Gold Mining Operations

Summary Audit Report

for

Minas Argentinas S.A/ Gualcamayo facility.

Argentina/ June 2025.

Prepared by NCABrasil Expert Auditors Ltd.

www.globalsheq.com

This report contains 31 (thirty one) pages.



Gualcamayo		29/03/2026
Name of Mine	Signature of Lead Auditor	Date

SUMMARY AUDIT REPORT
FOR GOLD MINING OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.

2. The name of the mine operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report. The lead auditor's signature at the bottom of the attestation on page 3 must be certified by notarization or equivalent.

3. An operation that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.

4. The Summary Audit Report and Corrective Action Plan, if appropriate, with all required signatures must be submitted in hard copy to:

ICMI (International Cyanide Management Institute)
1400 I Street, NW, Suite 550.
Washington, DC, 20005, USA.
Tel: +1-202-495-4020.

5. The submittal must be accompanied with 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report on the Code Website, and 2) a completed Auditor Credentials Form. The letter and lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.

6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable gold mining company.

7. The description of the operations should include sufficient information to describe the scope and complexity of the gold mining operation and gold recovery process.



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SUMMARY AUDIT REPORT

Name of Mine: Gualcamayo.
Name of Mine Owner: Minas Argentinas S.A.
Name of Mine Operator: Gualcamayo.
Name of Responsible Manager: Ing. Ariel Alejandro Alfonso (SHE Manager)
Address: Ruta Nacional 40.
State/Province: San Juan/ San Juan Country: Argentina
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Location detail and description of operation:

Gualcamayo is a gold mine owned by Minas Argentinas SA, a company within the Colombian holding group Mineros S.A. Gualcamayo is in the northern part of San Juan province, in the Jáchal Department. Minas Argentinas began exploration work in 1994. It holds mining property rights in both San Juan and La Rioja provinces. Fifteen years passed from the first mineral prospecting to the production of the first dore metal bar. During this time, there was a significant investment in exploration, feasibility studies, permit acquisition, and mine construction. Gualcamayo declared commercial production in mid-2009.
Access to Minas Gualcamayo, whether from San Juan Capital or San José de Jáchal, is via National Route 40, a completely paved, low-elevation road that passes through the mining property and has no steep, cliffside areas.
Its metallurgical treatment plant is located 1,800 meters above sea level and its base camp is at an altitude of 1,600 meters. The average annual temperature recorded in Gualcamayo is 25 degrees Celsius, with extremes of 40 degrees Celsius in the summer and -10 degrees Celsius in the winter.
Gualcamayo has different mineralized zones. The most important are Quebrada del Diablo, Amelia Inés, Magdalena, and Quebrada del Diablo Bajo Oeste. Quebrada del Diablo was the main body for the first 8 years of mine's life.
Today, thanks to continuous exploration work, new areas of interest have been incorporated for both exploration and production. The most important is Carbonatos Profundos, a mineralized body that now has over 2 million ounces of resources. Additionally, Las Vacas, Salamanca, Target D, and Pirrotinas have also been added, among others.

How is the production process carried out at Gualcamayo?

The first step in the process consists of detaching the ore from the mountain, a task performed through controlled blasting. The detached ore is loaded by mechanical shovels into trucks that transport it to the transfer chute (also called an ore pass) through which the ore descends to the cavern containing the primary crusher.
The crushed ore is transported to the intermediate ore stockpile by a 1,647-meter-long conveyor belt inside a tunnel. It is then received by the secondary and tertiary crushers, which further reduces the ore to a diameter of approximately half an inch.
Next, a conveyor belt almost 3 kilometers long carries the crushed ore to the heap leach pads.
Gualcamayo is unique in being a mixed mine, meaning it combines surface, or open-pit, and underground gallery production methods in the same deposit.
During the first four years of production, work was exclusively on the surface. But, since late 2013, production began at its underground mine, called Quebrada del Diablo Bajo Oeste.
There, the mineralized body is located approximately 500 meters below the surface and has a shape similar to a rugby ball. The mineralization is disseminated throughout the body, with no preferred direction.



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Production at Quebrada del Diablo Bajo Oeste was managed using two different methods. During the first phase, at the upper level, the "Sublevel Stoping with Backfill" system was used. Currently, work is being done on the lower levels, where the "Sublevel Caving" system is employed.
In the sublevel caving method, parallel galleries, generally 9 to 15 meters apart, are developed and are known as production galleries. The sublevels are located through the mineralized body at vertical intervals that, in most cases, vary from 8 to 13 meters. The operation is thus designed according to a symmetrical geometric configuration.
The operation basically consists of fan-drilling from the bottom up from the sublevels, thus drilling the rock mass of the corresponding sublevel and through the pillar of the upper sublevel. Explosives are then loaded, and the blast is carried out. The fragmented ore falls into the lower sublevel, from where it is loaded with low-profile machines.
The caving method is based on the force of gravity, the pressure, and the weight created by the rock immediately above the mineralized body, and the fracturing of the rock by means of controlled explosives.
The ore from the underground mine is also transported to the primary crusher. In this case, it is carried through conveyor belts located in galleries inside the mountain. In the primary crusher, the ore from the underground operation is mixed with that from the surface operations, which arrive via the ore pass.

How is gold extracted from the crushed rock?

Gualcamayo uses a closed-circuit heap leaching system with a cyanide solution.

Once the crushed ore arrives at the heap leach pad area, also called the valley, it is stacked in productive units or cells, which are 60 meters long by 86 meters wide and 10 meters high. A system of pumps and pipes sends the leach solution, called the “lean solution,” to drippers scattered over the cells. The leach solution percolates through the ore, and in its downward movement, it dissolves the gold contained in the rock and carries it along. Upon reaching the bottom, it will encounter an impermeable geomembrane over which it will slide by gravity to the collector pipes that will lead the solution with the dissolved gold, now called the “rich solution,” to the Process Plant.
There, in what is known as the Process Plant, the gold is recovered, and the solution is returned to the heap leach pad for a new cycle.
The cyanide leach solution works in a closed circuit between the leach pad, the storage tanks, and the gold recovery plant, so there is never any contact with cyanide and the environment.
The cyanide solution used has a concentration of 110 to 150 parts per million, or, in other words, from 0.01% to 0.015%. This low concentration is what is necessary to carry out the heap leaching process for our ore.
Gualcamayo has 2 leach pads or valleys. The South valley was used during the first 4 years of mine, and the North valley is the one currently in use. The waterproofing of the leach pads consists of a system composed of a high-density polyethylene geomembrane and a low-permeability soil layer, mostly made of compacted clay 30 centimeters thick.
Above the geomembrane is a system of collector pipes that help guide the percolating solution out of the heap for the subsequent stages.
Various measures have been taken to ensure environmental control. For example, all pipes through which the leach solution circulate are placed on an impermeable surface. In addition, monitoring wells were built in areas adjacent to the process zone with the objective of detecting any anomaly early and containing it immediately.

How is the bullion obtained?

The gold leached from the ore is extracted from the rich solution in the activated carbon adsorption circuit. The activated carbon, which is distributed in 3 columns with 5 tanks each, retains the gold within its porous structure.



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The gold is then extracted from the activated carbon with a cyanide solution at 145 degrees Celsius and 450 hectopascals of pressure, a method called pressurized Zadra. The elution solution, which will contain approximately 150 grams per cubic meter, will pass through the electrodeposition cells where the gold in solution will be transformed into metallic gold on the cathodes.
The resulting sludge is filtered and dried to be able to be loaded into the melting furnace along with fluxes. The sludge contains significant amounts of gold and smaller amounts of other metals. The elimination of these metals is achieved with added fluxes to the smelting charge. The charge is then melted in a gas furnace, and the gold is separated from the lighter-weight elements. These elements are contained in what is called "slag."
When the molten charge is poured from the furnace, the gold is collected in bullion molds, and the lighter slag flows into the slag pot.
The bullion will contain mainly gold, around 90%, 6% silver, and 4% impurities. Normally, 3 to 4 ingots will be obtained per cast.
The bars or ingots are cleaned of slag, marked, and weighed. They are then stored in a vault until they are shipped to the refinery. The bars are 20 cm long, 10 cm high, and 8 cm wide, and weigh approximately 28 kg.
There is constant monitoring of the refinery area by cameras, in addition to strict entry and exit controls for personnel.
Each part of this mining and metallurgical process we have just described requires properly calculated procedures, both from a mining engineering perspective and for the care of the environment and the safety of its workers. This is why Mina Gualcamayo has adjusted all its processes and certified ISO 14001 Environmental Management, OSHAS 18001 Occupational Health and Safety standards, and the International Cyanide Management Code, a protocol developed under the auspices of the United Nations Environment Programme.



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Auditor's Finding

This operation is:

(X) in full compliance
☐ in substantial compliance *(see below)
☐ not in compliance

with the International Cyanide Management Code.

* The Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit (not applicable).

During the previous three years, MASA did not experience any significant cyanide related incidents, nor any compliance problems related to cyanide management.

Audit Company: NCA Brasil Expert Auditors Ltd. (www.globalsheq.com)
Audit Team Leader: Celso Sandt Pessoa
E-mail: celsopessoa@ncabrasil.com.br or celso@globalsheq.com (ICMI qualified lead auditor, since 2006, and TEA (Technical Expert Auditor for Gold and Silver Mining, Production and Transportation of Cyanide).
Names and Signatures of Other Auditors: Carlos Alberto Neves (ICMI qualified, since 2024,Technical Expert Auditor for Gold and Silver Mining).

Date(s) of Audit: 24 ~ 26/06/2025 (on-site) and
29 ~ 30/09/2025 (off-site).

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

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



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

Standard of Practice1.1: *Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.*

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 1.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation purchases solid NaCN from the Draslovka USA production plant, a cyanide producer certified by the ICMI (where ICMI stands for International Cyanide Management Institute), according to the information available on the ICMI website. The current certification is dated June 13, 2025, and it is Draslovka USA's fifth certification. The supply contract documentation was evidenced during the audit.

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

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

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 2.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The transportation documents (e.g: truck and railway waybill, packing list, bill of ladding) issued by Draslovka USA and Transportes Cinca are retained by the operation. Reviewed such transportation documentation, issued in 2024 and 2025, in this opportunity. The cyanide producer (Draslovka USA production plant) provides documentation (statement of origin, quality certificate, bill of lading (ocean freight) and railway waybill) to the operation (transportation between USA and Argentina). The Argentinian transporter (Transportes Cinca) also provides transport documentation (guia de remesa) related to the transportation of cyanide between Terminal Zárate/ Buenos Aires port (port of entry) and the operation.



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Draslovka Global Ocean Supply chain is certified by ICMI (last certification dated 13/06/2025). The Draslovka Global Ocean Supply Chain includes rail transport from Draslovka's Memphis production plant to U.S.A. ports of departure, including the Ports of Everglades, Long Beach, Los Angeles/San Pedro, New Orleans, Savannah and Seattle in the US, ocean carriers American Presidents Line (APL), Hamburg Süd, Maersk Line, Mediterranean Shipping Co. (MSC), Seaboard Marine and Hapag Lloyd. The supply chain also includes the following ports outside of the U.S.A: Buenos Aires (Zárate terminal) and Puerto Deseado (both ports in Argentina). Grupo Cinca S.A (Transportes Valentin S.A) is certified by ICMI (last certification dated 28/05/2025), according to the information available at ICMI website in both cases.

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

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

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 3.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

There is a sodium cyanide (NaCN) storage warehouse designed and constructed according to the plans developed by Minas Argentinas SA (MASA). The design and construction documentation is maintained by the operation. The cyanide solution mixing and storage facilities were also designed and built according to MASA's engineering plans, as evidenced in the design drawings. The warehouse is located near fenced plant areas, minimizing the risks associated with transporting cyanide briquette boxes for solution preparation. It has restricted access and is distant from administrative offices. The warehouse is secured with a padlock, with the key held in the control room under limited access. Signage regarding cyanide, its risks, and protective measures is appropriate. The operation does not use liquid cyanide solution. Only uses solid NaCN briquettes. The solid NaCN boxes are unloaded over concreted floor. In the event of any incident during unloading or internal transport between the warehouse and the preparation tank, the recovery, with plastic shovels and plastic brushes. All process tanks are provided with level sensors, which are maintained by the operation (they are included in the instrumentation preventive maintenance plan). All process tanks volume is not used 100%. Alarm 1 is 85% and alarm 2 is 90%, as evidenced during the field audit. All process tanks involving sodium cyanide use are built within secondary containment systems, which were deemed to be in good physical condition based on a visual inspection conducted during field audits. The containment tanks are equipped with pumps capable of recovering cyanide solution that may drain or overflow from the tanks and returning it to the process. All process tanks are anchored to concrete structural foundations, as confirmed during field audits and in the project documentation.



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Secondary containments for cyanide mixing, distribution, and storage tanks are constructed of reinforced concrete (containment walls and floors), which provides a competent barrier to leakage. During the field audit, the containments were visually inspected and found to be in good physical condition (no evidence of damage that would compromise containment). The containment areas are equipped with sump pumps capable of recovering any cyanide solution that may drain or overflow from the tanks and returning it to the process. All process tanks are anchored to concrete structural foundations, as confirmed during field audits and in the project documentation. The cyanide warehouse is under a roof and has a smooth concrete floor with no visible cracks or damage that could allow solid NaCN accumulation in the event of a spill. If a spill occurs, neutralization and cleanup procedures are appropriate and conducted by trained and equipped personnel using PPE, plastic shovels, and brushes. Refer to documents PADM-ABA-001, "PROCEDIMIENTO TRASLADO DESCARGA Y ALMACENAMIENTO DE CIANURO DE SODIO," revisión 18 (19/06/2025); POPE-PRO-013, "PROCEDIMIENTO OPERACIONAL - CONTROL DE DERRAMES DE CIANURO DE SODIO," revisión 18 (19/06/2025); and POPE-PRO-011, "PREPARACION DE SOLUCION CIANURADA (CIANURO DE SODIO)," revisión 37 (05/05/2025). The cyanide preparation building is equipped with adequate ventilation to prevent the build-up of hydrogen as evidenced during the field audit and by the reviewed ventilation design and construction documentation. The cyanide mixing and distribution tanks are located in a secure area within the fenced plant boundary with controlled access. Warning signage indicating restricted access and cyanide risks are posted, and the area is monitored by cameras through the control room. The sodium cyanide storage warehouse also has restricted access (secured with a padlock, with the key held in the control room under limited access). The warehouse is used specifically to store solid NaCN boxes. No other products are allowed to be stored in these warehouses. The cyanide mixing and solution storage facilities are located inside a fenced area and separated from other materials (there are no other materials inside the secondary containments where the cyanide solution preparation and distribution tanks are installed).

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

The operation is:

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

Summarize the basis for this Finding/Deficiencies Identified:

The operational procedure establishes a rigorous and safe process for handling, neutralizing, and disposing of the bags used in the preparation of the cyanide solution, aiming to protect the environment and ensure worker safety. It can be evidenced in document POPE-PRO-011, "PREPARACION DE SOLUCION CIANURADA (CIANURO DE SODIO)," revisión 37 (05/05/2025).



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After emptying the bags into the preparation tank (TK20), triple washing is performed using sodium hydroxide. The bags are immersed in a container with water and sodium hydroxide and agitated for approximately 4 to 5 minutes. This process is repeated three times to ensure the removal of residual cyanide. After washing, a sample of the bag fabric is taken and sent to the chemical laboratory for free cyanide analysis. Final disposal is only allowed if the result indicates a concentration equal to or less than 0.05 ppm; otherwise, the washing process is repeated. Approved bags are discarded in designated containers. In the case of wooden pallets, a composite sampling is conducted. The samples are analyzed and may only be disposed of if they show a cyanide concentration of 0.01 ppm or less, with removal authorized exclusively by the Environmental Department. At the end of the entire process, the preparation area must be thoroughly cleaned with clean water, ensuring no cyanide or briquette residue remains. Operators must wash their boots in trays containing sodium hypochlorite before leaving the area to ensure neutralization of any hazardous residues. After this cleaning process, all bags, boxes and pallets are delivered to the Environmental process for intermediate storage. Final destination will be a certified and accredited environmental waste management supplier. The sea container returned to the NaCN producer (Draslovka USA) is inspected, cleaned (brushed) and sealed, before returning to the above-mentioned stakeholder. All pumps, tanks, secondary containments, are included in the operation preventive maintenance plan. Please refer to SoP 4.1. The operation does not use hoses and couplings for mixing solid cyanide. Related to valves, the operation replaces any potentially defective valve by a new one. This approach is considered as a predictive maintenance. The valve replacement frequency is defined in accordance with the routine inspection results. Any potentially defective valve is replaced, as previously mentioned. Related to the valves installed in the cyanide solution preparation tank and at the cyanide solution distribution tank, their operation instructions are addressed at a documented work instruction, indicating the correct sequence to open and close that valves. During the field audit, a preparation of a cyanide solution batch was evidenced, as well the transfer of such cyanide solution batch to the distribution tank. All NaCN boxes are handled with the help of forklifts, operated by qualified operators. It was evidenced, during the field audit, that all NaCN boxes are kept in order, without puncturing or rupturing. The stacking limit is three boxes, according to the producer's instructions. This was evidenced during the field audit. Evidenced, during the field audit, that the cyanide solution preparation area is kept clean. The operation´s safe work procedure requires that after the preparation of cyanide solution, the preparation area must be washed and cleaned and kept in order and cleaned, as evidenced during the field audit. Refer to documents PADM-ABA-001, "PROCEDIMIENTO TRASLADO DESCARGA Y ALMACENAMIENTO DE CIANURO DE SODIO," revisión 18 (19/06/2025); POPE-PRO-013, "PROCEDIMIENTO OPERACIONAL - CONTROL DE DERRAMES DE CIANURO DE SODIO," revisión 18 (19/06/2025); and POPE-PRO-011, "PREPARACION DE SOLUCION CIANURADA (CIANURO DE SODIO)," revisión 37 (05/05/2025). During the cyanide solution preparation is the presence of a second operator observing the activity from a safe area is mandatory, according to the safe work procedure. Specific PPEs are defined, in a safe work procedure, to be used during the NaCN solution preparation. All cyanide solution preparation steps are defined in a documented safe work procedure POPE-PRO-011, "PREPARACION DE SOLUCION CIANURADA (CIANURO DE SODIO)," revisión 37 (05/05/2025). Draslovka USA supplies solid NaCN with dye colorant, as evidenced during the field audit.



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

Standard of Practice 4.1: *Implement management and operating systems designed to protect human health and the environment utilizing contingency planning and inspection and preventive maintenance procedures.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has written, detailed, and recently revised procedures for the management and operation involving cyanide. By sampling, the following documents were evidenced: PADM-ABA-001, PROCEDIMIENTO TRASLADO DESCARGA Y ALMACENAMIENTO DE CIANURO DE SODIO, Revisión 18 (06/19/2025), POPE-PRO-013, PROCEDIMIENTO OPERACIONAL - CONTROL DE DERRAMES DE CIANURO DE SODIO, Revisión 18 (06/19/2025), POPE-PRO-011, PREPARACION DE SOLUCION CIANURADA (CIANURO DE SODIO), Revisión 37 (05/05/2025), PLAN DE OPERACIONES PARA EL MONITOREO MANTENIMIENTO Y CONTINGENCIA (POMMyC), Revisión 15 (May 2025). PLAN DE OPERACIONES PARA EL MONITOREO MANTENIMIENTO Y CONTINGENCIA (POMMyC), Revisión 15 (May 2025) addresses situations that fall within the full scope of Standard Practice 4.1.5, including: probabilistic water balance models considering extreme events (e.g., 500-year return rainfall); procedures to handle events that may compromise containment capacity, including solution evacuation and emergency pumping. The plan considers events such as strikes, ore shortages, economic or legal disruptions as non-standard operational scenarios, and defines drainage procedures, safe storage of reagents, and temporary decommissioning of process areas. It also includes protocols for heap stabilization, containment of residual solutions, and maintenance of critical infrastructure during periods of inactivity.



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The operation defined, documented and implemented specific inspection checklists focused on the process plants installations. Records of such inspections are retained by the operation. Reviewed inspection records performed between 2023 and 2025. The inspections are performed per area and include all the installations included in that area (e.g: tanks, secondary containments, valves, pumps, piping, instrumentation). All cyanide containing tanks are inspected on a monthly basis. The inspection scope is focused on corrosion signs, leakages, pipelines, joints, valves and structural integrity. It is an integrated inspection, including the secondary containment, the tanks concreted base. Records of such inspections are retained and were reviewed during this opportunity. During the field audit, it was evidenced that those installations are well maintained. The PLS (Pregnant Leaching Solution, the only pond available in the operation) is inspected on a regular basis (daily) and all quality and operational aspects of the PLS are inspected, including the available freeboard and the condition of the water diversion systems available at the leaching valleys, all in accordance with the Argentinian laws. Records of such inspections are retained by the operation. Inspections results were reviewed between 2023 and 2025. The results showed that the PLS is well maintained. Major problems were not identified. The PLS is covered by a net, in order to avoid the contact of local fauna and kettle with the pond solution. Leak detection and collection systems are included in the scope of this operational inspection protocol. As previously mentioned, the inspection of secondary containment, for tanks and piping, are included in the monthly inspection scope. During the field audit, it was evidenced that such installations are well maintained. The PLS (Pregnant Leaching Solution, the only pond available in the operation) is inspected on a regular basis and all quality and operational aspects of the PLS is inspected, in accordance with the Argentinian laws. Records of such inspections are retained by the operation. Inspections results were reviewed between 2023 and 2025. The results showed that the PLS pool is well maintained. Major problems were not identified. The PLS pool is covered by a net, in order to avoid the contact of local fauna and kettle with the PLS pond water. Pipelines, pumps and valves are included in the inspection scope. All cyanide installations are included in a preventive maintenance program, and inspections are performed in order to confirm the effectiveness of the preventive maintenance program. The PLS is inspected on a regular basis in accordance with the Argentinian laws for this type of installation and in accordance operation´s inspection program. The inspection plan includes the inspection of the integrity of surface water diversions, which are part of the PLS configuration and the leaching valleys. The inspection plan includes the inspection of the integrity of surface water diversions, which are part of the PLS pool configuration. Cyanide containing installations (tanks, pipes, pumps, valves, secondary containment) are inspected on a monthly basis, in between preventive maintenance activities. In my professional experience, the defined inspection frequencies are adequate to maintain the process plant installations and equipment working in conformance with the defined parameters. Inspection checklists were developed and implemented.



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The inspection results are recorded in this checklist, that are retained by the operation in accordance with the quality records management procedure. The inspection records address the inspection date and the name of the inspector. The checklist addresses the quality aspects to be inspected and the acceptance criteria to be observed. If opportunities of improvement are identified, corrective or preventive maintenance orders are issued and implemented. Such cases were evidenced during this opportunity. Corrective maintenance orders are issued when the inspection result demands one. All corrective maintenance orders are dated and, when concluded, are retained by the operation. Some corrective maintenance orders issued between 2023 and 2025 were sampled and reviewed during this opportunity. The operation designed, documented, implemented and maintains a preventive maintenance program focused on tanks, pipelines, pumps, valves (predictive approach), secondary containments and instrumentation (e.g: HCN detector, level transmitter). The frequency of preventive maintenance is variable. In my professional experience, the defined preventive maintenance frequency is adequate to maintain the process installations in a safe way. Records of preventive maintenance orders performed during the last twelve months were reviewed. It was evidenced that the operation has emergency power resources (two diesel generators) to operate pumps and other equipment (e.g: agitators) to prevent unintentional releases and exposures in the event its primary source of power is interrupted (the operation has one Cummins (trademark) diesel generators of 2000 kVA (kilo Volt Ampere). The second generator is a Caterpillar (trademark) with 400 kVA. The back-up power generators equipment is covered by a preventive maintenance program (annual) and inspections. The generator is turned-on on a monthly basis. Records of such activities are retained by the operations and were reviewed during this audit.

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

The operation is:	**X** in full compliance with ☐ in substantial compliance with ☐ not in compliance with ☐ not subject to	Standard of Practice 4.2

Summarize the basis for this Finding/Deficiencies Identified:
The operation recirculates nearly 100% of the cyanide solution (1,500 m³/h). The operation also has important initiatives to reduce current cyanide consumption, mainly: 1 – Implementation of a lime plant, currently in the operational adjustment phase, aimed at conditioning the ore matrix in the valley (Valley Leach Facility - VLF) through alkaline washing prior to cyanide leaching. Currently, there is drainage of the pregnant solution from the valley at pH 8 and, in some collectors, at pH 7.7, resulting in approximately 70% cyanide hydrolysis within the heap; 2 – Performing chemical precipitation of weakly bound metals complexed with cyanide, such as metal hydroxides, and recovering cyanide at approximately 3–4%.



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Standard of Practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

The project, in collaboration with Vector, Ausenco, and Knight Piezold (the latter being the most recent study), developed a comprehensive, probabilistic, and dynamic water balance system. The model considers a 500-year return rainfall event. The region has low average annual precipitation (190 mm per year), while average evaporation is 1,800 mm per year, resulting in a negative natural water balance. Replenishment water is obtained from underground wells, with flow rates monitored by automated flow meters. There are no power generators for these wells because, according to MASA, the history of power outages in the area is very low, and the total flow pumped by the wells is insignificant in the balance, where 1,600 m3/h is from barren solution recirculation. The region has a significant amount of groundwater, and MASA monitors these volumes and levels using piezometers. The operation has five meteorological stations in Gualcamayo. The evaporation rate is considered, and the evapotranspiration factor used is 0.65. The operation also adopts initiatives to reduce evaporation, such as covering part of the surface exposed to cyanide on the upper face of Leach Heap. The water balance considers leaching solutions and flows to the tailings deposit. The quality of precipitation and evaporation data is good, and losses other than evaporation are also considered in the balance. There are no freeze-thaw effects in the region. The rates at which solutions are applied to leaching valleys are considered in the model. There is no TSF (Tailings Storage Facility) in the operation. The model considers a 500-year return rainfall event. The region has low average annual precipitation (190 mm per year), while average evaporation is 1,800 mm per year, resulting in a negative natural water balance. The operation has five meteorological stations in Gualcamayo and considers precipitation data. The calculated precipitation volume resulting from surface run-on from the up-gradient watershed is lower than the available free volume (PLS) at the operation. There are no freeze-thaw effects in the region. The solution losses in addition to evaporation and evapotranspiration, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface has no significant impact on the water balance. The region has low average annual precipitation (190 mm per year), while average evaporation is 1,800 mm per year, resulting in a negative natural water balance. The operation also adopts initiatives to reduce evaporation, such as covering part of the surface exposed to cyanide on the upper face of the Leach Heap.



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There are no discharges to surface water. There are no power generators for the pumping wells because, according to MASA, the history of power outages in the area is very low, and the total flow pumped by the wells (100 m3/h) is insignificant in the balance, where 1,600 m3/h is from barren solution recirculation. The operation does not release effluent on surface waters. No other aspects are considered in the water balance model. The operation has enough available volume (PLS) enough to retain all calculated storm rain amount. The PLS are inspected on a regular basis as previously mentioned. Inspections include the available freeboard. One PLS inspection was performed during the field audit, in the presence of the audit technical auditor. The operation monitors precipitation and evaporation and compares with historical values. It was observed that the rain profile is being maintained along the years as well as the evaporation profile. The region has low average annual precipitation (190 mm per year). The operation has five meteorological stations in Gualcamayo.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All the operation perimeter is fenced. The Pregnant Leaching Solution facility (PLS) is covered with a net, in order to avoid the presence of birds and other animals. The amount of WAD (Weak Acid Dissociable Cyanide: an operationally defined group of cyanide species that undergo dissociation and liberate free cyanide when refluxed under weakly acidic conditions (pH 4.5~6)) cyanide in the PLS is maintained above 50 ppm. Reviewed monitoring records issued by Induser Laboratory Ltd. (an ISO 17025/2017 accredited laboratory by IRAM Argentina/ Instituto Argentino de Normalización y Certificación). All samples were collected by Induser´technicians between June 2023 and June 2025. The operation developed and implemented an environmental monitoring plan (refer to Standard of Practice 4.9), which includes the monitoring of the open waters. The monitoring frequency is defined in accordance with the environmental permits held by the operation (daily samples). Samples are collected at the discharge points and at the PLS pool. Reviewed monitoring results related to 2023, 2024 and 2025 for WAD cyanide. The PLS is covered by a net in order to avoid contact with birds and other animals. The PLS is inspected on a regular basis and there were no cases of fauna/ wildlife mortality in the last years. The leach solution is not sprayed but applied through drops.



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

The operation is:
X in full compliance with
☐ in substantial compliance with
☐ not in compliance with
Standard of Practice 4.5

Summarize the basis for this Finding/Deficiencies Identified:

There is no direct discharge of process effluents on surface waters. The operation operates in a closed circuit (treated effluent recirculation as industrial water and Barrens solution re-used for leaching). This was evidenced during the field audit. There are no surface waters in the surroundings of the operation. There are three seasonal (filled with rainwater during the rainy season)) creeks down gradient of the PLS (Jachán creek, Vermejo creek and Guandacol creek), which are monitored during the rainy season. Reviewed monitoring results for WAD cyanide, performed in 2023,2024 and 2025, where it was not detectable (<0.01 mg/l). Water from these creeks is not appropriate to be used for any purpose (industrial use, human or kettle use for drinking). The operation does not discharge process effluents on surface waters. The operation water monitoring plan includes the monitoring (upstream and downstream) of the operation for the previously mentioned creeks. Results for WAD and free cyanide are below 0,01mg/l (not detectable). There were no impacts on surface waters caused by the operation. Water from these creeks is not appropriate to be used for any purpose.



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Standard of Practice 4.6: *Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.*

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

Summarize the basis for this Finding/Deficiencies Identified:

Beyond the dynamic water balance management, where dewatering is not a critical aspect that could impact the water balance and, consequently, the underground water quality, the operation monitors the quality of ground water on a regular basis, in accordance with the Argentinian laws and environmental permits. The operation installed water monitoring wells around the operation area, in different depths. The operation monitors the content of total cyanide (according to the Argentinian law, CNt (total cyanide) content must be < 0,1 ppm) in underground waters taking samples in all water wells installed by the operation. All results between 2023 and 2025 are below 0,01 ppm (not detected). The operation does not use tailings as backfill, as evidenced during the field audit. There is no TSF in the operation. There were no impacts on the underground water between 2023 and 2025. The operation is located downgradient of the nearest village, 40 km south of Guandacol.

Standard of Practice 4.7: *Provide spill prevention or containment measures for process tanks and pipelines.*

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

Summarize the basis for this Finding/Deficiencies Identified:

All process tanks involving sodium cyanide use are built within secondary containment systems, which were deemed to be in good physical condition based on a visual inspection conducted during field audits. The containment tanks are equipped with pumps capable of recovering cyanide solution that may drain or overflow from the tanks and returning it to the process. All process tanks are anchored to concrete structural foundations, as confirmed during field audits and in the project documentation. In the cyanide preparation area, in the event of solid cyanide spills, plastic shovels and brooms were shown as available to begin the neutralization and cleanup process. During an interview with the control room operator after a field visit, the auditor asked about monitoring, and the operator correctly noted, through camera footage, the areas where the auditor had been, demonstrating active monitoring. Access control is in place for critical valves. All the secondary containments are designed to hold more than the biggest tank volume inside the containment plus the storm rain return. The containment tanks are equipped with pumps capable of recovering cyanide solution that may drain or overflow from the tanks and returning it to the process.



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All secondary containments are provided with floor pumps, inside a sump. All effluent collected inside a secondary containment is pumped back to the process tank. Evidenced this system during the field audit. The pumps in the secondary containment sumps that collect cyanide-contaminated water are automated, actuated by level sensors (automatic start/stop), and can also be manually controlled via the control system/SCADA when required by the process operator.All process tanks are constructed inside secondary containments. Pipes and fittings containing cyanide are equipped with secondary containment systems to prevent spills or leaks. Two types of containment systems were identified: the first consisting of a union within a pull-through, and the second consisting of geomembrane-lined channels. This configuration was confirmed both in the project documentation and during the field audits. There is no evidence where pipes containing cyanide pose a risk to surface waters. Such evaluation was performed by the operation and there are no cases where cyanide containing pipelines are a risk to surface waters. All cyanide containing tanks are constructed of carbon steel and pipelines, depending on the diameter, are made of carbon steel or HDPE. Evidenced through the design documentation and during the field audit.

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

The operation is:
X in full compliance with
☐ in substantial compliance with Standard of Practice 4.8
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation has a technical library where some original design and construction documentation could be found. During this opportunity, only some specific design and construction documentation was reviewed, such as cyanide solution preparation and distribution tanks, leaching tanks, some pumps and piping and secondary containments (concrete structures), and cyanide warehouse. Membrane liners, welding procedures and records, material specifications and quality records are retained by the operation. Commissioning records and as-built documentation, for processing plant and TSF, are retained by the operation. Commissioning records are signed off by authorized Argentinian engineers in accordance with the Argentinian Engineering Council (Colégio Argentino de Ingenieros). The PLS pool is technically inspected by a third-party engineer on a yearly basis, according to the Argentinian mining legislation. The operation retains, as previously mentioned, as-built documentation, quality assurance and commissioning records.



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Standard of Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation, in accordance with the Argentinian environmental legislation, designed, documented, implemented and maintains an environmental monitoring plan (Plan de Monitoreo Ambiental 2024, which addresses the monitoring of water quality (open (PLS), surface (seasonal creeks) and underground). Please refer to Standard of Practices 4.4, 4.5 and 4.6, respectively), and the local fauna and flora. Wildlife monitoring activities are addressed at the PLS documented inspection plan. All monitoring activities (water and wastewater analysis) are performed by Laboratório Induser, an ISO 17025/2017 accredited laboratory (IRAM Argentina), where all analytical protocols were developed and approved by qualified professionals. The analytical protocols are based on the Standard Methods for Water and Wastewater Analysis (23rd edition). All sampling activities are performed by Induser technicians in accordance with accredited protocols for sample preservation, environmental conditions, sample identification, cyanide types to be analyzed, handling and transporting procedures and custody records. Quality assurance requirements are in place due to fact that Induser laboratory is an ISO 17025 accredited one. The sampling points are defined at the operation´s environmental operational permit, issued by the local environmental protection agency (Secretaría de Minería de la Província de San Juan). As previously mentioned, all environmental conditions/ aspects, during sampling activities, are recorded in the sampling form. Sampling records, including the custody record, are retained by the operation and were reviewed during this opportunity (refer to SoP (Standard of Practice) 4.4, 4.5 and 4.6)). The monitoring frequencies are defined by the local environmental agency. In my professional experience and in accordance with the environmental circumstances found at the operation, the defined monitoring frequency is adequate. Related to the local fauna monitoring plan, it was developed and implemented by the operation. Fauna monitoring is performed by the operation´s environmental process on a monthly basis. In my professional experience monitoring frequency is adequate to evidence of any potential or real impact that could be caused by the operational activities. Reviewed reports don´t indicate any negative impact on the local fauna.



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

Standard of Practice 5.1: *Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation, in accordance with the Argentinian mining legislation, developed, documented (Knight Piezold document dated 30/06/2023 (ME-202-00124/92-01-IF(0)). Basically, the decommissioning plan addresses the activities related to neutralization of the cyanide installations, rinsing of neutralized cyanide installations, dismantling such installations and disposal of the removed installations. All effluent generated by these activities shall be monitored in order to determine the content of cyanide. There are specific activities related to the decommissioning of the PLS pool. The decommissioning and closure plan defines the implementation schedule for the operation, considering the life of mine (LoM). The closure plan is updated, at least, every four years. Last update was in June 2023.

Standard of Practice 5.2: *Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation calculated the value of implementing the decommissioning and closure plan by a third party. The estimated value is in accordance with the actual values of the activities that shall be performed to decommission, dismantle, closure of the operation and after closure activities. The estimated value is annually updated. The decommissioning and closure plan cost estimate is annually updated. Last cost update was in December 2024. There are no legal requirements linked with financial guarantees to implement the mining operation plan. There is draft law, but it is not yet valid. The operation defined a self-guaranteed mechanism to fund the closure plan. The operation has a self-guarantee financial assurance mechanism, which is annually audited by independent and qualified third-party financial auditors. Reviewed financial reports related to financial years finished 31/12/2023 and 31/12/2024.



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The audits were performed by PwC S.R.L (Price Waterhouse & Company), and led by Mr. Raul Leonardo Viglione (Financial Auditor credential # C-2165) and conducted in accordance with the International Accounting Standards (ASB) and Finance Information International Standards (NIIF). Auditors´ conclusions addresses that the provisioned values are adequate, and that the operation has financial health to implement the decommissioning and closure plan.

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

Standard of Practice 6.1: Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce or control them.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation designed, documented, implemented and maintains a set of safe work procedures which include operational and management ones, such as heap leaching operations, cyanide solution preparation, solid cyanide handling and storage, sampling activities, neutralization of cyanide containing installations before maintenance activities and working at confined spaces. All safe work procedures clearly define the necessary PPE that must be used to perform an activity which involves cyanide. Pre-work inspections, such as PPE inspection, forklift inspection, crane inspection, fire extinguisher inspection, shower and eye-washer inspection, among others are addressed at the safe work procedures. Records of such inspections are retained by the operation and were reviewed during this opportunity. The draft safe work procedures are prepared by the plant operators who will perform that activity, reviewed by process supervisors and approved by a process engineer.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation defined two ranges of pH that shall be observed, one during cyanide solution preparation (between 11 and 12) and another one during leaching process (between 10.8 and 11). Verified during the field audit and through interviews with plant operators and supervisors that these values are kept under control.



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The areas with such HCN generation potential (or cyanide dust), such as cyanide solution preparation tank, cyanide solution addition tanks, were identified and specific and adequate PPEs are mandatory to be used in such areas. Such areas are well ventilated and clearly identified, as evidenced during the field audit. In such areas, operators use portable HCN detectors (mandatory). HCN detectors are included in the preventive maintenance and calibration program. Records of such activities are retained by the operation and were reviewed during this opportunity. HCN detectors are calibrated to alarm in two points: 2,5 ppm (supervision must be contacted) and 4,5 ppm (operators must leave the area). Reviewed calibration records between 2023 and 2025. HCN detectors' calibration records must be retained, at least, for three years, according to quality records management procedure. The calibration frequency is in accordance with the directions defined by the OEM (Original Equipment Manufacturer). Safety signage and safety pictograms are placed in specific places in the process plants, including the solid NaCN warehouse, which are inside the fenced perimeter of the process plant and at the TSF, including its associated pipelines. Safety signage includes information related to cyanide, the PPEs that must be used, that is forbidden to eat, drink and smoke in such places and also that open flames are not allowed. The cyanide solution is dyed for clear identification. Draslovka USA plant supplies solid NaCN briquettes with dye colorant. Evidenced dyed solution during the field audit (cyanide solution preparation activity). It was evidenced during the field audit that shower and low-pressure eye-washers are available in specific assigned places at the process plants. Such installations were tested during the field audit and worked adequately. All safety showers and eye-washers are included in a preventive maintenance plan. Showers and low-pressure eye-washers are routinely inspected by process operators. The operation uses dry chemical powder fire extinguishers (ABC type) in the process plant area. Such fire extinguishers are annually maintained and monthly inspected by the occupational safety process. Records of such activities are retained by the operation and were reviewed during this audit. Fire extinguishers are also checked before some cyanide-related activities (pre-work inspection). All process tanks are identified by safety signage that cyanide is present. In the same way all pipelines containing cyanide are identified by safety signage and the flow direction identified. Evidenced during the field audit. Draslovka´s MSDS is available in the warehouse, in the cyanide solution preparation area and at process plant, documented in Spanish, as well as first aid procedures for cyanide intoxication and chemical burning, as evidenced during the field audit. The operation designed, documented, implemented and maintains and incident (real or potential) reporting and investigation procedure. There were no cyanide-related incidents (real or potential) in the last three years. In order to confirm that the defined incident investigation procedure was implemented (as demanded by ICMI), it was reviewed a minor incident investigation report (flash report), dated 08/05/2025, where a worker had a minor impact in his arm due to falling in the ground while walking. The incident was adequately investigated (using ICAM (Incident Cause Analysis Method)) protocol, where the causes were defined, corrective actions were defined and implemented and seem to be effective because since then there were no other incidents in such circumstances since then.



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Standard of Practice 6.3: *Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.*

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation has first aid resources such as oxygen bottles, AMBU (Artificial Manual Breathing Unit), Nithiodote (antidote) and water, communication means such as radios and telephone, as evidenced during the field audit, including the ambulatory. The operation has an ambulatory located outside the process plant, equipped with oxygen bottles, EADs (external automatic defibrillators), radio, telephone and two ambulances. The medical team (per work shift/ seven days) is composed by one doctor and nursing professionals. Medical services are provided by Castaño Minero UTE, a medical services supplier. All medical resources are inspected and tested by the medical team on a regular basis. Records of such inspections are retained by the operation and reviewed during this audit. All cyanide antidotes kits (Nithiodote, produced by Hope Pharmaceuticals Ltd., Scottdalle/AZ/USA), were evidenced to be adequately stored and within the expiration date defined by the producer. The operation developed a first aid protocol that includes cyanide intoxication (by ingestion, inhalation and absorption through the skin and eyes) and chemical burning. The operation has its own ambulatory, equipped with resources to attend workers exposed to cyanide. The operation has two ambulances that are able to transport stabilized workers to Dr. Guillermo Rawson hospital (high complexity one) and to Dr. Marcial Quiroga hospital (expert in chemical burning), both located in the city of San Juan. Both hospitals were evaluated by operation medical team and, depending on the decision of the operation doctor, the hospitals are adequate to be used in the event of a cyanide intoxicated or chemical burned worker, after receiving first aid at the operation ambulatory.

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

Standard of Practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

According to the Argentinian mining legislation, the operation designed, documented, implemented and maintains an emergency response plan. The emergency response plan was developed by different internal stakeholders such as process plant team, maintenance team, occupational health professionals, occupational safety team, environmental professionals and communicated to external stakeholders such as San Juan and Guandacol firefighters' group, San Juan municipality hospitals and national police. The following emergency scenarios are addressed at the operation´s emergency plan: catastrophic release of hydrogen cyanide from storage, process or regeneration facilities, transportation accidents occurring on site or in close proximity to the operation, cyanide releases during unloading and mixing, cyanide releases during fires and explosions, pipe, valve and tank ruptures, overtopping of ponds and impoundments, power outages and pump failures, failure of tailings impoundments and the collapse of leaching valleys is considered in the emergency response plan (ERP).Uncontrolled seepage is not a critical emergency scenario for the operation, due to the design and configuration of the TSF (due to effective soil compaction, due to physical aspects of the local soil and the TSF is covered with HDPE (High Density Poly-Ethylene) geomembrane). The primary responsibility related to solid NaCN transportation emergencies is from the cyanide seller and the cyanide transporter (Draslovka USA and Cinca Transportes, respectivelly). In the event of transport emergencies in the vicinity of the operation, the operation emergency response team will participate also. The cyanide boxes are transported within a 20´sea container. The plan addresses the activities to be performed related to the clearing of internal stakeholders (the first step is to reunite the site personnel in specific meeting points and then, under a brigade member orientation, to leave the operation) and potentially affected communities. The plan addresses the use of antidotes, such as oxygen and Nithiodote, and additional first aid measures. The plan was developed by different stakeholders, including the process plant and maintenance teams.

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The plan addresses, where necessary, containment actions such as containing berms, assessment and mitigation action such as the use of sodium hypochlorite solution (or hydrogen peroxide solution) to neutralize cyanide spillage and the review of the real or potential emergency (learning from incidents approach), resulting in the definition and implementation of corrective and preventive actions.

Standard of Practice 7.2: *Involve site personnel and stakeholders in the planning process.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The plan was developed by different internal stakeholders and submitted to external stakeholders such as San Juan and Guandacol municipalities firefighters, San Juan Municipality hospital, Argentinian National police, Guandacol and Santa Clara communities' representatives during specific planned meetings (refer to Principle # 9). The plan includes several external stakeholders such as San Juan and Guandacol Municipalities firefighters and hospitals. In order to keep the emergency response plan updated, the same above-mentioned process is observed. Different stakeholders are involved in the emergency response plan preparation and update.

Standard of Practice 7.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation defined an Emergency Response management group in order to manage any type of emergencies. The emergency coordinator is the general plant manager, that may be replaced by the SHE (Safety, Health, Environment) manager, that may be replaced by the Emergency Brigade Coordinator. The emergency management group is composed of distinct internal stakeholders. All requirements to be an emergency response brigade member are clearly defined. All volunteers must pass through a medical/ psychological evaluation, theoretical and practical training and a final evaluation to be qualified. All brigade members, including the Emergency Response Management Group contact information, are available at the emergency response plan. The emergency communication loop is clearly defined at the Emergency Response Plan.

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There are specific activities defined to emergency coordinators, brigade leader and brigade members, as well as by external stakeholders. The operation maintains a master list of all emergency response resources that must be available at the site. There is a specific emergency response facility where such resources are stored. This was evidenced during the field audit.

All emergency response resources are monthly inspected by the brigade members. Records of such inspections are retained by the operation and were reviewed during this audit. As previously mentioned, the role of external stakeholders during an emergency is clearly defined at the emergency response plan. The operation promotes meetings and performs emergency mock drills, involving external stakeholders, where the roles of external stakeholders are communicated, and all involved stakeholders become aware about their roles during an emergency response. Records of such meetings are retained by the operation and reviewed during this audit.

Standard of Practice 7.4: *Develop procedures for internal and external emergency notification and reporting.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The emergency response plan addresses the communication loop to be followed during an emergency, which includes communication with external stakeholders (including ICMI, hospitals, firefighters, public authorities (including regulatory agencies), press, among others). As previously mentioned, the operation develops a communication loop involving the contact with internal and external stakeholders, including communities' representatives, press institutions and public authorities. Communication to ICMI is included in the operation communication loop. The protocol for communicating with ICMI includes requirements and details to notify ICMI of any significant cyanide incident.



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

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

Summarize the basis for this Finding/Deficiencies Identified:

The plan defines, in the event of solid NaCN leakage or NaCN solution spillages, the actions to be performed in both cases. The plan describes neutralization of soils or other contaminated media. The operation will neutralize the impacted soils with a 10% hydrogen peroxide solution, which is available in 1000-liter plastic containers stored in a warehouse (for minor soil impacts, the emergency brigade will use 12% sodium hypochlorite solution available in 5 liter bottles available in the emergency support vehicle).

After neutralization, soil samples are taken every 5 cm (centimeter) in depth, until the result of free cyanide is not detectable. It is important to note that all process tanks and cyanide containing pipelines are protected by a secondary containment and the soil in the process plants were compacted. There are no surface waters in the vicinity of the operation, that could be impacted. Any contaminated and neutralized debris, including soil, will be disposed at the TSF or at leaching valleys. There are no surface waters that could be impacted by the operation´s activities. Anyway, in the event of such demand, the operation is able to manage the provision of potable water using tank trucks and mineral water bottles. Although the probability of the impact of the seasonal creeks, located down gradient of the operation, waters is nil, in the event of such emergency the plan clearly defines that the use of any chemical product is forbidden to be used to mitigate the impact of potentially containing cyanide effluent on the surface waters. The environmental monitoring plan addresses the necessary monitoring of contaminated soil, water and air, defining sampling protocols, the type of cyanide to be monitored and the acceptance criteria.



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Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation plans and performs, on an annual basis, emergency mock drills. The mock drills are integrated, impacting three dimensions, safety, health and environment. The operation emergency drills are not tabletop exercises. They are integrated field exercises simulating environmental impacts caused by cyanide releases, cyanide intoxication and first aid exercises. Brigade members and operational workforce are assigned to attend and participate in the drills, according to the scenario addressed at the Emergency Response Plan (ERP). Observers are also assigned to attend the emergency drills. After the drill the results are reviewed by the attendees in order to confirm if the drill was a real situation and the specific ERP would work and if the attendees performed their roles in accordance with the planned activities. Reviewed three emergency drill reports, performed between 2023 and 2025, and in all cases, opportunities of improvement (corrective and preventive) were identified and implemented, resulting in the update of the emergency response plan. All reviewed emergency drill reports addressed the initial emergency call-out protocol up to the closure of the entire emergency response process.

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

Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

The operation is:	**X** in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 8.1

Summarize the basis for this Finding/Deficiencies Identified:

The operation provides integrated safety, health, and environmental training to all stakeholders arriving on site, including all MASA employees and contractors, as well as ICMI auditors. This training includes a specific module on the cyanide management system. Records of these training sessions are maintained by the operation and were reviewed during this audit. The training is provided by the supplier Draslovka, which also trains MASA employees to become in-house trainers on cyanide-related topics. Cyanide awareness training addresses cyanide-containing materials present at the operation, associated cyanide risks, the health effects of cyanide, symptoms of cyanide exposure, and the procedures to follow in the event of exposure (including immediate response and notification/escalation). It was reviewed training content/materials, attendance records, and evidence of periodic refresher training.



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For internal stakeholders (including permanent contractors), the operation provides refreshing training. The operation also plans and delivers SHE (Safety, Health, Environmental) training, where cyanide related risks and operation. Training records are maintained and were verified during the audit.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Introductory training in safety, health, and environment, which includes a specific module on the cyanide management system, is offered to all MASA employees and contractors, including new employees entering the industrial area. More extensive training is offered to individuals who will work directly with sodium cyanide, such as in transportation, loading and unloading, storage, solution preparation, operation, and maintenance. After training, participants must take an exam ("CYANIDE MANAGEMENT TRAINING DIAGNOSIS"), signed by both the candidate and the examiner. MASA maintains training records. The operational training is focused on the operational procedures (safe work procedures) that are linked with activities involving cyanide. The training is provided by the supplier Draslovka, which also trains MASA employees to become in-house trainers on cyanide-related topics. All new employees and contractors that will work in activities involving cyanide are trained and qualified before working with cyanide, as previously mentioned. For internal stakeholders (including permanent contractors), the operation provides refreshing training. The operation also plans and delivers SHE (Safety, Health, Environmental) training, where cyanide related risks and operations). After training, participants must take an exam ("CYANIDE MANAGEMENT TRAINING DIAGNOSIS"), signed by both the candidate and the examiner. MASA maintains training records including the name of the trainees, the name of the instructor, the date of the training, the total hours of training, the training scope and the conclusions of the training, which includes that the trainees understood the training material provided.



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Standard of Practice 8.3: *Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.*

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

Summarize the basis for this Finding/Deficiencies Identified:

All employees that work directly with cyanide receive specific emergency related training (general knowledge) which includes first aid procedures, decontamination of workers, neutralization of leakages over soil or other surfaces, like concrete. Records of such trainings are retained by the operation and were evidenced during this audit. During the field audit, some plant operators and supervisors were interviewed and demonstrated they are aware about general and specific aspects of emergency response activities. The emergency response coordinators are trained in the response protocols related to emergencies with cyanide and the resources that are necessary to respond to such situations. The Emergency Brigade members are volunteer employees that pass through medical / psychological evaluations, theoretical and practical training before being qualified as brigade members. Records of such trainings are retained by the operation and were reviewed during this opportunity. Annually, the coordinators and brigade members participate in emergency mock drills, as part of their permanent training program. All external stakeholders that are included in the emergency response plan, such as San Juan municipality firefighters and hospitals and communities ‘representatives are aware about their roles in cyanide related emergencies and also participates in emergency mock drills.



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9. DIALOGUE: Engage in public consultation and disclosure.

Standard of Practice 9.1: *Provide stakeholders the opportunity to communicate issues of concern.*

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

Summarize the basis for this Finding/Deficiencies Identified:
The operation has a specific communication process to interact with internal and external stakeholders (e.g., employees, communities, visits from external stakeholders to the mine). On a regular basis, the operation holds specific meetings with the communities to discuss various aspects, including the cyanide management model. Records of these communications were evidenced during this audit, such as: MANUAL DE INFORMACIÓN PARA LA COMUNIDAD, INFORME MENSUAL DEL ÁREA DE RELACIONES COMUNITARIAS DE MINAS ARGENTINAS AS, Programa de Participación Ciudadana, and PES 00 3.3 001, Revision 3 (24/11/2023) - INTEGRATED MANAGEMENT SYSTEM - Internal and External Communication.

Standard of Practice 9.2: *Make appropriate operational and environmental information regarding cyanide available to stakeholders.*

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

Summarize the basis for this Finding/Deficiencies Identified:
The operation has a specific communication process to interact with internal and external stakeholders (e.g: communities, public authorities, press, employees). It was evidenced by SISTEMA DE GESTIÓN INTEGRADO - Comunicación Interna y Externa, No: PES 00 3.3 001, Revisión: 03, Fecha: 24/11/2023. It was evidenced that most of the stakeholders are educated and literate (internal ones are fully educated).



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Communication protocols are defined and documented in the crisis management plan, that includes communication with internal and external stakeholders. Public authorities must be informed (mandatory) about any real incident that resulted in hospitalization or fatality, releases off the mine site requiring response or remediation, releases on or off the mine site resulting in significant adverse effects to health or the environment, releases on or off the mine site requiring reporting under applicable regulations and releases cause applicable limits for cyanide to be exceeded. Such type of incidents did not happen in the last three years. The operation also, in a volunteer way, informs other external stakeholders, such as press and media, about any incident related to the above-mentioned situations. In both situations, all information is made public through press releases.

Audit team conclusions:

It was evidenced that Gualcamayo mining operation maintains a SHEQ management system. This system ensures an adequate cyanide management in accordance with the Cyanide Code principles. Being usual in all audit process, through random and bias sampling, opportunities of improvement (corrective and preventive) may exist and were not identified in this opportunity. Based on the sampled evidences, the physical conditions of the site (installations), in the interviewed personnel and in the reviewed documentation, the audit team concludes that the cyanide management system **is FULLY** implemented and maintained in accordance with the ICMI protocol for gold mining operations.



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