solutions into the process circuit. There are no discharges from secondary containments to the environment. As stated in the Code, no specific written procedures are necessary as the containment systems

have sumps and dedicated pumps and piping to return solutions to the production process. The pumps have automatic level sensors to keep the secondary containments free of water. These pumps are inspected on a weekly basis and are included in the preventive maintenance program. All tanks have level sensors and alarm systems. This requirement was verified through field observations and interviews with process and maintenance personnel

Cyanide pipelines at Veladero are located within a secondary containment provided for at the process plant and leach pad areas, including concrete and plastic lined channels. There are no buried pipelines in the plant area. Pipelines connecting the leach pad, PLS ponds and the process plant are lined with High Density Polyethylene (HDPE) through all its extension to convey any leaks to larger containment areas. In addition, Veladero has installed protection devices (metal boxes) along the pipelines to prevent any high-pressure releases outside of containment, including alarms for loss of both pressure and flow. Veladero also monitors pressure in these pipelines and has determined a Hi-Hi limit that is below the nominal pressure of the pipe to prevent pipe ruptures due to high pressures. Cyanide pipelines in the leach pad are inspected on a daily basis as part of the routine inspections by plant personnel and are also included in the preventive maintenance program.

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

As stated in previous audit reports, all cyanide mixing, storage and process tanks and pipelines are constructed of coated carbon steel and HDPE. These materials are compatible with high pH cyanide solutions. All tanks and pipes were well supported and in good condition.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Quality control and quality assurance (QA/QC) programs have been implemented during the construction of cyanide facilities at Veladero. The mine maintains files with QA/QC reports for the facilities constructed before the last recertification audit in 2022, which was found in compliance with the Code requirements, and has implemented QA/QC programs for new cyanide facilities built during this recertification period. New facilities constructed since the 2022 audit include an expansion of the leach pad Phases 7A and 7B, which were commissioned in March

2023 and November 2024, respectively, and includes additional leach pad areas with geomembrane, pumping and piping systems. These new facilities were built and tested following a quality control and quality assurance program conducted by Tierra Group International (TGI). The auditors reviewed the QA/QC documentation for the foundation, geomembrane, geotextile, underdrain systems, collection systems, and piping, as well as as-built drawings properly stamped and signed off by the engineer of record.

Veladero QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The mine maintains files with the QA/QC reports for its cyanide facilities including the Merrill Crowe plant, leach pad stages, PLS ponds and cyanide storage area. The QA/QC reports for the new facilities (Phases 7A and 7B) include soil compaction tests, subgrade testing, fabrication certificates and technical specifications for HDPE drainage products, liners, piping, electrical and mechanical instrumentation. QA/QC reports also include non-destructive test logs, destructive test logs, vacuum tests, pre-weld tests, destructive sample tests, and repair controls. As mentioned in the previous recertification audit report, the QA/QC program and the records reviewed and verified during this audit demonstrate that the materials are according to design specifications, the compaction has been adequate, the foundations of the tanks are suitable, geomembranes are appropriate and have been placed according to design and assembly specifications.

QA/QC records for cyanide facilities are retained by Veladero. For the new cyanide facilities built since 2022 (i.e. expansion of the leach pad Stages 7A and 7B), the auditors reviewed the following documents in electronic version: Leach Pad expansion Phase 7A – Final Quality Dossier CQA, dated March 2023; signed off by TGI, and Leach Pad expansion Phase 7B – Final Quality Dossier CQA, dated November 2024; signed off by TGI. The auditors also verified that QA/QC records are retained for all other cyanide facilities including leach pads (Stages 1-6 and the PLS ponds), and the Merrill Crowe plant.

Qualified engineering companies performed the QA/QC inspections and reviews during construction of the cyanide facilities at Veladero and prepared the final construction reports and as-built drawings certifying that the facilities were constructed in accordance with the design drawings and technical specifications. The auditors reviewed records of construction reports, including as-built drawings for the new cyanide facilities (i.e. leach pad expansion Phases 7A and 7B). As-built drawings were properly stamped by a qualified engineer. As mentioned in previous recertification audit reports, construction of all other cyanide facilities was reviewed by reputable engineering companies. Veladero has as-built drawings/certification for all cyanide facilities which are properly stamped by a qualified engineer. In addition, Veladero also has quality control and quality assurance documentation for its cyanide facilities.

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

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

Describe the basis for the Finding/Deficiencies Identified:

Veladero has a Monitoring Program dated 2022 that is updated based on regulatory requirements or changes requested by the relevant authorities. This monitoring program is presented to the regulators for approval and includes details related to monitoring locations for surface and groundwater, frequency of samples and parameters to be analyzed, including cyanide species. Veladero also has procedures for wildlife monitoring activities. The Veladero Monitoring Program is complemented by three procedures: Procedure MAM-PVL-109 “Monitoring of water and effluents” that includes sampling techniques, sampling equipment, calibration of field equipment, preservation techniques and chain of custody procedures. Procedure MAN-PVL-154 “Quality control of chemical data” that includes quality assurance/quality control techniques (e.g. duplicate samples, field blanks, equipment blanks). Procedure MAM-PVL-108 “Shipment of samples to external lab”, that provides guidance on how to prepare samples, chain of custody and ship samples. Water sampling is conducted by Veladero personnel and samples are sent to SGS lab in San Juan for analysis.

Competent individuals from Veladero have originally developed, reviewed, updated and approved the monitoring program and procedures. The monitoring program is updated as required by relevant authorities and the procedures are updated in-house by environmental personnel with qualifications in water sampling and monitoring activities and approved by the Environmental Superintendent. All personnel involved in the development and updating of the monitoring program and procedures are registered engineers (e.g. Biologists, Chemical engineers) with more than 10 years of experience in environmental management in mining. Analytical protocols for environmental samples are provided by SGS lab in San Juan. The auditors reviewed letters of certification to verify compliance.

The Veladero monitoring program and the three supporting monitoring procedures provide details related to sampling locations, preservation techniques, chain of custody procedures, shipping instructions to SGS lab and cyanide species to be analyzed and quality assurance/quality control requirements. The monitoring program includes sampling frequencies for both surface and groundwater (that vary between every 3 days, weekly, biweekly, monthly and quarterly), the suites of parameters to be analyzed (including Total, WAD and Free Cyanide) and maps showing the surface and groundwater monitoring locations with respect to cyanide facilities. Examples of completed chain-of-custody records for the recertification period showing proper use of the forms were reviewed.

Veladero field data sheets for surface and groundwater samples register in writing sampling conditions including weather, presence of fauna and flora, field parameters (i.e. conductivity, pH,

and temperature) and groundwater levels. Completed monitoring field forms were reviewed by the auditors and verified that these conditions are being registered consistently.

The Veladero Monitoring Program and the three supporting procedures include sample locations, frequencies, and cyanide species and other parameters to be analyzed. The monitoring programs include sampling frequencies that vary between every 3 days, weekly, biweekly, monthly and quarterly. Samples are sent for analysis to SGS lab in San Juan. Cyanide species (WAD, Free, Total) are analyzed in all samples. Records were available and reviewed by the auditors for all sampling and monitoring activities. The frequencies of the monitoring activities were deemed to be appropriate by the auditors.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Veladero has a conceptual Mine Closure Plan (MCP) dated 2023 that was developed by SRK. This plan has been presented for approval to the local authorities as an appendix of the most recent Environmental Impact Study for Veladero. There is no frequency established by the local authorities for mining companies to review and update their MCP. The MCP has a section on decommissioning activities of cyanide facilities. This includes decontamination of equipment (tanks, pipelines, pumps, and valves), removal of residual cyanide reagents, management of leach pad draindown water through a passive treatment system, final decommissioning and disposal of cyanide facilities, and/or reclamation of facilities. The plan considered that the leach pad will not be rinsed with fresh water. The MCP considers decommissioning strategies for cyanide facilities including the heap leach pad, PLS ponds and solution channels, Merrill Crowe plant, cyanide storage facility, and seepage collection system. At closure, once gold recovery ceases, all processing plant items, and steel structures will be decontaminated. All concrete surfaces will be thoroughly washed down to remove any residual material.

The MCP has an implementation schedule for decommissioning activities including the sequence and duration of facilities closure. Closure activities are expected to occur between 2029 and 2059, including 4 years of closure (2045 - 2048) and 11 years of post-closure activities (2048 - 2059), mainly related to monitoring activities. Process plant decontamination and decommissioning are expected to occur between 2046 and 2048. Decommissioning of the cyanide storage facility is planned for 2045. This schedule will continue to be refined as Veladero approaches the closure period. The schedule is divided into three phases: operations, closure and post-closure. Closure phase is the period when most physical closure actions will take place (i.e. decontamination and demolition, earthworks etc.). Post-closure is when monitoring and any ongoing maintenance of the site occur.

Veladero reviews its MCP and updates it periodically. The MCP is updated on an as-needed basis (when closure strategies significantly change). The current version of the MCP is dated 2023. Previous versions of the MCP are dated 2018 and 2015. There are no regulatory requirements to update the closure plans on a defined frequency. In addition to that, Barrick Corporate office requires its operations, including Veladero, to review and update its Asset Retirement Obligation (ARO) / Provisions for Environmental Reclamation (PER) cost estimation for the mine, including cyanide facilities decommissioning costs. These costs are reviewed and updated annually and submitted to the Corporate office, where it is audited by an external party.

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

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

Describe the basis for this Finding/Deficiencies Identified:

The 2023 MCP developed by SRK does not include closure costs. According to Barrick requirements, Veladero reviews and updates annually its closure costs. These cost estimations outline the cost for full implementation of the site-wide closure and reclamation plan for existing facilities, including all cyanide facilities. The total closure cost, including concurrent reclamation, final reclamation and post closure activities, has been estimated at US$ 139 MM (million). The decommissioning and cyanide decontamination estimates provided were generated as a function of full fund third party implementation costs. This is consistent with the methodology used at other ICMI certified Barrick sites and represents a reliable estimation of third-party decommissioning costs. The costs were estimated using third-party rates from 2 contractor companies (ECP Minera and Milicic) used by Veladero for earthworks, concrete, infrastructures and dismantling activities.

Veladero reviews its MCP and updates it periodically. The MCP is updated on an as-needed basis (when closure strategies significantly change). The current version of the MCP is dated 2023. There are no regulatory requirements to update the closure plans on a defined frequency. According to Barrick requirements, Veladero reviews and updates annually its closure costs, including decommissioning costs for cyanide facilities, as part of its internal PER (Provisions for Environmental Reclamation) cost estimation exercise. The most recent 2024 PER closure cost estimate is US$139 MM (millions), which is similar than the previous year's amount of US$138 MM.

As local and central authorities have no requirement for financial assurance of closure activities, Veladero has established self-insurance as a financial assurance mechanism for closure activities, which includes decommissioning of cyanide related facilities. The auditors reviewed a letter from PricewaterhouseCoopers LLP (PWC) dated March 28th, 2025, for the review of Veladero Financial Statements as of December 31st, 2024, that includes closure and reclamation costs, verifying its conformance with the financial tests for a self-guaranteed mechanism to cover the estimated costs for cyanide-related decommissioning activities. Financial evaluation methodology used by the external financial auditor includes the assessment of the Asset Retirement Obligation (ARO) liability in the period it was incurred. Liability equals the present value of the expected cost of retirement/remediation. An asset equal to the initial liability is added to the Balance Sheet, and depreciated over the life of the asset. The result is an increase in both the assets and the liabilities. The auditors reviewed the statement from PricewaterhouseCoopers and confirmed that the self-insurance was calculated including the estimated decommissioning cost and that the operation has sufficient financial strength to fulfill the self-insurance obligation. The auditors also verified the professional certification of the financial auditor.

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

Standards of Practice

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

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

Describe the basis for the Finding/Deficiencies Identified:

Veladero has established and maintained operating procedures, related checklists and work permits to ensure that worker exposure to cyanide is minimized and/or controlled when

performing tasks such as unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination. Several procedures were reviewed, for example: Procedure ALM-PVL-012 for Cyanide Handling includes cyanide unloading on the warehouse, storage and transport to the cyanide preparation area, VEL-PO-PRO-116 which describes the Cyanide Mixing and Storage process, VEL-PE-PRI-304 covers the work performed in Confined Spaces, updated in July 2024, MAN-PVL-005 describes maintenance work in equipment in contact with cyanide solution, PRO-PVL-140 Equipment transfer for Maintenance activities in Leach Pad and Merrill Crowe, PRO-PVL-409 Cyanide Spill Control Procedures, PRO-PVL-410 Inspection control procedure in the Process Plant, PRO- PVL-119 Cyanide boxes and bags rinsing, PRI-PVL-122 Emergency response Sodium Cyanide Incident and PRO-PVL-408 Evacuation in case of a Cyanide Gas Release. All these procedures have sections that indicate the risks involved with each task and adequately describe safe work practices, including also the use of Personal Protective Equipment (PPE), therefore they are sufficiently detailed to enable safe operation and to minimize worker exposure. Veladero has also maintained a Surveillance and Operational Plan (POMM) related with contingency measures to be taken in the valley-fill heap leach pad. Work permit systems have been developed for more general activities which apply across various areas of the plant and/or the mine operation. These include, for example, lock out/ tag out/try out, hot work and confined space entry permits.

The auditors verified that operating procedures provide a listing of required personal protective equipment (PPE) to prevent and/or minimize worker exposure to cyanide and/or cyanide containing solutions. Pre-start checklists for cyanide unloading, mixing and preparation were reviewed by the auditors, certifying that operators are required to identify whether they have the required PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures. Also, other observations during the cyanide preparation confirmed that hard hat, rubber boots, rubber gloves, chemical suits, face shields, handheld two-way radio, and HCN monitors were in use at the cyanide mixing area. Pre-work inspections prior to a cyanide mixing are completed by supply chain, process, and maintenance personnel. In the case of cyanide unloading personnel must verify the work area for safety and health hazards, eye wash stations, fire extinguishers, HCN detectors, Pre-use equipment checklist and the use of PPE´s. Pre-work inspection prior to cyanide preparation, includes a Job Safety Analysis (JSA) before conducting the task, and filling out the annex 1 pre-work checklist which includes PPE, HCN levels, air exhaust, closed caption camera system, eye wash stations, calibration of the HCN sensor, pH of the solution, cyanide emergency response kit, among others. Pre-work inspections for confined spaces include the verification of conditions by obtaining a specific work permit provided by the Safety and Health department and also filling out a Job Safety Analysis (JSA).

Workers at the operation are given the opportunity to provide input to procedures by following certain mechanisms as safety talks every morning with workers, including discussions and observations by workers from the previous day (maintenance and process control),when filling out the Job Safety Analysis the format requires the operator to identify the procedure related to that work and considers the participation of a leader, a technician and the job supervisor to

ensure any opportunities for improvement are identified; the Argentine legislation requires that the Hazard Identification and Risk evaluation for performing a job should be done with input from workers; the Visible Leadership Program (using an app) in which during the interaction between supervision and workers, they can identify improvements and recommendations that include procedures; the Safety Committee meetings every week, which include operator representatives, provide the opportunity to discuss procedures and finally workers can scan a QR code (located in different parts of the process plant offices) and provide input, comments and observations on procedures.

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:

Veladero has determined minimum pH levels for cyanide solutions as part of what is called “operation philosophy” to prevent the generation of HCN gas. Regarding Cyanide preparation, according to procedure PRO-PVL-116, operators verify that the pH of the barren solution should be equal or greater than 11.5 prior to mixing cyanide. To help control pH, barren solution is used to mix and dissolve solid sodium cyanide briquettes and sodium hydroxide is added to rise the pH to the desired value. pH sensors are located in three strategic locations: Barren Tank # 18, Barren exit form sludge ponds and mixing tank. pH readings in the tank are measured (previously conducting an equipment calibration) every time a cyanide mixing is performed. The auditors verified records (PI system) from 2022 to 2025 and certified that the solution was raised and maintained above 11.5. For controlling pH in the processing circuit (Merrill Crowe plant and Leach Pad system) Veladero continue to use procedure PRO-PVL-102 “pH Adjustment”, which indicates that desired pH in the solution should be 10 as a minimum within the system. In case values go below 10, process plant should add sodium hydroxide to certain proportions in the process plant pumping system that goes to the leach pad.

Veladero has established areas where workers may be at risk of exposure to HCN gas, which are the Warehouse, the Cyanide mixing area, the Merrill Crowe Plant, the Process Maintenance area and the Refinery. Veladero has determined appropriate controls including the use of appropriate PPE according to the operational procedures (which specify the PPE required) and which have been developed and implemented in the areas mentioned above. Procedure PRO-PVL-408 indicates that HCN values of 4.7 ppm or above will trigger an evacuation of the specific process work area only, but if two HCN sensors indicate 4.7 ppm or if one goes above 10 ppm all workers will evacuate the process plant. Fixed HCN gas monitors are installed in the Cyanide Mixing Room (02), filter press (01), Leach Pad Drop Box (01), Metallurgical Lab (01), and the

cyanide warehouse. Workers are also required to wear portable HCN monitors.

Veladero uses fixed and portable monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide. Fixed HCN Detectors (MCA Toxguard II) are located in the Cyanide Mixing Room (02), Refinery (01), Leach Pad Drop Box (01), Metallurgical Lab (01), and in the Cyanide warehouse. HCN alarms are set to generate a visual alert to operators at 4.7 ppm and sound and visual above 10 ppm alerting the control room of possible high HCN gas in the area. Veladero mine has 10 Portable devices (BW Gas Alert Extreme Monitors) distributed in the process plant, laboratory, metallurgical, refinery, warehouse. Veladero has acquired 2 Honeywell BW Solo HCN Portable monitors that soon will replace the BW devices. Personal HCN monitors have identical alarm thresholds as fixed HCN gas detectors. Procedure PRO-PVL-408 “Plant Evacuation due to HCN gas release” indicates the plant evacuation in the case of 4.7 ppm they evacuate their work area only, but if two HCN sensors indicate 4.7 or if one goes above 10 ppm all workers will evacuate the process plant.

HCN fixed and portable monitors are calibrated on a regular basis and records are kept by the Process team, who also coordinates the external calibration of fixed monitors every 6 months according to Procedure PRO PVL 609 “Calibration of Toxguard II”. The operation retains calibration records for at least three years. Testing and inspection of fixed monitors (Procedure PRO-PVL-607) are performed on a weekly basis including a contrast verification with the HCN buffer gas. The calibration of portable devices HCN BW Gas Alert Extreme are conducted following procedure PRO-PVL-610. The site has updated the procedure VEL-INS-PRO-623 and VEL-PO-PRO-410 (Monitoring equipment inspections) and provided evidence of applying the bump test procedure.

The auditors verified during the field inspection that appropriate signage is displayed at the plant entrance, warehouse, leach pad and throughout the various facilities to alert personnel of the presence of cyanide, access restrictions and the required PPE for the area. In addition to identification of cyanide areas and PPE requirements, signage is also used to restrict eating, drinking, smoking and open flames. Warning signs are posted in Spanish, the language of the workforce and located in areas where cyanide solution is mixed and used. Veladero also uses Globally Harmonized System Pictograms on mixing tanks and warehouse (health hazard, toxic and environmental impact).

High strength cyanide solution is dyed in red color for clear identification. Veladero purchased Sodium cyanide from Orica in 2022, 2023 and part of 2024. Orica sends the dye mix inside the cyanide bags together with the cyanide briquettes so that during the mixing operation, the high strength (15-20%) cyanide solution turn into a red color solution. Veladero is currently purchasing cyanide from Draslovka Memphis, which also sends dye mix inside the cyanide bags together with the cyanide briquettes. Veladero purchased Cyanide from Gualcamayo mine in December 2024 and February 2025 that contains bulk boxes from Draslovka Kolin Plant. This plant also sends dye mix inside the cyanide bags together with the cyanide briquettes, according to the MSDS reviewed.

Veladero has installed fixed safety showers and eyewash stations in the Cyanide Mixing room and Merrill Crowe plant in the event of chemical exposure and located at strategic locations where there is a potential for exposure to cyanide. The warehouse has a portable eyewash bottle station. The site also has Dry Powder ABC fire extinguishers located in strategic locations throughout the warehouse, cyanide preparation and Merrill Crowe plant. Currently the plant has 36 fire extinguishers which are inspected monthly. The plant has 4 showers in the cyanide mixing area, pumps area, body feed tank and escalator to tank area. Veladero has the Procedure RPP-006 “Showers and Eyewash Inspection” and RPP-005 “Fire Extinguisher Inspections” with their respective forms to register the inspection program. There is also procedure PRO-PVL-410, Inspection Control at the Process Plant. Safety showers and eyewash stations are checked as part of pre-work inspection checklists to ensure that they are operational and that water flows are adequate. Fire extinguishers follow a preventive maintenance program conducted by a third-party maintenance firm from San Juan, to check nozzles, pressure testing according to the expiration dates.

Veladero has established color coding for concentrated cyanide solution and cyanide solution that was observed by the auditors during site visit and inspection in the process plant. Labelling to identify the solution and the flow direction has also been installed in piping including the new leach pad phase 7 and 8 piping configurations, both for pregnant leach solution pipes and barren solution sent back to the leaching system. Pipelines and tanks that contain cyanide or cyanide solutions are labeled to enable plant personnel to identify its content. Labeling is typically located at places of frequent access by personnel, reasonable distance to be able to track the lines and identity contents. For pipelines, flow direction arrows are used to allow personnel to identify the flow and possible exposures and/or response requirements for leaks and/or maintenance work. Color coding is also used to identify tanks and process solution pipelines.

The auditors verified that Veladero maintains Safety Data Sheets (SDS) for sodium cyanide from current manufacturers (Draslovka Memphis and Kolin) in hard copy and in Spanish in areas such as the cyanide warehouse and mixing room. In addition to the SDS sheets, signage is available to alert personnel to chemicals and required emergency response requirements in the high-risk cyanide areas. Veladero also has binders with first aid procedures in the process plant (control room). All materials are written in Spanish.

Veladero has maintained procedure PRI-PVL-901 “Incident Reporting and Investigation” which describes that in the event of a safety and health related incident, the emergency is activated immediately, and workers proceed to control the situation. Within 24 hours of the incident a flash report must be prepared. This report includes a brief description of the immediate causes and the actions taken. Subsequently, the investigation of the incident is done ensuring that corrective actions are determined. Veladero also uses procedure MAM-EVL-015 for reporting and investigating Environmental related incidents. Veladero uses the ICAM systematic process to find and fix the root causes of incidents. The system is used to collect, understand, and organize evidence when an incident happens. It helps identify the basic causes (human errors or

equipment failures) that led to the problem. Veladero also uses the Isometrix Digital software system to develop and track action plans for incidents.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Veladero has made available oxygen, resuscitators, radios, telephones, and alarms in critical areas. First aid kits are in the following areas: Warehouse, Merrill Crowe Control Room, Merrill Crowe Plant ERT Container, and Medical Center. Antidote kits for cyanide specific treatment are located at the medical center at Los Amarillo's Camp and one at the Emergency Response Brigade Center at the Truck Shop. First aid kits include an oxygen tank with pressure gauge, a mask with reservoir bag, a manual resuscitator (Ambu), a gauze and gloves. The antidote kits at the medical center (05) and at the Emergency Response Brigade (01) contain sodium nitrite, sodium thiosulfate, examination gloves, nasogastric tube, needle catheter, physiological solution and activated carbon. Ambulances have the following means of communication: VHF, SSB and satellite phone. Veladero has an emergency communication procedure with instructions to activate the alarm system by radio or telephone. All employees and visitors are trained in this system as part of the safety and first aid induction. Operators are required to carry a radio while performing their tasks. The alarm systems for all the HCN monitors and showers have a visual and sound alarm and are hard wired to the control room.

Veladero maintains records of the cyanide first aid equipment inspections. The mine has monthly formal checklists to first aid equipment in areas where cyanide is used, to ensure it is available and in working conditions if needed. The checklist includes the inspection of cyanide antidote kits (storage requirements and expiration dates), oxygen, facemask, and the ambulance, among others. Cyanide kits are stored as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed and can be readily available for an emergency. Cyanide first aid equipment (oxygen) at the Merrill Crowe Plant is inspected prior to a cyanide solution preparation. American Advisor contractor staff perform frequent inspections of the ambulances; cyanide kit and oxygen located in the medical clinic. Inspections are documented.

Veladero medical department has updated and consolidated key procedures as SOC-PVL-014 What to do in case of an emergency involving cyanide poisoning, procedure SOC-PVL-003 Transport of patient within Veladero mine and SOC-PVL-003 Patient Evacuation in case of an Emergency. The new procedure is called VEL-PO-SOC-039 Medical action in a cyanide intoxication case, which now describes emergency response guidelines to respond to cyanide

exposures, responsibilities, scene assessment, safety aspects, first aid response, intoxication levels, cyanide poisoning symptoms, use of antidotes by medical staff, recovery, transportation and post incident medical treatment. Specific instructions are given for treating victims who are exposed to sodium cyanide via inhalation, ingestion, and dermal routes. Instructions detail the steps to be taken for conscious versus unconscious victims. Then the medical services will receive the victims decontaminated by the Emergency Response Team (ERT or brigades) to receive treatment with the cyanide antidotes, if necessary.

To provide first aid and medical assistance to workers exposed to cyanide, Veladero maintains a fully equipped medical centre (Medical Clinic in Amarillos Camp). The Amarillos Medical Clinic is located about 13 minutes vehicle ride from the process area, and it provides medical response to cyanide exposure incidents. First aid emergency response equipment includes three fully equipped ambulances on site (two at the clinic and one at the emergency brigade), and two extra units in Peñasquito and Sepultura (both at the Veladero access road). Veladero has an appropriate medical staff from contractor American Advisor, which consists of two doctors on call, an instrumentalist, anesthetist, two permanent nurses, one Radiologist, one kinesiology for ambulatory care, two Paramedics at Access Road (Peñasquito and Sepultura) and an ambulance driver-paramedic in each shift. The medical infrastructure and equipment consists of a Hospital High complexity care service, shock room and three ambulances, a Clinic at Old Veladero Hotel (for complex surgeries), a Radiology room, a Laboratory/pharmacy, an emergency post at Truck Shop Permanent paramedic and ambulance, an emergency post at Sepultura Permanent paramedic and ambulance driver and finally an emergency post at Peñasquito Permanent paramedic and ambulance driver. Veladero has trained professionals at the Health Service and ambulance to assist patients poisoned with cyanide 24 hours a day. Ambulances are parked at the entrance of the health services and emergency brigade (Truck shop). Ambulances are equipped with an oxygen tube and resuscitator.The site utilizes a fully trained Emergency Response Team (ERT) located in the Truck Shop area (10 minutes from the process plant) to effectively respond to cyanide and other incidents at the site. In addition to ERT and medical team personnel, Veladero has trained process plant personnel in first aid related to cyanide exposure. Several process plant first responders have been trained in the plant to provide initial treatment efforts.

The consolidated procedure VEL-PO-SOC-039 “Medical action in a cyanide intoxication case” indicates that, in the event of a cyanide exposure where the victim, once stabilized, requires medical attention beyond the capabilities of the on-site medical clinic, the medical contractor American Advisor will transport the victim in one of the ambulances to the High Complexity /Intensive Care Unit Medical Center (CEAC) in San Juan City. There is also the option to transport a patient by helicopter if required, however, there are several potential limitations for its use (it cannot fly at night or with high wind speeds or low visibility) and it is not considered as the first option. Veladero maintains an agreement with the Intensive Care Unit (CEAC) in San Juan, through the contractor American Advisor. The procedure also includes special instructions on the additional materials to be transported with the patient when it is a cyanide intoxication case.

Veladero has maintained a formalized arrangement with the High Complexity Medical Center (CEAC) located in San Juan, which is active through the contractor American Advisor, that provides all medical service to Veladero, however just in cases to further evaluate patients that have been exposed to cyanide and that has been previously stabilized at the medical facilities on-site. Therefore, the offsite facilities do not treat victims directly for cyanide exposure. This agreement provides for the training of doctors and nurses on how to treat a patient intoxicated with CN and the availability of suitable professionals trained in the care of patients with CN poisoning. Veladero has determined that its medical facilities have qualified staff, infrastructure, adequate equipment, and expertise to respond effectively. Rodeo and Jachal medical facilities are both small health centers in the communities and could be used to assist in emergency response in the route to the mine (whether cyanide-related or not). The CEAC would be used to transport a patient requiring additional attention after stabilization at the mine 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:

Veladero has kept several plans and procedures that address potential accidental releases of cyanide and cyanide exposure incidents. Procedure PRI-PVL-122 Sodium Cyanide Emergency Response Plan which describes specific response actions by the Emergency Brigade onsite. It establishes measures in the case of exposure to a cyanide gas release or spills of cyanide solution or solid cyanide, among others. The mine also has an Emergency Operations Plan PRI-JVL-001 known as POE, which is a general plan that establishes a series of guidelines to follow in case of any emergency. The POE has several annexes that describe emergency response protocols, first aid response to cyanide exposure scenarios, minimum emergency response materials, roles, and responsibilities among other elements. The POE considers three levels of emergency: I, II and III to made available additional resources. The document also describes specific instructions available for the emergency response team and for the operations team in case of Level 1 emergencies that can be controlled within the process area. Site also has the procedure PRI-PVL-140 “Decontamination after an incident with hazardous materials”,

procedure PRI-PVL-104 “Hazardous materials spills” and PRI-PVL-110 “Activating an emergency”.

Veladero plans for emergency response list the various credible event scenarios for the site inclusive of cyanide incidents such as cyanide spills, exposures, and transportation accidents. The Emergency Operations Plan (POE) considers possible HCN generation scenarios and a rapid response if values are above 10ppm (incident classification table). PRI-PVL-122 also includes a specific high HCN gas concentration scenario in the Process Plant. Veladero has established the use of escort vehicles for the cyanide convoy from Tudcum all the way to the mine site, including hazmat equipment, using the hazmat container in Peñasquito and Sepultura, Type A Suits, Brigade staff (supporting the cyanide supplier first respond equipment). Emergency response team from Veladero provides support to the cyanide convoy from Veladero entrance gate until the process plant warehouse. Procedure PRI-PVL-122 includes a concentrated cyanide solution spill during mixing/preparation, a solid release (briquettes) on the ground, pipe breakage, tank failure, and spill in dry soil. Procedure PRI PVL 122 covers the scenario of a spill with a fire activated, which considers restrictions for water use. The site also has a procedure PRI-PVL-104 Fire after spills with Hazardous materials. Procedure PRI-PVL-122 provides information on high concentration pipelines, valves and tanks in the Process Plant. Pipes, valves and pipelines have secondary containment. Barren and pregnant solution pipelines are located within an HDPE-lined secondary containment ditch. Any spills and leaks are to be contained. The scenario of an overtopping of the Pregnant solution ponds at phase 1-5 and Phase 6 and 7A of the Leach Pad is also considered in the General Plan during an Emergency (PADE). The Plan indicates specific actions and responsibilities for prevention and emergency response based on the solution levels in the ponds and impoundments. Power outages and pump failures scenarios are also described in the PADE. A more detailed description was found on procedure MAN-PVL-057 “Power Outage Actions“. In case of power outages, backup generators would keep the solution circulation systems active. The PADE includes emergency response in case of uncontrolled seepage. It describes the sub-drain system design for Phase 1-5 and the new Phase 6 independent system based on specific actions to be followed if the system detects increments in flow or cyanide concentrations. Site also has procedure MAM-PVL-111 “environmental actions during emergencies” which considers potential cyanide traces in the underdrain of the leach pad. Veladero has no cyanide treatment, recovery or destruction facilities. Veladero does not have a tailings storage facility nor an impoundment. The emergency scenarios at the heap leach facility are included in both the POE and the PADE plans. In the case of a leach pad failure, solution is directed to a contingency pond and ultimately solution will be pumped back the system.

The current cyanide supplier for Veladero is Draslovka Memphis. Veladero has a contract to transport Draslovka Cyanide from Buenos Aires port to Veladero using Grupo Cinca Transportation. Both companies have been certified as fully compliant with the Code. According to the transportation agreement, Grupo Cinca are responsible for the response to an emergency during the cyanide transport; however, the mine has emergency response equipment along the Tudcum-Veladero route (150 km) to provide support if needed. Veladero keeps a copy of Cinca´s

emergency response plan for cyanide transportation to the mine site. The plan addresses all Code requirements for the transportation of cyanide. The plan includes the vehicle specifications; responsibilities for the cyanide supplier, the mine, the transporters, and external responders; permits required by the national authorities, organization chart for emergencies, communications flow in case of emergencies, a route risk assessment and instructions for specific emergency scenarios.

Veladero's Emergency Operating Plan (POE), Procedure PRO-PVL-122 and the Action Plan in Emergencies PADE describe detailed response actions to cyanide incidents. Veladero is in an isolated area far from communities (approximately 150 kms), therefore Veladero´s communication plan does not consider an evacuation scenario, but it does include communication scenarios for potential impacts on water courses that could reach Iglesia and Jachal towns. The auditors verified the Crisis and Emergency Communication Plan. For clearing site personnel, the POE annex 1 indicates the need to evacuate personnel in case of a cyanide release incident. Procedure SOC-PVL-014 describes the use of antidotes and first aid measures. Veladero has currently 6 cyanide antidote kits. Procedure VEL-PO-SOC-039 "Medical Treatment for CN Intoxication" describes the use of antidotes. Control and mitigation measures of cyanide related incidents is covered under procedure PRI-PVL-122. Containment measures are also covered under procedure PRI-PVL-122. Regarding the assessment, investigation and prevention of future releases is covered under the Veladero Incident Reporting and Investigation procedure (Safety/Health and Environmental).

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:

Veladero solicits the input of its workforce in their emergency response planning documents through daily safety meetings (starting the shift) both at operating activities and emergency brigade, weekly meetings (tracker), sharing risks to workers and contractors, mock drills conducted and by emergency response plan training. No outside stakeholders have been involved in the development of the Emergency Operating Plan (POE), Procedure PRO-PVL-122 or the Action Plan for Emergencies (PADE) since they do not have designated responsibilities under the plan, however, Veladero maintains a social engagement program (describe in principle 9) that allows communication and feedback between communities, stakeholders, and the mine site. These include topics such as transportation and use of sodium cyanide and provide general emergency response written information.

Veladero has on-site capabilities for dealing with all possible cyanide related incident scenarios. Veladero will take full responsibility for response to a cyanide release within the facility. Veladero has also established formal arrangements with offsite medical facilities regarding the potential to treat patients that have been exposed to cyanide. Veladero has the policy to stabilize victims onsite prior to transferring to off- site facilities.

Veladero has on-site capabilities for dealing with all possible cyanide related incident scenarios, including transportation because it is located in an isolated area far from communities (approximately 150 kms), therefore Veladero´s emergency plan does not consider external entities having responsibilities or roles nor formally participation in emergency response planning process. Veladero would maintain responsibility for emergency response activities within the communities if required, however, the Emergency Response Plan maintains an updated list of external entities, emergency response facilities and other agencies that could provide support.

Although Veladero emergency plans do not designate any responsibilities to off-site responders and communities, they are made aware of the emergency response plans, and a communication plan for nearby communities in case of a cyanide incident. Veladero maintains a social engagement program that allows communication and feedback between communities, stakeholders, and mine. These include topics such as transportation and use of sodium cyanide and general emergency response written information.

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

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

Describe the basis for the Finding/Deficiencies Identified:

The Emergency Operation Plan (POE) and the PRI-PVL-122 designates primary and alternative emergency response coordinators per shift to cover 24 hours service. The Emergency Brigade in Veladero considers Emergency Response Chief (01), Emergency Supervisors (02), Brigade Specialists (05) and volunteer brigade members. The Emergency Response Chief has the authority to commit the necessary resources to implement the Plan, and to define the primary and alternative response coordinators for the incident command. Verification was by review of the POE. The POE has a list of full-time onsite emergency personnel (a total of 8) (4 per shift), including First Responders and Brigade Members. Currently, Veladero has 49 volunteer responders divided in 4 groups of 7-10 responders based in their shift and work schedule. There are 12 volunteer brigade members on the access road and a total of 25 contractor volunteers. The annual training plan also details the training required for the Brigade Members. The training plan includes vehicle rescue, trauma management, hazmat (2 months), plus other topics as

confined spaces and firefighting. It also includes advanced first aid (cyanide exposure, locations of cyanide antidote kits, medical oxygen). Verification was done by interview with emergency response personnel, review of the POE and training records. The POE includes office and 24-hour cell phone numbers for the Brigade Members. Veladero also uses an app called Braco which notifies members of the brigade that are actively marked as present and will receive an alarm notification if an emergency gets activated. This information includes name, address, phone number, and working area. Annex K of the POE specifies duties and responsibilities of all brigade members including specific duties and responsibilities, equipment, material and supplies, and communication teams. The emergency Response Chief and its alternate responsibilities are described in the POE. Appendix F of the POE has a list of emergency response equipment for each area where cyanide is used and for the emergency response vehicles. It considers the mine camp, routes, access road, emergency containers in the road. Verification was done during a field inspection. All emergency equipment and supplies are inspected on a regular basis by the Emergency Response and Safety personnel following the procedure PRI-PO-VRI-118 “Inspection and Maintenance of Emergency Equipment”. Bi-weekly inspection records (it used to be weekly but because of the pandemic has been extended) were verified for compliance. Veladero does not assign responsibilities for off-site responders in case of cyanide emergencies.

Veladero does not use off-site responders for cyanide emergencies. However, the site has established formal arrangements with off-site medical facilities regarding the potential to treat patients that have been exposed to cyanide. Veladero has the policy to stabilize victims on-site prior to transferring them to San Juan. Veladero has adequate staff, equipment, and expertise to respond effectively to emergencies, however it maintains a social engagement program that allows communication and feedback between communities, stakeholders, and the mine. These include topics such as transportation and use of sodium cyanide and general emergency response written information.

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:

Veladero uses the Bravo app for emergency communication procedures internally to management, and additionally it also uses an updated list of managers tracked by the security dispatch. The dispatch is the entity that activates/communicates the emergency. The auditors verified that the list is maintained up to date in the Emergency Operations Plan (POE). Veladero also uses a tool to update the list of managers and senior supervisors that are on shifts on a weekly basis (very Monday and Thursday). This list is distributed among staff and security control

room. The POE (Annex G) also includes procedures and current contact information tables to notify regulatory agencies, municipal and provincial authorities, cyanide supplier and transporter (Draslovka and Cinca), Local Police, off-site medical facilities, ambulance, helicopter service, aerial space control agency, the media, and other stakeholders.

The Emergency Operations Plan (POE) and PRO-PVL-122 Annex G include communication procedures as well as contact information for community representatives in the nearby areas. Media communication procedures are also included in the plan.

Veladero has established a requirement to notify the ICMI in case of a significant cyanide incident. The auditors verified this in the Emergency Operations Plan (POE) Hazmat section, annex B and at the Procedure PRO PVL 122, in case of an emergency the incident Commander should communicate the ICMI (International Cyanide Management Institute) of a significant cyanide related incident. Veladero has not reported any significant cyanide related incident during this recertification period.

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:

Veladero does not consider the use of neutralizing agents in the case of a cyanide spill. Procedure MAM PVL 111 “Environmental Actions during Cyanide Related Emergencies“ covers the recovery actions for incidents of cyanide spill in soil or in waters. The procedure MAM-PVL-002 indicates the soil sampling procedure of impacted soils after a spill for determination of total cyanide via Standard Methods 4500-CN using traditional manual distillation followed by colorimetric finish in the Veladero chemical lab. The final concentration is extrapolated and reported as mg/kg. If all the samples come back with values for total cyanide below 500 mg/kg, those areas could be considered as “reclaimed” and adequately documented. In the case of spills in water, only passive treatments are allowed, and concentration should be below 0.03 mg/l free cyanide. Cyanide recovery requirements are also established in the PRI-PVL-122 Cyanide Emergencies procedure which considers spill scenarios of liquid or solid cyanide on solid or open waters. The procedure clearly states the prohibition of using neutralization agents such as Sodium Hypochlorite, Ferrous Sulphate or Hydrogen Peroxide for spills on open waters. Decontamination is described in procedure PRI-PVL-140 “Decontamination after a HazMat Incident “describes the cleanup procedure to avoid exposure to emergency responders. Soils disposal after cyanide related incidents is included in Procedure MAM-PVL-111. All contaminated debris (soils) will be disposed of in the Valley Fill Heap Leach Pad (approved by

the local authorities). Procedure MAM-PVL-007 „Waste Management “also assures the correct segregation and management of wastes based on their composition and toxicity characteristics. Veladero uses bottled water for its mine site drinking water supply. There are no community or resident water supplies that would be at risk to potentially require an alternative water supply. Verification was by interview with environmental personnel.

The Procedure PRO-PVL-122 “Cyanide Emergencies”, prohibits the use of sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat surface waters or in conditions where the spill or treatment chemicals could reach surface waters.

Veladero has established a Procedure MAM-PVL-111 “Environmental Actions during Cyanide Related Emergencies”, which describes the sampling and analysis process for potential affected areas, and to identify the extent and impact of a cyanide release. Veladero also specifies monitoring action during emergencies according to Procedure MAM-PVL-116 “Environmental Monitoring under anomalies in the Leach Pad”, which includes a very detailed list of possible failures and the actions to be taken regarding sampling methodologies, parameters and, where practical, possible sampling locations.

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:

The Emergency Operations Plan VEL-PO-BRI-001 (POE) is revised at least once every two years; however, some annexes should regularly be reviewed (for example, contact telephone numbers) or every time there are significant changes and new information, after the occurrence of an unwanted event, mock drills or changes in compliance with requirements or regulations. The procedure VEL-PO-BRI-122 Cyanide Emergencies has to be reviewed on a frequent basis also. The site has conducted a new update of both procedures and has provided evidence of retraining workers and emergency brigade members.

Veladero conducts annual mock drills based on likely release/exposure scenarios to test the response procedure, and incorporates lessons learned from the drills into its response planning. Records of these drills are kept with the Emergency Response Department and were reviewed as part of the evidence. Documentation includes photos, strengths, weaknesses, lessons learned and corrective actions. Follow up correspondence verifying that identified corrective actions have been accomplished was also reviewed. On September 9th, 2024, a drill was conducted related to a truck collision transporting cyanide. This incident generated four improvement plans related to refresher training and reinforcing of PPE by the transporter. On

July 27th, 2024 – a cyanide spraying of cyanide solution to leach pad operator. This incident generated three action plans related to communications improvement (radio channel) and activation. On July 26th, 2023 – a process plant got in contact with cyanide solution during cyanide mixing Three action plans generated related with training and incident activation opportunities. On August 2nd, 2022 – a cyanide spraying of cyanide solution to leach pad operator. No observations. All drills conducted over this recertification period were field exercises, involved on-site personnel expected to respond to cyanide incidents, covered the entire emergency response process, and improvement action plans generated have been closed.

Procedure PRI-PVL-013 “Emergency Mock Drills” indicates that if deviations are encountered when performing a mock drill, the Emergency Operations Plan (POE) can be revised to implement improvements if required. The Emergency Operations Plan PRI-JVL-001 (POE) is also revised if an unwanted event occurs, after mock drills or changes in compliance requirements or regulations.

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 personnel and contractors that enters the site attend the course “Safe Handling of Cyanide in Veladero”. This training is provided through a PowerPoint presentation. After the training, test is completed; a test is applied. In addition, a Process Plant Induction is required for all personnel with process plant access. This training provides a plant overview and includes environmental, health, and safety standards for working inside the plant area, as well as cyanide risks and safe operating practices. The training covers but is not limited to locations where cyanide is present, alarm response, PPE requirements, safe handling and management guidelines, symptoms of exposure, cyanide first aid and emergency response. Veladero also maintains a register in excel with all training courses provided about Safe Handling of Cyanide. It also has a training matrix in excel for employees that details which training should be received depending on their job description. The training matrix includes personnel from all departments. Veladero has

established a yearly program with courses required, including cyanide and standard operating procedures. The program is based on positions to decide what curses are required per area of expertise and risks. Since July 2024, Veladero is now using a new digital platform called “Academia Veladero” to manage performance and training for workers, including training in Cyanide.

General cyanide training is refreshed at least on an annual basis to employees and contractors through either safety talks or classroom training, and since late 2024 and 2025, using the training platform “Academia Veladero”. The presentation regarding the use of CN includes topics as Cyanide transport, storage and handling, Cyanide risks, Health effect and intoxication symptoms, PPE required, Exposure limits and Emergency instructions for spill and fire. The auditors reviewed the training matrix for the “Safe Handling of Cyanide Course” and check registers for six different workers that were interviewed during the audit and found refresher training for all of them. A training matrix has been developed which identifies mandated courses and frequencies for refreshers.

Training records, including refreshers and cyanide hazard training for the warehouse personnel, the process plant operators, maintenance operators and contractors are retained by each department in the form of hard copies and an electronic version stored. The auditors verified the site has maintained training records for the last three years, verifying the training records for six employees that were interviewed during the field visit and inspections. In 2025, the site is also retaining course completion certificates. The 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 two workers in the warehouse, two in the process plant and two in maintenance, covering the recertification period.

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

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

Describe the basis for the Finding/Deficiencies Identified:

All personnel in job positions including cyanide unloading, mixing, production and maintenance, receive training on how to perform their assigned tasks with minimum risk to worker health and safety. Prerequisite training includes site induction, plant induction, plant general/ specific orientation to ensure that all operators understand and can operate the various areas of the plant in a safe and environmentally responsible manner. In addition, after successful completion of these training sessions, operators are assigned to a specific circuit and work under the direction of a competent operator until they have been deemed competent to work without direct

supervision. Task specific training includes operating procedures relevant for the worker area (e.g., cyanide unloading and handling for warehouse personnel, cyanide transfer, cyanide bags and boxes disposal, critical valves management, etc. for process area employees). Training in procedures is conducted and verified through a tracking matrix. The training procedure tracking matrix for the years 2024 and 2023 have been verified for the operators interviewed at the MC Plant and in the Leach Pad valley. Training is always conducted by the shift leader and/or supervisor, and is done in person, at the beginning of the shift or during downtime. In the future, the idea would be to integrate them into the Platform “Academia Veladero”. Determination of competency is based on test score and observations by qualified and/or experienced plant operators and/or maintenance personnel. Veladero is ISO 14001 certified and uses the training record formats for operating procedures according to this management system.

Training personnel, in collaboration with functional area personnel, maintain a series of training programs designed to build awareness and competence for various plant activities and programs. Each training module includes a training plan which outlines the course objectives and expected competency testing requirements for the module. Training schedules, plans and modules are developed and maintained and were available for review by the auditors. Some of the training modules at the Warehouse area Emergency Activation, Cyanide Warehouse Entering procedure and Cyanide Handling in the warehouse and transport to the mixing plant. Training at the process plant includes Cyanide Preparation, Cyanide Boxes disposal, Plant Start Up after emergency stop, Equipment clean-up for maintenance and Inspections and Control in Process Plant. Training at the Leach Pad considers visual inspections in the leach facility, Solution ponding actions on leaching cells and Operation of the pregnant solution storage area and leak detection and recovery system. Training at the Maintenance shop includes Maintenance work in equipment in contact with Cyanide solution, Contingency plan in case of power failure, Maintenance work on cyanide solution pumps, Emergency Plan for electrical power failure, Alarm system for high levels in process tanks and Equipment maintenance on the Valley leach facility. Training elements for each specific job are identified in the work procedures and presentations that are used as training material and are divided by department, with each of them responsible for their own personnel training program. Personnel are trained following the work procedures, which include the step-by-step process to perform the job. These work procedures include the objective, required PPE, decontamination requirements, risks associated with the cyanide task and the individual task specific steps.

Veladero has experienced personnel in cyanide processes conducting the training to operators, which is provided directly by the area leaders and supervisors who have been in their position for several years and have helped to develop the Standard Operating Procedures. The auditors verified in an interview that one of the lead trainers at the process plant and another from the maintenance department have the necessary level of technical expertise to perform the task as a trainer and adequate training skills, based on technical knowledge, adequate interactions with trainees, asking open questions, discussing lessons learned, among others. For the emergency response brigades, training on hazardous materials response, rescue in confined space, etc.; these training topics are provided by the Emergency Response team. First aid and use of cyanide

kits training is provided by the mine medical staff and the contractor that manages the medical center (professional doctors). The name of the trainer is kept on the attendance list for each training event.

All personnel in job positions that involve the use of cyanide and cyanide management are required, prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety. After completing the Safe Handling of Cyanide training, employees that will be interacting with cyanide complete specific training in the process area (a prerequisite for working in the plant). Individual training in operational procedures is provided for each specific cyanide related task that an operator will perform. This has been verified by looking at training records of new workers (a contractor at the leach pad) in 2023 and 2024. The auditors have verified that training records for a new employee (supervisor) in 2024 and in 2025 that have received CN induction training and key cyanide procedures as cyanide preparation, cyanide gas exposure emergency response, and maintenance procedures. Any employee required to work in new areas must present their training records to the supervisor. New trainees are assigned to work in one of the circuits under the supervision of a competent operator. These trainees are required to work under the direction of these competent operators until they demonstrate their ability to work without direct supervision in a safe and responsible manner.

Veladero requires and provides refresher training for safe handling of cyanide, first aid for cyanide intoxication and cyanide emergency response to assure that employees and contractors continue to perform their jobs in a safe and environmentally protective manner. Veladero training matrix indicates that refresher training courses should be taken every year (now is being tracked using the platform Academia Veladero). The same requirement applies for operational procedures. Training database in excel includes all training given to the process plant employees. Training records and test results covering the recertification period were reviewed by the auditors for supply chain, maintenance, and process plant staff.

To evaluate the effectiveness of training related to cyanide, tests are taken after a classroom training session while planned task observations are conducted by the supervisor of the trainee after on-the-job training sessions. The supervisor is responsible for observing new employees and determining when they are ready to work independently.Veladero has a customized training program for each employee. Its annual evaluation considers the operation and compliance with the training program.Procedure PRO PVL 405 Training on Safe handling of Cyanide (updated in 2023) indicates the need for a Cyanide course and refresher. The requirement for testing indicates that the employee should at least obtain a grade of 8/10 to pass. In case the employee does not pass the evaluation, it must retake the test. Currently the tests are registered in Microsoft Forms platform.

Cyanide training in Veladero is centralized in the Process department database (for all Veladero employees and contractors) for areas as Merrill Crowe, Refinery, Heap leach pad, labs. The warehouse maintains its own register, same as the process maintenance area. Human

resources maintain a database that includes general induction records. Additionally, paper records with an attendance list for each training event, indicating the date, training title, and the name of the person lecturing the training. The paper records are kept by each area (e.g., warehouse, process, emergency response). Site retains the training records throughout a worker's employment. A training matrix in excel is generated from the training database to assist plant personnel in their training progression and refresher exercises.

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:

The auditors verified that plant operators and maintenance personnel responsible for unloading, mixing, production, and maintenance are trained in decontamination of cyanide exposure and first aid procedures for cyanide release incidents. Training is conducted by Veladero´s Emergency Brigade and Medical Department, including topics such as: cyanide management, safe cyanide handling, decontamination of cyanide exposure victims, first aid for cyanide intoxication, cyanide SDS, General Emergency Plan, Cyanide Code, equipment decontamination and plant emergency stop, among others. Verification included review of training records (training matrix) for six operators and also by interviews with operators as well as process personnel during the plant visit. The auditors also reviewed training on specific response procedures including PRO-PVL-408 HCN Gas Release Evacuation Procedure and PRO-PL-409 Sodium Cyanide Spill Control Procedure and VEL- PO - SOC – 039 Medical Treatment for a CN exposure. Operators were interviewed and demonstrated good awareness of what actions are to be taken in the event of a cyanide release, including decontamination of a victim and first aid actions. Records of training attendance were reviewed by the auditors and found them complete.

The Emergency Response Chief, supervisors, leaders and responders are all trained in the Emergency Response Plan according to an annual training program and schedule which includes hazmat and cyanide related emergency response. The operation has a full-time Emergency Brigade. All their members are trained in the use of necessary response equipment. In addition, Process Plant responders receive communications and training on an emergency in the plant. Knowledge of these plans and understanding of the plans is tested through drills. ERT members are trained through participation in mock drill exercises as well as formal training programs. Formal brigades are in place for different scenarios such as fire, hazmat, first aid, vehicle incidents, rope rescue and confined space. Emergency responders are available on all shifts.

Veladero has provided evidence that their own responders are prepared for cyanide-related emergencies involving unloading, mixing, production, and maintenance activities. Veladero has adequate staff, equipment, and expertise to respond effectively to emergencies and does not require off-site emergency responders, nevertheless, Veladero has established formal arrangement with off-site medical facility (San Juan) regarding the potential to treat patients that have been exposed to cyanide. Veladero has the policy to stabilize victims on-site prior to transferring them to San Juan. Veladero maintains the agreement with the High Complexity Center (CEAC) located in San Juan.

Refresher training for cyanide events is conducted as part of the site training and emergency drills program. Training requirements from the training matrix are routinely monitored and refresher training is scheduled as required. Veladero personnel receive annual specific and general refresher training. Training topics include cyanide management, safe cyanide handling, first aid for cyanide intoxication, cyanide SDS, General Emergency Plan, Cyanide Code, management, equipment decontamination and plant emergency stop, among others. Training records were reviewed for the recertification period including evaluation results. The auditors also reviewed refresher training on specific response procedures including PRO-PVL-408 HCN Gas Release Evacuation Procedure and PRO-PL-409 Sodium Cyanide Spill Control Procedure.

Records of emergency response training are documented in a database maintained by both the Emergency Brigade and the Process Plant (pdf and excel files). These include training conducted by internal and external parties. The auditors verified training performed by Draslovka in 2024. In all cases, records have names of the employee and the trainer, the date of training, the topics covered, and an evaluation.

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:

Veladero has continued to implement a Communication and Community Engagement Plan which includes a series of programs that allow stakeholders with an opportunity to communicate issues or concerns regarding cyanide management. The program “Community Development Committees”: consisting of programmed meetings and specific topics to develop investment projects in coordination with authorities. These are conducted monthly at community locations. During 2022, the mine established 8 committees, increasing to 9 in total for 2024 (between Jachal and Iglesia). During these meetings there are always options for community members to express issues, concerns or comments. The Grievance Mechanism Program: procedure RCO-PVL-001 is currently active and enables the site to receive, process, manage and resolve written or verbal complaints and grievances in a culturally sensitive, timely and consistent manner. There have not been cyanide-related grievances during the recertification period. The program Participatory Monitoring: trained community members participate in periodic water quality monitoring in river systems. Water quality parameters include CN. The program continues to be conducted on a quarterly basis. The Community Site Visits Program: continues to be a process to interact with community members on topics like: Veladero operations, Health, Safety and Environment (Cyanide management is covered within the Environment topics). Materials provided include pamphlets on CN Use in Veladero and CN Code Certification. Among those attending the mine visits are representatives of schools, colleges, clubs, national parks, NGOs, legislators from other provinces, departmental representatives, and other community referrals. After the visit, people complete a feedback form, in which they give their opinion of the activity. During the recertification period (2022-2024) there has been an average of 4-6 each year. The Participation on the Camara Minera Argentina – Association of miners in San Juan, where mining topics are discussed, new legislation is reviewed, and provincial mining sector position statements are generated. Other resources are the Office in San Juan, Iglesia and Jachal: during working hours there is always Veladero social engagement personnel to attend community people. Another program used is Radio communication: through local radio stations. Veladero also uses social media networks including the following accounts: facebook.com/BarrickArgentina;Instagram/BarrickArgentina; barricksudamerica.com/Argentina.

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:

Veladero distributes a pamphlet called Cyanide Manual to residents to provide information regarding cyanide management. This information is also available in the web (Barrick Argentina), offices in San Juan, Iglesia and Jachal, and it includes topics are What is Cyanide, how cyanide is found in many natural products, how is it being used in mining and other industries , how is it

transported to Veladero, how it is used for leaching the gold content in the ore, environmental Controls and monitoring and finally actions in case of an emergency. Veladero also provides more general information on Cyanide management on their website including environmental, safety, health, transportation and emergency response topics. All the cyanide information described above is written in Spanish.

Veladero Sustainability and Community Relations staff stated that illiteracy is low. Nonetheless, Veladero provides information verbally and/or visually via meetings, slideshows, and videos as Community Development Committees, Mine site visits and Veladero social engagement offices. Veladero has documented these programs via sign-in sheets, photographs of site visits and videos that were reviewed by the auditors.

Veladero has not experienced incidents related to cyanide transport, storage, use or disposal during the recertification period. Nevertheless, the site has maintained their Emergency Response and Communication systems up to date for any type of potential cyanide releases that could have significant adverse effects on health and environment. Veladero is required to report severe incidents involving hospitalization or fatalities to the provincial authorities, who then will make this information publicly available. The Cyanide Management Plan, the Emergency Operations Plan POE have specific reporting requirements for any release of hazardous materials resulting in potential adverse effects on the environment, to safety and health of workers or communities. The Emergency Operations Plan for Veladero describes several scenarios of response and remediation required in the event of emergency response. Among the incidents included in the Plan there are scenarios related to cyanide releases off the mine site. The Emergency Response Plan describes the different response actions required as indicated in principle 7. The plan indicates that the reporting criteria will describe the location and the nature of the incident, immediate mitigation actions taken as well as information made available to the public. The Emergency Operations Plan for Veladero describes communication statements made available to the public required in the event of emergency response. Among the incidents included in the Plan there are scenarios related to cyanide releases on and off the mine site. The Emergency Response Plan and Communication plan covers the town of Iglesia and Jachal, as well as the city of San Juan. The Emergency Operations Plan for Veladero describes regulatory communication statements made available to the public, required in the event of emergency response. Veladero has developed an Emergency Communications Plan, which is presented as an annex of the Action Plan against Emergencies PADE and describes the different communication and reporting channels the mine will use to communicate incidents via press statements, reports to authorities, web press statements. The plan indicates that the reporting criteria will describe the location and the nature of the incident, as well as immediate mitigation actions taken. The communication plan also includes an updated list of stakeholders and a Communication Action Guideline. Veladero Emergency Communications Plan, which is presented as an annex of the Action Plan against Emergencies PADE, also describes the different communication and reporting channels the mine will use to make the information available to the public, which will also include exceedances of applicable limits.