

TSM Verification Summary Report 2023

Shahuindo, Peru



Pan American Silver

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SIGNATURE PAGE

TSM Verification Summary Report 2023

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ACRONYMS AND ABBREVIATIONS

CMP	Crisis Management Plan
COI	Community of Interest
CAR	Regional Environmental Commission
EEM	Environmental Effects Monitoring
EOR	Engineer of Record
EPRP	Emergency Preparedness and Response Plan
FN	First Nations
GHG	Greenhouse Gases
HR	Human Rights
HS	Health and Safety
JHSC	Joint Health and Safety Committee
MOWL	Maximum Operating Water Level
PAS	Pan American Silver
RASCI	Responsible, Accountable, Supporting, Consulted and Informed

SPCR	Spill Prevention, Control and Response
TARP	Trigger Action and Response Plan
TEK	Traditional Ecological Knowledge
TSM	Towards Sustainable Mining
VSP	TSM Verification Service Provider

1. FACILITY INFORMATION

Facility Information:			
Name of Company	Pan American Silver		
Name of Facility	Shahuindo		
Address	Located in the province of Cajabamba, in the district of Cachachi, near Centro Poblado Algamarca (villages of Algamarca, La Fila, Liclipampa Alto, Pauquilla, San José and Rosahuayta) and Centro Poblado Araqueda (villages of Araqueda, Moyán Alto, Moyán Bajo and Quilishpampa).		
Country of Operation	Perú		
Products/metals produced on Site	Gold		
Types of operation	Types of operations included in the scope:		
Mining	Shahuindo is a heap leach open-pit gold mine.		
Concentrate blending	N/A		
Smelting	N/A		
Refining	N/A		
Other (please explain)	N/A		
Types of Infrastructure included in the scope:			
Roads	N/A		
Rails	N/A		
Ports	N/A		
Other (please explain)	N/A		



FIGURE 1. LOCATION OF SHAHUIDO, PERU OPERATION



VERIFIER AND VERIFICATION INFORMATION 2.

Verification Firm	ERM Peru SA
Confirmation that all verifiers involved in the verification are accredited TSM verifiers	Yes. Erick Chang, Managing Consultant, Qualified VSP.
Date(s) of verification	Document Review: 16/10/2023 - 20/10/2023
activities (dd/mm/yyyy – dd/mm/yyyy)	Site Visit: 23/10/2023 - 27/10/2023
44 ,, , , , , , ,	COI Interviews: 23/10/2023 - 27/10/2023
	Reporting: 15/12/2022 - 19/12/2023
Verification period	This is the first external verification of the Shahuindo Mining Unit. The VSP focused on the 2023 self-assessments provided by the Site, with reference to the 2021 and 2022 assessments. The corporate crisis management protocol was verified in 2022.
Summary of the verification methodology	This was the first verification for Shahuindo.



The verification did not include other standards or the addition of the Responsible Sourcing Alignment Supplement.

A SSite visit to Shahuindo was agreed to given this is their first verification.

The process included document review, Site-based interviews, COI interviews, and reporting.

The Tailings protocol was excluded, as Shahuindo does not generate tailings in its operation. The remaining 7 protocols were reviewed.

Summary of the verification activities

Planning

Planning for the verification was organized with Pan American Silver (PAS) corporate environment staff, who also attended the Site visit with a representative from the sustainability team. A request for key COI representatives was made and arrangements were made to have short interviews. A schedule of verification activities was prepared and shared with Site representatives. The schedule included a focused interview with the lead for each TSM protocol and selected Site tours.

Document Review

In advance of the Site visit, a SharePoint Site was set up by PAS to allow access to the self-assessment reports and associated documented evidence. The VSP reviewed this material in advance of the Site visit and in several cases, requested some additional information.

Site Visit

A visit to the Shahuindo Mine was conducted over five days. In accordance with the schedule, an opening meeting was held with Site staff, including the mine general manager and other Site leadership. The subsequent interviews focused on reviews of the Site's self-assessments for each protocol. Evidence was reviewed and if required, the VSP requested additional information or adjustments to the self-assessment.



Sampling of evidence was limited to certain monitoring reports, minutes of meetings, and other periodically scheduled activities.

A tour of the facilities and general views of the operation were conducted.

Interviews were conducted with operational personnel and also verification of systems, processes and implementation of procedures. With some protocols, several people from the Site participated in the discussion. See Appendix A for a list of PAS participants.

COI Interviews

The COI interviews were conducted in person and by telephone call based on availability of the participants. See Appendix B for a list of COI the VSP engaged with.

SUMMARY OF FINDINGS

This section summarizes ratings for all TSM indicators and provide brief commentary regarding these indicators and the facility's score on a given protocol.

TABLE 1 SUMMARY OF CONFORMANCE RATINGS

Criterion	PAS Rating	ERM Verified Rating			
Indigenous and Community Relations	Indigenous and Community Relationships				
1. Community of Interest (COI) Identification	AA	А			
2. Effective COI Engagement and Dialogue	А	А			
3. Effective Indigenous Engagement and Dialogue	NA	NA			
4. Community Impact and Benefit Management	А	А			
5. COI Response Mechanism	Α	А			



Criterion	PAS Rating	ERM Verified Rating		
Safety and Health				
1. Commitments and Accountability	А	AA		
2. Planning and Implementation	А	AA		
3. Training, Behaviour and Culture	А	AAA		
4. Monitoring and Reporting	Α	AA		
5. Performance	А	Α		
Crisis Management and Communication	ns Planning			
Crisis Management and Communications Preparedness	Yes	Yes		
2. Review	Yes	Yes		
3. Training	Yes	Yes		
Preventing of Child and Forced Labour				
1. Preventing Forced Labour	Yes	Yes		
2. Preventing Child Labour	Yes	Yes		
Climate Change Protocol				
Corporate Climate Change Management	А	А		
2. Facility Climate Change Management	А	AA		
3. Facility Performance Targets and Reporting	А	А		



Criterion	PAS Rating	ERM Verified Rating		
Biodiversity Conservation Managemen	t			
Corporate biodiversity conservation commitment, accountability, and communications	AA	AA		
2. Biodiversity conservation planning and implementation	AA	А		
3. Biodiversity conservation reporting	AA	АА		
Water Stewardship				
1. Water Governance	АА	АА		
2. Operational Water Management	А	А		
3. Watershed-scale Planning	АА	АА		
4. Water Reporting and Performance	AA	AA		

TABLE 2 SUMMARY COMMENTS ON CONFORMANCE RATINGS

Criterion	Rating	Comments		
Indigenous and Com	Indigenous and Community Relationships			
1. Community of Interest (COI) Identification	A	Shahiundo has a COI identification process that identifies stakeholders with a wide range of interests and concerns. Mechanisms, such as an annual survey, which allows COIs self-identify.		
		The COI List includes attributes for identified COIs, including contact information, areas of interest, etc. This List is reviewed annually to ensure that it contains up-to-date information.		
		COI are periodically reconsidered during all stages of the mine life cycle to ensure that engagement with affected COI occurs for any new or expanded project.		
		The document process for COI identification does not include how the facility identifies under represented COI within the		



Criterion	Rating	Comments
		local context and COI have not been invited to provide input into how Shahuindo identifies COI.
2. Effective COI Engagement and Dialogue	А	There is a documented engagement processes in the Social Communication and Local Outreach procedure and Community Outreach Protocol that are updated on an annual basis or as required.
		The social management team carries out meetings with the COI and has Shahuindo staff to attend community meetings with COI, in addition system to engage through various channels (physically in the office, providing phone numbers and other social media groups.
		Activities and results of COI engagement and participation are discussed in weekly update meetings and in monthly meetings with the social management committee. COI engagement activities and results were also reported in the corporate sustainability dashboard for the annual sustainability reporting results.
		Documents for COI are written in language that is clear and understandable to COI.
		Relevant materials were provided to COI in an informative manner, and the execution of required projects is coordinated with them as required.
3. Effective Indigenous Engagement and Dialogue	NA	This indicator does not apply, since there are no indigenous peoples in the Shahuindo mining unit, since during the process of obtaining the Shahuindo environmental licence, work was carried out to identify indigenous peoples, in which it was confirmed that there are no indigenous peoples in the area of influence of the project.
4. Community Impact and Benefit Management	A	Processes are in place to identify, prioritize and avoid potential adverse impacts on COI through an Evaluation and Management of Social Impacts Procedure that evaluates social impacts and risks. This process sets KPIs and plans to manage these including monitoring these actions, setting accountable persons, etc. In addition, the Site has a social affairs committee, which meets on a monthly basis, to review social issues related to current impacts and controls. Site.
		The Site executes several projects related to water management, improvement of transportation and product



Criterion	Rating	Comments	
		generation so that the COIs can be self-sustaining after the Mine.	
		Through its official channels, the Site handles complaints, claims and concerns of the COIs, with established times and a solution in conjunction with the COIsinvolved.	
		Through Pan American's annual corporate survey, main COI concerns related to the operation of the Site are captured. In general, the relevance of the possible social, environmental and health and safety impacts for the COIs is dictated by the COIs themselves.	
5. COI Response Mechanism	А	The process for receiving, documenting, reporting and responding to COI comments is described in the Complaints and Grievance Procedure and the Social Communication and Outreach Procedure. Comments can be received by a number of channels. The procedure is communicated to the COI, through the social management team carries out with the COI, and in the mentioned communication channels.	
		COI complaints are recorded and followed up by the social management team and tracked in a database.	
Safety and Health			
Commitments and Accountability	AA	There is a demonstrated commitment to safety and health through the Site Health and Safety Policy, which is communicated to workers and contractors.	
		Responsibilities under the Health and Safety Management System are understood at all levels.	
		PAS has completed an internal audit of the HS management system.	
2. Planning and Implementation	AA	The Site has a robust Occupational Health and Safety management system, which includes:	
		Setting objectives and goals.	
		Hazard identification and risk assessment, and maintenance of a risk register.	
		 An industrial hygiene program (using a contracted hygienist) 	
		Defined roles and responsibilities.	
		Health and Safety Training Plan	



SUMMARY OF FINDINGS

Criterion	Rating	Comments
		Annual Safety and Health Plan at work
		Occupational Health Plan (By an occupational doctor and a psychologist)
		Workplace inspections
		Validation of the effectiveness of controls.
		Work procedures, including an accident investigation procedure
		The facility has verified that critical controls are in place and functioning by monitoring Bow Tie and critical controls.
		Additionally, the Site has completed an internal audit of its Health and Safety management system.
3. Training, Behaviour and Culture	AAA	The Site maintains a Training Plan for Health and Safety for employees and contractors. There are orientation programs for employees, on-Site contractors and visitors.
		Safety and health are integrated with business planning, purchasing decisions (selection and qualifications), performance evaluations and compensation (annual safety incentives).
		The facility has implemented a Wellness Program and Mental Health Plans to encourage healthy lifestyles.
		The Site has meetings with the country manager with the operational management of different areas.
		Additionally, facility management visibly demonstrate their commitment with one-on-one interactions with employees.
		Programs to assess trainers effectiveness have also been implemented.
4. Monitoring and Reporting	AA	There are internal audit and inspection programs, including evaluations led by Site management and also corporate audit programs.
		Monthly reviews of the Occupational Health and Safety management system are carried out, they have the platform, REPORT PAS, in which the key indicators are obtained, these are reported to the corporate, and also in the meetings of the Safety and Health Committee The results are indicated in the Work. In addition, they meet at the management level in which the results are discussed by email. The results are also



Criterion	Rating	Comments
		shown in public reports linked to health and safety management.
		Additionally, the Site has conducted an internal audit on Health and Safety management, however, an external audit of the HS management system has not been completed as required for a AAA level.
5. Performance	Α	Health and safety performance objectives established for facility employees and communicated through monthly reports and during in-person talks and emails.
		There have been no fatal accidents at the Site during the last three years.
		The facility has met its continuous improvement performance goal for at least 3 of the last 4 years, however, the Site's safety and health performance is not benchmarked against other non-Pan American companies and has not been externally audited.
Crisis Management a	nd Comm	unications Planning
Crisis Management and Communications Preparedness	Yes	A risk register including credible threats and risk is kept and communication channels are established for each crisis level; these plans are updated on an annual basis or when deemed necessary and assessment results are shared and updated with Corporate.
		A crisis management team has been created and a Local Crisis Management and Communication Plan (CMP) developed. Shahuindo has reviewed the crisis management and communication plans at the operation level and interviewed the persons responsible for their maintenance.
		Media training has been provided to designated team members.
		A notification protocol is in place.
		A crisis control center has been established.
		Contact information for all stakeholders is kept up to date. The Site manages requests for meetings with local authorities who can provide support in an emergency.
2. Review	Yes	The CMP is reviewed annually with the contact list or when there is a change in personnel.



Criterion	Rating	Comments
		Notification systems are tested through drills, as well as the level of effectiveness of the measures considered in the CMP.
		The facility maintains an alarm system to notify employees and contractors, as well as a radio system.
		Plans are shared with corporate team.
3. Training	Yes	Facility-wide full crisis simulation exercises are conducted annually.
Preventing of Child a	nd Force	d Labour
Preventing Forced Labour	Yes	The Site has a Code of Conduct, HR Policy, vendor qualification program and stating that forced labor is not permitted and has a human rights policy.
		In addition, the Site requests its contractors to provide proof of payment of labor rights for the period on a monthly basis for its workers. The human resources area validates that they make payments to their workers, suppliers and subcontractors.
		In addition, the Site requests police and criminal records of workers, so that they can work at the Site, for its own staff and contractors.
2. Preventing Child Labour	Yes	There are processes proportional to the jurisdictional risks to ensure that no one under 18 years of age is hired. PAS will not employ minors under 18 years of age in its operations.
		The Site has a Code of Conduct which indicates that the work of people under 18 years of age is not permitted. It also has a supplier qualification program in which the age of its staff and their police records are verified, and it has a human rights policy.
Climate Change		
1. Corporate Climate Change Management	А	A corporate climate change strategy has been developed at PAS and includes developing and implementing a corporate standard on energy, emissions and climate change. This process includes setting annual targets at each operation to support meeting corporate targets, setting accountabilities for implementing the standard, assessing material climate risks and opportunities across the company, detailed public reporting on the company's climate strategy. The standard is



Criterion	Rating	Comments
		also supported by a Capital Appropriate Report Process to integrate climate change targets into review of new projects, equipment upgrades, etc.
2. Facility Climate Change Management	AA	The Site has an Energy Management and Greenhouse Gases directive which mentions the commitment of the Environment and Permits Directorate to the management of energy use and GHG emissions, which has been implemented at Shahuindo.
		The Site has an identification and breakdown matrix of the significant sources of energy consumption and GHG emissions. In addition, the Site has monthly and weekly data recording reports based on energy use and emission sources, it also has an energy management committee in which the functions are described.
		The Site conducts an annual review of Energy and GHG Emissions management system, which was led by the Corporate group.
		Physical climate impacts were evaluated and did not identify any significant physical risks, however, the assessment will be repeated in 2024 as part of the Site management system.
		The Site collaborates with COI through participation in a group made up of authorities from the Cajamarca region, which is the CAR (by its acronym in Spanish Regional Environmental Commission). The committee evaluates problems in the region, including environmental issues, in the month of October 2023 the committee determined that Shahuindo and the government will form a committee for Climate Change in the region.
3. Facility Performance Targets and Reporting	A	Energy use and GHG emissions performance targets for the facility and/or business unit been met in the reporting year. Targets are set annually and reviewed on a monthly basis with Senior Management and Corporate to track progress. The PAS has a sustainability report in which data from the Site linked to the annual management of climate change and GHG are reported, in addition, the Site has the carbon footprint report for the 2022 reporting, which is managed through the Ministry of the Environment.



Criterion	Rating	Comments
		PAS has long-term corporate objectives for all its operations. The short-term objective at the Site level are included in the annual objectives and goals. The data on the energy used and scope 1 and 2 GHG emissions are verified by an external audit by the company SGS.
Biodiversity Conserv	ation Man	nagement
1. Corporate biodiversity conservation	AA	The PAS Environmental Standard for Biodiversity and Mine Closure (CG-MA-02) outlines biodiversity commitments for the company.
commitment, accountability, and communications		The PAS Environmental Policy includes commitments to managing risks related to biodiversity and integrating biodiversity conservation into mine planning. The Environmental Policy is consistent with the intent of the TSM Mining and Biodiversity Conservation Framework. It was approved by the Board on March 15, 2021.
		The LSG Biodiversity Management Program (TI-ENV-MAN-01) summarizes biodiversity conservation commitments, including the mitigation hierarchy.
		The Site has shared and communicated the commitment to biodiversity conservation to employees, contractors and relevant on-Site Communities of Interest (COI).
		In addition, roles and responsibilities for implementation of the commitment are clear, and the environmental team has been assigned to implement the commitment.
2. Biodiversity conservation planning and implementation	A	The Site facility level biodiversity conservation processes in place that include a Biodiversity Preservation Directive which seeks to mitigate impacts through the rescue and relocation for sensitive species, monitoring of biodiversity and identification and communication with key COI. These plans are approved by senior management.
		Shahuindo has not had an independent verification of the implementation of the implementation of the management system.
3. Biodiversity conservation reporting	AA	Progress on biodiversity objectives, targets, and action plans is reported to senior management on a quarterly basis; Results inform decision-making.



Criterion	Rating	Comments
		There are Monthly Sustainability Scorecard Presentations - Status of biodiversity conservation projects / initiatives and issues are presented to senior management.
		Progress on biodiversity objectives, goals and action plans are communicated monthly to senior management; results inform decision making.
		Monthly presentations of the Scorecard of the indicators linked to the Biodiversity objectives.
		They also have sustainability reports published annually. An internal review has been carried out on the management of biodiversity linked to the HMS.
		The Site applied a survey to the COIs linked to the perception of biodiversity linked to the Site. However, this activity is recent, and it was not possible to show that comments from the COI have been actively sought in relation to reports on the preservation of biodiversity, and these COI comments are also not public as requested by the AAA level.
1. Water Governance AA		Assessment of water risks and opportunities is integrated into annual business planning and /or budgeting processes through the Site's risk matrix for the operational components, with a 3-year risk projection linked to the operation, considering control measures and those responsible for the findings. Risks to water are also assessed through the environmental license and a matrix called IAIA that considers the environmental aspects and impacts linked to water management. They have a water management committee, which defines roles, responsibilities and accountabilities for water management.
		Processes are in place to track and correct non-compliances with water related regulatory requirements and commitments.
		An internal audit of sustainable water management commitments, roles, responsibilities and accountability was carried out as part of the internal audit.
2. Operational Water Management	А	The Site has a Water Management Committee, which has annual plans for water management, which is fed weekly with the observations and inspections carried out by the



Criterion	Rating	Comments
		Committee, it also has an annual monitoring matrix, This matrix indicates the commitments linked to water by the environmental license. Also the Site controls the risks, through a risk matrix in Excel, this matrix monitors the effectiveness of the controls of the risk identification and analysis matrix referred to the operational management of water within the framework of the HMS water responsibility protocol.
		They have a water management committee, which has specific responsibilities and monthly monitoring of the Site's water actions.
		The Site updates its water balance annually and has integrated climate change into its water balance. An internal audit of commitments, functions, responsibilities and accountability regarding sustainable water management has also been carried out in 2022.
3. Watershed-scale Planning	AA	Relevant watersheds within the impact area of the Site have been identified. Responsibility for watershed-scale planning has been designated at Site and includes a Head of Water Management and the Hydrogeology area.
		Through engagement with relevant COI has taken place, including conducting a survey of the COIs around local practices, customs or beliefs related to water.
		The Site participates in an evaluation group linked to mining in the Cajamarca region called the CAR, through engagement with relevant COI, water-related risks and opportunities in the watershed have been identified and prioritized.
		The Site carries out projects related to water with the COIs, both in supply and in training. In addition, COIs are part of participatory monitoring of water quality and quantity.
		For priority risks beyond the control of the facility, the facility participates in watershed governance of Cajamarca to evaluate and develop collaborative response options.
4. Water Reporting and Performance	AA	Ongoing water management objectives, goals and action plans are established annually, tracked and reported to the Site management and senior management team. Progress is documented and tracked in the Management Plan and through the water management committee.



Criterion	Rating	Comments
		Water-related compliance is communicated to communities of interest through regulatory reports submitted to government agencies. Public water compliance reports include:
		- Water quality and quantity monitoring
		- Annual reports on environmental management
		- Annual performance reports through the Sustainability Report
		- They carry out a verification of the corporate, for the GRI report.
		- The Blue Certificate - They measure the water footprint of the mining unit, which the National Water Authority (ANA) of Peru has evaluated and granted the blue certificate to the Site.
		In 2022, a sustainability report verification readiness assessment was completed. The same criteria that would normally be used for independent verification were applied.
		This process verified the accuracy of public reporting on water performance at the facility level. However, COI comments are not actively sought on water reports as indicated by the AAA level.



STATEMENT OF VERIFICATION 4.

The external verification was conducted in accordance with the Terms of Reference for Verifiers and, accordingly, consisted primarily of interviews, data analysis, and examination (on a sample basis) of other evidence relevant to management's assertion of conformance to the requirements of the TSM performance indicators.

The scores indicated in this report are verified as being accurate based on the evidence reviewed during the external verification of this facility.

Limitations	No limitations to how this verification was to be planned and completed were encountered.
Additional comments	The Pan American and Shahuindo teams were well prepared for the verification process. Their self-assessments were comprehensive, and they were very transparent with document and data sharing.
Name of lead verifier	Erick Chang, VSP
Date of statement of verification	November 24, 2023
Signature of lead verifier	With M.R.



APPENDIX A PAN AMERICAN SILVER / SHAHUINDO **PERSONNEL**

Protocol	Interviewees	Position
Biodiversity	Magaly Chumpitaz	Deputy Manager of Environmental Management - Lima
	Francisco Quevedo	Superintendent of Environmental Management
	Ananías Pantoja Créspulo	Head of environmental Management
	Julio Gastañadui	Head of Water Management
	Jimena Arias	Environmental Management Coordinator
	Hernán Bautista	Environmental Management Coordinator
	Percy Abanto	Environmental Management Engineer
Energy and GHG	Magaly Chumpitaz	Deputy Manager of Environmental Management - Lima
	Francisco Quevedo	Superintendent of Environmental Management
	Ananías Pantoja Créspulo	Head of environmental Management
	Jimena Arias	Environmental Management Coordinator
	Hernán Bautista	Environmental Management Coordinator



Protocol	Interviewees	Position
Water	Magaly Chumpitaz	Deputy Manager of Environmental Management - Lima
	Francisco Quevedo	Superintendent of Environmental Management
	Julio Gastañadui	Head of Water Management
	Jimena Arias	Environmental Management Coordinator
	Hernán Bautista	Environmental Management Coordinator
Tailings	Not applicable	Not applicable
Crisis and Communications	Jorge Salazar Rios	Occupational Health And Safety Manager – Site
	Jackeline Aracelly Sinche	Coordinator Safety - Lima
	Gustavo Llanos Ruiz	Safety Engineer
	Maria Villanueva Avila	Safety Assistant
Indigenous and Community	Antonella Castagnina	Head of Social Management System
	Enrique Paz Espilco	Gerente De Gestión Social – Site
	Vanessa Leon Carrasco	Social Management Assistant
	Sheyla Muñoz Sangay	Social Management Assistant



Protocol	Interviewees	Position
	Roberto Galdos	Social Management Assistant
Child and Forced Labour	Bismarck Adrianzen Rojas	Head of Human Resources
Safety and Health	Jorge Salazar Rios	Occupational Health And Safety Manager – Site
	Jackeline Aracelly Sinche	Coordinator Safety - Lima
	Gustavo Llanos Ruiz	Safety Engineer
	Maria Villanueva Avila	Safety Assistant



APPENDIX B

COMMUNITY OF INTEREST (COI) PARTICIPANTS IN THE VERIFICATION PROCESS

Name	Organization	Protocol Association
Marisol Mendoza	Operational Supervisor, Madoyan Company	Biodiversity
Marco Baca	President of the Amasba Community	Indigenous and Community Relations
Naun Briceño	Amasba Community Leader	Indigenous and Community Relations
Carlos Mendez	Health and Safety Manager, Estracon Company	Safety and Health
Richar Paredes	Super Intendant, Estracon Company	Safety and Health
Bertha Soto	Caserio de Shahuindo de Araqueda, Secretary of the Participatory Monitoring Committee	Indigenous and Community Relations Water Stewardship Biodiversity
Rogelio Pascual	Caserio de Liclipampa Bajo, Local Authority	Indigenous and Community Relations Water Stewardship Biodiversity



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