Gold Mining Operations

Summary Audit Report

for

Minera Cerro Moro/ Pan-American Silver Mining.

Argentina/ July 2024.

Prepared by NCABrasil Expert Auditors Ltd.

www.globalsheq.com

This report contains 30 (thirty) pages.



Cerro Moro		17/06/2025
Name of Mine	Signature of Lead Auditor	Date

SUMMARY AUDIT REPORT
FOR GOLD MINING OPERATIONS

Instructions

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

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

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

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

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

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

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

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



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Name of Mine: Minera Cerro Moro.
Name of Mine Owner: Pan-American Silver Co.
Name of Mine Operator: Minera Cerro Moro.
Name of Responsible Manager: Ing. Paulino Velazquez
Address: Ruta Provincial 87, km 80.
State/Province: Santa Cruz/ Puerto Deseado Country: Argentina
Telephone: (+54) 296-249-6300
Cell phone: (+54) 929-740-99213
E-Mail: Paulino.Velazquez@ar.panamericansilver.com

Location detail and description of operation:

Location:
The Cerro Moro mining unit exploits gold and was acquired from Yamana Gold Mining Group in July 2023. It is located in the district of Puerto Deseado, province of Santa Cruz at sea level. It is accessible from the city of Comodoro Rivadavia (275 km through Ruta Nacional # 3) and from the town of Puerto Deseado (100 km through Ruta Provincial # 87).

Description of operation:

Size Reduction:

The ore is reduced in size using a two-stage crushing circuit, consisting of a primary jaw crusher operating in open circuit and a secondary cone crusher operating in closed circuit with a double-deck vibrating screen. The crushed product has a P80 of 9 mm (where P80 means that at least 80% of the particle size is smaller than 9 milimeters). The crushed ore is then conveyed to a fine ore bin.

Grinding:

The crushed ore is conveyed to a grinding circuit to liberate gold and silver minerals. The grinding circuit consists of a single-stage overflow ball mill operated in closed circuit with hydro-cyclones and a flash flotation cell (on cyclone underflow) to produce a cyclone overflow product with a P80 of 75 μm (microns).

Flotation and Thickening:

- Bulk rougher flotation with a single stage of cleaning.
- Concentrate thickening of combined flash flotation and conventional cleaner concentrate, followed by regrinding to produce concentrate leach feed with a P80 of 30 μm.



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Leaching and Solid/Liquid Separation:

- Intensive cyanide leaching of concentrate in an agitated leach tank.
- Cyanide leaching of flotation tails combined with concentrate leach residue in agitated leach tanks.
- Solid/liquid separation using a six-stage counter-current decantation (CCD) circuit. The pregnant solution is sent to a hopper clarifier to remove additional solids.
- The solution from the clarifier is treated with pressure leaf clarifier filters to lower the solids content to less than 10 ppm.
- The clarified solution is treated in a deaeration tower to reduce the dissolved oxygen content to less than 0.2 ppm prior to the addition of zinc.

Merrill-Crowe Process and Melting:

- The Merrill-Crowe (MC) process (zinc precipitation) is used to precipitate the gold and silver from the de-aerated pregnant solution. The solution containing the precipitate is filtered in plate and frame filter presses.
- The precipitate is removed from the filters and placed in retorts to remove water.
- The zinc precipitate is melted with fluxes to produce a gold-silver doré bar, which is the final product of the ore processing facility.

Neutralization and Tailings Storage:

- Neutralization of residual cyanide in the agitated leach tail stream is done using hydrogen peroxide, sodium metabisulfite and air.
- The neutralized slurry is sent to a conventional tailings' storage facility (TSF).
- Solution from the tailings pond is recycled for reuse in the process. Plant water streams includes process solution, fresh water and potable water.



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Auditor's Finding

This operation is:

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

with the International Cyanide Management Code.

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

Audit Company: NCA Brasil Expert Auditors Ltd. (www.globalsheq.com)
Audit Team Leader: Celso Sandt Pessoa
E-mail: celsopessoa@ncabrasil.com.br or celso@globalsheq.com (ICMI qualified lead auditor, since 2006, and TEA (Technical Expert Auditor for Gold and Silver Mining, Production and Transportation of cyanide).
Names and Signatures of Other Auditors: none

Date(s) of Audit: 07 ~ 11/07/2024 (on-site) and
29 ~ 30/10/2024 (off-site).

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

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



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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation buys solid NaCN from Draslovka USA production plant, an ICMI (where ICMI means International Cyanide Management Institute) certified cyanide producer, in accordance with the information available at ICMI´s website (current certification is dated 24/ May/ 2023).

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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



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Draslovka USA/Canada Rail & Barge Supply Chain, is an ICMI certified transporter as evidenced at ICMI´s website (current certification is dated 07/April/2022), Draslovka Global Ocean Supply Chain is also certified by ICMI (current certification is dated 07/April/ 2022) and Transportes Vesprini S.A is also certified by ICMI (current certification is dated 17/April/2023).

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

1. There is one NaCN storage warehouse designed and constructed in accordance with Argentinian engineering standards. Design and construction documentation are retained by the operation. The cyanide mixing and solution storage facilities were also designed and constructed in accordance with Argentinian engineering standards, as evidenced in the design drawings and quality assurance fabrication and testing records, retained by the operation (please refer to SoP (Standard of Practice) 4.8. Both tanks were constructed with ASTM A-36 carbon steel (where ASTM means American Society for Testing Materials) and welded according AWS standards (were AWS means American Welding Society). The warehouse is inside plant fenced areas, with restricted access, far from administrative offices. There are no surface waters in the vicinity of the operation, as evidenced during the field audit. The cyanide mixing and solution storage facilities are located away from people, inside the same fenced area as above mentioned. The operation does not use liquid cyanide solution. Only uses solid NaCN briquettes. The solid NaCN boxes are unloaded over concreted floor. In the event of any incident during unloading or internal transport between the warehouse and the preparation tank, the recovery, with plastic shovels and plastic brushes, is very simple. All process tanks are provided with level sensors, which are maintained by the operation (they are included in the instrumentation preventive maintenance plan). All process tanks volume is not used 100%. Alarm 1 is 85% and alarm 2 is 90%, as evidenced during the field audit. All process tanks are installed inside concreted secondary containments over a concrete base, as evidenced during the field audit and in the design documentation. All secondary containments are constructed of structural concrete and process tanks are constructed, according API 650 standard (where API means American Petroleum Institute), of carbon steel



The solid NaCN boxes are stored inside specific designed warehouse, under a roof and off the concrete ground (over pallets), as evidenced during the field audit. The warehouse was evidenced to be kept dry. The warehouse was designed and constructed with natural ventilation and mechanical exhaustion systems (fenced wall), as evidenced during the field audit and reviewed design and construction documentation. The cyanide mixing and solution storage facilities are located inside a fenced area, with restricted access and in a well-ventilated area, as evidenced during the field audit. The warehouse is constructed inside the plant fenced area, with restricted access (only authorized personnel allowed to enter these areas), with security control, and the warehouse is locked with lockers. The cyanide mixing and solution storage facilities are located inside the same fenced area. The warehouse is used specifically to store solid NaCN boxes. No other products are allowed to be stored in these warehouses. The cyanide mixing and solution storage facilities are located inside a fenced area and separated from other materials (there are no other materials inside the secondary containments where the cyanide solution preparation and distribution tanks are installed. Both tanks are constructed of carbon steel which offer an affective barrier to avoid the contact of cyanide solution with other not compatible materials.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

After use, the two big bags are neutralized into specifically construct tanks fulfilled with hydrogen peroxide (10%) solution. After neutralization is complete (after 24 hours), the big bags are washed and dried and disposed into de NaCN wooden boxes That are sent for final disposition at an approved environmental services supplier. The sea container returned to the NaCN producer (Draslovka USA) is inspected, cleaned (brushed) and sealed, before returning to the above-mentioned stakeholder.



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All pumps, tanks, secondary containments, are included in the operation preventive maintenance plan. Please refer to SoP 4.1 (Standard of Practice). The operation does not use hoses and couplings for mixing solid cyanide. Related to valves, the operation replaces any potentially defective valve by a new one. This approach is considered as a predictive maintenance. The valve replacement frequency is defined in accordance with the routine inspection results. Any potentially defective valve is replaced, as previously mentioned. Related to the valves installed in the cyanide solution preparation tank and at the cyanide solution distribution tank, their operation instructions are addressed at a documented work instruction, indicating the correct sequence to open and close that valves. During the field audit, a preparation of a cyanide solution batch was evidenced, as well the transfer of such cyanide solution batch to the distribution tank. All NaCN boxes are handled with the help of forklifts, operated by qualified operators. It was evidenced, during the field audit, that all NaCN boxes are kept in order, without puncturing or rupturing. The stacking limit is three boxes, according to the producer instructions. This was evidenced during the field audit. Evidenced, during the field audit, that the cyanide solution preparation area is kept clean. The operation´s safe work procedure requires that after the preparation of cyanide solution, the preparation area must be washed and cleaned and kept in order and cleaned, as evidenced during the field audit. The cyanide solution preparation is always performed by two operators (this means that during the preparation of cyanide solution (mechanical mixing, not manual) the presence of a second operator observing the activity from a safe area is mandatory, according to the safe work procedure. This procedure was evidenced during the field audit where a cyanide solution preparation activity was observed). Specific PPEs are defined, in a safe work procedure, to be used during the NaCN solution preparation. Evidenced, during the field audit, the preparation of one NaCN solution batch. All cyanide solution preparation steps are defined in a documented safe work procedure. Draslovka USA supplies solid NaCN with dye colorant (red), as evidenced during the field audit.



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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation designed, documented, implemented and maintains a SHEQ (Safety, Health, Environmental and Quality) management system which includes the management of cyanide. The system includes operational procedures such as reception, storage and handling of solid cyanide, cyanide solution preparation, tank leaching operational control, TSF operational control, decontamination of cyanide installations prior to maintenance activities, working at confined spaces, among others and management procedures such as change management, incident reporting and investigation, water balance management, emergencies and crisis management, communication management, among others. All operational documented procedures are based on the design premises and were updated along the time, in accordance with the change management procedure. Legal requirements are also addressed at the operational and management procedures. Such design premises include the required freeboard for the tailings storage facility (TSF), the design storm events for the TSF and the concentration of WAD (Weak Acid Dissociable cyanide is a group of cyanide species that can be released as free cyanide when refluxed in a weakly acidic environment) cyanide in the TSF. All operational and management procedures describe specifically the actions to be done in order to achieve the planned results. Hazards, risks and operational controls are addressed in the operational procedures. The required PPEs and prework inspections are also addressed in such operational procedures (or safe work procedures). The preventive maintenance management system and the maintenance inspection management system are included in the documented management system. The operation designed, documented, implemented and maintains a change management procedure which is applicable to several types of changes such as engineering changes, employees' changes, documentation changes among others. The change management procedure demands the participation of different stakeholders in order to review the proposed change, always including representatives of the environmental, health and occupational safety processes.



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The operation developed a contingency plan related to the management of any upset in the water balance, in the dry season and in the rainy season. There were no such of upsets in the water balance during the operation life. Any problem related to monitoring results (e.g: free cyanide content in open waters) or detected during process plant inspections (e.g: pump leakages) are managed through the corrective actions management process. During the operation life there were no environmental monitoring nonconformances. Minor mechanical problems were evidenced during maintenance inspections and corrective maintenance orders were issued and timely implemented. The operation developed and implemented a crisis management plan. There were no crisis situations during the operation life. Related to temporary closure, the potential measures will include (but not limited to) the maintenance of the agitators of the leaching tanks, without leaching (no addition of cyanide solution on the leaching process). A second option will discharge the pulp being leached to the TSF. If necessary, all stored solid NaCN will be sent/ sold to another gold mining operation. In the event of cessation of operation, the operation´s closure and decommissioning plan (please refer to Standard of Practice 5.1) will be implemented. The operation defined, documented and implemented specific inspection checklists focused on the process plants installations. Records of such inspections are retained by the operation. Reviewed inspection records performed between 2023 and 2024. The inspections are performed per area and includes all the installations included in that area (e.g: tanks, secondary containments, valves, pumps, piping, instrumentation). All cyanide containing tanks are inspected on a monthly basis. The inspection scope is focused on corrosion signs, leakages, pipelines, joints, valves and structural integrity. It is an integrated inspection, including the secondary containment, the tanks concreted base. Records of such inspections are retained and were reviewed during this opportunity. During the field audit, it was evidenced that those installations are well maintained. As previously mentioned, the inspection of secondary containment, for tanks and piping, are included in the monthly inspection scope. During the field audit, it was evidenced that such installations are well maintained. The TSF (the only pond available in the operation) is inspected on a regular basis and all quality and operational aspects of the TSF (Tailings Storage Facility) are inspected, in accordance of the Argentinian laws. Records of such inspections are retained by the operation. Inspections results performed between 2023 and 2024 were reviewed. The results showed that the TSF is well maintained. Major problems were not identified. During the field audit a TSF inspection was performed and witnessed by the lead auditor. Pipelines, pumps and valves are included in the inspection scope. All cyanide installations are included in a preventive maintenance program, and inspections are performed in order to confirm the effectiveness of the preventive maintenance program. The TSF is inspected on a regular basis in accordance with the Argentinian laws for this type of installation and in accordance operation´s inspection program. The inspection plan includes the inspection of the integrity of surface water diversions, which are part of the TSF configuration.



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Cyanide containing installations (tanks, pipes, pumps, valves, secondary containment) are inspected on a monthly basis, in between preventive maintenance activities. In my professional experience, the defined inspection frequencies are adequate to maintain the process plant installations and equipment working in conformance with the defined parameters. Inspection checklists were developed and implemented. The inspection results are recorded in this checklist, that are retained by the operation in accordance with the quality records management procedure. The inspection records address the inspection date and the name of the inspector. The checklist addresses the quality aspects to be inspected and the acceptance criteria to be observed. If opportunities of improvement are identified, corrective or preventive maintenance orders are issued and implemented. Such cases were evidenced during this opportunity. Corrective maintenance orders are issued when the inspection result demands one. All corrective maintenance orders are dated and, when concluded, are retained by the operation. Some corrective maintenance orders issued between 2023 and 2024 were sampled and reviewed during this opportunity. The operation designed, documented, implemented and maintains a preventive maintenance program focused on tanks, pipelines, pumps, valves (predictive approach), secondary containments and instrumentation (e.g: pHmeter, HCN detector, level transmitter). The frequency of preventive maintenance is variable. In my professional experience, the defined preventive maintenance frequency is adequate to maintain the process installations in a safe way. Records of preventive maintenance orders performed during the last twelve months were reviewed. It was evidenced that the operation has emergency power resources (four diesel generators) to operate pumps and other equipment (e.g: agitators) to prevent unintentional releases and exposures in the event its primary source of power is interrupted (the operation has four Cummins (trademark) diesel generators of 1250 kVA (kilo Volt Ampere) each one. The back-up power generator equipment is covered by a preventive maintenance program (annual) and inspections. The generator is turned-on on a monthly basis. Records of such activities are retained by the operations and were reviewed during this audit.

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

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

Summarize the basis for this Finding/Deficiencies Identified:
Cyanide solution is not added during the milling phase and the operation has strategies to minimize the use of cyanide.



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The operation conducts a program to determine appropriate cyanide addition rates and optimize gold recovery. This program is based on metallurgical tests (bottle testing/ agitation leaching) and is performed in accordance with the ore quality that will be leached, by the operation´s process laboratory. Cyanide consumption metrics are defined and the results until June 2024 indicates that the planned results for cyanide consumption will be reached. The operation implements a program of manual sampling and analysis of tailings. The operation demonstrated that its ore characteristics are constant, and its standard addition rate is appropriate to minimize its cyanide use.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Cerro Moro operation developed (in conjunction with Knight Piezold Argentina Ltd.) a comprehensive, probabilistic and dynamic water balance system, focused on the process plant, which includes the reference to the design assumed inputs and outputs, and the real inputs and outputs. The water balance is managed and monitored on a daily basis, in accordance with the defined and implemented water balance model. The model considers the storm rain return of 500 years/ 103 mm/ 24 hours (0,5% probability to fall during the life of mine (LoM = 2031). The model is based on the Markov approach and the GoldSim (trademark) software is used to simulate all defined probabilistic and dynamic circumstances. The rates at which tailings are deposited at the TSF is considered in the model. The model considers the storm rain return of 500 years/ 103 mm/ 24 hours (0,5% probability to fall during the life of mine (LoM = 2031). The highest rain fall value, obtained since 2010, was 45,7 mm/24h. The operation has the precipitation and evaporation data since 2010. The calculated precipitation volume resulting from surface run-on from the up-gradient watershed is lower than the available free volume (TSF) at the operation. Effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and any upgradient watershed is not considered because the freezing potential is nil. The solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface has no significant impact on the water balance. There are no discharges to surface water. The operation has a power backup system that provides enough energy to maintain the pumping and agitation system working. The process plant pumping system has a redundancy of two pumps (one pump working and the other one stand-by). There is no leach pad at the operation. The operation does not release effluents on surface waters. No other aspects are considered in the water balance model. The operation has enough available volume (TSF) enough to retain all calculated storm rain amount. The TSF are inspected on a regular basis as previously mentioned. Inspections include the available freeboard. One TSF inspection was performed during the field audit, in the presence of the audit lead auditor.

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The operation monitors precipitation and evaporation and compares with the historical values. It was observed that the rain profile is being maintained along the years as well as the evaporation profile. The meteorological station is placed close to the TSF.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All the operation perimeter is fenced. The amount of WAD (Weak Acid Dissociable Cyanide: An operationally defined group of cyanide species that undergo dissociation and liberate free cyanide when refluxed under weakly acidic conditions (pH 4.5~6)) cyanide in the TSF is maintained much below 50 ppm. Reviewed monitoring records issued by Generis Laboratory Ltd. (an ISO 17025/2017 accredited laboratory by IRAM Argentina/ Instituto Argentino de Normalización y Certificación). All samples were collected by Generis´technicians between June 2023 and June 2024. The operation developed and implemented an environmental monitoring plan (refer to Standard of Practice 4.9), which includes the monitoring of the open waters. The monitoring frequency is defined in accordance with the environmental permits hold by the operation (daily samples). Samples are collected at the discharge points and at supernatant pond. Reviewed monitoring results related to 2023 and 2024 for WAD cyanide. All evidenced results are below 50 ppm. All WAD cyanide results at the TSF are below 50 mg/l. The TSF is inspected a regular basis and there were no cases of fauna/ wildlife mortality in the last years. During the field audit, a small group of ducks was evidenced inside the TSF pond. The operation has no leach pads.



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

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

Summarize the basis for this Finding/Deficiencies Identified:

There is no direct discharge of process effluents on surface waters. The operation operates in a closed circuit (treated effluent recirculation as industrial water). This was evidenced during the field audit. There are no surface waters in the surroundings of the operation. There are three seasonal (filled with rainwater during the rainy season)) small ponds down gradient of the TSF (Lagunas Mosquito (4 km far from TSF, Deborah (6 km far from TSF) and Enriette (10 km far from TSF)), which are monitored during the rainy season. Reviewed monitoring results for WAD cyanide, performed in 2023 and 2024, where it was not detectable (<0.01 mg/l). It is important to note that these intermittent ponds are old natural salt deposits and the rainy water becomes very salty and not appropriate to be used for any purpose (industrial use, human or kettle use for drinking). There are no surface waters in the surroundings of the operation.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Beyond the dynamic water balance management, where dewatering is not a critical aspect that could impact the water balance and, consequently, the underground water quality, the operation monitors the quality of ground water on a regular basis, in accordance with the Argentinian laws and environmental permits. The operation installed water monitoring wells around the operation area, in different depths. The operation monitors the content of total cyanide (according to the Argentinian law, CNt (total cyanide) content must be < 0,1 ppm) in underground waters taking samples in all water wells installed by the operation. All results between 2023 and 2024 are below 0,01 ppm (not detected). In all cases. The groundwater is used as industrial water in the process plant. The operation does not use tailings as backfill, as evidenced during the field audit. There were no impacts on the underground water between 2023 and 2024. The operation is located downgradient of the nearest village, 80 km south of Tellier.



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

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

Summarize the basis for this Finding/Deficiencies Identified:

All process tanks are constructed inside secondary containments, made of structural concrete, as evidenced in the design specifications, construction records and during the field audit. All process tanks are fixed over structural concrete bases, as evidenced in the field audit and in the design documentation. The process tanks are not constructed on ring beam foundations. All the secondary containments are designed to hold 115% of the biggest tank volume inside the containment plus the storm rain return, which probability is 0,5% during LoM. All secondary containments are provided with automatic floor pumps, inside a sump. All effluent collected inside a secondary containment is pumped back to the process tank. Evidenced this system during the field audit. All cyanide containing pipelines and joints have a secondary containment in order to avoid any spillage or leakage. This includes the tailings delivery and return pipelines. It was evidenced two types of containment, the first one a pipe inside a pipe and the second one composed of channels covered with geomembrane. This was evidenced in design documentation and during the field audit. There are no cases where cyanide containing pipelines are a risk to surface waters. All cyanide containing tanks are constructed of carbon steel and pipelines, depending on the diameter are made of carbon steel or HDPE. Evidenced through the design documentation and during the field audit.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has a technical library where some original design and construction documentation could be found. During this opportunity, only some specific design and construction documentation was reviewed, such as cyanide solution preparation and distribution tanks, leaching tanks, TSF, some pumps and piping and secondary containments (concrete structures). Soil compaction test records (for TSF construction), welding procedures and records, material specifications and quality records are retained by the operation.



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Commissioning records and as-built documentation, for process plant and TSF, are retained by the operation. Commissioning records are signed-off by authorized Argentinian engineers in accordance with the Argentinian Engineering Council (Colégio Argentino de Ingenieros). The TSF is technically inspected by a third-party engineer on a yearly basis, according to the Argentinian mining legislation. The operation retains, as previously mentioned, as-built documentation, quality assurance and commissioning records.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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



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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation, in accordance with the Argentinian mining legislation, developed, documented (Knight Piezold document # ME-201-392-27-02 dated 08/11/2022 and updated on 31/12/2023) which is being reviewed by the Secretaria de Mineria de la Provincia de Santa Cruz. The operation decommissioning and closure plan, which is divided in two phases (progressive and final decommissioning and closure plan). Basically, the decommissioning plan addresses the activities related to neutralization of the cyanide installations, rinsing of neutralized cyanide installations, dismantling such installations and disposal of the removed installations. All effluents generated by these activities shall be monitored in order to determine the content of cyanide. There are specific activities related to the decommissioning of the TSF. The decommissioning and closure plan define the implementation schedule for the operation, considering the life of mine (LoM) the year of 2031. The closure plan must be updated, at least, every two years. Last update was in December 2023.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation calculated the value to implement the decommissioning and closure plan by a third party. The estimated value is in accordance with the actual values of the activities that shall be performed to decommission, dismantle, closure of the operation and after closure activities. Such value was approved by the Pan American Silver Corporation and is being reviewed by the Secretaría de Minería de la Provincia de Santa Cruz in order to define the value of the financial guarantee that the operation must offer in accordance to the law # 3751/2022 of the Santa Cruz province. The estimated value is annually updated.



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The decommissioning and closure plan cost estimate is annually updated. Last cost update was in December 2023. According to the Argentinian legislation (law # 3751/2022), the operation must have a financial guarantee, issued on behalf of the Secretaría de Minería de la Provincia de Santa Cruz. This legal requirement is under implementation (on the date of the audit) and shall be implemented after the approval, by the Secretaría de Minería de la Provincia de Santa Cruz, of the operation´s mine decommissioning and closure plan. Beyond this legal requirement, the operation has budgeted its own financial guarantees. The operation has also a self-guarantee financial assurance mechanism, which is annually audited by independent and qualified third-party financial auditors. Reviewed financial reports related to financial years finished 31/12/2022 and 31/12/2023. The audits were performed by Delloite & Company S.A. and led by Mr. Cristian Rapetti (Financial Auditor credential # I-09087) and conducted in accordance with the International Accounting Standards (ASB) and Finance Information International Standards (NIIF). Auditors´ conclusions addresses that the provisioned values are adequate, and that the operation has financial health to implement the decommissioning and closure plan.

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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



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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation defined two ranges of pH that shall be observed, one during cyanide solution preparation (between 11 and 12) and other one during leaching process (between 10.5 and 11). Verified during the field audit and through interviews with plant operators and supervisors that these values are kept under control. Also evidenced that the operation installed pHmeters in specific process tanks. Such pHmeters are included in the preventive maintenance plan, and pHmeters maintenance and calibration records were reviewed during this audit. The areas with such HCN generation potential (or cyanide dust), such as cyanide solution preparation tank, cyanide solution addition tanks, were identified and specific and adequate PPEs are mandatory to be used in such areas. Such areas are well ventilated and clearly identified, as evidenced during the field audit. The operation installed fixed HCN detectors in such areas and operators also use portable HCN detectors. Both HCN detector types are included in the preventive maintenance and calibration program. Records of such activities are retained by the operation and were reviewed during this opportunity. Both types of HCN detectors are calibrated to alarm in two points: 2,5 ppm (supervision must be contacted) and 4,5 ppm (operators must leave the area). Reviewed calibration records between 2022 and 2024. HCN detectors calibration records must be retained, at least, for three years, according to quality records management procedure. The calibration frequency is in accordance with the directions defined by the OEM (Original Equipment Manufacturer). Safety signage and safety pictograms are placed in specific places in the process plants, including the solid NaCN warehouse, which are inside the fenced perimeter of the process plant and at the TSF, including its associated pipelines. Safety signage includes information related to cyanide, the PPEs that must be used, that is forbidden to eat, drink and smoke in such places and also that open flames are not allowed. The cyanide solution is dyed for clear identification. Draslovka USA plant supplies solid NaCN briquettes with dye colorant. Evidenced dyed solution during the field audit (cyanide solution preparation activity). It was evidenced during the field audit that shower and low-pressure eye-washers are available in specific assigned places at the process plants. Such installations were tested during the field audit and worked adequately. All safety showers and eye-washers are included in a preventive maintenance plan. Showers and low-pressure eye-washers are routinely inspected by process operators.



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The operation uses dry chemical powder fire extinguishers (ABC type) in the process plant area. Such fire extinguishers are annually maintained and monthly inspected by the occupational safety process. Records of such activities are retained by the operation and were reviewed during this audit. Fire extinguishers are also checked before some cyanide related activities (pre-work inspection). All process tanks are identified by safety signage that cyanide is present. In the same way all pipelines containing cyanide are identified by safety signage and the flow direction identified. Evidenced during the field audit. Draslovka´s MSDS is available in the warehouse, in the cyanide solution preparation area and at process plant, documented in Spanish, as well as first aid procedures for cyanide intoxication and chemical burning, as evidenced during the field audit. The operation designed, documented, implemented and maintains and incident (real or potential) reporting and investigation procedure. There were no cyanide related incidents (real or potential) in the last twelve months. In order to confirm that the defined incident investigation procedure was implemented (as demanded by ICMI), it was reviewed a minor incident investigation report (INC-787), dated 25/07/2023, were a worker had a small crack in the elbow due to fall in the ground while walking. The incident was adequately investigated (using ICAM (Incident Cause Analysis Method) protocol, where the causes were defined, corrective actions were defined and implemented, and seems to be effective because since then there were no other incidents in such circumstances since then.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation has first aid resources such as oxygen bottles, AMBU (Artificial Manual Breathing Unit), cyanokits (antidote) and water, communication means such as radios and telephone, as evidenced during the field audit, including the ambulatory. The operation has an ambulatory located outside the process plant, equipped with oxygen bottles, EADs (external automatic defibrillators), radio, telephone and two ambulances. The medical team (per work shift) is composed by one doctor and nursing professionals. All medical resources are inspected and tested by the medical team on a regular basis. Records of such inspections are retained by the operation and reviewed during this audit. All cyanide antidotes kits were evidenced to be adequately stored and within the expiration date defined by the producer. The operation developed a first aid protocol that includes cyanide intoxication (by ingestion, inhalation and absorption through the skin and eyes) and chemical burning.



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The operation has its own ambulatory, equipped with resources to attend workers exposed to cyanide. The operation has two ambulances that are able to transport stabilized workers to Puerto Deseado Municipality hospital. The Puerto Deseado Municipality hospital was evaluated by operation medical team and, depending on the decision of the operation doctor, the hospital is adequate to be used in the event of a cyanide intoxicated or chemical burned worker, after receiving the first aid at the operation ambulatory.

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

According to the Argentinian mining legislation, the operation designed, documented, implemented and maintains an emergency response plan (HSEC-MA-POP-05(1.03)). The emergency response plan was developed by different internal stakeholders such as process plant team, maintenance team, occupational health professionals, occupational safety team, environmental professionals and communicated to external stakeholders such as Puerto Deseado firefighters group, Puerto Deseado municipality hospital, national police and other gold mining operations, for mutual assistance. The following emergency scenarios are addressed at the operation´s emergency plan: catastrophic release of hydrogen cyanide from storage, process or regeneration facilities, transportation accidents occurring on site or in close proximity to the operation, cyanide releases during unloading and mixing, cyanide releases during fires and explosions, pipe, valve and tank ruptures, overtopping of ponds and impoundments, power outages and pump failures, failure of cyanide treatment system and failure of tailings impoundments. Uncontrolled seepage is not a critical emergency scenario for the operation, due to the design and configuration of the TSF (due to effective soil compaction, due to physical aspects of the local soil and the TSF is covered with HDPE (High Density Poly-Ethylene) geomembrane). The primary responsibility related to solid NaCN transportation emergencies is from the cyanide seller and the cyanide transporter (Draslovka USA and Transportes Vesprini, respectivelly). In the event of transport emergencies in the vicinity of the operation, the operation emergency response team will participate also.



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The cyanide boxes are transported within a 20´sea container. The plan addresses the activities to be performed related to the clearing of internal stakeholders (the first step is to reunite the site personnel in specific meeting points and then, under a brigade member orientation, to leave the operation) and also potentially affected communities. The plan addresses the use of antidotes, such as oxygen and cyanokit, and additional first aid measures. The plan was developed by different stakeholders, including the process plant and maintenance teams.The plan addresses, where necessary, containment actions such as containing berms, assessment and mitigation action such as the use of sodium hypochlorite solution (or hydrogen peroxide solution) to neutralize cyanide spillage and the review of the real or potential emergency (learning from incidents approach), resulting in the definition and implementation of corrective and preventive actions.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The plan was developed by different internal stakeholders and submitted to external stakeholders such as Puerto Deseado municipaly firefighters, Puerto Deseado Municipality hospital, Argentinian National police, Tellier and Puerto Deseado communities representatives and other gold mining operations (e.g: Cerro Vanguardia), during specific planned meetings (refer to Principle # 9). The plan includes several external stakeholders such as Puerto Deseado Municipality firefighters and hospital. In order to maintain the emergency response plan updated, the same process above mentioned is observed. Different stakeholders are involved in the emergency response plan preparation and update.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation defined an Emergency Response management group in order to manage any type of emergencies. The emergency coordinator is the general plant manager, that may be replaced by the SHE (Safety, Health, Environment) manager, that may be replaced by the Emergency Brigade Coordinator. The emergency management group is composed of distinct internal stakeholders. All requirements to be an emergency response brigade member are clearly defined.



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All volunteers must pass through a medical/ psychological evaluation, theoretical and practical training and a final evaluation to be qualified. All brigade members, including the Emergency Response Management Group contact information, are available at the emergency response plan. The emergency communication loop is clearly defined at the Emergency Response Plan.

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

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The emergency response plan addresses the communication loop to be followed during an emergency, which includes the communication with external stakeholders (including ICMI, hospitals, firefighters, public authorities, press, among others). As previously mentioned, the operation develops a communication loop involving the contact with internal and external stakeholders, including communities' representatives, press institutions and public authorities. Communication to ICMI is included in the operation communication loop.

The protocol for communicating with ICMI includes requirements and details to notify ICMI of any significant cyanide incidents.



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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

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



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

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

Summarize the basis for this Finding/Deficiencies Identified:

In the event of real or potential emergencies, after mock drills or external emergencies related to cyanide, the emergency response is reviewed and updated if necessary. The operation plans and performs, on an annual basis, emergency mock drills. The mock drills are integrated impacting three dimensions, safety, health and environment. The operation emergency drills are not tabletop exercises. They are integrated field exercises simulating environmental impacts caused by cyanide releases, cyanide intoxication and first aid exercises. Brigade members and operational workforce are assigned to attend and participate in the drills, according to the scenario addressed at the Emergency Response Plan (ERP). Observers are also assigned to attend the emergency drills. After the drill the results are reviewed by the attendees in order to confirm if the drill was a real situation the specific ERP (Emergency Response Plan) would work and if the attendees performed their roles in accordance with the planned activities. Reviewed two emergency drill reports, performed between 2023 and 2024, and in both cases, opportunities of improvement (corrective and preventive) were identified and implemented, resulting in the update of the emergency response plan.

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

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

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



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Summarize the basis for this Finding/Deficiencies Identified:

The operation developed an integrated safety, health and environmental induction training for all stakeholders arriving in the operation, including the ICMI auditor, where there is a specific chapter about the cyanide management system, which includes the description of solid sodium cyanide and cyanide solutions, the associated risks of cyanide exposure to health, safety and the environment, basic operational controls (pH control) and first aid protocols for each type of intoxication caused by cyanide, including the usual symptoms associated with cyanide exposures . Records of such training sessions are retained by the operation and were reviewed during this audit. For internal stakeholders (including permanent contractors), the operation performs a refresh induction training every two years (cyanide related chapters). Records of such refresh training sessions are retained by the operation and were reviewed during this audit. The operation also plans and deliver SHE (Safety, Health, Environmental) daily dialogues, where cyanide related risks and operational controls are discussed.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

After passing through the safety, health and environmental induction training, the new employees or contractors that will work in activities involving cyanide are assigned to be trained (theory and practice) specifically in the operational procedures (safe work procedures) during three work shifts (each work shift is equal a 14 days). Trainees will be trained and work (practical training), under supervision, all three shifts in order to be qualified to work in the process plant. The operational training is focused on the operational procedures (safe work procedures) that are linked with activities involving cyanide. All operational training is provided by process operators, supervisors and/ or process engineers. All new employees or contractors that will work in activities involving cyanide are trained and qualified before working with cyanide, as previously mentioned. In order to ensure that the employees that work with cyanide maintain their knowledge, the operation performs refresh training sessions every two years (in the operational procedures) or, in the event of any update in the operational procedures, all involved employees are promptly trained in the new version of the operational procedure (safe work procedure). The training effectiveness is evaluated in two phases, the first one during the theoretical training through tests and the second phase through planned job observations while they are working under supervision. Records of such evaluations are retained by the operation and were reviewed during this audit.



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All training related records are retained by the operation, by the Human Resources management process. According to the Argentinian legislation, training records must be retained by the operation throughout the individual´s employment. Initial and refresh training records were sampled and reviewed during this opportunity. All the training records address the name of the trainees, the name of the instructor(s), the date of the training, the total hours of training, the training scope and the conclusions of the training, which includes that the trainees understood the provided training material.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All employees that work directly with cyanide receive specific emergency related training (general knowledge) which includes first aid procedures, decontamination of workers, neutralization of leakages over soil or other surfaces, like concrete. Records of such trainings are retained by the operation and were evidenced during this audit. During the field audit, some plant operators and supervisors were interviewed and demonstrated they are aware about general and specific aspects of emergency response activities. The emergency response coordinators are trained in the response protocols related to emergencies with cyanide and the resources that are necessary to respond to such situations. The Emergency Brigade members are volunteer employees that pass through medical / psychological evaluations, theoretical and practical training before being qualified as brigade members. Records of such trainings are retained by the operation and were reviewed during this opportunity. Annually, the coordinators and brigade members participate in emergency mock drills, as part of their permanent training program. All external stakeholders that are included in the emergency response plan, such as Puerto Deseado municipality firefighters and hospital, other mining operations and communities ‘representatives are aware about their roles in cyanide related emergencies and also participates in emergency mock drills. Records of such meetings and mock drills (2023 and 2024) are retained by the operation and were reviewed during this audit. Beyond the annual mock drill program, the brigade members are requalified/ retrained every year. Records of such activities are retained by the operation and were reviewed during this audit. The initial and refresh training records, beyond the emergency mock drill reports, addresses the attendee’s names, their performance, the training scope, instructors’ names, dates and instructors’ feedback about the trainee performance.



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9. DIALOGUE: Engage in public consultation and disclosure.

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

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

Summarize the basis for this Finding/Deficiencies Identified:
The operation has a specific communication process to interact with internal and external stakeholders (e.g: press, communities, public authorities). On a regular basis, the operation promotes specific meetings with the communities in order to discuss several aspects, including the cyanide management model. Records of such meetings performed in 2023 and 2024 were reviewed during this audit.

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

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

Summarize the basis for this Finding/Deficiencies Identified:
The operation designed and documented (procedures, brochures) specific information about the cyanide management at the operation that are available to internal and external stakeholders and are distributed during the meetings with the communities (summary flyer). All information is in Spanish, the official language of Republic of Argentina. It was evidenced that most of the external stakeholders are educated and literate. The operation has a specific communication process to interact with internal and external stakeholders (e.g: communities, public authorities, press, employees). In the last twelve months there were no critical incidents (cyanide exposure resulting in hospitalization or fatality, cyanide releases off the mine site requiring response or remediation, cyanide releases on or off the mine site resulting in significant adverse effects to health or the environment, cyanide releases on or off the mine site requiring reporting under applicable regulations and releases cause applicable limits for cyanide to be exceeded) involving cyanide that deserved to be communicated to the general public (internal and external).



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In the event of such real and confirmed critical incidents, the operation developed and documented a Crisis Management plan, which was reviewed during this opportunity and includes a specific chapter about the communication management during a crisis situation. The crisis management plan has a specific chapter related to communication protocols to be applied to communicate the above-mentioned real incidents to internal and external stakeholders (e.g: public authorities, press, internet). These protocols include meetings with authorities and the press, press releases and social media communication.

Audit team conclusions:

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



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