2026 ICMC CYANIDE CODE DETAILED AUDIT REPORT
RECERTIFICATION AUDIT

Cerro Negro Mine, Argentina
Newmont Corporation



Submitted to

International Cyanide Management Institute (ICMI)

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Submitted by

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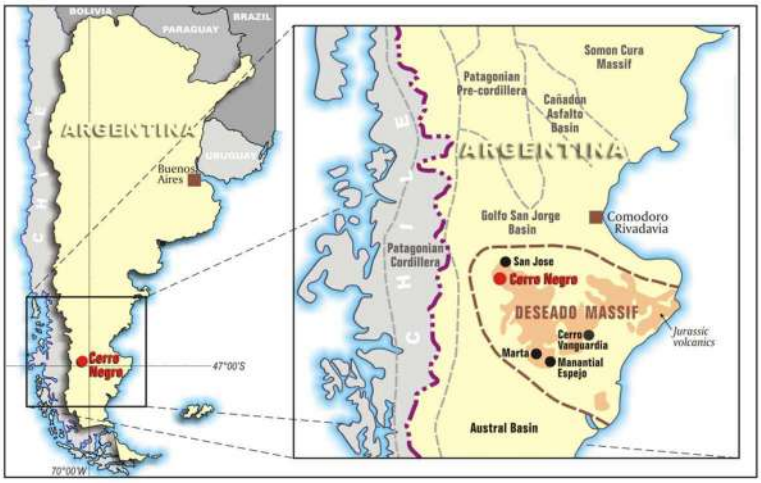
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OPERATION LOCATION DETAIL DESCRIPTION

LOCALIZATION:

Cerro Negro mine is located near the city of Perito Moreno, in the Lago Buenos Aires department, Santa Cruz province, in Argentine Patagonia.
The deposit is situated in the northwest of the region known as the Deseado Massif, a geological district of approximately 75,000 km² in Santa Cruz Province.



PROJECT DESCRIPTION

The objective of the Mine is the extraction of gold and silver minerals from five mineralized bodies: Eureka, Central Mariana, North Mariana, San Marcos, and Emilia, which comprise the Cerro Negro mining district. Cerro Negro has three geographically differentiated zones: Marianas Complex; Eureka Mine; and Eastern District. Currently, the Marianas Complex Mines (including San Marcos and Emilia) are in the exploitation phase, while the Eastern District is in the construction phase.
According to reserve calculations, the estimated life of the Mine extends until the year 2033. It is noteworthy that the operating company OPSA (OroPlata S.A.) continues exploration efforts to extend the Mine's life.

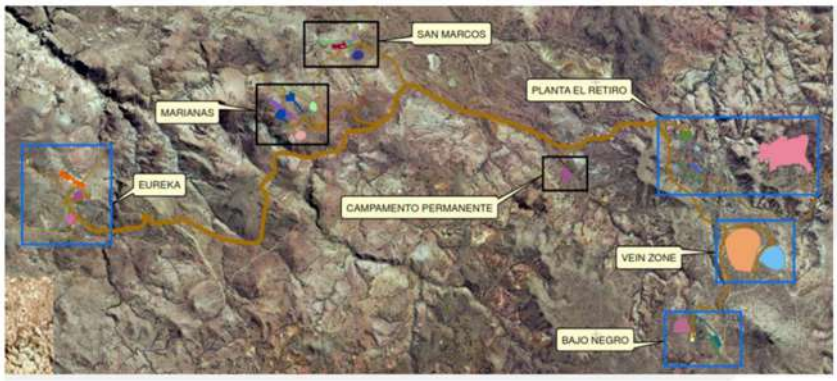
Average processed tonnage is variable at 77,000 tons per month, with a budgeted estimate of 100,000 tons per month.

Sodium cyanide is received in one-ton wooden boxes containing briquettes with red dye included. The average cyanide consumption ranges from 60 to 70 tons per month, with a

usage of 0.7 to 0.9 kg of cyanide per processed ton. The maximum cyanide consumption for 2025 is 70 tons
Cerro Negro maintains a sodium cyanide inventory equivalent to 3 to 4 months of production.

OPERATION OF THE CERRO NEGRO MINE

The Cerro Negro Mine is in its operational phase and simultaneously develops progressive closure activities for unused facilities and areas, as well as construction activities for new development areas. The current configuration of the Mine includes the underground exploitation of the mineralized structures of Eureka, Mariana District (North Mariana, Central Mariana, and Emilia), Marianas Expansion District (Northeast Mariana, Northeast Beta Mariana, San Marcos, and South San Marcos), and Eastern District (Silica Cap and Bajo Negro). The total surface area of OPSA's mining properties is 26,891 hectares, with the current area affected by mining activities being 403 hectares.



The Processing Plant was commissioned in July 2014, while commercial production began in 2015. Simultaneously with the Plant's startup, tailings pumping to the tailings storage facility commenced.

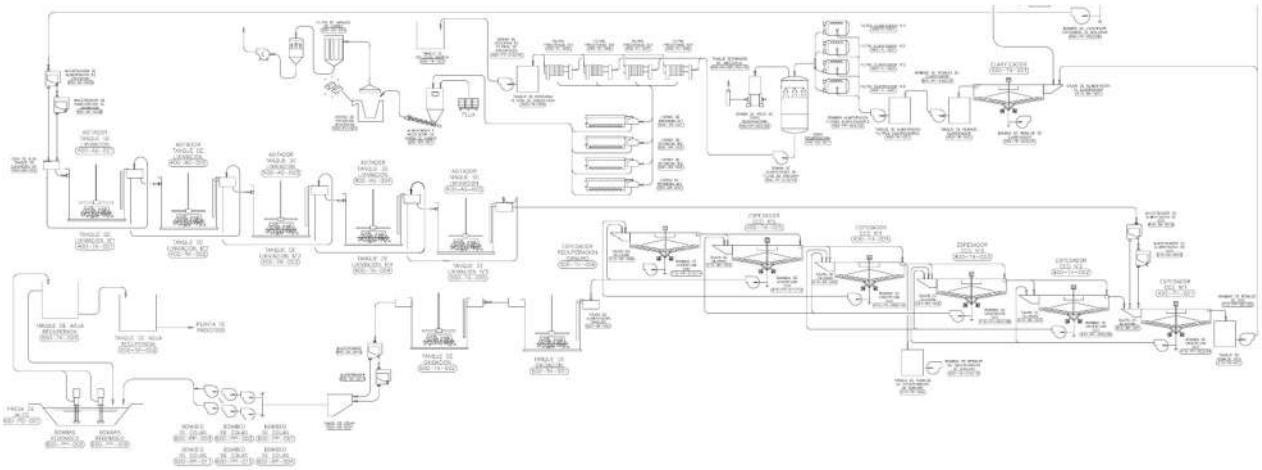
Generally, the process involves transporting the coarse mineralized material extracted from the mining operations to the Processing Plant area, where it enters the crushing and grinding (comminution), leaching, countercurrent decantation, solution clarification, and Merrill Crowe process (precipitation with zinc), processing gold and silver ore at an average rate of 4,000 tons per day (tpd). The final product consists of dore metal bars, with an approximate percentage of 10 to 19% gold and 80 to 89% silver, plus impurities without commercial value.

TAILINGS STORAGE

The tailings storage facility is located 1.5 km east of the Processing Plant. This facility serves as the final disposal area for the tailings resulting from mineral processing, ensuring

long-term safety and stability. The tailings storage is formed by three main walls: 1, 2, and 2 East, all of which are impermeable, as is the entire storage facility. Additionally, it features a drainage collection system and groundwater quality monitoring wells, both in the shallow and deep aquifers.

This audit encompasses the areas of sodium cyanide utilization, including unloading, storage, and mixing facilities, as well as leaching, countercurrent decantation, solution clarification, and the Merrill-Crowe process (zinc precipitation). It also includes the tailings storage facility and cyanide recuperation. Please refer to the plant diagram for further details.



Plant Diagram

AUDITOR´S FINDING

	☒ **in full compliance with**	**the International**
The operation is	☐ in substantial compliance with	**Cyanide Management**
	☐ not in compliance with	**Code**

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

Audit Company: GR Auditing
Lead and Technical Auditor: Gabriel Rodriguez
Lead Auditor Email: gabriellrdz@gmail.com
Dates of Audit: September 23-26, 2025

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Auditors.

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



Cerro Negro _____ _____ March 08, 2026
Name of Mine Signature of Lead Auditor Date



Cerro Negro (Newmont) _____ March 08, 2026
Name of Mine Signature of Lead Auditor Date

PRINCIPLES AND STANDARD OF PRACTICE

Principle 1 | PRODUCTION AND PURCHASE

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

Standard of Practice 1.1

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

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

Basis for this Finding/Deficiencies Identified:

Cerro Negro has sourced sodium cyanide exclusively from Draslovka Holdings, a.s. in the Czech Republic, which operates a production facility in Memphis, TN. Draslovka's operations were recertified under the Cyanide Code on May 24, 2023.

The auditor reviewed the purchasing contract, purchase orders, and shipping records for the recertification audit period.

Principle 2 | TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1

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

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

Basis for this Finding/Deficiencies Identified:

Cerro Negro keeps detailed chain of custody records for transporting cyanide from Draslovka, its sole supplier. The process includes:

- Sodium cyanide is produced at Draslovka's Memphis, TN plant and packaged at the LSI Plant.
- IMC Logistics LLC transports the product to the CSX terminal in Memphis.
- CSX Railway ships it by rail to Savannah, GA.
- Shipping carriers like Maersk and MSC then transport it to South America.
- The product arrives at either Deseado Port in Argentina or Punta Arenas Port in Chile.
- Finally, Transporte Vesprini or Victor Masson Transportes Cruz del Sur deliver the cyanide to Cerro Negro Mine.

Every segment of the Draslovka Supply Chain is certified under the Cyanide Code, with up-to-date certifications verified on the ICMI website. The Supply Chain for sodium cyanide for Cerro Negro Mine includes:

- Production at Draslovka's Memphis, TN plant and packaging at the adjacent LSI Plant, both audited last on May 24, 2023.
- After repackaging, IMC Logistics LLC transports the product to the CSX multimodal terminal in Memphis, with responsibility for transport transferred to CSX Transportation. IMC Logistics is compliant with the Cyanide Code, with its last audit on June 13, 2025.
- CSX Railway then transports the material to the port in Savannah, GA, where custody is passed to ocean carriers. A due diligence audit confirmed CSX's full compliance with the Cyanide Code.
- Ocean shipping carriers like Maersk and MSC load the containers for transport to either Deseado or Punta Arenas ports, both certified under the Cyanide Code, with the last recertification on June 13, 2025.
- Finally, Draslovka sends the cyanide to Newmont Cerro Negro Mine using Transporte Vesprini or Victor Masson Transportes Cruz del Sur, both certified by the ICMI, with their last recertification dates on April 17, 2023, and December 27, 2023, respectively.

Overall, the entire chain of custody from Memphis to the ports and the transport services are in full compliance with the Cyanide Code.

Principle 3 | HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

Standard of Practice 3.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All facilities for the unloading, mixing, and storage of sodium cyanide have been designed and constructed by professional engineers for the safe storage, mixing, and handling of sodium cyanide throughout the cyanide cycle at the Cerro Negro mine. This documentation was previously audited during the 2016 certification audit and found to be in full compliance with the Cyanide Code. During this audit period, the facilities for the unloading, mixing, and storage of sodium cyanide have not been changed or modified. No new areas have been established since the initial certification audit in 2026.

Cerro Negro has design specifications and as-built plans sealed by a certified professional engineer. It also has quality assurance and quality control (QA/QC) documentation for the cyanide warehouse. The warehouse is a steel-structured building with corrugated metal panels, a sealed concrete floor, and footings. The roof is constructed with steel beams covered with corrugated panels. The warehouse is weather-resistant and shows no signs of water leakage inside the building. The warehouse includes an access ramp. The building has sectional doors that can be opened for loading and unloading activities; otherwise, the doors remain closed and locked. Warehouse personnel transport solid cyanide from the storage buildings to the cyanide preparation area located in the plant, as required.

The cyanide unloading, mixing, and storage facilities have been located away from populated areas and surface waters. The cyanide unloading and storage areas are controlled access zones and are situated far from the mine's offices and workshops. There

are no nearby communities; the closest locality is Perito Moreno, approximately 75 kilometers away.

Cerro Negro does not receive liquid cyanide; it receives sodium cyanide only in solid form, packaged in one-ton boxes containing briquettes.

The three cyanide storage tanks in the preparation area are equipped with level sensors linked to the computer system in the control room. The operation has developed and implemented procedures for the inspection, maintenance, and routine testing of overflow protection equipment and instruments to ensure their proper functioning. The auditor reviewed the maintenance records of the overflow protection equipment, verifying that maintenance activities were conducted during the audit cycle. Additionally, during the tour of the control room, the control level values were observed to be functioning correctly.

The cyanide preparation and storage tanks are equipped with an impermeable concrete barrier situated between the bottom of the tank and the ground, as well as a concrete base serving as secondary containment, which prevents leakage into the underground environment. The containment floor and the bases of the tanks are monolithic, with the floor being thicker beneath the bases' footings. This floor and base system are designed to prevent any leaks from the bottom of the tanks from contaminating the soil. The auditor noted that the concrete bases were in good condition.

The secondary containment structures for the cyanide storage and mixing tanks are constructed of concrete (capable of holding a volume of 110% of the largest tank), featuring a slope that directs potential spills toward a sump pump, which then transfers the material to the grinding thickener and subsequently to the leaching tanks. During the site walkthrough, it was verified that these secondary containment structures showed no cracks or breaks, and they were found to be well-maintained and in good condition.

The warehouse is a steel-structured building with corrugated metal panels, a sealed concrete floor, and footings. The roof is constructed with steel beams covered with corrugated panels. The warehouse is weather-resistant and shows no signs of water leakage inside the building. The warehouse is equipped with a forced ventilation system, consisting of four extractors that are activated at the entrance of the warehouse. Moreover, the addition, preparation, and distribution tanks are entirely enclosed and feature piping that discharges at the rooftop of the building, where the elevation minimizes the impact of HCN on individuals.

The warehouse has restricted access; only authorized personnel are allowed to enter. Furthermore, the cyanide solution is contained within the enclosed and roofed section of the

plant, specifically in the addition, mixing and distribution tanks, which are secured and accessible solely to authorized personnel.
The sodium cyanide warehouse is exclusively for NaCN; no other materials or chemicals are stored inside. The cyanide solution (specifically in the addition, mixing, and distribution tanks) is kept separate from incompatible materials. In the event of a leak, secondary containment directs the solution to process tanks that are compatible with cyanide.

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.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 3.2
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro receives solid sodium cyanide briquettes packaged in wooden boxes. The operation ensures that empty cyanide containers are not used for any purpose other than storing cyanide. The empty boxes that contained cyanide are dismantled and stored in the hazardous waste warehouse prior to being sent for disposal by a certified company approved by the environmental department of the Santa Cruz region. The auditor reviewed several outgoing manifests for these empty packages. Cerro Negro uses the classification Y33-H10 to identify empty cyanide packaging.

The procedure CN-PRC-PRO-334, Sodium Cyanide Bag Washing Procedure, details the cleaning of bags that have been in contact with sodium cyanide. It specifies that these bags will undergo three rinses, will be left to dry in the sodium cyanide unloading area, and the liquids from the rinses will flow to the sump pump in the area before being sent to the leaching process tanks. The dried bags are folded and sent to the hazardous waste room, where they will be collected by an approved hazardous waste collection company. The auditor observed the rinsing of the bags during the audit of the cyanide preparation area.

The empty boxes and bags that contained cyanide are stored in the hazardous waste warehouse prior to being sent for disposal by a certified company. The auditor reviewed several outgoing manifests for these empty packages.

Cerro Negro has procedures in place for the mixing operation, as well as maintenance protocols for all tanks and devices, including valves, pipes, pumps, tanks, etc. The auditor reviewed the evidence of these operating procedure and maintenance records, finding them to be in good working order.

The handling of cyanide boxes within the cyanide storage area and in the preparation area is carried out using forklifts. Forklift operators possess the necessary certifications for their use and are trained in the proper handling of cyanide boxes to prevent impacts, accidental breakages, and drops.

Cerro Negro organizes the sodium cyanide boxes in stacks of no more than three, which complies with the maximum limit advised by the manufacturer and noted on the boxes. The operation follows procedure CN-HSS-PRO-073, Emergency Operating Procedure for Cyanide, which outlines the steps to take in the event of a spill of solid cyanide or cyanide solution that may occur in the mixing area. This area is equipped with secondary containment that would direct the spilled material to the process tanks using sump pumps.

The procedure, CN-PRC-PRO-331, Sodium Cyanide Preparation Procedure, specifies the following personal protective equipment (PPE) to be used during the operation: safety helmet, cup-style hearing protection, full face mask with dust filters (P100 type), disposable waterproof protective suit (Tychem QC), disposable nitrile gloves, acrylonitrile gloves, and safety rubber boots with steel toes. The procedure also mentions the necessity of having a calibrated portable HCN detector and a portable communication radio. The third operator, who observes the operation, will carry the radio; if any issues arise, they will be the one to activate the alert. Moreover, there will be an observer in the control room equipped with a phone, a radio, and a first aid kit for cyanide incidents.

During the current recertification audit, the auditor observed a safety meeting prior to the preparation activity and then a cyanide preparation event. They verified that the cyanide preparation procedure was implemented correctly. Additionally, the auditor reviewed the procedure and concluded that Cerro Negro developed an adequate checklist, defined safety tasks, and conducted appropriate observations to document and safely complete all preparation activities.

The cyanide briquettes come with a coloring dye from the sodium cyanide supplier, Draslovka, which is added to each of the boxes. Its trade name is FD&C Red No. 40

Powder. CAS Number: 25956-17-6. The auditor inspected the cyanide use areas for signs of spills and found no indications of red-colored cyanide solution.

Principle 4 | OPERATIONS

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

Standard of Practice 4.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has established documented management and operating plans and procedures related to cyanide management. These include protocols for unloading, mixing and storage facilities, process plants, lixiviation operations, countercurrent decantation, solution clarification, and the Merrill-Crowe process (zinc precipitation). It also includes the tailings impoundments, and cyanide recuperation aimed at safeguarding human health and the environment.

The plans and procedures are kept in a formal document control system on the Cerro Negro data base. A review of these documents, along with interviews with plant operators, maintenance staff, and environmental personnel, shows that Cerro Negro is equipped to manage cyanide effectively, preventing environmental releases and protecting workers and the community from exposure.

Cerro Negro has developed plans and procedures that describe the design criteria and applicable regulatory requirements to prevent or control cyanide releases and exposures.

- The required operational freeboard is 1 meter. This freeboard refers to the distance from the crest of the wall to the tailings beach. Presently, the freeboard

measures approximately 2 meters. It is important to note that upon completion of Phase 4A, the freeboard will increase to 6 meters.

- The discharge concentration to the tailings dam was designed for a maximum of 50 ppm of WAD CN. During this audit period, the highest concentration recorded was approximately 21.22 mg/l of WAD Cyanide.
- Safety Conditions Regarding Exposure: Exposure levels of 4.7 ppm and 10 ppm with a preventive alert threshold of 2.3 ppm.
- The design storm events for impoundments:
    - 20 years/24 hours, 56 mm
    - 50 years/24 hours, 72 mm
    - 100 years/24 hours, 96 mm.

Cerro Negro has developed plans and procedures for a safe and environmentally responsible operations; the procedures detail the risks involved with each task and adequately describe safe work practices. Each procedure details task-specific measures, personal protective equipment (PPE) requirements, and the persons responsible for verifying that the procedures for each cyanide task are implemented. Cerro Negro has reviewed and updated as necessary its procedures at least once this audit cycle. Some specific elements covered in the operational plans or procedures include the following: water management procedures, operational management inspection programs for cyanide facilities, and preventive maintenance programs

The procedure CN-HSS-PRO-044. Julio 2025, Management of Change (MOC), details the process for managing changes within operations. It ensures that all modifications to production processes, operational practices, or cyanide facilities are evaluated to determine whether they might increase the potential for cyanide releases and worker exposures and incorporate any measures necessary to protect worker health and safety and the environment.

The document CN-PRC-PRO-211, Procedure for Operation in the Event of a Water Imbalance, outlines the steps to be followed in the event of a water imbalance where the amount of water in various operational positions is excessive, potentially leading to overflows or risks to health, the environment, and equipment. These conditions may arise from excessive rainfall, snowfall, or hail, as well as uncontrolled water supply conditions.

In the case of a significant excess of an aqueous solution, the emergency pond 650-PD-001 (with a capacity of 3600 m^3) will be used first; if its capacity is exceeded, the tailings pond will serve as a reservoir for the liquid. The excess solution will be sent to the pond via pump 650-PP-010 from tank 650 TK-002. Water can also be sent through the pump train, either as an aqueous solution or by reducing the density of the tailings. The tailings pond operates at a safety level, indicating a minimum freeboard margin of 1 meters. The facility

has two recovered water pumps with a capacity of 260 m^3/h, which would allow for transporting excess water to the emergency pond 650-TK-002 if needed.

Cerro Negro maintains a cyanide facility inspection program that enables the timely identification of potential spill or personnel exposure issues. The following monitoring and inspections, amount others, are included: safety edge of the tailings dam, integrity of secondary containment, integrity of concrete in cyanide facility floors y walls, calibration of fixed and portable HCN detectors, monitoring of tank levels in case of power outages, monitoring of leaks in cyanide pipelines, and pH meter monitoring

The Mine Closure Plan and the Cerro Negro Tailings Dam Manual provide measures for unplanned and temporary closures. These plans include the requirement to continue regular maintenance and inspection of the entire processing plant, the tailings dam, and the emergency pond, as well as ensuring the integrity of all pipes, ditches, diversion structures, berms, and dams is maintained. In the event of closure or disruption of the water balance, no additional tailings would be pumped to the tailings dam.

Additionally, during the temporary closure or cessation of operations, the following documents specify the management of cyanide on-site, including in the storage areas, tanks, pipelines, emergency pond, and impoundments. They also outline the necessary precautions during shutdowns in various areas such as leaching, the CCD circuit, and others. Furthermore, necessary measures are taken for any emergencies that may arise during this period, including required environmental monitoring and emptying of pipelines and tanks as needed:

- Cerro Negro Closure Plan
- CN-PRC-PLN-601, TSF Emergency Response Plan
- CN-REX-PRO-001, Crisis Management Procedure
- CN-HSS-PRO-073, Cyanide Emergency Operational Procedure
- CN-PRC-PRO-263, Start-up of the Leaching Area
- CN-PRC-PRO-271, Shutdown of the Leaching Area
- CN-PRC-PRO-277, Shutdown of CCD Circuit
- CN-PRC-PRO-275, Start-up of CCD Circuit
- CN-PRC-PRO-211, Operation in Response to a Water Imbalance
- CN-PRC-FOR-208, Monitoring of tank levels
- Contingency plans for water balance

The control room operators and process plant personnel demonstrated knowledge of the contingency shutdown procedures for the safe cessation of operations in the process plant. The procedures for the plant and the tailings dam are adequate.

Cerro Negro operation personnel carry out weekly visual inspections of processing facilities and examine tanks for signs of corrosion and leaks. These inspections cover the preparation, distribution, and all tanks containing cyanide within the processing plant to detect potential corrosion and other issues.

The operations personnel conduct monthly inspections of the concrete secondary containment systems in the processing plant to monitor their integrity and the presence of fluids, ensure the closure and blocking of drainage systems, and prevent accidental spills into the environment.

Cerro Negro conducts weekly inspections of the spill collection systems in ditches, the processing area, and cyanide preparation. All these areas have concrete containment with proper slopes that allow spills to drain into a sump where an automatic level detector will activate the pump to return the spill to the process. The inspections require verifying that the drains connecting the containment areas are open and free of obstructions. Operations personnel inspect the secondary containment in the cyanide preparation area and distribution tank for cracks and to assess the overall condition of the concrete.

Cerro Negro conducts weekly visual inspections of processing facilities, focusing on pipes, pumps, and valves for corrosion and leaks in the processing plant and tailings dam. Monthly inspections cover Areas 300, 400, and 600 (only pipes to pumps), while Area 400 from 400-TK-001 to the CCD1 thickener is inspected every eight months. Other areas are inspected every four months.

Preventive maintenance inspections of pumps occur weekly, monthly, and quarterly. Weekly inspections include lubrication, external cleaning, and minor failure checks, while monthly inspections add internal cleaning without disassembly. Quarterly inspections involve decommissioning and checking internal operation.

Cerro Negro operators conduct daily inspections of water levels in the tailings pond and surface water diversions upstream of the tailings dam to prevent water accumulation. The auditor reviewed inspection records for the recertification audit period and confirmed that inspections are completed and documented.

Inspections of the facilities have been conducted frequently enough to detect potential issues before they become risks of spills or cyanide exposure. Cerro Negro's inspection program for cyanide facilities is considered adequate to ensure safe operations within the designed parameters.

Cerro Negro performs inspections at various frequencies in the cyanide warehouse, processing plant, tailings dam, and pulp transport pipeline. Inspections at the plant include the cyanide preparation area, fixed HCN meters, process solution pH levels, safety

equipment, and cyanide antidote kits. Emergency showers and eyewash stations are checked and tested at the beginning of each shift and before any tasks that may expose workers to cyanide (such as cyanide preparation and maintenance work on pipes). Weekly inspections include process tanks, emergency showers, eyewash stations, fire extinguishers, hydrants, and first aid equipment. Inspections of concrete secondary containment systems are performed monthly.

Cerro Negro conducts pump inspections on a weekly, monthly, and quarterly basis. Tank level instruments are calibrated and maintained every two weeks and monthly for the preparation and distribution tanks. These inspections evaluate the condition of tanks, valves, pumps, and pipes, as well as other elements of the processing plant. The Environmental department carries out daily checks of the flora and fauna around the tailings dam. The auditor reviewed cyanide facility inspection records from the last three years and verified that inspections are conducted consistently.

Facility inspections are documented on inspection forms that include the inspection date, inspector's name, and any deficiencies noted. Additionally, the type and date of corrective actions are recorded in the inspection log.

Operational inspections are documented using checklists. Corrective actions are recorded in maintenance logs and work orders within the SAP system. Cerro Negro utilizes SAP to document, track, and close out corrective actions identified during inspections.

Cerro Negro maintains a documented preventive maintenance program to ensure that all equipment and devices function correctly for safe cyanide management. This program focuses on necessary maintenance and inspections of the integrity of equipment, pipes, and process tanks according to a maintenance schedule and whenever required to ensure proper operation.

Maintenance schedules for daily, weekly, monthly, quarterly, and annual activities for cyanide facilities are kept electronically. Work orders are created, and trained maintenance staff perform the necessary tasks. Written procedures are in place to ensure that any equipment containing cyanide is properly decontaminated before maintenance work and that maintenance staff wear the required personal protective equipment (PPE).

Cerro Negro conducts preventive maintenance on pumps, valves, flowmeters, pressure gauges, level sensors, pH meters, sump pumps, filters, and HCN meters. Weekly maintenance schedules are generated using SAP. Maintenance checklists (work orders) are provided to workers who complete them and submit them to the maintenance planner for entry into the SAP system, which retains a record of all completed work. The auditor inspected the cyanide facilities, reviewed the maintenance records, and interviewed staff, ultimately determining that these procedures are being followed.

The operation is equipped with emergency generators to power pumps and other essential equipment, helping to prevent spills and unintended exposure in the event of a main power outage. Cerro Negro has two Caterpillar diesel generators, each rated at 2000 kW, located in Area 700 of the processing plant. The critical areas of the plant require around 3600 kW of power. Cerro Negro has a documented procedure for activating the generators during power outages, detailing the steps to take for activating the Area 700 generators to supply power to all designated areas of the plant when external power is lost.

The preventive maintenance program for the generators includes weekly maintenance tasks and comprehensive overhauls every three years performed by the Caterpillar distributor. The generators are also tested for 15 minutes every two weeks. The auditor examined maintenance records and confirmed that the operation carries out the necessary maintenance and testing to ensure these systems work effectively when required.

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

Summarize the basis for this Finding/Deficiencies Identified:

The mine has an ongoing program to assess whether the standard cyanide addition rate in the processing plant is adequate but not excessive, optimizing the recovery of gold and silver. The auditor confirmed that this program has been implemented by the operation. The procedure identifies anticipated changes in the characteristics of the ore entering the plant and adjusts the cyanide addition rate accordingly. The operation has also established a manual program for sampling and analyzing tailings to determine residual cyanide levels and adjust addition rates in real-time to maintain optimal dosing.

Currently, Cerro Negro adds cyanide in the lixiviation tank 1, although it can also be added in the lixiviation tank 3 if necessary. According to the bold role tests from 2025, the optimal concentration of free cyanide to add to the process is 800 ppm. The analyses were conducted with a blend of material from all the mines, such as the Mariana complex (Mariana Central, Mariana Norte, and Emilia), San Marcos mine, as well as with different characteristics like sulfur concentrations, moisture, sulfides, etc.

Standard of Practice 4.3

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

Summarize the basis for this Finding/Deficiencies Identified:

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

Cerro Negro has continued to utilize a comprehensive probabilistic water balance model using the GoldSim software platform. Since 2023, an external consulting firm, Piteau Associates Engineering, has been responsible for calibrating and updating the model. Prior to this, Golder Associates was the company that handled the updates and calibrations.

The balance is used as a predictive tool, allowing for real-time management of cyanide solutions to account for anticipated precipitation events. The auditor reviewed the water balance, which considers the appropriate factors, and confirmed that the site implements the necessary practices to maintain the balance continuously.

The water balance model is holistic and takes into account various factors, including the plant's production schedule, water pumped from the tailings dam to the plant, fresh water additions to production wells, process plant downtimes, tailings deposition rates, freezing and thawing effects, water pumped to the tailings dam from seepage collection wells, precipitation, evaporation, filtration rates, and potential power interruptions, among others.

The water balance model incorporates the uncertainty and inherent variability associated with predicting precipitation patterns, along with the frequency and distribution of precipitation events, which should be evaluated in conjunction with extremes and

seasonal variations. The model employs meteorological data sourced from on-site weather stations and contrasts it with regional data gathered in the vicinity.

The tailings deposition rates in the tailings dam from the process plant are calculated based on the solid material production values and the solids content of the tailings. The water balance system incorporates a storm duration and a design return period that effectively minimize the risk of overflow in the ponds and tailings dam throughout the operational life of the facility.

The design criteria were as follows:

- Design Storm Events :
    - 20 years/24 hours, 56 mm
    - 50 years/24 hours, 72 mm
    - 100 years/24 hours, 96 mm.
- Historical values used to define the criteria were from 1979 to 2019 (40 years):
    - Recurrence interval of 20 years for the channels.
    - Lining in channels (rock) with a recurrence interval of 20 years.
    - Design of culverts with a recurrence interval of 50 years.
    - Rock lining in culverts with a recurrence interval of 50 years.

The precipitation and evaporation data available at the site are representative of the actual conditions. Cerro Negro is equipped with three meteorological stations. The model utilizes actual daily data collected from the site. Surface runoff toward the tailings dam is not considered, as all upgradient runoff is diverted. The model considers the impacts of freezing and thawing, enabling it to address both processes with a 24-hour delay for thawing effects.

The water balance for Cerro Negro accounts for an average daily evaporation rate of about 470 m^3. Additionally, the model considers the solution that is pumped from the drainage collection system to the tailings dam. Losses to surface water are not considered since there are no discharges. The water balance at Cerro Negro incorporates the potential effects of equipment failures and power outages, with the capability for the tailings line to drain by gravity into the emergency pond.

Treatment capacity is not considered because there is no discharge to surface water. The impact of the water table is not considered, as the groundwater level is more than 2 meters below the lining.

The auditor reviewed the design documents and water balance for the tailings dam. It specifies a minimum freeboard of 1 meters above the designed storage capacity of the dam. The auditor examined the inspection records of the operation and confirmed that

the facilities operate with adequate freeboard and are monitored in accordance with the procedures and the tailings operational manual for the period covered by this recertification audit.

Cerro Negro has developed a standard operating procedure to inspect and monitor activities to implement the water balance and prevent overtopping the tailing pond and unplanned discharge of cyanide solution to the environment.

The procedure addresses upset conditions in the contingency pond and the tailings mill pond. The auditor examined completed inspection forms from the recertification period and deemed them acceptable.

Regular inspections are conducted to evaluate the freeboard levels in the ponds, the status of the perimeter fencing and access gates, as well as the condition of the geomembrane liner in the ponds. The auditor reviewed completed inspection forms covering the audit re-certification period and found them to be acceptable.

Cerro Negro regularly measures precipitation and conducts a comparison of these results with the initial design assumptions. The site consistently incorporates this precipitation data into its water balance model.

Standard of Practice 4.4

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro does not have open waters with WAD cyanide concentrations exceeding 50 mg/l. The auditor reviewed laboratory data and the historical record of WAD concentrations, finding that the maximum concentration of WAD cyanide was 21.22 mg/l in 2023. This finding confirms that the site consistently maintains cyanide levels well below regulatory limits.

A perimeter fence has been installed around the tailings dam to prevent wildlife from accessing the liquid zone. The operations team carries out inspections of the fence every other day, while the environmental team conducts check on a weekly basis. The auditor reviewed the completed inspection checklists pertaining to the fences for the

recertification period of this audit and concluded that they were comprehensive and complete.

Cerro Negro does not have open waters with WAD cyanide concentrations exceeding 50 mg/l. The auditor reviewed external laboratory data and the historical record of WAD concentrations before and at the discharge to the tailing dam, finding that the maximum concentration of WAD cyanide was 20 mg/l in 2023. This finding confirms that the site consistently maintains cyanide levels well below the 50 mg/l threshold for WAD cyanide.

During the audit period, there was no recorded wildlife mortality. As part of this recertification audit, the auditor thoroughly reviewed the daily inspections for wildlife mortality conducted by the operations team at the tailings dam. This review confirmed that there were zero cyanide-related incidents of wildlife mortality during the specified timeframe.

Standard of Practice 4.5

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro does not have surface water on-site and has no indirect discharges. The nearest river is the Río Pinturas, located 18 kilometers from Cerro Negro, which is monitored annually by Cerro Negro. The monitoring results showed undetectable levels, with a minimum detection limit of 0.01 mg/l of free cyanide.

Standard of Practice 4.6

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 4.6

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The tailings dam is entirely covered with a bituminous geomembrane, from the base up to the walls. Furthermore, effective management techniques for the dam and tailings deposition are in place to ensure its structural integrity. The processing facility is designed and operated to monitor and control seepage, thereby safeguarding groundwater quality. All chemical solutions produced during operations are stored in process tanks, which are equipped with a secondary containment system in the concrete floor of the facility to prevent any leakage into the groundwater.

During the audit period, concentration tests performed by external laboratories on the wells located at walls 1 and 2 of the tailings dam indicated undetectable levels of free cyanide, with 0.01 mg/l being the minimum detectable level.

Cerro Negro has a network of 12 groundwater monitoring wells positioned around the tailings dam: four located upstream and eight downstream of the facilities. The analytical results from the groundwater wells downstream of the tailings dam indicate that there are no detectable levels of free, total, or weak acid dissociable cyanide. The detection threshold for free cyanide in the laboratory analysis is 0.01 mg/l.

Additionally, Cerro Negro uses a reference of 0.1 mg/l of free cyanide, which is the existing legislation for human consumption according to the Argentine Food Code.

Furthermore, Cerro Negro is equipped with five groundwater monitoring wells surrounding the processing plant area. There are no beneficial domestic or agricultural applications of groundwater located directly beneath or immediately downstream of Cerro Negro. Monthly samples are collected from all wells and tested for free, total, and weak acid dissociable cyanide, in addition to other water quality indicators. The auditor has examined the analytical data from the recertification period and verified that no detectable concentrations of free, total, or weak acid dissociable cyanide were present.

Cerro Negro does not use mill tailings for underground backfilling. There has been no seepage leading to cyanide contamination in the groundwater. Furthermore, there are no beneficial uses for the groundwater located beneath the operation or in the immediate downstream area.

Standard of Practice 4.7

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

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

Summarize the basis for this Finding/Deficiencies Identified:

At Cerro Negro, all tanks containing cyanide solution, including discharge, storage, preparation, and leaching tanks, as well as other process solution tanks with weak acid dissociable cyanide concentrations of 0.5 mg/l or higher, have secondary containment. The containment systems are adequately sized. During this recertification audit, field inspections were conducted in the cyanide storage and process areas of the plant. Throughout the audit period, there were no changes in the spill prevention and containment measures for the storage, preparation, and cyanide processing plant.

The entire process area, including the cyanide preparation zone, is secured within reinforced concrete platforms that create containment areas with curbs and berms to prevent leakages. The process tanks are anchored to solid bases with reinforced concrete footings. Daily inspections of the secondary containment system are conducted as part of the facilities' inspection protocol. During the recertification audit, the auditor noted that all tank bases and concrete containment systems were in good condition.

Each containment area features a sloped concrete floor that drains into a concrete trench, where potential spills are pumped to the grinding thickener tank. Backup pumps in each sump are automatically activated by water level sensors and can also be manually controlled from the control room. The grinding circuit and Merrill-Crowe area have concrete slabs with containment curbs to retain spills, directing any liquid and solids to sumps that pump them to the grinding thickener tank.

In the agitation leaching circuit, a concrete containment slab and curb manage rainwater runoff and process spills. A sump pump (400-PP-010) transfers water back to the leaching or counter-current decantation circuits.

In the cyanide oxidation area, a similar concrete containment slab and curb are used to handle runoff and spills, with a sump pump (600-PP-007) directing material to the oxidation tanks or tailings pump box.

An emergency basin (650-PD-001) is in place for draining the tailings line, which is a concrete trench directing flow to the basin. A pump (650-PP-018) moves material from the emergency basin to the tailings pump box or the grinding thickener feed box.

The secondary containment areas for the cyanide tanks are interconnected to ensure enough containment volume for the largest tank, including drainage from piping and accommodating significant storm events. These areas feature sumps with dedicated pumps for returning collected solutions to the process circuit and are constructed from reinforced concrete.

Cerro Negro has dedicated pumps in the secondary containment collection areas that extract solutions and return them to the process circuit, ensuring no cyanide-contaminated water is discharged. These automatic pumps are included in a preventive maintenance program. Additionally, water collected in containment can drain by gravity into an emergency basin (The containment consists of a pipe inside a concrete channel), from which it is pumped to the tailings pump box or the grinding thickener feed box.

Cerro Negro has established the Operational Procedure for Water Balance Disruption to manage plant operations, critical tank levels, and the safe functioning of the tailings dam during water balance disruptions caused by atmospheric events like heavy precipitation or uncontrolled water.

Additionally, the Tank Level Monitoring Procedure ensures oversight of critical tank levels through visual inspections when signal loss occurs in the control room.

The written procedure for managing Tank TK 600-001 in Area 600 – Oxidation aims to prevent the discharge of cyanide solutions into the environment. In the event of an overflow in the oxidation circuit, it would be recorded in the tailings pump box and redirected to the tailings dam, with Tank 1 draining by gravity into Tank 2.

All cyanide process solution piping at Cerro Negro is fitted with spill prevention and containment measures to collect leaks and prevent environmental spills. The process solution piping includes secondary concrete containment, while the tailings slurry pipeline to the dam is housed in a concrete trench and lined with high-density polyethylene. Notably, there are no cyanide pipes located outside of containment. Plant personnel conduct daily inspections of the cyanide piping as part of routine procedures.

As noted in the previous audit report, all cyanide tanks and piping at Cerro Negro are made from materials compatible with cyanide and high pH conditions, including carbon steel, stainless steel, and high-density polyethylene (HDPE). It was confirmed that all test records for construction materials and equipment specifications containing cyanide are complying.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has implemented quality assurance and quality control (QA/QC) programs for the construction of cyanide facilities in various locations, including the warehouse, processing plant, and tailings dam. The initial certification audit confirmed compliance with these standards.

During the previous recertification audit, Phase 3 of the tailings dam was completed, and its QA/QC processes were reviewed, confirming compliance. The auditor verified the availability of QA/QC records in both the document library room and digital library.

At the time of the audit, Phase 4 of the tailings dam was under construction, which will increase the deposit's impermeability height by 4 meters. The auditor reviewed a document from Knight Piésold Consulting titled "Proyecto Cerro Negro, QA/QC Phase 4, Tailings Dam (Level Growth 788 M.S.N.M)" dated August 2025, detailing the QA/QC information for this phase. Phase 4 has not yet been completed; therefore, the complete information regarding its construction will be audited in the next recertification audit.

The previous certification audit report for Cerro Negro confirmed that the quality assurance and quality control (QA/QC) documentation for the processing plant and tailings dam includes comprehensive testing for: material suitability, welding, concrete

quality, earthworks and soil compaction, and Installation of geomembrane liners. The program also assessed the quality of metal fabrication at the tank supplier and included testing for manufacturing, electrical, mechanical, instrumentation, and piping.

The quality assurance and quality control documentation for the processing plant and the tailings pond includes adequate testing related to material suitability, welding, concrete quality, suitability of earthworks and soil compaction, and installation of asphalt liners. The program also covers the quality of metal fabrication at the tank supplier and includes concrete and subgrade testing in various areas such as manufacturing, electrical, mechanical, instrumentation, and piping, as well as the asphalt lining in the tailings pond.

Cerro Negro maintains quality assurance and quality control information for all active cyanide facilities. The auditor confirmed the retention of QA/QC records by reviewing both the document library and the digital library, ensuring that all information for facilities constructed prior to the recertification audit is preserved.

The previous certification audit report and the current recertification audit confirmed that quality assurance and quality control inspections during construction were conducted by engineering firms. These firms prepared final construction reports certifying that the facilities were built according to technical specifications and design plans.

Standard of Practice 4.9

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 4.9
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro utilizes the CN-ENV-GDL-004 Water Quality Procedure to monitor the effects of cyanide use on wildlife and the quality of surface and groundwater. This procedure specifies methods for collecting representative samples and conducting both internal and external analyses.

The laboratory INDUSER performs monthly tests for WAD, free, and total cyanides, with results reported on the CIMA online platform in Santa Cruz province. This process

complies with the Environmental Impact Resolution for the Environmental Oversight and Control Secretary, and the environmental permit is renewed every two years.

- Graphs for concentrations from wells in Wall 1 and Wall 2 from September 2022 to the end of July 2025 show that the values of WAD, free, and total cyanides in the wells are below the detection limit of 0.01
- Water from a well downstream of Wall 1, July 10, 2025, all cyanide data (WAD, free, and total) are below the detection limit of 0.01
- Water from the tailings pond, July 10, 2025, WAD cyanide = 3.0

The auditor reviewed the procedures and data records for the recertification audit cycle, confirming periodic monitoring of wildlife, surface water, and groundwater. During this period, Cerro Negro reported no wildlife mortality related to cyanide. The auditor also assessed the updated sampling procedures for infiltration collection wells and deemed them adequate.

The procedure CN-ENV-GDL-009, Sampling of Groundwater and Surface Water Procedure, has been conducted by environmental staff with over 23 years of experience in the field. This procedure outlines the internal and external sampling plan, as well as the analytical protocols for surface and external waters.

Cerro Negro has a procedure for sampling groundwater and surface water that details the collection of representative samples, field parameters, sample preservation and handling, shipping instructions, chain of custody, calibration of field monitoring equipment, and quality control. The procedure specifies analysis for total, free, and weakly dissociable cyanide, with an external consultant responsible for sample collection. The auditor confirmed the proper use of completed chain of custody forms during the recertification audit cycle and examined maps showing the monitoring points in relation to the cyanide facilities.

The groundwater and surface water sampling procedure mandates that the sampler document field conditions during sampling. This includes written records of weather conditions, presence of wildlife and livestock, field parameters such as conductivity, pH, and temperature, groundwater levels, and other water characteristics like color and odor.

Monthly monitoring is deemed timely and effective, as cyanide concentration levels in the wells have remained undetectable throughout the audit cycle. This outcome reflects adequate process control, ensuring no contaminants in the groundwater. Continuous monitoring facilitates constant oversight and allows for the quick identification of any potential anomalies in cyanide levels.

Additionally, the surface water monitoring program, CN-ENV-GDL-007, states that monitoring is conducted annually in surface waters, where the Río Pinturas, located 18 kilometers away, has shown undetectable results for the last three years. Furthermore, the daily wildlife report in the impoundments area (TSF) has not detected any fatalities in animals related to cyanide during the audit cycle. Therefore, the monitoring of surface water and wildlife is conducted at adequate frequency to characterize the medium being monitored and to identify changes in a timely manner.

Principle 5 | DECOMMISSIONING

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

Standard of Practice 5.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has a mine closure plan for Cerro Negro that includes procedures for closing all cyanide facilities. The latest update was submitted to the Ministry of Mining in Río Gallegos, Santa Cruz province, in February 2025. The project's lifespan is projected to extend until 2035, with closure activities for cyanide areas set to begin in 2036. The plan outlines a mine closure schedule and addresses residual cyanide management once production ceases. It details necessary activities for treating, neutralizing, and managing cyanide and cyanide-containing solutions in storage and production facilities during closure preparation, ensuring they do not pose risks to people, wildlife, or the environment.

The decommissioning activities outlined in the plan include tasks such as decontaminating equipment, removing residual cyanide reagents, neutralizing process solutions, and installing necessary measures for managing surface or groundwater. This includes implementing pumping systems that will operate during the closure period.

Cerro Negro has created an implementation schedule with a Gantt chart for the mine closure, detailing the major decommissioning activities for the cyanide facilities. The sequence of these activities is organized in relation to the years following closure. As the closure period approaches, Cerro Negro plans to refine this schedule.

The mine regularly reviews its decommissioning plan during its active operation to ensure it remains current and applicable to ongoing activities, accommodating any changes that may impact decommissioning and incorporating updates in techniques and planned measures. The plan includes a provision for periodic reviews and specifies the date of the last review.

In 2021, a closure plan law was enacted in Santa Cruz, Argentina, mandating updates to the closure plan and environmental impact study every two years. The latest update of the closure plan was submitted to the Ministry of Mining in Río Gallegos, Santa Cruz province, in February 2025.

Standard of Practice 5.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has developed a cost estimation based on applicable labor rates and equipment quotes from contractors and suppliers in Argentina. This estimation includes individual line items for decommissioning activities related to cyanide on-site and their corresponding costs. Newmont has created a cost estimation model to fully fund third-party cyanide-related decommissioning measures outlined in its site decommissioning plan, utilizing the Standardized Remediation Cost Estimator (SRCE).

The cost estimation includes additional percentages for contract management and third-party engineering design, conservatively assuming that cyanide equipment will be decontaminated and transported off-site for reuse or disposal. It covers various cyanide facilities such as milling, leaching, the counter-current decantation circuit, the Merrill-

Crowe plant, cyanide recovery and oxidation circuit, and the tailings dam, with estimated costs reviewed annually.

Cerro Negro reviews and updates the cost estimate annually as part of its corporate financial accounting procedures. This process starts in June and concludes at the end of December. Once completed, the estimate is internally approved by a technical committee led by the General Manager of Cerro Negro and reviewed by the corporate office at the Americas level. Additionally, the auditing firm Ernst & Young Global Limited conducts an annual audit of Newmont.

The local government does not require any financial guarantees. However, Ernst & Young Global Limited, the auditing firm, issued a self-guarantee letter on August 20, 2025, affirming that Cerro Negro can cover all its financial liabilities, including the expenses for closing the mine.

Cerro Negro uses a self-guarantee as financial assurance for mine closure supported by a letter from Ernst & Young Global Limited confirming sufficient financial strength dated August 20, 2025, complying with the Cyanide Code requirements the estimated decommissioning costs reflect the most recent review of the plan.

Newmont commissions Ernst & Young for an annual financial audit to assess whether the consolidated financial statements accurately reflect its financial position performance and cash flow in a letter dated August 20, 2025, Ernst & Young confirmed that Newmont meets the self-guarantee criteria without exception.

The auditor reviewed Ernst & Young's financial auditor statement and confirmed that the self-guarantee was calculated at an amount sufficient to cover the estimated decommissioning costs related to cyanide for the operation.

Principle 6 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Standard of Practice 6.1

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 6.1



Cerro Negro (Newmont)		March 08, 2026
Name of Mine	Signature of Lead Auditor	Date

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has developed and implemented written procedures for tasks involving cyanide management, including unloading procedures, preparation, plant operations, entry into confined spaces, and decontamination of equipment prior to maintenance.

Cerro Negro's procedures mention in Section 5.I "Mandatory Personal Protective Equipment" the necessary personal protective equipment for carrying out operations. For example, the Sodium Cyanide Preparation Procedure, CN-PRC-PRO-331, specifies the following PPE: cup-type hearing protection, full-face mask with dust filters (P100 type), the filter must be discarded once the preparation is complete, disposable waterproof protective suit (Tychem QC), disposable nitrile gloves, acrylonitrile gloves, safety rubber boots with steel toe, HCN detector, portable communication radio. (The third operator will have the radio; in case of any issues, they will be the one to activate the alert.).

In the case of critical work, such as entry into confined spaces, the procedures require the implementation of the Hazard Identification and Risk Assessment and Control Protocol. Maintenance personnel must obtain a work permit before performing activities in process areas. The work permit includes an analysis of the risks related to the work to be performed. For non-routine activities, the operation requires a Safe Task Analysis in which workers assess the task they are about to undertake to identify potential hazards and plan the work to manage them effectively. When necessary, the procedures require pre-work inspections, such as a startup checklist for the cyanide preparation operations.

Cerro Negro obtains suggestions from workers regarding their health and safety procedures and considers them for development and evaluation.

During daily safety talks there is direct communication between supervisors and operators with worker suggestions considered to improve procedures the auditor observed the pre-shift meeting for the cyanide preparation operation reviewing topics such as the previous day's analysis the procedure to be carried out and the Hazard Identification and Risk Assessment Control Protocols (IPERC) and Safe Task Analysis (ATS).

Cyanide management procedures are periodically reviewed with input from process operators training sessions are conducted to share updates and gather worker feedback the auditor reviewed records of suggestions and training sessions from the last three years finding them complete the technical information department has two trainers who document operator comments during training and operators sign off on applicable modifications in the latest procedure update.



In incident investigations workers can suggest improvements for safety procedures the auditor reviewed incident investigation reports confirming the system's application for safety suggestions. Maintenance staff and operators showed understanding of the pre-operational risk assessment where workers identify potential risks and communicate issues to supervisors' interviews with medical staff highlighted their involvement in procedure development. PPE tests are conducted with equipment distributed to operators during a trial period feedback is gathered to decide on equipment approval or withdrawal and the PPE evaluation form CN-HSS-FOR-015 is used for documentation.

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.

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has set the appropriate pH level to limit HCN gas generation during preparation and production activities the cyanide preparation procedure requires a pH of 11.5 in the preparation tank before starting the process pH levels are regulated with calcium oxide added at a rate of 1.2 kg/ton before entering the mill.

The auditor observed a cyanide preparation activity confirming that the pH of the preparation tank was checked and recorded before the process the Sodium Cyanide Dosing Procedure states that a pH level between 10.8 and 11.1 should be maintained after preparation to limit hydrogen cyanide gas evolution pH values are displayed on monitors in the control room and were verified during the field audit.

Monthly maintenance is performed on fixed pH meters for calibration, with more detailed maintenance tasks, including electrical components and instrumentation, conducted every three to six months. Maintenance and calibration records from the last three years have been reviewed and found to be complete.

Cerro Negro has identified areas where workers may be exposed to cyanide. These areas are identified and monitored with fixed HCN gas monitoring units located throughout the processing plant. Portable HCN meters are available in areas with potential HCN exposure.

In these areas, workers are alerted through signage, operational procedures, and training regarding the necessity of using personal protective equipment (PPE).

Procedures have been developed for all activities involving cyanide handling. These procedures include a section that outlines PPE requirements. Signage has been installed in appropriate locations displaying the PPE requirements for entering cyanide facilities.

Cerro Negro uses fixed and portable monitoring devices to confirm that controls are adequate to limit workers' exposure to hydrogen cyanide (HCN) gas. According to Newmont's internal requirements and Argentine regulations, the HCN alarms on both portable and fixed monitoring devices are configured to provide a visual warning to operators when cyanide levels reach 4.7 ppm (prevention) and 10 ppm (evacuation).

There are 17 fixed detectors installed: 12 are in the plant, 3 in the laboratory, and 2 in the warehouse. In the plant, they are distributed as follows: Their locations were determined considering cyanide reagent addition points, the presence of workers, and the differential pH levels as part of operations. Operators use portable HCN meters to perform maintenance tasks, work related to confined spaces, and other cyanide-related activities.

Cerro Negro maintains, tests, and calibrates its fixed and portable HCN monitoring equipment according to the manufacturer's recommendations. The fixed HCN meters are calibrated every 30 days as part of the preventive maintenance program.
For portable meters, a bump test is conducted using a calibration gas of 10 ppm HCN, and a report is generated confirming that the test has been performed. Personal (portable) HCN meters are calibrated every 24 hours through a bump test with an automatic system that controls all parameters using a calibration gas of 10 ppm HCN.

This requirement was verified through the review of calibration and maintenance records, as well as discussions with maintenance and process personnel. Calibration records for both fixed and personal meters are documented for tracking in the preventive maintenance system.

Cerro Negro alerts its workers about the presence of cyanide and reminds them of the various prohibitions related to its use. The operation has placed warning posters in all areas where cyanide is present, informing workers about the use of cyanide. The posters indicate that smoking, lighting flames, eating, and drinking are not permitted, and that personal protective equipment (PPE) must be used when required. The posters are in Spanish, which is the workers' language. Warning posters can be found at the entrances to buildings in the processing plant area, the reagent area, the process tank facilities, the cyanide storage area, and the tailings dam.

To facilitate the clear identification of high-strength cyanide solution, a red dye is incorporated. Draslovka, the cyanide manufacturer, sends the dye mixture alongside the briquettes in wooden containers, which allows the high-strength (>20%) cyanide solution to become red during the mixing process.
The auditor reviewed the specification of the red dye, FD&C Reg. 40, and the operation's cyanide supply contract to verify the availability of the red dye in the operation.

Cerro Negro has installed safety showers, low-pressure eyewash stations, and dry powder fire extinguishers in the loading, preparation, and storage areas of reactive cyanide, the processing plant, and areas where personnel may be exposed to cyanide during regular tasks. Emergency showers and eyewash stations are inspected and tested daily, as well as before starting any task that could involve cyanide exposure (e.g., cyanide preparation, opening a pipeline for maintenance) according to procedure CN-PRC-PRO-204, Checking Showers and Eyewash Stations.

Cerro Negro has 250 dry powder extinguishers available in areas where cyanide is present. These extinguishers are inspected and tested monthly. Additionally, maintenance and recharging are carried out annually or as needed by the external company.

Pipes containing cyanide are labeled and colored purple to indicate the presence of cyanide solution and show the flow direction storage and process tanks are similarly labeled purple with confined space signage placed on the tanks the auditor conducted a visual inspection tracing the cyanide solution circuit from the preparation area through the process plant to the tailings dam confirming that the labels and colors were correct.

Cerro Negro has the latest version of the Sodium Cyanide Safety Data Sheet (SDS) from Draslovka, dated July 19, 2022, along with first aid procedures in areas where cyanide is handled, including storage, preparation area, the control room, and process plant areas where cyanide is used.

The Sodium Cyanide Safety Data Sheet is attached to each procedure and is also available in medical first aid kits and at the medical clinic. Verification was conducted through visual inspection, confirming that first aid procedures and safety data sheets were available in areas where cyanide is used.

AII information relating to cyanide management including SDS information, procedures and emergency response plans are provided in Spanish, the workforce language at the site, and in their most updated versions.

Cerro Negro has the procedure NEM-RMS-PRO-010, Safety and Sustainability Event Management Procedure, designed to investigate and evaluate incidents, including cyanide exposure incidents.

Standard of Practice 6.3

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

The operation is	☒ 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:

Cerro Negro has oxygen, a resuscitator, antidote kits, a radio (using channel 1), an alarm system, a cell phone, and a landline readily available for use at cyanide unloading, storage, and mixing locations, as well as elsewhere in the plant. In an emergency, personnel connect via radio on channel 1, and the entire emergency is managed from there. All activities are halted until the exposed person is in the medical area. All personnel have a radio.

Cerro Negro utilizes Amyl Nitrite and Cyanokit (Hydroxocobalamin) as antidotes Hydroxocobalamin is kept in the clinic at temperatures below 25°C according to manufacturer guidelines while Amyl nitrite is stored in the plant at temperatures ranging from 2 to 8°C also as recommended all antidotes are within their expiration dates and the oxygen tanks are fully pressurized.

Before each cyanide preparation event, first aid equipment for cyanide incidents in the process area is inspected. Oxygen tanks and emergency kits are inspected every 15 days to verify their condition. Medical personnel inspect ambulances every two weeks. During the audit, inspection records were reviewed and found to be complete.

Cerro Negro has developed the procedure CH-HSS-PRO-092, HCN Intoxication Procedure, to respond to cyanide exposure. This procedure includes staff responsibilities, levels of intoxication, first aid procedures, medical care, referral to the clinic, and treatment. The procedure includes specific instructions for treating victims exposed to sodium cyanide by inhalation, ingestion, and skin contact.

Cerro Negro has on-site capacity to provide first aid and medical assistance to workers exposed to cyanide, with two doctors and six nurses available at the medical clinic. In addition to four ambulances, there are cyanide antidote kits, defibrillators, oxygen, stretchers, and splints, among other medical devices.

Decontamination is provided through the safety showers and initial oxygen ca be provided by process workers who have been trained in the use of the equipment. The emergency response team, trained in emergency first aid, would provide additional medical support if needed. The medical team receives training on the use of antidotes from the cyanide supplier. Additionally, emergency response team members receive internal training three times a week and external training on hazardous materials (including cyanide) as needed (usually every two years).

Additionally, procedure CH-HSS-PRO-093, Referral of Medium and High Complexity Patients, details the steps to follow when a patient needs external care and is referred to the hospital in the city of Las Heras or Pico Truncado.

Cerro Negro has formalized arrangements with two local hospitals, one in the city of Las Heras and another in Pico Truncado, to ensure these providers are aware of the potential need to treat patients for cyanide exposure. Cerro Negro conducts an annual discussion regarding patient acceptance and the potential to treat patients exposed to cyanide with the two hospitals.

Principle 7 | EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities

Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has developed the HSS-PLN-008 Emergency Response Plan (ERP), the procedure CN-HSS-PRO-073 Cyanide Emergency Operational Procedure, and various operational procedures, contingency plans, and first aid procedures, among other documents. The operation maintains the ERP to address accidental spills, including cyanide spills. The plan outlines roles and responsibilities; activities before, during, and after an emergency; activation of the emergency state; emergency scenarios, including hazardous material spills; gathering points; evacuation plans, and drills.

Complementary to the Emergency Response Plan, Cerro Negro has developed and implemented the following procedures:

- CN-REX-PRO-001, Crisis Management Procedure
- CN-HSS-PRO-092, HCN Intoxication Procedure
- CN-PRC-PLN-601-2025, TSF Emergency Response Plan
- CH-HSS-PRO-093, Referral of Medium and High Complexity Patients
- NEM-RMS-PRO-010, Safety and Sustainability Event Management Procedure,
- CN-HSS-PRO-076, Drill Operational Procedure
- Emergency Response Guide (ERG)
- Sodium Cyanide Briquettes Safety Data Sheet
- CN-ENV-PRO-006, Hazardous Substances Impact Management and Prevention Procedure
- CN-MTN-PRO-001, Segregation, Storage, and Disposal Procedure for Temporary and Final Waste
- General Contingency Plan for Road Transport of Sodium Cyanide Transportes Vesprini S.A.
- CN-HSS-PRO-088, Procedimiento Elementos de Primeros Auxilios

These documents address various cyanide exposure scenarios, such as transport incidents, spills, and exposure (inhalation, absorption, skin contact, and ingestion). They also include decontamination procedures, evacuation, emergency contacts, cleanup measures, and information requirements.

Cerro Negro has the HSS-PLN-008 Emergency Response Plan (ERP) outlining evacuation routes and assembly points for general emergencies Additionally, the CN-HSS-PRO-073 Cyanide Emergency Operational Procedure provides guidelines for safe evacuation during an HCN emergency including assembly points, directions to follow, and ways to avoid wind exposure It also details steps for mitigating and eliminating HCN sources if generated

Procedure CN-HSS-PRO-073, Cyanide Emergency Operational Procedure, outlines how to handle transport incidents such as box drops and ruptures on dry, wet, or damp ground

during transportation It is also part of the General Contingency Plan for Road Transport of Sodium Cyanide by Transportes Vesprini S.A.

The CN-HSS-PRO-073 Cyanide Emergency Operational Procedure considers the following events: package drop and rupture during unloading and storage, package drop and rupture due to poor stacking, package rupture during the mixing process, formation of sodium cyanide dust in the mixing area, and formation of hydrogen cyanide gas in the mixing or oxidation area. Section VII of the CN-HSS-PRO-073 Cyanide Emergency Operational Procedure details the steps to follow in case of cyanide releases due to fires or explosions.

The CN-HSS-PRO-073 Cyanide Emergency Operational Procedure details scenarios such as valve/pipe/tank rupture with high concentration of cyanide and spill due to pipe/tailings channel rupture. The CN-PRC-PLN-601-2025 TSF Emergency Response Plan details the steps to follow in case of any overflow of the tailings dam. Cerro Negro does not have cyanide solution process ponds. The CN-HSS-PRO-073, Cyanide Emergency Operational Procedure, mentions that the plant has backup generator systems that allow for the continuous operation of the pumps.

The CN-PRC-PLN-601-2025 TSF Emergency Response Plan in Appendix 8, outlines the actions to be taken in the event of any seepage, as well as severe damage to the geomembranes that could cause seepage. Additionally, Cerro Negro does not have processes that require the use of ponds with sodium cyanide solutions.

Cerro Negro decontaminates sludge from the process area to send it to the tailings dam once decontaminated. A failure in the DETOX process would not have a significant impact. The CN-PRC-PLN-601-2025 TSF Emergency Response Plan details the steps to follow in case of any failure of the tailings dam.

Cyanide transportation is carried out in ocean containers, which are covered with material strong enough to prevent sodium briquette spills in case of an incident on the road. The solid briquettes are inside wooden boxes. In the case of cyanide transportation from the port to the mine, the General Contingency Plan for Road Transport of Sodium Cyanide by Transportes Vesprini S.A. details the cyanide transportation route and the steps for cyanide emergencies during transportation. For incidents during transport within the mine or nearby, the CN-HSS-PRO-073 procedure is used. It addresses scenarios like boxes dropping and rupturing on dry, wet, or damp surfaces.

Cerro Negro has the HSS-PLN-008 Emergency Response Plan (ERP), which details evacuation routes and meeting points in case of a general emergency. Additionally, the CN-HSS-PRO-073 Cyanide Emergency Operational Procedure outlines details for an HCN

emergency, providing guidelines for safe evacuation, meeting points, directions to follow, and how to avoid wind exposure. The CN-HSS-PRO-073 procedure also specifies steps to take in the event of HCN generation for mitigation and elimination of the HCN source.

Cerro Negro has developed the procedure CH-HSS-PRO-092, HCN Intoxication Procedure, to respond to cyanide exposure. This procedure outlines the steps to follow in case of cyanide exposure and includes staff responsibilities, levels of intoxication, first aid procedures, medical care, referral to the clinic, and treatment.

The CN-HSS-PLN-008 Emergency Response Plan procedure states that after notifying the emergency, if possible and equipped, personnel should cut off the product supply to minimize the spill while the emergency response team (ERT) arrives to handle the supply cutoff, mitigation, and cleanup.

The CN-HSS-PLN-008 Emergency Response Plan procedure details how to contain a spill from its source and mitigate it. The Emergency Response Team (ERT) is responsible for cleaning contaminated areas and, together with the environmental team, disposing of contaminated materials according to the CN-ENV-PRO-006, Management and Prevention of Impacts Derived from Hazardous Substances Procedure.

Cerro Negro uses the document NEM-RMS-PRO-010, Safety and Sustainability Event Management Procedure, which aims to ensure a consistent approach to classifying, reporting, and investigating events, determining root causes, and communicating lessons learned to prevent recurrence throughout the organization.

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

The operation is	☒ 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:

During regular reviews of the emergency response planning, site staff are involved in emergency planning to better identify potential spill scenarios, available resources, and viable responses.

After each emergency drill, meetings are held with the workforce to discuss actions taken and identify corrective measures, which are tracked in Enablon. The plan is updated with lessons learned as needed.

Cerro Negro has the Cyanide Route Program with nearby communities, providing training, workshops, and communication about emergency roles during cyanide transport. Local hospitals, fire stations, and police are involved in these training sessions. Community feedback is considered, and the Emergency Response Procedure is adjusted if necessary.

Cerro Negro shares information regarding the nature of their risks associated with accidental cyanide releases with stakeholders and takes their comments and concerns into account. This is done through various informational meetings held with communities and stakeholders, which include the cities of Perito Moreno and Los Antiguos, as well as the communities along the cyanide transport route from the port to the mine. This route includes communities such as Puerto Deseado (Port Administrative Unit), Pico Truncado, and Las Heras.

Although the Cerro Negro HSS-PLN-008, Emergency Response Plan and CN-HSS-PRO-073 Cyanide Emergency Operational Procedure don't involve external responders or communities in on-site cyanide emergencies, Cerro Negro keeps external stakeholders (such as Civil Protection, local fire departments, police, environmental agencies, hospitals, and communities) informed about the risks of accidental cyanide releases. This is done through regular informational meetings in communities like Perito Moreno and surrounding areas, as well as along the cyanide transport route from the port to the mine. Community feedback is considered, and the Emergency Response Procedure is adjusted if necessary. The auditor reviewed the Emergency Response Plan and the community training records.

Standard of Practice 7.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:



Cerro Negro (Newmont) — Name of Mine
Signature of Lead Auditor
March 08, 2026 — Date

The Cerro Negro Emergency Response Team (ERT) is composed of 57 volunteer personnel from different areas. The operation has designated two emergency coordinators per shift, who have the authority to commit the necessary resources for the implementation of the plan. The ERP describes the responsibilities and level of authority of the emergency response coordinators for different site emergency scenarios. The plan also includes procedures for an alternate emergency response leader.

Procedure CN-HSS-PLN-008, Emergency Response Plan, identifies the Emergency Response Team and includes an updated list of team members (brigade members, doctors, nurses, and paramedics) with their names, shifts, and work areas. The contact information for managers and supervisors is also included in the plan.

Cerro Negro continued implementing a training plan for their emergency responders. The plan includes the training required by level of response including first aid, fires, rescue and hazmat. It also includes requirement for annual training on cyanide awareness and cyanide intoxication.

The ERP includes 24-hour contact information and call-out procedures for the emergency response team, coordinators, and members. Additionally, ERT personnel are provided with a radio upon arrival at the mine, which they keep on and tuned to the emergency channel 24/7.

Section 4 of the CN-HSS-PLN-008, Emergency Response Plan, describes the responsibilities and level of authority of the Leaders and Chief of Emergency Response before, during, and after an emergency. It also includes the responsibilities of the General Manager, Managers, Superintendents, Supervisors, Workers, Communications Team, Evacuation Team, Mine Rescue Team, Medical Service, Crisis Committee, and External Services.

The procedure CN-HSS-PRO-071, Equipment and Tools Inspection Procedure, includes emergency response equipment suitable for cyanide emergencies, including among others: antidote kits, oxygen tanks, the medical clinic ambulance, fire extinguishers, spill response equipment, rescue equipment, and self-contained breathing apparatus.

The procedure CN-HSS-PRO-071, Equipment and Tools Inspection Procedure, includes inspection requirements applicable to emergency equipment. Process personnel, members of the Emergency Brigade, and medical staff inspect all emergency equipment and supplies on a weekly, biweekly, and monthly basis. The auditor reviewed the inspection records of antidote kits, oxygen tanks, the medical clinic ambulance, fire extinguishers, spill response equipment, rescue equipment, and self-contained breathing apparatus.

Cerro Negro communicated with the hospitals in La Heras and Pico Truncado, outlining the necessity to admit patients exposed to cyanide, should the need arise. The letter detailed the hospitals' responsibilities and confirmed the delivery of a cyanokit (hydroxocobalamin) to each facility.

Besides hospitals, the Cerro Negro Emergency Response Plan does not assign a specific role to external responders in cyanide-related emergencies. Nevertheless, Cerro Negro continues to involve external stakeholders located along the transportation route in cyanide emergency response planning as part of the cyanide route program. External stakeholders (such as hospitals, local firefighters, police, and communities) do not participate in drills; however, they have been engaged and trained in cyanide emergency response during the recertification period.

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

	☒ 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 following appendices of the procedure CN-HSS-PLN-008, Emergency Response Plan, contain information related to emergency contacts for notifying management, regulatory agencies, external response providers, and medical facilities in the event of a cyanide emergency:

- CN-HSS-FCH-001, Emergency Response Roles: Includes contact procedures for on-site and off-site emergency response and presents a communication flowchart for emergency situations.

- CN-HSS-GDL-016, External Emergency Numbers: Provides information on external responders, including regulatory agencies, fire departments, police stations, local medical centers, and Civil Protection.
- CN-HSS-GDL-017, Emergency Contacts: Provides emergency contact numbers for Newmont personnel and information about internal responders.

Even though the nearest community, Perito Moreno, is located approximately 80 km from the mine operations, the procedure CN-HSS-PLN-008, Emergency Response Plan, includes, in Section 4, Communications Equipment, the requirement to notify local communities and regulatory agencies of emergency situations, if necessary.

The procedure and contact details are specified in the appendices CN-HSS-FCH-001, Emergency Response Roles, and CN-HSS-GDL-016, External Emergency Numbers of the CN-HSS-PLN-008, Emergency Response Plan. Additionally, the procedure CN-REX-PRO-001, Crisis Management Procedure, clearly defines the roles and responsibilities, as well as the required actions and communication protocol for informing internal and external stakeholders, including the media, about significant emergency situations. This information was verified through a review of the Emergency Response Plan and the supporting procedures.

The procedure CN-HSS-PRO-073, Cyanide Emergency Operational Procedure, establishes the requirement to notify the ICMI of any significant cyanide incident, as defined in the ICMI Definitions and Acronyms document, and includes the details for notification. No such incidents have occurred during the recertification period. **Standard of Practice 7.5**

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro employs the procedure CN-HSS-PRO-073, Cyanide Emergency Operational Procedure, for the recovery and neutralization of both solid and liquid cyanide spills. The procedure CN-HSS-PRO-073, includes steps for neutralizing soils contaminated with sodium hypochlorite solution as necessary.



Cerro Negro (Newmont) — Name of Mine
Signature of Lead Auditor
March 08, 2026 — Date

The CN-HSS-PRO-073, Cyanide Emergency Operational Procedure, states that for liquid spills, the solution should be directed to the appropriate tanks, which can be accomplished using portable pumps and hoses. For solid cyanide spills, the procedure provides guidelines for safely collecting the solid material. The procedure CN-MTN-PRO-001, Procedure for Segregation, Storage, and Temporary and Final Disposal of Waste, specifies that the cleanup materials from a cyanide spill and its residues must be treated as hazardous material. This procedure classifies these materials as Y-33 (according to Argentine regulations) and requires that their disposal take place at an external secure landfill.

Cerro Negro prohibits the use of chemicals like sodium hypochlorite, ferrous sulfate, and hydrogen peroxide for treating cyanide released into surface water, as detailed in Section V of the CN-HSS-PRO-073, Cyanide Emergency Operational Procedure.

The procedures: CN-ENV-PRO-034 Soil Sampling and CN-ENV-PRO-004 Water Quality Sampling. Have been used by Cerro Negro for proper monitoring of contaminated water or soil following a cyanide spill. The documents outline the methodologies, parameters, and the allowable final concentration of cyanide in residual soils as evidence of complete spill cleanup.

Standard of Practice 7.6

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The Cerro Negro Emergency Response Plan, CN-HSS-PLN-008, and the Cyanide Emergency Operational Procedure, CN-HSS-PRO-073, along with the operational procedures, are annually reviewed and updated as needed to ensure that the information remains current and the plan remains suitable for the processing facilities. Additionally, the documents CN-HSS-PLN-008 and CN-HSS-PRO-073 are reviewed after a drill or incident, if necessary. Changes made to both procedures are recorded in Section 10, titled Change Log. The information in the plans was current at the time of the audit.

Cerro Negro conducts emergency mock drills centered on cyanide scenarios, such as spills or exposure, to assess response procedures and incorporate lessons learned into response planning. These mock drills are designed to evaluate the effectiveness of the Emergency Response Plan and the operational preparedness, including training and equipment availability. Cerro Negro assesses the drills and identifies corrective actions, which are recorded in Enablon for tracking until resolution. The mock drills have thoroughly tested the entire cyanide emergency response process, starting from the initial emergency notification through to the completion of the response actions.

The Emergency Response Plan requires evaluation after drills and any emergency that necessitated its implementation. The operating procedure for drills mandates a critical evaluation of each drill to identify deficiencies and take corrective actions. The format CN-HSS-INF-002, Drill Report, includes the template used for evaluating the drills. When necessary, the plan was appropriately updated following emergency drills.

Principle 8 | TRAINING

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

Standard of Practice 8.1

Train workers to understand the hazards associated with cyanide use.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 8.1
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has written training programs and materials that provide training to all personnel who may come into contact with cyanide, enabling them to recognize the cyanide materials present in operations, their health effects, symptoms of cyanide exposure, and applicable procedures in case of exposure.



Cerro Negro has developed and implemented three modules for personnel who may work with cyanide:

- Module 1: This is an introductory training for all workers related to the safe handling of cyanide, response and first aid prior to cyanide exposure, and information about cyanide antidotes. This module is provided to new hires (including contractors) and visitors.
- Module 2: This is specific cyanide training for individuals working directly in cyanide facilities. It covers the Cyanide Code, procedures for the safe use of cyanide, treatment of patients poisoned with cyanide, and response to cyanide emergencies. This training is provided to process and maintenance personnel, as well as contractors who will work in areas with cyanide presence.
- Module 3: This training is for emergency response personnel (medical and nursing staff and members of the Emergency Brigade). This training is conducted by external specialists; this year, it was provided by Hazmat Argentina.

Written tests are conducted for Modules 1, 2, and 3, and skill confirmation is carried out through on-the-job observation. In addition to general training, all employees working in process areas must receive specific training for their tasks. This specific training includes work procedures and follows an on-the-job training program, where experienced supervisors train workers before they can work independently in the process plant.

Cerro Negro requires employees working with cyanide to undergo semiannual refresher training for Module 2 (Cyanide Management). Refresher sessions for Module 3 (Emergency Response) directed at emergency response personnel are conducted as needed (generally every three years).

The operation maintains training records related to the recognition of cyanide hazards to verify that personnel have received initial and refresher training on this subject. According to Argentine legal requirements, training records must be kept for 7 years. The records identify the instructor, trainee, topics covered, date, and signed attendance sheet.

The records are physically archived, labeled by month, year, and specific procedure, and stored in blue boxes. Electronically, two systems are used: TOTARA and SharePoint. At the time of the audit, Cerro Negro was in the process of transferring information to the LMS (Learning Management System).

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.

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

Summarize the basis for this Finding/Deficiencies Identified:

All Cerro Negro personnel involved in cyanide management receive training to carry out their assigned tasks safely and in an environmentally responsible manner. This training focuses on instructing new employees to perform their assigned tasks safely, ensuring that no spills or cyanide exposure occur. Cerro Negro has developed a training needs list related to cyanide management for each position according to their responsibilities.

In addition to training in operational and specific process procedures, process plant operators and maintenance personnel received training in Module 2, regarding cyanide management, which includes topics such as the use of cyanide in the process; procedures for the safe storage, handling, and use of cyanide; preparation of sodium cyanide; cyanide dosing points; HCN measurement methods; HCN alarms; cyanide exposure; HCN poisoning; treatment of patients poisoned with cyanide; and emergency response related to cyanide.

In addition to Modules 1 and 2 training, all employees working in process areas must receive specific training for their tasks. These procedures define the steps required to complete a task, and the procedure itself is used as training material. The work procedures include the objectives of the procedures, responsibilities, necessary personal protective equipment (PPE), decontamination requirements, associated risks with cyanide tasks, and specific steps for the individual task.

Specific task training directed at operators is delivered by supervisors and process leaders who have several years of experience in different process areas. Supervisors are considered qualified to provide training based on their experience.

Module 1 is delivered through a virtual platform managed by the safety department. Module 2 is conducted by medical service personnel, the emergency brigade leader, and a

trained supervisor or the training coordinator at the plant. Module 3 is taught by external specialists from the company trained in handling hazardous substances.

Employees who will work with cyanide receive a theoretical training session (Module 2) that covers the Cyanide Code, procedures for the safe use of cyanide, treatment of patients poisoned with cyanide, and emergency response to cyanide incidents.

Cerro Negro requires employees working with cyanide to undergo semiannual refresher training for Module 2 (Cyanide Management). Refresher sessions for Module 3 (Emergency Response) directed at emergency response personnel are conducted as needed (generally every three years). Additionally, staff working in process areas also receive updates on work procedures or when changes to procedures are introduced (typically during daily briefings).

For operational procedures, a general exam is administered, with the format aligning with the training program. An 80% score is required to meet the program standards. Cerro Negro evaluates the effectiveness of cyanide training through written tests and on-site observation. Training records and test results corresponding to the period of this recertification audit were reviewed and found to be complete.

Training records are maintained throughout the entire employment history. The records identify the instructor, trainee, topics covered, date, and signed attendance sheet. Additionally, test results are kept as part of the employee files.

Standard of Practice 8.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All personnel involved in unloading, preparation, production, and maintenance are trained in the procedures to follow in the event of a cyanide spill and for decontaminating a victim exposed to cyanide. The requirements of the operational procedures, including emergency response procedures, are addressed in Module 2 of the training, which

includes topics such as oxygen therapy, treatment and first aid for poisoned patients, and emergency response.

Employees working with cyanide receive specific training in the operational procedure for cyanide emergencies and spill response, which includes neutralization, decontamination, first aid, cyanide antidotes, and oxygen dosing.

Personnel working in areas with cyanide presence receive training in decontamination procedures and first aid. This staff includes unloading, preparation, and production operators, as well as maintenance workers. Module 2 of the training includes details on how to respond to a cyanide-related emergency in cases of inhalation, ingestion, or skin contact.

The mine also has a fully equipped medical clinic located near the areas with cyanide presence. Several medical professionals comprise the staff, and at least one is on duty at all times. Additionally, employees working with cyanide receive specific training in the operational procedure for cyanide emergencies and spill response, which includes neutralization, decontamination, first aid, cyanide antidotes, and oxygen dosing.

Cerro Negro provides training to members of the Emergency Brigade three times a week, covering topics such as decontamination of equipment and soil, and response to cyanide spills. The operation trains Emergency Brigade members in the use of necessary response equipment. Furthermore, Hazmat Argentina provides periodic external training.

Cerro Negro continues to involve stakeholders and communities located along the transportation route in the planning of cyanide emergency response as part of the Cyanide Route Program.

Although Cerro Negro's Emergency Response Plan does not include the active participation of external response personnel or communities in the event of on-site cyanide emergencies, external stakeholders (including hospitals, local fire stations, police departments, and communities) participated in and received training on cyanide emergency response during the recertification period.

Cerro Negro requires employees working with cyanide to undergo semiannual refresher training for Module 2 (Cyanide Management). Refresher sessions for Module 3 (Emergency Response) directed at emergency response personnel are conducted as needed (generally every three years). Verification was conducted through interviews with training and process personnel, as well as a review of training records. It was confirmed that training and testing records are maintained and complete for the period corresponding to the recertification audit.

The records identify the instructor's name, the name of the trained individual, topics covered, date, and signed attendance sheet. Additionally, test results are kept as part of the records. Training records are kept for the entire duration of employment. These records are physically stored in blue boxes and organized by month, year, and specific procedure. Additionally, two electronic systems are utilized: TOTARA and SharePoint. During the audit, Cerro Negro was in the process of migrating this information to the Learning Management System (LMS).

Principle 9 | DIALOGUE AND DISCLOSURE

Engage in public consultation and disclosure.

Standard of Practice 9.1

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

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 9.1
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro shares information regarding cyanide management with stakeholders and takes their comments and concerns into account. This is done through various informational meetings held with communities and stakeholders, which include the cities of Perito Moreno and Los Antiguos, as well as the communities along the cyanide transport route from the port to the mine. This route includes communities such as Puerto Deseado (Port Administrative Unit), Pico Truncado, and Las Heras.

Furthermore, Cerro Negro produces a Spanish-language brochure titled "5 Questions and Answers about Sodium Cyanide," which is provided to the general public and the communities involved in the meetings. This brochure addresses the following topics: What is cyanide?, Can cyanide be found in nature?, What are the uses of cyanide in mining?, What is the International Cyanide Management Code?, and How is it transported?

In case of any comments or concerns, the brochure includes the contact numbers for Cerro Negro, the email address, and the address of the mine office located in Perito Moreno.

Standard of Practice 9.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Negro has a brochure in Spanish titled "5 Questions and Answers about Sodium Cyanide," which is distributed to the general public and to the communities participating in the meetings. Additionally, there is the brochure “Cyanide in Mining”, which informs the communities about the operation's cyanide management activities.

Additionally, Cerro Negro conducts annual training sessions where it explains its activities and the handling of cyanide to the communities. These communities include Perito Moreno and the surrounding areas, as well as those along the cyanide transport route from the port to the mine, which includes communities such as: Puerto Deseado (Port Administrative Unit), Pico Truncado, and Las Heras.

The areas of the mine that participate in these training sessions and the topics they cover are:

- Process Plant: Topic: Handling and proper use of cyanide in mining
- Medical Service: Topic: Cyanide poisoning
- Medical Service / Rescuer: Topic: Rescue in the event of a cyanide-related incident
- Environmental Department: Topic: Environmental Monitoring

Additionally, the personnel from the Tailings Area of Cerro Negro conducted the Tailings Management workshop for the cities of Perito Moreno and Los Antiguos on April 15, 2025, with 42 attendees.

Cerro Negro conducts its annual training sessions for the community verbally, where they discuss their activities and the handling of cyanide. It is worth mentioning that the region has a literacy rate of 99% according to the 2022 census.

By regulation, Cerro Negro informs the competent authorities of any spills and cyanide exposure through the public relations department. The procedure CN-HSS-PLN-008,

Emergency Response Plan (ERP), outlines the external communications that Cerro Negro would undertake in the event of an emergency. Regulatory agencies are responsible for making this information public through their respective communication channels. The governmental body that must be informed about cyanide incidents involving personnel is the Ministry of Labor, Employment, and Social Security of the Province of Santa Cruz. Additionally, the authority to be informed in the event of any cyanide spills is the Secretariat of Mining of the Province of Santa Cruz.

Additionally, when these incidents are deemed significant, they are published in the annual corporate social responsibility report, which specifies the Newmont operation to which the incident pertains, and is available to the public on Newmont's website.

Cerro Negro will communicate any incident of cyanide exposure that requires hospitalization or results in fatality, in accordance with procedure CN-HSS-PLN-008, Emergency Response Plan (ERP). It is worth mentioning that during this audit period, Cerro Negro has not had any incidents of exposure that required hospitalization or resulted in any fatalities.

Cerro Negro will communicate any cyanide releases off the mine site requiring response or remediation, in accordance with procedure CN-HSS-PLN-008, Emergency Response Plan (ERP). It is worth mentioning that during this audit period, Cerro Negro has not had any incidents of this nature.

Cerro Negro will communicate any cyanide spills, whether inside or outside the site, that have significant adverse effects on health or the environment, in accordance with procedure CN-HSS-PLN-008, Emergency Response Plan (ERP). It is worth mentioning that during this audit period, Cerro Negro has not had any incidents of this nature.

Cerro Negro will communicate any cyanide spills, whether inside or outside the site, that require reporting under applicable regulations, in accordance with procedure CN-HSS-PLN-008, Emergency Response Plan (ERP). It is worth mentioning that during this audit period, Cerro Negro has not had any incidents of this nature. Additionally, Cerro Negro voluntarily submits a report to the competent authorities every six months regarding all spills to the environment, which includes cyanide spills.

Cerro Negro will communicate any significant spills that exceed the applicable limits for cyanide, in accordance with procedure CN-HSS-PLN-008, Emergency Response Plan (ERP). It is worth mentioning that during this audit period, Cerro Negro has not had any incidents of this nature. Additionally, Cerro Negro voluntarily submits a report to the competent authorities every six months regarding all spills to the environment, which includes cyanide spills.