

TSM Verification Summary Report

Facility Information

Name of company	Pan American Silver
Name of facility	Huaron
Address	Huayllay district of the province of Pasco in the Central Highlands of Peru. The nearest city to the mine is Cerro de Pasco.
Country of operation	Peru
Products/metals produced on site	Silver-rich zinc, lead and copper concentrates
Types of operations included in scope:	
Mining	
Milling	
Smelting	
Hydrometallurgical	
Refining	
Other (please explain)	
Types of infrastructure included in scope:	
Roads	
Rails	
Ports	
Other (please explain)	The mine infrastructure comprises the underground mine workings, processing facilities, existing tailing dam, effluent management and treatment systems, waste rock storage facilities, maintenance shops and warehouses laboratories, storage facilities, offices, drill core and logging sheds, water and power lines, access roads, and the worker's camp and recreational facilities. The primary source of power for the mine is the Peruvian national power grid.



Verifier and Verification Information

Verification firm	Environmental Management Resources (ERM)
Confirmation that all verifiers involved in the	Yes
verification are accredited TSM verifiers	Cecilia Tejada, Principal Consultant, Qualified VSP (Verification Service Provider).
	Erick Chang, Managing Consultant, Qualified VSP (Verification Service Provider).
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	 Document Review: 04/11/2024 – 08/11/2024 Site Visit: 04/11/2024 – 08/11/2024 COI Interviews: 05/11/2024 – 08/11/2024 Reporting: 09/1/2024 – 13/12/2024
Verification period	This is the first external verification of the Huaron Mining Unit. The VSP focused on the 2024 self-assessments provided by the site, with reference to the 2021 - 2023 assessments.
Summary of the verification methodology	Document Review Sampling: Select a sample of documents (e.g., procedures, work instructions, records) to review for compliance with TSM requirements. This helps assess the documentation aspect of the Huaron Management System.
	 Process-Based Sampling. Evaluate inputs, processes, and outputs to determine compliance with established procedures. Included document review, site-based interviews, COI interviews, and reporting.
Summary of the verification activities	Planning Planning for the verification was organized with Pan American Silver (PAS) corporate ESG staff, who also attended the site visit. 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

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	several cases, requested some additional information. Site Visit A visit to Huaron 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.
Was a site visit conducted?	Yes

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.

Summary of Conformance Ratings

Criterion	PAS Rating	ERM Verified Rating	
Indigenous and Community Relationships	Indigenous and Community Relationships		
1. Community of Interest (COI) Identification	AA	AA	
2. Effective COI Engagement and Dialogue	AA	AA	
Effective Indigenous Engagement and Dialogue	А	А	
Community Impact and Benefit Management	А	А	



Criterion	PAS Rating	ERM Verified Rating
5. COI Response Mechanism	AA	AA
Safety and Health		·
Commitments and Accountability	AA	AA
2. Planning and Implementation	AAA	AA
3. Training, Behaviour and Culture	AAA	AAA
4. Monitoring and Reporting	AA	AA
5. Performance	В	В
Crisis Management and Communications Plant	ning	·
Crisis Management and Communications Preparedness	Yes	Yes
2. Review	Yes	Yes
3. Training	Yes	Yes
Preventing of Child and Forced Labour		·
Preventing Forced Labour	Yes	Yes
2. Preventing Child Labour	Yes	Yes
Climate Change Protocol		·
Corporate Climate Change Management	А	А
Facility Climate Change Management	AA	AA
Facility Performance Targets and Reporting	AA	AA
Biodiversity Conservation Management		
Corporate biodiversity conservation commitment, accountability, and communications	AA	AAA
Biodiversity conservation planning and implementation	AA	AAA
Biodiversity conservation reporting	AAA	AAA
Water Stewardship		•
Water Governance	AA	AA
Operational Water Management	AA	AA
Watershed-scale Planning	AA	AA
Water Reporting and Performance	AAA	AA
Tailing Management		



Criterion	PAS Rating	ERM Verified Rating
Tailings management policy and commitment	A	А
Tailings management system and emergency preparedness	A	Α
Assigned accountability and responsibility for tailings management	А	А
4. Annual tailings management review	Α	Α
5. Operation, maintenance, and surveillance	А	А

Summary Comments On Conformance Ratings

	Rating	
Criterion	C, B, A, AA or AAA (unless otherwise indicated)	Examples of Evidence Consulted
Biodiversity Conservation Manag	ement	
Corporate biodiversity conservation commitment, accountability, and communications	AAA	Huaron has an Environmental Policy PAS that includes commitments to manage biodiversity-related risks and integrate biodiversity conservation into mine planning. The Environmental Policy is consistent with the intent of TSM's Mining and Biodiversity Conservation Framework, the latest version of which is dated February 2023. Huaron has shared and communicated the commitment to biodiversity
		conservation to employees, contractors and relevant on-site communities of interest (COI), this was confirmed in interviews with the site contractor.
		In addition, the roles and responsibilities for implementing the commitment are clear, and the environmental team has been tasked with implementing the biodiversity commitment. Huaron also has a commitment with the National Service of Natural Areas Protected by the State (SERNANP), which indicates the intention to work actively for



		biodiversity conservation, and the site has a budget linked to biodiversity management.
Biodiversity conservation planning and implementation	AAA	Huaron has biodiversity conservation processes that include a Biodiversity Preservation Directive that aims to mitigate biodiversity impacts, also has part of the Procedure for Identification of Legal Requirements and Other Requirements (P-PAS PERU-06) is established to implement and use the George System, which helps to identify and systematize regulatory requirements and environmental commitments (including commitments of the Environmental Management Plan).
		In addition, the established objectives and goals detail the actions or Action Plan with operational controls for compliance with biodiversity management. These objectives and targets are approved by senior management, and are followed up on a monthly basis, along with monitoring of the budget.
		Huaron has conducted an internal independent verification in 2023 by RDZ, which conducted an independent verification of the implementation of the biodiversity management system.
		In addition, they have a biannual biological monitoring, this activity is participatory with the staff of the communities and local COI, also as results of these monitoring publications are made which are shared with their social networks Huaron. Huaron also started a reforestation campaign with some of Pan American's employees and as part of the environmental license update has conducted ecosystem services assessments.
3. Biodiversity conservation reporting	AAA	Huaron conducts monthly meetings to review progress on biodiversity objectives, targets and action plans, which are communicated to senior management and used to evaluate decision making. Huaron prepares



		dashboards that are presented monthly. The performance report is presented at the end of the year. The Sustainability Report is prepared annually and includes information provided by the Huaron on biodiversity issues. The PAS Lima team completed an internal audit of the biodiversity information published in the sustainability report. Records of the review and corrective actions taken were provided as evidence. Also, Huaron applied a survey to the COIs linked to the perception of biodiversity linked to the Site, and part of the information is used in the Sustainability Reports and also shared on social networks. Huaron has made the dissemination of the Sustainability Report to internal and external COI through email, letters, an email where they can send their comments, is provided. No comments have been received to date.
Climate Change		
Corporate climate change management	A	Verified in 2023
2. Facility climate change management	AA	It was reviewed and verified that PAS Perú has established the Energy Management and Greenhouse Gas Directive, which outlines the commitment of the Environment and Permits Management to energy use management and GHG emissions, and must be applied in its Mining Units, including the Huaron. Furthermore, Huaron has a Letter of Appointment to implement the Climate Change Protocol, issued by the Manager of the Huaron, Alex Zapata, appointing the Environmental Management Superintendent, Jimmy Antunez (01/08/2024). Furthermore, Huaron has a Regulation for the Energy and GHG Management Committee, that include the assignment of responsibilities for the



members of the Energy Management Committee.

A corporate procedure titled "Preparation of Reports on Energy Use Calculations and Greenhouse Gas Emissions" has been established, providing guidelines for identifying significant sources (emission values over 10%) of energy consumption and GHG emissions. This calculation includes the fuel consumption of contractor companies. The procedure also outlines the guidelines for identifying significant non-energy GHG sources. using the "Calculation Engine" to identify and estimate these significant energy and non-energy consumption and emissions sources. Additionally, GHG data and emissions have been recorded since 2023 in the "Registration Sheets," which were used as input for preparing the 2023 Greenhouse Gas Emissions Report, which is also used for the 2024 report.

A study (WSP, June 2024) titled "Climate Assessment to Support the Working Group on Financial Disclosures Related to Climate" was conducted, analyzing the physical impacts of climate change and adaptation for the Huaron, with projections for 2030, 2050, and 2100. The extreme risk parameter is precipitation. An Action Plan for Potential Physical Impacts of Climate Change (15/10/2024) has been developed, and the progress of this action plan is presented at monthly Energy Management Committee meetings. "Extreme precipitation" has been prioritized as the 2030 objective related to the Tailings Dam as a critical infrastructure: "Extreme precipitation events may affect the tailings facilities, causing slope erosion, water overflow, and sudden flooding." Therefore, actions have been established to increase the dam height and enhance the crown channels. The study is required to be updated every five years, as stipulated by the Corporate Environmental



Standard for Energy, Emissions, and Climate Change.

The PETS (Environmental Technical Procedures) describe internal process actions and controls related to energy use and GHG emissions. It has also conducted training related to these PETS for operators to ensure knowledge and understanding. Examples include:

- PETS-HU-MG-114: Measurement of electrical motor parameters and devices at Pique D. In item 4.2, numeral 11, it specifies the pressure values required for the motor to function properly (a parameter related to energy efficiency).
- PETS-HU-MG-058: Replacement of hydraulic hoses and elimination of oil leaks. In item 4.1, numerals 7 and 8, it outlines actions to prevent spills (a parameter related to energy efficiency).
- PETS-HU-MG-025: Tire assembly and inflation in workshops. The item 4 table specifies the pressure values that the tires must have (a parameter related to energy efficiency).

Additionally, a flyer has been created to provide information on parameters affecting energy performance (emission sources and energy consumption), which has been disseminated and trained through various communication channels: Working groups at Huaron, the "Turn On Savings" campaign.

The annual review of energy management is conducted each year (29/04/2024) in the Energy Management Committee, with participation from the corporate office.

The Change Management Procedure applied at Huaron establishes that for any new project or change, the Environment department verifies the compliance with applicable environmental criteria, including energy-related aspects, which are also identified in the CARs (Capital Requirement



Requests) of the projects. For example, a project in the exploration area was reviewed for execution, and the construction of diversion channels had to be included in its new design as a control measure for heavy rainfall.

The Annual Training Program for 2024 includes training for employees on the Energy Protocol. It also promotes awareness among workers and contractors regarding compliance with their Environmental Performance Indicators (EPIs), which include training on topics such as "Energy - GHGs and Climate Change".

It was reviewed and verified that Huaron conducted a Perception Survey in September 2024, measuring the level of importance of climate change mitigation and adaptation among COIs (Contracted Operating Units), contractors, the community, authorities, etc. As part of the analysis of the perception surveys applied to the COIs at Huaron, the following projects are being implemented:

- A shared value project titled "Training and Raising Awareness for the Residents of the Caserío de Condorcayán on Efficient Water Use," aimed at addressing their habits on efficient water use and preparing them to cope with the effects of climate change.
- Training on pasture planting as part of the Livestock Project, aimed at informing and reinforcing COIs' skills on the most effective ways to plant pastures and prepare them for the impacts of climate change.
- Huaron has conducted an internal audit of the energy and GHG management system (14-15/08/2024). An independent verification process (external audit) of its source data, conversion factors, and others was carried out with SGS in 2023 for



		calculating the Carbon Footprint, based on ISO 14064.
Facility performance targets and reporting	AA	Huaron has established objectives related to energy management and GHG emissions for 2024, aligned with corporate goals:
		SPI-E4 Energy – Reduce total energy consumption compared to the baseline, which includes all energy sources. Reduce to 1,301 GJ.
		SPI-E5 GHGs – Reduce total GHG emissions produced by the total energy consumption compared to the baseline. Reduce to 86 TnCO2eq.
		The achievement of these objectives is being made possible through two projects: "Sprinkler Irrigation System at Tailings Dam No. 5," a project with implications for reducing GHG emissions (Scope 1), and the "Installation of a Timer at House 39 – San José" project, which is addressed as a performance objective for reducing electrical energy consumption (Scope 2). These actions are part of the short-term and long-term objectives to reduce GHG emissions and improve climate change preparedness by 2030. No offsets are used to achieve these goals. These objectives and their progress/compliance are presented monthly at the Central Committee and the Energy, GHG, and Climate Change Committee. The objective was met in 2023, and progress is reflected in 2024.
		The procedure "Preparation of Reports on Energy Use Calculations and Greenhouse Gas Emissions" specifies that standard methodologies must be used and referenced in the carbon footprint engines for each mining unit (e.g., IPCC, DEFRA, Info Carbon, among others). These methodologies are specified in the Calculation Engine, and the methodology is applied to each emission.
		The following public reports are available:



		GEI Inventory on the MINAM Platform,
		which is a public report with free access.
		2023 Sustainability Report prepared by the Corporate Office (Public Report) that demonstrates and references the energy inventories and GHG emissions specifically for the Huaron, available on its website and social media (Facebook, LinkedIn).
		It was reviewed and verified that Huaron, through its 2023 Sustainability Report (public report), provides information on the evaluation of potential physical climate impacts. Additionally, it was published on LinkedIn that a workshop was held with the Huallay municipality, and if interested, those wishing to learn more about the actions Huaron has taken regarding these matters can request information at the Permanent Information Office in both Huallay and Huaychao.
		Huaron has undergone the independent verification process (external audit) of its source data, conversion factors, and others for Scope 1 and Scope 2, conducted by SGS in 2023 for calculating the Carbon Footprint.
		Furthermore, the mechanisms for receiving feedback on the Public Reports are outlined in the Disclaimer (last page of the Sustainability Report), where users are informed that any inquiries about the document (feedback) can be communicated through the provided email addresses. To date, no inquiries have been received.
Crisis Management and Commun	ications Plann	ing - FACILITY (YES)
Crisis Management and Communications Preparedness	YES	Based on a review of Emergency Preparedness and Response Plan (PL-HU-SEG-01), Huaron has a Crisis Management and Communications Plan (P-PAS PERU-082), developed by the Internal Protection and Risk Management Manager and approved by Vladimiro Berrocal (General Manager)



on 06/09/2024. This plan is a controlled document. There is evidence of delivery letters for this plan to the members of the Huaron LCMT(Local Crisis Management Team), which include the contact list. Additionally, this plan is stored in the shared folder CORP-TSM, which is accessible to all members and corporate management in Vancouver/Canada.

The team for Crisis Management in Peru is the LCMT that works jointly with the ERT (Emergency Response Team) at Huaron. The Crisis Management and Communications Plan includes the functions of the LCMT, its responsibilities, and roles. Huaron has five spokespersons who participated in a "Media Training Workshop" (13/09/2024). A spokesperson, Elias Chuquirasi – Superintendent of Social Management, was interviewed and confirmed as competent to execute his role.

This plan identifies 14 credible risks for Huaron, including those related to underground mining as well as crosscutting risks due to the context (e.g., concentrate convoy attack, theft, and security risks). Each identified risk has an associated protocol for its management.

The NOGGIN, a corporate PAS tool, is used to activate, notify, and manage a crisis. Within the LCMT, there is a coordinator or planner role, who keeps records of the crisis and must include them in NOGGIN. This tool has been in use at the corporate level since 2023.

The communications area in Lima is responsible for maintaining an updated list of media contacts. At the Huaron level, the social management area keeps key stakeholders updated and channels communications to the media and stakeholders. The social management area is responsible for following up on commitments arising



with these stakeholders through NOGGIN.

Huaron has a physical crisis control center, the Boardroom on-site. This room is equipped with the minimum information required by the Crisis Management and Communications Plan. It has internet connection and a screen that allows remote connection with the Lima office to coordinate with other LCMT members.

The mechanisms for alerting employees when a crisis is triggered include audible crisis operational systems, radios, emails, and NOGGIN, through which members of the Committee are notified, and it is their responsibility to notify their employees about the crisis activation. For crisis monitoring, posters, signs, and bulletins are used.

The Occupational Health and Safety management of Huaron held a meeting (17/08/2024) with the Head of the Risk Management Unit of Huallay, in which they discussed the Crisis Management and Communications Plan. They agreed (Letter 001-2024-SSO) on the importance of joint participation and the integration of the mining unit into the integrated risk platform, which includes emergency response organizations, among others.

Additionally, Huaron participated in the INDECI (National Institute of Civil Defense) Regional Workshop (29/10/2024), where it presented emergency and crisis actions to be developed in the event of a catastrophic El Niño.

It is verified that Huaron has held meetings with the leaders of the Huallay community (photos) and a meeting with the emergency officer of the Huallay municipality. Furthermore, on 25/10/2024, a record of the interinstitutional cooperation meeting with the Huallay police station was verified, aimed



		at strengthening mutual support in the event of an emergency/crisis.
2. Review	YES	The Crisis Management and Communications Plan is reviewed annually (the previous review was on 23/07/2023). It is evident that the plan was modified due to the appointment of the new General Manager of PAS Peru and because improvements were made to the scope of actions for each mining unit (Huaron, La Arena, Shahuindo).
		Two drills were conducted in 2024 (May and November) at Huaron, testing the activation of the LCMT, and it was concluded that the activation process is effective. Additionally, on 18/09/2024, a desk drill was conducted solely to verify the notification process to the LCMT. A multi-hazard drill was also held on 31/05, where the crisis alert was activated for all employees. Sirens and notifications were triggered.
		The social management team is responsible for permanently updating the contact list for the media and stakeholders, and for communicating any modifications to the Crisis Committee responsible.
		Huaron has a CORP-TSM Teams folder where all information related to TSM protocols is shared, including the approved Crisis Management and Communications Plan. Access to this folder by the corporate office management is verified.
		The Manager of Asset Protection is responsible for ensuring that the members of the committee are familiar with the plan. Therefore, a training session was held on 03/09/2024, where all the managers participated. Furthermore, Huaron has a new mining unit manager (appointed 04/11/2024), and their training on the Crisis and Communications Plan has been scheduled as part of their induction process.



3. Training	YES	Huaron conducted a desktop crisis drill
3. Hailing		on 18/09/2024, where the participation of the Committee members was tested. The previous desktop drill took place on 08/11/2023, focusing on the "Tailings Dam Breach," and was activated only at the Huaron Peru level.
		On 23/09/2022, a Level III (crisis) drill was held on the "Mineral Concentrate Spill" along the alternate route San Jerónimo (in front of Julio C. Tello School) – Matucana – Huarochirí, where emergency response personnel were physically deployed, including: Fire Company No. 32 Chosica, San Jose Hospital of Matucana, Matucana Police Station, Matucana Security, Ambipar, Transagui Personnel, G4S Personnel, and PAS Administrative Staff.
Indigenous and Community Rela	tionships	
1. Community of Interest (COI) Identification	AA	Huaron has a Procedure for Stakeholder Identification and Communities of Interest Management (P-HU-GS-002, version 1, approved 26/09/2024) that establishes the identification of stakeholders based on its Social and Environmental Impact Assessment. This is completed and updated through the Stakeholder Analysis Matrix, which includes local COIs (Communities of Interest). This Matrix identifies the interests and concerns of each COI. The procedure includes the following process: Self-identification of COIs through an annual survey. COIs identified include indigenous persons. It is also possible to visit the Customer Service Offices, speak with the community relations representative, and self-identify. Descriptions of relevant attributes for identified COIs: A process ensures that the information is kept updated. The annual survey includes relevant attributes for COIs (e.g., gender, education, indigenous origin, ethnicity, religion, age, etc.), and the results are fed into the Stakeholder



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2 Effective COI Engagement and	ΔΔ	Analysis Matrix (on a monthly basis in IsoMetrix). Provisions to protect confidentiality: Where requested by a COI, the surveys developed in September 2024 are anonymous, and COIs are addressed as groups. The P-PAS PERU-069 Monitoring of Current Affairs and Conflict Prevention (26/09/2022), item 5.1 Monitoring of Actors, states that this identification of COIs is carried out monthly or quarterly, depending on the social context of Huaron, and includes a social temperature indicator to analyze risk levels. Additionally, the process includes: Under-represented COI within the local context: The Huallay and Huaychao communities have been identified as indigenous peoples, as declared by the Ministry of Culture. COI whose interest in the operation may be indirect and issues-based: the Stakeholder Matrix includes Congressman Pasion Davila, who on 13/09/2024 sent a letter to the Social Management Superintendency of Huaron expressing his social commitment to Pasco. As part of the consultation and participation process in the latest MEIA (Modification of an Environmental Impact Study) of Huaron in Huallay, the COI identification was shared for them to provide feedback on the identification process, as well as a list of preliminary COIs. Based on interviews conducted with the leaders of the communities of Huallay and Huaychao, they value this open process that allows them to leave comments. Huaron has a "Stakeholder Engagement to the comments.
		process, as well as a list of preliminary COIs. Based on interviews conducted with the leaders of the communities of Huallay and Huaychao, they value this open process that allows them to leave
2. Effective COI Engagement and Dialogue	AA	Huaron has a "Stakeholder Engagement and Management Plan" that focuses on key areas of social intervention (Health, Education, Capacity Building, Alternative Income to Mining, among others), creating spaces for interaction and coordination with the COIs (Stakeholder Organizations). The dialogue and



inclusion mechanisms developed during this evaluation period are as follows:

- PAS Cooperation Agreement with UGEL Pasco, which coordinates with the Local Educational Management Unit of Pasco to fulfill the social commitments made in the Education area and includes interaction with represented COIs.
- Periodic meetings and visits with the represented COIs (e.g., mayors, community leaders of Huayllay and Huaychao).
- Community relations staff at the Permanent Information Offices (OIP) in Huayllay and Huaychao, addressing concerns from those who have them.
 Internal reports involving COIs are produced, such as:
- Daily reports to Senior Management regarding interactions with COIs and relevant issues.
- Monthly reports on interactions with COIs across different intervention areas, through Dashboards and Monthly Committees.

As formal participation and dialogue processes with COIs, there is a Social Communication and Local Relations Procedure, item 5.4 Communication Channels, which outlines meetings with community committees, authorities, families, campaigns, posters, suggestion boxes, leaflets, workshops, letters, calls, social media channels, etc.

The OIPs are also available to address concerns face to face. Each of these mechanisms can feed into the query resolution process, with records maintained in IsoMetrix.

Huaron has developed the "Integrated Livestock Project in Huallay," which was designed based on consultations with COIs and the company's four partners. There is also documented evidence of the consultation and participation process for the update of the Environmental Impact Assessment (EIA), as well as results from Participatory Environmental Monitoring.



In the monthly reports of the Social and Corporate Affairs Department, the status of commitments with COIs and the outcomes of their participation and consultation activities are presented. Additionally, the bi-monthly "Santuario de Plata" newsletter showcases the results of commitments made with the involved COIs. All communications (reports, press releases, letters, posters, radio spots, etc.) are written in Spanish, and educational materials are designed to be understood through visuals (for illiterate individuals).

Capacity development needs are identified through ongoing meetings with the mayors and leaders of the Huallay and Huaychao communities. For example, the Integrated Livestock Project provides technical assistance to community members, as well as services for their livestock to improve production. Huaron data is published on the Annual Corporate Sustainability Report. This report graphically presents the results of PAAS Listening:

Issues/concerns/complaints by category in 2023.

Additionally, the Annual Commitment Declaration (DAC) is presented as part of the legal compliance in Peru, outlining Huaron 's social participation topics. Furthermore, radio spots are aired, and posts on Facebook regarding COIs participation, artisanal women, and other topics are shared on local radio stations. Through the participation mechanisms outlined above, COIs express their concerns and improvements that may impact them, providing a foundation for the social management planning of Huaron. This was also reflected in interviews with COIs (community leaders from Huallay and Huaychao). The Huaron Commitment Matrix integrates all commitments, both from the Environmental Management Instruments and those related to agreements with COIs (including underrepresented ones). Additionally,



		records from the complaint and query
		resolution process are systematized in
		IsoMetrix, where it is possible to identify
		which COIs is the most engaged
		(Huallay).
		One of the public mechanisms for
		obtaining feedback from COIs on
		participation and project execution
		results is through radio spots and press
		releases. The newsletters shared in the
		Permanent Information Offices also
		describe the progress of projects and
		commitments. Social media is also used
		for activity dissemination. For example,
		in October 2024, Huaron participated in
		a workshop organized by COER
		(Regional Emergency Operations
		Center) Pasco and INDECI (National
		Institute of Civil Defense), where it
		presented its Risk and Contingency Management Plan. This was published
		on LinkedIn, with information on how to
		request further details through the OIPs
		via WhatsApp and email.
3. Effective Indigenous	Α	The Corporate Sustainability Policy from
Engagement and Dialogue		PAS, Commitment No. 06 states: "To
Zingagement and Zialegae		recognize and respect the rights, cultural
		values, beliefs, knowledge, and
		traditions of Indigenous Peoples present
		in the areas where we operate; and with
		the intention of achieving free, prior, and
		informed consent, related to impacts on
		the rights of Indigenous Peoples directly
		affected."
		Through REPORT No. 000047-2023-
		DCP-RPC/MC (02/05/2023), the
		communities of Huallay and Huaychao
		are recognized as peasant communities,
		identified as part of the Quechua people,
		in accordance with the information
		provided by the BDPI (Indigenous
		Population Database). Given the scope
		of the communities recognized as
		Indigenous Quechua (Huallay and
		Huanchao), Huaron already maintains
		formal processes with these COIs.
		The personnel of Huaron have
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		demonstrated competency for engaging



Huaychao. Additionally, the social management department has a Code of Good Relations that supports this engagement, and staff have received training on Indigenous Peoples (14/09/2024).

Huaron demonstrates its commitment to Indigenous participation through its Corporate Sustainability Policy PAS. particularly in items 6 and 7, which are related to Indigenous Peoples and are being disseminated as part of the induction for all new entrants to Huaron. These commitments are reflected in the participation of social management in cultural events (e.g., Señor de los Milagros-Huaychao and Huallay, Day of the Farmer in Huallay). They are also involved in the consultation processes for the Environmental Impact Assessment (EIA) 2024 to ensure free, prior, and informed consent. Furthermore, they have equitable access to job opportunities, as they participate in local employment calls under the same conditions. The sustainable projects carried out by Huaron also extend to the Indigenous Peoples, for example, the Integrated Livestock Project.

The processes for interacting with Indigenous Peoples, as part of their engagement actions, include:

- a) Studies on issues of interest in both communities.
- b) The same language is used.
- c) There are agreements in place.
- d) Community relations staff participate in cultural events as part of the Traditional Festivities Program.
- e) A partnership agreement with Huaychao was signed in 2022.

Since both the Huallay and Huaychao communities are within Huaron 's area of influence, agreements are maintained with them. In the case of the Huaychao



		Agreement, collaborative opportunities are identified, and participation in the festival calendar is included. Furthermore, the social management department has produced a Social Management video, which is being disseminated across PAS, contracted companies, and externally via local television.
4. Community Impact and Benefit Management	A	Huaron has a Corporate Sustainability Policy from PAS, which was communicated to all PAS business units by email (February 2022). Additionally, there is a procedure P-PAS PERU-069 Monitoring of Context and Conflict Prevention (26/09/2022), approved by the Director of Social and Corporate Affairs, item 5.2 Social Temperature Measurement, which helps identify the impact on the COIs (Indigenous Organizations) from activities related to Huaron and allows the social management department to act based on the results. This review is ongoing. This procedure outlines the responsibilities of the social management staff for handling these tasks.
		A Social Impact Matrix (September 2024) is available, which identifies the involved COIs. This matrix includes mitigation actions for impacts, such as environmental impacts and impacts on community safety and health, for example, alteration of water resource quality (environmental), disruption of local road traffic (safety and health), and disruption of housing areas (social).
		There is also a formal procedure P-PAS PERU-62 for Request and Donation Management, which establishes how decisions regarding community contributions will be made and how priorities will be set.
		The social management department is responsible for the formal follow-up of impacts and trends every six months as part of the Impact Assessment and



Management Procedure, which is reviewed at the level of the PAS Peru Corporate Affairs Directorate.

To engage with the COIs in the identification, prioritization, and mitigation of actual and potential adverse impacts, Huaron has a Participatory Committee that meets monthly, including the social and environmental management departments and other relevant members. Other processes include participation and consultation for environmental project impacts (update of the EIA), the Procedure for identifying and implementing impacts with COIs, and the Procedure for social work/engagement with COIs (including participatory techniques and methods for COI contributions), as well as participation in regional disaster management plan workshops.

In the Social Impact Matrix associated with environmental, occupational health and safety impacts at Huaron, the relevance of COIs is considered for impacts attributable to the operation, environment, and community health and safety. Examples include water resource quality alteration (environmental), disruption of local traffic (safety and health), and disruption of housing areas (social). This matrix also identifies significantly affected COIs (including underrepresented ones). In February 2024, Huaron took action to address risks from two lagoons near the La Rosada settlement by raising the height of the dam. This was verified to successfully mitigate the impact of rainfall, ensuring the dam contained precipitation.

Action plans for prioritized impacts with COIs have been identified. For example, in October 2024, Huaron participated in a workshop organized by COER Pasco and INDECI, where it presented Huaron 's Risk and Contingency Management Plan, with actions



executed (related to the effects of climate change on tailings infrastructure). It was communicated that actions such as slope growth and improvements to crown channels could also benefit the community during intense rainfall events. Another example is the update of the Relationship Plan, which establishes actions to be developed. This plan outlines objectives, monthly reports to track progress, and quarterly corporate reports.

It was reviewed and verified that, within the follow-up meetings held with the COIs involved in the projects, activities are prioritized, and changes can be made to improve the project regarding acquisitions and employment. For example, the update of the Baseline Study in August 2024, which describes the community interests, was developed, and a prioritization list was created based on studies of Economic Activities (IASD).

The establishment of agreements with local authorities is the formal method to report on contributions to COIs for community initiatives, such as the servitude agreement with Huallay.

The 2023 Sustainability Report is published on the PAS website and it is also shared on Huaron' social media. It has newsletters, press releases, external videos, and radio spots where contributions linked to social initiatives are described in general terms. As for current contributions, there is a monthly review of the agreement execution with the Huaychao community, where progress on the contributions generated is reported. Additionally, baseline data reports for high-impact areas are available, such as in the update of the **Environmental and Social Impact** Assessment Study in 2024.

A CDI (Community Development Initiative) tool and Key Performances Indicators (KPI) are available for



		initiatives related to impact mitigation action plans. To verify effectiveness, the team indicated that no complaints or claims have been related to this issue. Huaron reviews the results of its management with COIs regarding the implementation of community development initiatives, for example, through monthly meetings on its main projects: the Integrated Livestock Project, the Textile Project, and the Tourism Promotion Project.
5. COI Response Mechanism	AA	The Attending Consultations and Resolution of Claims Procedure, includes a Register for concerns raised by the COIs, which lists all issues. The procedure specifies a maximum response time of 15 days for addressing the concerns of the involved COIs, and it is accessible at the OIP (Permanent Information Office). Based on interviews with leaders from the Huallay communities and local mayors, it was indicated that the established mechanisms for handling complaints and resolving issues are highly appreciated and valued. This register includes the traceability of the issue, enabling the identification of causes and assigning responsibilities for the proposed actions. This procedure is reviewed annually. Huaron has conducted training, issued newsletters, made family visits, and sent WhatsApp messages to various stakeholders to inform the COIs about the complaint and grievance mechanism. Based on interviews with leaders from the Huallay communities and mayors, it was indicated that the mechanisms established for the complaint and grievance resolution process are excellent and commendable. In the OIPs, there is a form where individuals can submit any queries or suggestions for improvement related to the complaint and grievance process. This register includes opportunities for process improvements.



Preventing of Child and Forced Labour (Indicate YES or NO)			
1. Preventing Forced Labour	Yes	Huaron has an internal Work Regulations, a Code of Conduct, and a supplier qualification program. Additionally, there is a qualification assessment process to evaluate new staff members joining Huaron. In addition, prior to the entry of personnel, a Checklist on labor obligations must be completed, as forced labor is not allowed. The Human Resources team also manages a SharePoint in which they follow up on the management of contractors, in which a monthly follow-up of payment compliance, legal and insurance payments and legal compliance is made. If there is a failure in payment or legal compliance, the contracts area calls the contractor's attention, and if it is repeated, the contracts area imposes sanctions. In addition, the construction site requests the police and criminal records of the workers, so that they can work at the site, for its own personnel and contractors. In addition, a basic general induction is provided for all persons entering the site, which includes labor compliance issues, occupational health and safety aspects, and guidelines for general services offered at the facilities to ensure a safe stay that respects the integrity and rights of the workers. Training is also provided on human rights, child labor, and forced labor.	
2. Preventing Child Labour	Yes	Processes commensurate with jurisdictional risks are in place to ensure that no one under the age of 18 is employed. Huaron will not employ anyone under the age of 18 in its operations. It has a Code of Conduct that indicates that no employment of minors under the age of 18 is permitted. It also has a supplier qualification program that checks the age of its personnel and their police records.	



Safety and Health			
1. Commitments and Accountability	AA	Huaron demonstrates a strong commitment to safety and health through its Health and Safety Policy, which is communicated to both employees and contractors. Huaron has assigned safety responsibilities through an official designation letter to the senior management representative, as well as to the Site and Occupational Health and Safety Managers. The responsibilities derived from the Health and Safety Management System are understood at all levels. Additionally, an internal audit of the Health and Safety Management System was conducted in November 2023. The audit observed a clear commitment to safety and health at the site, with ongoing monitoring of indicators and the management system. This commitment is also evident on-site, where both workers and interviewed Occupational Health and Safety Coordinators (COI) highlighted the strong focus on safety and health, which is managed through the site's plans and procedures.	
2. Planning and Implementation	AA	It was verified that Huaron has an integrated occupational health and safety management system, which includes a policy, objectives, goals, plans, and procedures tailored to the site's specific needs. The system incorporates elements that define a clear process for investigating and reporting incidents in compliance with national legal standards. Huaron also has a dedicated team for safety management, with clearly defined responsibilities and roles based on job positions. There is a process of inspections and internal audits to verify and monitor safety and health objectives, ensuring the achievement of the set goals for the year. Huaron performs monthly verification of critical controls through follow-up and	



		result presentation meetings, as well as supervision of Bow Tie and the identified critical controls. Additionally, the facility has conducted an internal audit of its health and safety management system.
3. Training, Behavior and Culture	AAA	Huaron has a Health and Safety Training Plan for employees and contractors, which is updated annually. There are also orientation programs for on-site employees, contractors, and visitors.
		Health and safety are integrated into business planning, purchasing decisions (selection and qualification), performance evaluations, and compensation (annual safety incentives).
		The facilities have implemented a Wellness Program and Mental Health Plans to promote healthy lifestyles, supported by a medical team on-site.
		Furthermore, Huaron's general and safety management visibly demonstrate their commitment through individual interactions with employees. Monthly meetings are also held with the national director from the Lima office and the operational management of various areas.
		Additionally, programs have been implemented to assess the effectiveness of trainers and the evaluation of individuals receiving training. During interviews with Occupational Health and Safety Coordinators, the commitment to site safety and health was highlighted through the site's programs, plans, and daily safety management.
4. Monitoring and Reporting	AA	There are audit and internal inspection programs in place, including evaluations led by Huaron's management, as well as a cross-audit program. In this program, experienced personnel from other PAS mining units conduct audits across various mining units within the group to assess best practices.



		Monthly reviews of the Occupational
		Health and Safety Management System are carried out, with follow-up on the achievement of objectives and goals through various tracking tools such as the Performance Index Program (IDS), planned task observations (OPT), verification of operational standards (VEO), and Safe Acts Indexes (IAS). These reviews are conducted with the mining unit manager, followed by further assessments in Lima and then at the corporate level.
		The Safety and Health Committee also holds monthly meetings, consisting of representatives from both workers and the site. These meetings track the progress of health and safety management. The results are also presented in public reports, such as the sustainability report, which covers safety and health management.
		Additionally, the facility has conducted an internal audit of its Safety and Health Management System.
5. Performance	В	Huaron has established health and safety performance objectives for facility employees, which are communicated through monthly reports, in-person meetings, and emails. Huaron recorded a fatal accident at the site in 2024.
Tailings Management	1	
Tailings management policy and commitment	A	Huaron has conducted an internal audit (October 2024) carried out by the Corporate Senior Director of Critical Facilities, using the Compliance Table to verify the fulfillment of requirements.
		The Tailings Management Policy, approved in November 2024, complies with the guidelines established in version 3.2 of the Tailings Guide. It has also been approved by the new General Manager of Huaron, as confirmed by a Designation Letter stating that Favio Chonta is responsible for ensuring compliance with the Tailings Protocol.



		This policy includes a process to ensure that:
		It is communicated to employees through posters placed in various offices on site, a specific video of the operation, and training sessions for contractor companies (e.g., EMICONSATH).
		It is understood in terms of roles and responsibilities, with evidence of memorandums being delivered to different areas of Huaron, outlining their responsibilities in tailings management. Additionally, there is an evaluation of understanding of their roles (October 2024) and a RACI (responsible, accountable, consulted, informed) matrix for tailings management.
		 Budget allocation, with a specific allocation within the resource budget for the tailing's facility. Priority sessions are held to approve the budgetary activities.
2. Tailings management system and emergency preparedness	A	Huaron has developed and implemented a Tailings Management System and an Emergency Preparedness and Response Plan in accordance with the Tailings Guide version 3.2.
		An internal audit was conducted by the Corporate Senior Director of Critical Facilities, using the 2022 Compliance Table to verify the fulfillment of requirements related to the tailings management system.
		The tailings management system has been developed and implemented in accordance with the Tailings Guide 3.2, which includes:
		The 2024 risk assessment.
		 The 2024 Operational Monitoring and Safety (OMS) manual.
		 The 2024 Tailings Storage Facility (TSF) Emergency Preparedness and Response Plan (EPRP).



		Regular instrumentation and inspection reports generated by the site, including daily inspection reports.
		 Performance evaluation reports conducted by the Engineering of Record (EoR): Inspections (e.g., DSI 2024) and quarterly instrumentation performance evaluation reports.
		Trigger Actions Response Plan (TARP) for critical controls and alert levels.
		 A Dry Tailings Storage (DSR) was completed in 2021, and the new one is scheduled for 2025.
		Huaron has developed an Emergency Preparedness and Response Plan for the Tailings Storage Facility (PL-HU-PC-GR- 01, approved September 2024) for the tailings area, which includes the latest analysis of dam failure and the most recent increase in dam height.
		The conducted drills were:
		29/06/2023: Level 2 emergency drill - Possible Tailings Dam Collapse.
		30/08/2023: Level 2 emergency drill - Possible Tailings Dam Collapse.
		25/02/2024: Level 2 emergency drill - Possible Tailings Dam Collapse.
		• 31/08/2024: Tailings Dam 5 failure drill
3. Assigned accountability and responsibility for tailings management	A	The internal audit conducted in October 2024 by the Corporate Senior Director of Critical Facilities used the Compliance Table to verify the fulfillment of requirements related to responsibilities and accountability.
		A Roles and Responsibilities Matrix is in place, ranging from the Board of Directors at the corporate level of PAS to the local level of positions at Huaron. This same RACI Matrix is included in the OMS (September 2024). Additionally, Designation Letters are in place from the corporation to the Site Management.



		At Huaron, the communication is direct and the reports generated by the Corporate Director of Critical Facilities (including tailings, dams, and heap leaching) are sent to the Responsible Executive (AEO) and subsequently discussed with the Chief Operating Officer (COO) and the Senior Vice President of Technical Services (SVP Technical Services) for later presentation to the HSE Board Committee. The roles and responsibilities of key employees and consultants working in tailings management are included in the OMS manual (September 2024). The role descriptions for the EOR and others are included in the OMS. The Corporate Senior Director of Critical Facilities is also a qualified person and a registered
4. Annual tailings management review	A	engineer in British Columbia, Canada. Huaron has conducted Management Reviews in 2021, 2023, and 2024, the latter in compliance with all the level A requirements.
		An internal audit was carried out (October 2024) using the 2022 conformity table to verify compliance with what needs to be addressed in the Management Review.
		It was confirmed that Huaron has been conducting annual Management Reviews (November 2023 and November 2024).
		The November 2024 Management Review was carried out in accordance with version 3.2 of the Tailings Guide. This management review addressed:
		- The status of actions arising from the 2023 management review; and
		- The adequacy, sufficiency, effectiveness, and need for changes in:
		The tailings management system;
		The ERP and PPE; The OMO manuals.
		The OMS manual;



		 The performance of the tailings facility;
		 The effectiveness of risk management;
		The sufficiency of resources allocated to tailings management; and
		 The integration of the tailings management system with the safety and environmental systems.
		It was also evidenced that this has been communicated to the Board and the EOR (Dennis Parra-ANDESS).
5. Operation, maintenance, and surveillance	A	Huaron has developed the OMS Manual (M-HU-PC-GR-01, approved in September 2024), approved by the site management, which details the key aspects of design, protocols, documentation, permits, roles and responsibilities, maintenance and monitoring procedures, including identified failure modes and critical controls.
		An internal audit was conducted, determining that the OMS Manual is in compliance with version 2.1 of the OMS Guide.
		The OMS Manual includes details about roles and responsibilities (organization chart, RACI matrix), a description of key designs, and a list of documentation and permits; details about critical controls, the main operational components for the tailings storage facility (TSF), the transport system, and the water recovery systems; general maintenance procedures and monitoring protocols. The manual also includes TARP for instrumentation and other key performance indicators.
Water Stewardship		
1. Water Governance	AA	PAS has a Water Management Directive that reflects the commitment of the Occupational Health and Safety, Environment, and Permits Management to water responsibility, which must be implemented in its Mining Units,



		including the Huaron. Additionally, the Water Management has been promoted through informational posters. The evaluation of risks and opportunities related to water is integrated into the annual business planning and/or budgeting processes. A water management committee is in place, responsible for defining the functions, responsibilities, and accountability in this area. Through the monitoring of the site's water management committee, operational components are tracked, considering control measures and those responsible for the outcomes. Water-related risks are also assessed through the environmental license, the George platform, and the procedure for Identifying Legal and Other Requirements (P-PAS PERU-06). There are established processes for monitoring and correcting any non-compliance with regulatory requirements and commitments related to water. The Huaron Mining Unit conducted an internal audit to assess compliance with the commitments, functions, responsibilities, and accountability in the sustainable water management process.
2. Operational Water Management	AA	Huaron has a Water Management Committee, which has annual water management plans, updated weekly with the observations and inspections carried out by both the Committee and the operational area. Additionally, a follow- up is conducted on legal compliance and the site's environmental permits, monitoring compliance with regulations as well as the plans and programs outlined in the environmental license. Huaron also conducts inspections of the mining components related to water resources and the controls implemented, in order to verify their proper management and effectiveness. The inspections are recorded in the PAS report, where deviations related to water, as well as unsafe acts and conditions, are tracked. The site also has an



		Emergency Response Plan, which includes five specific procedures to address water-related emergencies. Huaron has incorporated climate change into its water balance, which is up to date. The latest version of the balance was completed in September 2024, and the final version of the report was observed during the verification.
3. Watershed-scale Planning	AA	Huaron has identified the relevant watersheds within the site's impact area. The responsibility for watershed-scale planning has been assigned to the Environmental Management Superintendent.
		Additionally, the identification of relevant Communities of Interest (COI) was carried out. To better understand water resource use, Huaron has developed and applied surveys to the COIs. These surveys collected information on various factors, including practices, beliefs, customs, and local traditional knowledge related to water.
		Huaron, through the Environmental Management Superintendent and/or the Senior Environmental Management Engineer, actively participates in watershed groups convened by the National Water Authority (ANA). It also participated in the National Water Forum, an event where the results of national water management were presented, with presentations by the highest authorities on water management (Minister of Agriculture and Irrigation, Minister of the Environment, Head of the National Water Authority). Furthermore, for 2024, Huaron requested the Annual Program 2024 from the ALA Pasco to participate in the Watershed Committee.
		Huaron implements water-related projects in collaboration with the COIs, both in terms of water supply and training. Additionally, the COIs



		participate in the monitoring of water quality and quantity. In the case of priority risks beyond the facility's control, the site participates in watershed governance through the National Water Forum and with the ANA, in order to assess and develop collaborative response options.
4. Water Reporting and Performance	AA	Huaron has annual objectives, goals, and action plans for water management. For 2024, these were focused on reducing fresh water consumption. The objectives and goals are monitored and communicated to the Site Management and the executive team, who track them monthly through indicators that are managed in the Management Plan and through the water management committee.
		Performance related to the established objectives and goals is included in the Sustainability Report (public report). Additionally, Huaron, through the environmental license, conducts monitoring of water quality and quantity, in which the Communities of Interest (COI) participate.
		In 2024, an independent audit was carried out by the Management Systems team and the Environmental Submanagement of the Lima office to evaluate and review the data that would be reported in the sustainability report.

Statement of Verification

Statement of Verification			
The external verification was conducted in accordance with the <i>Terms of Reference</i> for <i>Verifiers</i> 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 external verification was conducted in accordance with the TSM Verifier Terms of Reference.		



The scores indicated in this report are verified as being accurate based on the evidence reviewed during the external verification of this facility.	☐ The scores in this report are considered accurate based on this verification.
Limitations	NA
Additional comments	NA
Has an additional assurance statement been provided by the verifier?	No
Name of lead verifier	Cecilia del Pilar Tejada Matos
Date of statement of verification	30/12/2024
Signature of lead verifier	auful



Appendix A List of PAS participants

Karina Nakandakari - Manager, ESG Standards Compliance

Angela Paredes - Corporate ESG Analyst

Elias Chuquirasi – Social Management Superintendent

Janina Diestra – Social Management Assitant

Rocío Requena Cano – Senior Enviromental management Engineer

Yahira Puente Romero - Enviromental management Engineer

Hugo Paredes Pajuelo - Enviromental management Engineer

Alvarez Boluarte Bruno Alfredo - Security Manager

Luis Romulo Villacrez – Security Head

Carlos Iturralbe – Corporate Senior Director, Critical Facilities

Leo Aubone - Corporate Senior Engineer Tailings and Dams

Favio Chonta Vargas - Concentrate Plant Superintendent

Pilar Requena – Tailing Management Assistant

Juan Carlos Merino - Human Resources Superintendent

Yennifer Mayta - General Services Assistants

Juana Argomero - Head of Talent Management

Jacqueline Sinche Rosillo - Senior Coordinator Integrated Management System

Paul Ore Mora - Senior Occupational Health and Safety Officer

Jimmy Antunez - Environmental Management Superintendent

Yahaira Puente - Environmental Engineer



Appendix B List of COIs interviewed

- Julio Celis Zambrano Workers' Representative of the H&S Committee
- Emilio Bonifaz Environmental Monitoring Specialist, JCI Contractor.
- Alfredo Hinostroza Safety Engineer, Master Drilling.
- Eugenio Escobar Environmental Head at SERNANP, Pasco
- Sergio Gareis Comunidad ONG NGO Community
- Belen Barria Community
- Juan Hermitaño General Secretary of the Union
- Joiler Condezo Economy Secretary of the Union.
- Robert Robles Zelada Municipal Manager of the Huallay District Municipality
- Fredy Sosa Quinto President of La Cruzada Settlement
- Erika Baldeaon Treasurer of La Cruzada Settlement
- Jaime Hinostroza Member of La Cruzada Settlement
- Alejandro Mendoza Prosecutor of the Huallay Peasant Community
- Omar Henry Luis Vargas Mayor of Huachoy
- Jorge Cardenas EOR (ANDESS)
- Jairo Córdova Zevallos Assistant of Tailing management, EMICONSATH