



TSM Verification Summary Report

Facility Information

Name of company	Pan American Silver (PAS)
Name of facility	Pan American Silver Bolivia S.A. - San Vicente Mine
Address	San Vicente, Provincia Sud Chichas, Departamento de Potosí, Bolivia
Country of operation	Bolivia
Products/metals produced on site	Silver-Zinc and Silver-Lead Concentrates
Types of operations included in scope:	
Mining	<input checked="" type="checkbox"/> San Vicente uses sublevel long-hole stopping (SLS) as a mining method and standard flotation process to produce concentrates.
Milling	<input type="checkbox"/>
Smelting	<input type="checkbox"/>
Hydrometallurgical	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Other (please explain)	Not applicable (NA)
Types of infrastructure included in scope:	
Roads	<input type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input type="checkbox"/>
Other (please explain)	The mine infrastructure comprises the underground mine workings, the processing plant, tailings storage facilities, waste rock storage facilities, effluent management and treatment systems, maintenance shop, warehouses, laboratories, offices, drill core and logging sheds, water and power lines, access roads, the worker's camp, recreational facilities, and a landfill. Electricity is acquired from Servicios Eléctricos Potosí, S.A. (SEPSA), a private energy company in Potosí, Bolivia.



Verifier and Verification Information

Verification firm	Environmental Management Resources (ERM)
Confirmation that all verifiers involved in the verification are accredited TSM verifiers	Yes Omar Rios, Managing Technical Consultant, Qualified Verification Service Provider (VSP).
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	Document review: 18/11/2024 - 21/11/2024 Verification: 18/11/2024 - 21/11/2024 COIs Interview: 20/11/2024 - 21/11/2024 Reporting 14/01/2025 - 20/01/2025
Verification period	This is the first external verification of the San Vicente Mine (The Site). The VSP focused on the 2024 self-assessment provided by the site.
Summary of the verification methodology	<ul style="list-style-type: none"> • 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 San Vicente. • 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	<p><u>Planning</u></p> <p>A schedule for verification activities was organized with Pan American Silver (PAS) corporate ESG staff and shared with site representatives. The schedule included a site tour of selected areas including the main administrative and production areas, interviews with the lead for each TSM protocol, interviews with key COI representatives and opening and closing meetings.</p> <p><u>Document Review</u></p> <p>In advance of the site visit, a virtual data room (OneDrive) 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.</p> <p><u>Site Visit</u></p> <p>A general tour of the facilities was conducted. Photographs were taken by VSP as evidence of specific activities. During the tour, interviews were conducted with operational personnel to</p>

	<p>verify specific systems, processes and implementation of procedures.</p> <p><u>Interviews</u></p> <p>A series of interviews with key site staff at San Vicente were conducted over four 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. See Appendix A for a list of PAS participants.</p> <p>Evidence was reviewed and if required, the VSP requested additional information or adjustments to the self-assessment. Evidence was limited to certain procedures, monitoring reports, minutes of meetings, and other periodically scheduled activities.</p> <p>Also, interviews with key COIs were conducted by telephone and virtually based on the availability of the participants. See Appendix B for a list of COIs the VSP engaged with.</p>
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
<i>Biodiversity Conservation Management</i>		
1. Corporate biodiversity conservation commitment, accountability, and communications	A	A
2. Biodiversity conservation planning and implementation	A	A
3. Biodiversity conservation reporting	A	A
<i>Climate Change Protocol</i>		
1. Corporate Climate Change Management	A*	A*
2. Facility Climate Change Management	A	A
3. Facility Performance Targets and Reporting	A	A
<i>Crisis Management and Communications Planning</i>		
1. Crisis Management and Communications Preparedness	Yes	Yes
2. Review	Yes	Yes
3. Training	Yes	Yes
<i>Indigenous and Community Relationships</i>		
1. Community of Interest (COI) Identification	AA	AA
2. Effective COI Engagement and Dialogue	A	A
3. Effective Indigenous Engagement and Dialogue	A	A
4. Community Impact and Benefit Management	A	A
5. COI Response Mechanism	A	A
<i>Preventing of Child and Forced Labour</i>		
1. Preventing Forced Labour	Yes	Yes
2. Preventing Child Labour	Yes	Yes
<i>Safety and Health</i>		
1. Commitments and Accountability	A	A
2. Planning and Implementation	A	A
3. Training, Behaviour and Culture	A	A
4. Monitoring and Reporting	A	A
5. Performance	A	A
<i>Tailings Management</i>		
1. Tailings Management Policy and Commitment	A	A
2. Tailings Management System and Emergency Preparedness	A	A
3. Assigned Accountability and Responsibility for Tailings Management	A	A
4. Annual Tailings Management Review	A	A
5. OMS Manual	A	A
<i>Water Stewardship</i>		
1. Water Governance	A	A
2. Operational Water Management	A	A
3. Watershed-scale Planning	A	A
4. Water Reporting and Performance	A	A

*Verification from 2023



Summary Comments On Conformance Ratings

Criterion	Rating C, B, A, AA or AAA (unless otherwise indicated)	Examples of Evidence Consulted
Biodiversity Conservation Management		
1. Corporate biodiversity conservation commitment, accountability, and communications	A	<p>Pan American Silver's corporate Environmental Policy, approved by the Board in March 2021, commits to biodiversity conservation throughout the life cycle of mining by integrating biodiversity conservation into mine planning. Key components include: avoid, minimize, restore and potentially offset significant adverse effects on biodiversity, with the aim of achieving no net loss, and not exploring or developing mines in internationally designated protected areas.</p> <p>At the site level, San Vicente also has a Biodiversity Policy, approved by the General Manager of PAS Bolivia, based on the Towards Sustainable Mining framework and PAS corporate standard. Its commitments include preservation of biodiversity in the lifecycle of San Vicente mine including closure; implementation of procedures to protect flora and fauna; identification of risks and impacts to biodiversity within operating processes; identification of key communities of interest (COI) related to biodiversity preservation; implementation of targets referred to biodiversity conservation; definition of roles and responsibilities on biodiversity conservation; monitoring of biotic factors; implementation of a management plan for biodiversity preservation and restoration of areas.</p> <p>The Environmental Superintendent is formally designated as the lead for implementing the TSM protocols for Biodiversity Preservation, Climate</p>

		<p>Change, Tailings Management and Water Stewardship.</p> <p>Duties include self-assessment of protocols, management of resources for maintenance and continuous improvement, follow-up on action plans, delivery of progress reports to managers, and keeping of records.</p> <p>The Environmental Management System Manual, version 02 from July 2024, states biodiversity conservation as one of its eight significant aspects and established responsibilities for roles at San Vicente for performance.</p> <p>Sustainability Performance Indicators (SPI) 2024 contains indicator SPI-E7 for Biodiversity conservation as reforestation of 1 hectare of terrain per year. The set of SPIs is communicated to staff at the beginning of each year.</p> <p>Budget for 2024 demonstrates allocation of resources to achieve the committed activities for biodiversity conservation.</p> <p>Biodiversity conservation policies, goals and their progress tracking are communicated to employees, contractors and COIs through various media:</p> <ul style="list-style-type: none"> - Information boards were observed throughout areas of mine displaying policies in force and monthly progress report of goals for the year. - Records of induction training on environmental topics demonstrate that employees and contractors are informed about commitments and responsibility to biodiversity conservation. - Monthly e-mail distribution of “environmental talks” to all staff at operational areas.
2. Biodiversity conservation planning and implementation	A	<p>The Biodiversity management plan is issued for a two-year period. The first plan was issued in 2020, and the 2024-2025 version is currently in effect.</p>

		<p>The administrative part of the plan addresses the policies, standards and corporate framework for biodiversity conservation. The plan also records updated identification of risks, COIs, and a communication strategy based on community relations, training programs, reporting and biodiversity informative signage.</p> <p>The operational section of the plan describes the monitoring strategy to observe, quantify, and record flora and fauna species, and its comparison <i>versus</i> the local baseline study.</p> <p>Finally, it outlines the action plan and its progress program to achieve the biodiversity conservation goals.</p> <p>As evidence of implementation, biodiversity management includes a report on the execution results from the 2023 operational cycle.</p>
3. Biodiversity conservation reporting	A	<p>San Vicente reports the progress of its biodiversity conservation goals every month to senior management and the corporate office. Records were reviewed January – October 2024 period for the sustainability indicator (SPI-E7 Biodiversity) and are available in the site's electronic dashboard exhibiting the progress of the reforestation goal of 1 hectare/year for 2024.</p> <p>Public information on its biodiversity conservation performance is outlined in the Pan American Silver 2023 Annual Sustainability Report (public report at https://panamericansilver.com/wp-content/uploads/2024/08/PAS-Reporte-de-Sostenibilidad-2023-Esp.pdf).</p>
Climate Change		
1. Corporate climate change management	A	This indicator was verified in 2023.
2. Facility climate change management	A	San Vicente has an Energy Use and GHG Emissions Policy signed by the General Manager in 2021, as well as a related management system aligned with

		<p>Towards Sustainable Mining expectations.</p> <p>Manager has issued written designations to employees who have a role in climate change management.</p> <p>The monthly records for the period of January – October 2024 demonstrate that direct and indirect energy sources are identified and monitored; GHG emissions are calculated and reported based on energy usage from energy reports. These records are based on the management procedures PASBOL-MAB-PO-13-21 (for identification and inventory), PASBOL-MAB-PO-14-21 (estimation and quantification), and PASBOL-MAB-PO-15-21 (for report issuance).</p> <p>Also, non-energy GHG emissions were identified and assessed in July 2023 and June 2024; the landfill is the only non-energy GHG source with a calculation of 717.05 tons of CO₂ equivalent.</p> <p>Regarding physical impact of climate change, WSP consultancy conducted a study under 3 climate change risk scenarios (SSP1, SSP2 and SSP5) projected for 2030, 2050 and 2100.</p> <p>Physical impact studies are reviewed every year as exhibited by data published in sustainability reports from 2020 to 2023.</p> <p>Physical impact of climate change is part of business planning as exhibited by the 2024 climate action plan that was based on projections from the performance in 2023, The closure of San Vicente is estimated for the year 2028 and therefore actions focus on monitoring and operational optimization of the tailings dam as it is the infrastructure with the highest risk rating ("MEDIUM") and is sensitive to intense precipitation in the 2030, 2050 and 2100 projections.</p> <p>Interviewed communities of interest (COIs) confirmed awareness of the climate change communications shared</p>
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		by San Vicente, which included talks and formal induction materials.
3. Facility performance targets and reporting	A	<p>San Vicente has established sustainability performance indicators for 2024 targets regarding energy use (SPI-E4 Energy) and scope 1 and 2 GHG emissions (SPI-E6 GHG Emissions). The ongoing targets are based on the performance obtained in 2023 and projected during the annual review by senior management.</p> <p>Records reviewed (January – October 2024) for sustainability indicators SPI-E4 and SPI-E6 are available in the site's electronic dashboard exhibiting their performance towards reduction of 58 GJ and 4-ton CO₂eq, respectively.</p> <p>Public information on its performance about GHG and climate management is described in the Pan American Silver 2023 Annual Sustainability Report (public report at https://panamericansilver.com/wp-content/uploads/2024/08/PAS-Reporte-de-Sostenibilidad-2023-Esp.pdf).</p>
Crisis Management and Communications Planning - FACILITY		
1. Crisis Management and Communications Preparedness	Yes	<p>San Vicente has 1) a Crisis management and communications plan (controlled document PASBOL-SSC-PL-02-21, version 1, 2024) and 2) an Emergency and Crisis Management Plan (PASBOL-SSC-PL-03-17, version 7, 2024).</p> <p>Those plans are updated annually and based on an analysis of threats, vulnerabilities and risks (PASBOL-SSC-FM-57-2, version 1, 2024).</p> <p>The plan contains contact information of designated crisis management team members, communication media, and stakeholders. Contact information is reviewed and updated once per year.</p> <p>The site has a crisis room equipped with printed plan information with index cards and the necessary electronic equipment. Camera information from the monitoring center is accessible online.</p>

		The crisis management plan is shared with the corporate office. Interactions with relevant COIs and local emergency response authorities are arranged to raise awareness and gather feedback on the plan.
2. Review	Yes	<p>The crisis management plan is reviewed once a year with senior management; updates are made if there are changes to the functional content of the plan, the scope of the business, or the personnel assigned roles in the plan.</p> <p>The latest update of the plan is 2024 (PASBOL-SSC-PL-02-21, version 1, 2024) and contains a control change table explaining the motivation for changes, if any.</p> <p>The notification mechanism of the plan is tested twice per year. In January 2024 it was tested as part of yearly training for the crisis committee members and used the Noggin online notification tool in September, 2024.</p> <p>When new members join the committee, they are provided with the crisis management plan and trained in its operation within the first month of them joining the committee.</p>
3. Training	Yes	<p>San Vicente has an annual program to conduct desktop exercises and drills.</p> <p>On September 18, 2024, a desktop exercise was conducted for a tailings dam collapse scenario.</p> <p>On April 20, 2023, a full crisis drill was conducted for a fire scenario inside the mine (level -405) without prior notice to members of the crisis committee.</p>
Indigenous and Community Relationships		
1. Community of Interest (COI) Identification	AA	San Vicente has a procedure for the identification and analysis of COIs (PASBOL-RSC-PA-07-22, updated 2024). The procedure includes the criteria for selection of the Interest Groups. Examples include the survey mechanism "I identify myself with pride",

		<p>(evidence is records from external communities in 2023 and 2024).</p> <p>The community relations department has a well-established workflow for inclusion and dialogue with the COIs so that all the concerns and recurring topics of interest of those COIs are considered in the Management Plan.</p> <p>The identification of COIs is updated twice a year and confidentiality is considered whenever a new stakeholder is identified.</p> <p>COI information management such as stakeholder matrix, interactions, consultations, workshops, development programs, and communications is recorded in the ISOMETRIX platform, as verified for the June 2024 update.</p> <p>There are letters from COIs requesting meetings with the mine to express their interest, and requests from the mine to these groups to hold workshops or meetings on topics such as sustainability, environmental issues, and production protocols.</p> <p>The interviews with COIs confirmed their interaction with San Vicente according to the approach outlined in the identification procedure.</p>
2. Effective COI Engagement and Dialogue	A	<p>San Vicente has a community relations plan (PASBOL-RSC-01-24-PL, first issued in 2022, version 02 in effect in 2024) which includes a strategy to establish direct contact between the communities and the company to promote constructive relationships, as well as a strategy to implement inclusive participation mechanisms for the population in areas of direct and indirect influence.</p> <p>The plan executed these strategies through 1) Communication program with COIs and external actors, 2) COI identification program, and 3) Program for handling inquiries, complaints, claims and external notes.</p>

		<p>Derived from the relationship plan, there is a communication procedure with COIs (PASBOL-RSC-PA-07-24, issued in 2022, version 02 in effect in 2024) that has evolved through various meetings (formal and informal), workshops and training sessions held over time between the community relations team and COI members.</p> <p>Interviews with representatives from COIs confirm their participation in the dialogue process, however, some representatives mention that they do not always respond to dialogue invitations from the San Vicente mine due to time constraints or lack of organization of the people in their communities.</p> <p>According to evidence from the procedure for handling complaints, requests, queries and external notes (PASBOL-RSC-PA-04, v2 2024), the general management and operations management are informed of the level of criticality of the interactions. Managers are directly involved in resolving issues with the COIs when applicable, as determined by the social impact matrix.</p> <p>Commitments with COIs are reviewed through meetings held at the frequency agreed upon in those commitments, with the outcomes recorded in meeting minutes. Weekly, quarterly, and annual activity reports on community relations actions are submitted to the Site general management team.</p> <p>When COIs are invited (e.g. groups of mothers or workers) for workshops and communications, WhatsApp groups are used to inform them about the topic to be discussed, time and date; emails are also sent and signed and sealed letters are delivered for interactions with authority groups and government representatives including reference information required for the meeting.</p> <p>Community Relations staff are trained to address participation, dialogues on cultural matters, rights of indigenous</p>
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		<p>peoples, conflict resolution and good community relationship.</p> <p>Participation with COIs during the year is monitored using indicators such as the number of interactions and type of engagement. Information for internal COIs is displayed on information boards throughout the site. Communication with community members is shared by WhatsApp and notes to leaders, while publications for regional external COIs are made in newspapers.</p>
3. Effective Indigenous Engagement and Dialogue	A	<p>Bolivia is a Plurinational State, which is why it legally recognizes the different cultures, nations and indigenous peoples, in such a way that it pursues the protection, defense, promotion and guarantee of individual and collective rights based on their realities and worldviews. In this way, the San Vicente mine has structured its community relations mechanisms (PASBOL-RSC-PA-07-22, issued 2021, updated 2024) based on the self-identification of individuals of the COIs as indigenous (in accordance with the expectations of the concept of a Plurinational State) and ensuring the functional characteristics of the TSM protocol requirements.</p> <p>The San Vicente operation, due to its location, does not have stakeholders who are self-identified as indigenous people, but it does have COIs who are Original Peasant Communities in accordance with the definitions from Chapter 4 of the Political Constitution of the Plurinational State of Bolivia.</p> <p>The General Manager and the Operations Manager are committed to ongoing engagement with communities. There are specific procedures for participation, dialogue and public consultation (PASBOL-RSC-PA-13-24, version 02 in force 2024), which guarantees a continuous interaction with the local authorities, keeping them informed of company's planned actions.</p>

		<p>San Vicente has implemented a compensation and indemnity procedure (PASBOL-RSC-PA-12-24, issue 2022, version 02 in effect in 2024) to ensure that communities are informed about the negotiations and can prepare their requests and applications to reach an agreement.</p> <p>An example of collaboration with 4 communities of direct impact is the ongoing Integral and Sustainable Camel Livestock Management Program which includes eight components focused on training, income generation, and management plans for llamas.</p> <p>Finally, competency management for the community relations staff at the San Vicente mine is based on the legal framework of the Plurinational State and does not require segmentation of self-declared indigenous groups. For the 2024 period staff will undergo an ongoing training program focused on resolution of conflict skills.</p>
4. Community Impact and Benefit Management	A	<p>Commitment from senior management at San Vicente is evidenced by publication of a Social Sustainability Policy, the designation and budget allocation for the community relations department and participation of manager in resolution of conflicts for potential high-risk events with COIs (as outlined in procedure PASBOL-RSC-PA-05-22, issue 2022, version 02 in effect in 2024).</p> <p>The Manual of Functions for the Social Team (PASBOL-RSC-01-22-MF, version 00 in effect in 2022) outlines the responsibilities, functions and professional profile for each designed role.</p> <p>The Site has identified and assessed its impacts on COIs in the risk and impact identification matrix (PASBOL-M-RSC-01-22, update September 2023). This matrix is updated annually or whenever necessary, and includes control</p>

		<p>measures for environmental, social, economic, health and safety impacts.</p> <p>Prior evaluations and coordination are conducted before any activity that may impact COIs. Following the procedure for participation, dialogue and public consultation (PASBOL-RSC-PA-13-24), communication is sent to COIs for agreement as evidenced by letters issued to: 1) authority representatives of San Vicente community for geological exploration tasks on March, July and August 2024, 2) Mayor or Cieneguillas community in May and July 2024.</p> <p>When the company needs local personnel for new positions, socialization efforts are made in the communities of direct impact, as evidenced by notification of a hiring process for electricians and janitor staff in May 2024.</p> <p>San Vicente has implemented a Strategic Plan for Community Relations (PASBOL-RSC-PL-01-22, issue 2022, version 02 in effect in 2024) that prioritizes opportunities for COIs within the area of direct influence of the mine. An ongoing program, developed jointly with the COIs, strengthens the region's productive capacity to prevent projects from being outsourced outside the area.</p> <p>There are social Key Performance Indicators (KPIs) with metrics that are used to monitor and follow up on the implementation of the Action Plan; The KPIs are reported monthly.</p> <p>Finally, meetings are held with the affected COIs at their request or scheduled to monitor the agreements reached and the results obtained on site. This is evidenced by sampled letters of invitation, pictures, progress statistics, and electronic dashboard for January – October 2024.</p>
5. COI Response Mechanism	A	<p>San Vicente has implemented a procedure for handling complaints, requests, queries and external notes (PASBOL-RSC-PA-04, v2 2024) to</p>

		<p>manage interactions whether verbal, digital or written, initiated by COIs.</p> <p>Interactions with COIs are recorded and centralized in the ISOMETRIX electronic platform; through this mechanism, the follow-ups and closures are conducted. Response statistics to COIs are communicated and published monthly to both management and affected COIs.</p> <p>The COIs are informed about the process to access the response mechanisms, which is communicated through social induction, WhatsApp groups or person-to-person interactions.</p>
Preventing of Child and Forced Labour (Indicate YES or NO)		
1. Preventing Forced Labour	Yes	<p>San Vicente has implemented the General Human Resources Policy (RRHH-PO/GE, revision 01 in effect in 2020) which includes prohibition of forced labor. Any violation of this policy is subject to penalties under Bolivian law, and the company will also take appropriate actions in response.</p> <p>A Training Plan has been implemented focusing on the Prevention of Child Labor, Workplace Harassment, Discrimination and Forced Labor. Its purpose is to raise awareness both among Pan American Silver Bolivia personnel from all areas and contractors.</p> <p>A video with explanatory content on Child and Forced Labor, Harassment and discrimination has been distributed to contractors through 2023 and through a training program for technical personnel completed at the end of 2023.</p> <p>An induction video has also been implemented to highlight the key aspects of the General Human Resources Policy, ensuring that workers are aware that Pan American Silver Bolivia complies with the established legal framework regarding forced labor, exploitation or involuntary labor.</p> <p>Interviewed representatives of internal COIs (workers, contractors) confirmed</p>

		their awareness of the policy's focus on preventing the employment of persons under 18 and the prohibition of forced labor.
2. Preventing Child Labour	Yes	<p>Although Law 548 in Bolivia allows people under 14 years old to work under authorization of the Office of the Ombudsman for Children and Teenagers (DNA, acronym in Spanish) having the same rights as adult workers, the General Human Resources Policy (RRHH-PO/GE, revision 01 in effect in 2020) strictly prohibits hiring minors.</p> <p>The Human resources department verifies the age of candidates applying for job positions through their identification card, and in the case of candidates from directly impacted communities, a letter of endorsement from the community's Mayor confirming the candidate's name, age, and legal status is also required.</p> <p>New employees must present their identity card in addition to their birth certificate, military service booklet, and if applicable, the work certificate, study certificate, marriage certificate, and birth certificate for direct dependents. In this way San Vicente verifies that no person under 18 years of age is employed by the company.</p> <p>For contractors and visitors, human resources department provides an access protocol that requires an identification card, health self-declaration, and proof of social security of private medical insurance. These documents are verified for identity and age before granting access to the San Vicente mine.</p> <p>An interviewed community Mayor explained that endorsement letters serve to ensure compliance with hiring agreements preventing the employment of persons under 18, and to demonstrate the community's support and confidence in its candidates.</p>

Safety and Health		
1. Commitments and Accountability	A	<p>San Vicente demonstrates its commitment to safety and health through its Occupational Health and Safety Policy, signed by the country manager (revision 04, in effect in May 2024), and aligned to the intent of the health and safety TSM protocol of the Mining Association of Canada.</p> <p>The Policy is published on information boards throughout the site and is part of the induction procedure (Cartilla de Inducción, version 5.0) provided and acknowledged by all San Vicente employees, contractors and visitors.</p> <p>Interviewed contractors expressed that San Vicente leaders are open to listen and address their concerns when questions arise.</p> <p>The Superintendent of Safety and Health is the management designee responsible for the safety and health performance at San Vicente, as evidenced by letter of designation for a period of 2 years (July 2023) and organizational chart 2024.</p> <p>To maintain ongoing awareness of the safety policy, refresher training is provided annually to remind the staff of their commitment to safety, as evidenced by sampled records throughout 2024.</p> <p>During site walks, an understanding of safety requirements, was provided to the verifier for each area visited.</p> <p>Interviews with internal COIs (employees and contractors) confirmed their understanding of the requirements necessary to ensure a safe operation in the workplace. They are also familiar with reporting procedures, and escalation mechanisms for situations they cannot solve directly.</p>
2. Planning and Implementation	A	<p>San Vicente has developed and implemented an Occupational Health and Safety Management System based on the ISO 45001 standard in conjunction</p>

		<p>with the Bolivian technical standard NTS-009/18 for occupational health and safety programs; certification of the system has not been sought.</p> <p>In general, the system consists of 38 elements and is managed through an electronic web platform that was designed locally at the San Vicente mine. It contains the occupational health and safety policy, the description and process map of all areas of the mine, work areas, procedures for protection against hazardous energies, incident/accident management procedures, and organizational management documentation.</p> <p>For the identification and control of risks there are tools such as:</p> <ol style="list-style-type: none"> 1. Procedure for identifying hazards and assessing risks (PASBOL-SSC-PA-04-20, v02). 2. Hazard identification and risk assessment and controls (IPERC, by its acronym in Spanish) matrix recorded in 2021 and updated in 2024 with the analysis of all operational areas. 3. Procedure for high-risk work permit (PASBOL-SSC-PA-04-21). 4. Forms for job safety analysis (PASBOL-SSC-FM-05-21) and high-risk work permit (PASBOL-SSC-FM-74-21) that are completed prior to hazardous works together with operational procedures and work instructions, as evidenced by random sampling of records at the geology, laboratory and mining areas. <p>The plan of objectives and goals by area for 2024 contains the specifications for training, inspections, review of procedures, management improvements, and application of critical controls to achieve each goal.</p>
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		<p>Commission in accordance with the technical standard NTS-009/2018 Regulations for the appointment of coordinators, constitution and possession of joint committees on hygiene, occupational safety and well-being.</p> <p>The procedure for inspections of work areas was updated (PASBOL-SSC-PA-07-21, version 01, effective 2022), defining the types and those responsible for carrying out the inspections. The inspection of tools is conducted quarterly according to an updated procedure (PASBOL-SSC-PA-05-15, version 02, effective 2023). The substandard conditions detected during inspections are recorded in the online RACS system (Registry of Substandard Conditions and Acts) and continuous monitoring is performed. For inspections inside the mine, work checklists are used.</p> <p>A procedure for control of records related to the management system is in place (PASBOL-SSC-PA-02-20, version 01, effective 2024). Records of safety management tools are uploaded to an online platform from which they are downloaded and stored by the safety department.</p> <p>An allocated and approved budget for 2024 and 2025 is in place for continuous improvement in matters of Hygiene and Safety and Health at Work. The budget is prepared and approved in the previous year.</p>
3. Training, Behaviour and Culture	A	<p>San Vicente provides general training on health and safety hazards, which includes induction training and a weekly program of 5-minute talks, as evidenced by sampled records for 2024.</p> <p>San Vicente also has implemented a planned annual health and safety program (ongoing 2024 plan). The program begins with an analysis of training needs based on the records of substandard conditions registered in the RACS system.</p>

		<p>Pareto methodology is then used to identify the "critical risks" that influence the registration of substandard acts and conditions. Based on this analysis, training topics are scheduled in a quarterly program and for the weekly 5-minute talks.</p> <p>The latest version of the induction manual (5.0) is used for training. It was prepared by the department of industrial safety, occupational health and training (SSC), and reviewed and approved by the operations management of the San Vicente mine.</p> <p>Training records are kept for two years in accordance with the management system's record control procedure (PASBOL-SSC-PA-02-20 v01), as evidenced by random sampling of 2023 and 2024 lists of attendance, slideshows, pictures, graded evaluation questionnaires and signed acknowledgment of policies.</p> <p>An allocated and approved budget for general training is in place for 2024.</p> <p>The personnel that provide health and safety training are engineers with experience in mining and with accredited certifications in occupational health (issued by National Registry of Professionals and Technicians in Occupational Hygiene, Safety and Occupational Medicine of Bolivia) and as trainers (issued by the Institute of Mining Safety of Bolivia).</p> <p>To reinforce training, an implemented work observation program conducted by supervisors to ensure procedures are followed and safety are in place. This allows for the immediate detection and correction of deviations or opportunities for improvement.</p> <p>Finally, San Vicente has a joint safety committee composed of management representatives and workers. The committee conducts site walks twice a month to identify safety issues, recognize</p>
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		good practices, and to promote safe work.
4. Monitoring and Reporting	A	<p>San Vicente has implemented a monitoring platform for its established performance indicators, including training, reporting of substandard conditions, work observations and working inside the mine, and reports of corrective actions for accidents and incident probable cause (RAC CPI, by its acronym in Spanish).</p> <p>A report with results of performance indicators is submitted to management on a weekly basis, as well as a monthly safety report that includes an evaluation of the management tools applied to each site area. Records and reports for the January – October 2024 period were reviewed.</p> <p>During the site tour, information boards were observed displaying policies, information campaigns and the monthly results of the various performance indicators of the San Vicente mine, including safety indicators. Results are also accessible on the dashboard of the local San Vicente web platform.</p> <p>The Occupational Health and Safety Management System includes the "Occupational Health and Safety Management System Audit Book", which addresses the 38 elements of the system. An internal audit is scheduled and conducted annually, using a cross-audit approach between business units.</p> <p>In July 2024, the audit was conducted by Pan American Silver Peru personnel, focusing on the procedures and standards of a sample of 10 management elements of the San Vicente system. The audit results were presented to management at the end of the audit (audit worksheet, July 27, 2024).</p> <p>Every two months, a safety indicator monitoring report is delivered for management review. The representative</p>

		<p>writes notes on each indicator with the purpose of guiding continuous improvement actions. These reviewed reports are recorded, signed and sealed by the management representative</p> <p>During the annual management review held on February 8, 2024, the actions from the October 2023 audit were reviewed to assess progress on closing findings as well as the actions needed to achieve 100% closing of open items. The progress on action plans after the July 2024 audit is scheduled to be reviewed during the January 2025 management review.</p> <p>From the interviews with internal COIs, both employees and contractors stated that they are aware of the performance indicators as part of the 5-minute talk and publication on informative boards.</p> <p>Finally, safety and health performance results are part of Pan American Silver sustainability reports, published at https://panamericansilver.com/sustainability/sustainability-reporting/; this verification reviewed the 2021, 2022 and 2023 reports.</p>
5. Performance	A	<p>The 2024 San Vicente goals and objectives are registered in its management system (local web platform).</p> <p>The site management establishes, reviews and improves the annual safety goals. This process begins with the setting of goals during the annual review meeting. It is followed by a bi-monthly follow-up report of the safety indicators for management review. The verifier reviewed reports from January to October 2024.</p> <p>Finally, San Vicente had no fatal accidents during 2024.</p>
Tailings Management		
1. Tailings management policy and commitment	A	San Vicente has the following policies on Tailings Management:

		<ol style="list-style-type: none"> 1. Corporate Environmental Policy, dated 2021, including scope on tailings management, endorsed at the governance level of Pan American Silver. 2. Tailings Management Policy, dated 2024, was signed by the general manager. <p>These documents are physically posted on information boards across the site and have been communicated directly to staff and contractors as part of their environmental induction training as evidenced by sampled attendance records for 2024.</p> <p>Interviewed internal (contractors and employees) and external (community representatives) COIs confirmed awareness of tailings management at San Vicente.</p> <p>The 2023 and 2024 internal audits, facilitated by corporate representatives and supported by site's staff, demonstrated that tailings management policy is in conformance with the Tailings Guide, which is approved by senior management, and is endorsed at the governance level.</p> <p>Finally, San Vicente has an operational expenditure (OPEX) budget allocated for 2024 covering labor, materials and services. For external services, specific allocations are made for updating the OMS manual & Emergency Response Plan / Emergency Preparedness Plan (ERP/EPP), Dam Safety Review, Management, half-year reports, Dam Safety Inspection, and conceptual closing plan.</p>
2. Tailings management system and emergency preparedness	A	<p>The 2023 and 2024 internal audits were facilitated by corporate representatives and supported by staff from other PAS operations, confirmed that:</p> <ol style="list-style-type: none"> 1. The company developed and implemented the tailings

		<p>management system in conformance with the Tailings Guide.</p> <p>2. Emergency Response Plan (ERP) / Emergency Preparedness Plan (EPP) for tailings area were developed in conformance with tailings guide.</p> <p>3. ERP/EPP were tested through a full exercise simulation of a tailings dam breach in October 2023 (report PASBOL-SSC-IF-50-23), and desktop simulation of a level 3 tailings dam breach in September 2024 (report PASBOL-SSC-IF-42-24).</p>
3. Assigned accountability and responsibility for tailings management	A	<p>The tailings management system (TMS) procedure (PASBOL-MAB-PA-12-21, version 02 effective 2022) and OMS manual 2024 describe roles, responsibilities and accountabilities as well as matrix of responsible, accountable, consulted, and informed (RACI) personnel. It also includes an organizational chart with all key roles and its relationship at the corporate and site levels, including an Accountable Executive Officer (AEO), Senior Director of Critical Facilities, Engineer of Record (EoR), responsible person (RP) at site, and others.</p> <p>The TMS states the Vice President of Processes, Tailings and Dams as the Accountable Executive Officer reporting to Board of Directors.</p> <p>Roles and responsibilities in the tailings management systems are required to be reviewed/updated annually; this was also verified for the 2023 TMS version.</p> <p>The TMS lists the designated persons in the roles of AEO, EoR, Senior Director of Critical Facilities, RP and other managers and staff working at site. The EoR is a formal contractor with clearly defined roles and responsibilities.</p> <p>Description of responsibilities in TMS (PASBOL-MAB-PA-12-21) and OMS manual 2024 for each role lists the</p>

		criteria set in Tailings Guide; checked-up with table of conformance, version 2022.
4. Annual Tailings Management Review	A	<p>An internal audit in 2024 facilitated by corporate representatives and supported by site's staff, demonstrated that:</p> <ol style="list-style-type: none"> 1. The tailings management review session for 2023 was held in November 2023; for 2024, a session is scheduled for December 2024. 2. The tailings management review is in conformance with the Tailings Guide; records include a summary of risks and controls, OMS manual, ERP, RACI matrix, designs, storage capacity and LOM, DSI reports, and recommendations / gaps, amongst others. <p>Additionally, a risk assessment and prioritization session was held in Q2 2024 with participation from both corporate and site management. During both the annual tailings review session and the risk assessment, key risks, action plans, and other aspects requiring attention concerning the tailings framework are discussed annually.</p>
5. OMS Manual	A	An internal audit conducted in 2024, conducted by corporate representatives and supported by site's staff, confirmed that the San Vicente OMS manual version 2024 was developed and implemented in conformance with OMS Guide; the audit was performed using the Table of Conformance and Self-assessment form of the Tailings Management Protocol version 2022.
Water Stewardship		
1. Water Governance	A	<p>San Vicente has implemented a Water Stewardship Policy (August 2021), signed by the general manager and published on information boards throughout the site.</p> <p>There is an Environmental Management System manual (PASBOL-MAB-MA-01-22, version 02, effective July 2024) with section 9.2 covering the identification and</p>

		<p>compliance of legal requirements, processes to monitor and correct non-compliance of requirements and commitments related to water. Current legal requirements are recorded in form PASBOL-MAB-FO-67-21, with the latest update in October 2024.</p> <p>All personnel with responsibilities and accountabilities for water stewardship have received letters of assignment, dated June 2024, and signed by the operations manager.</p> <p>In addition to the information boards for internal COIs, there is a water stewardship training program for covering environmental factors (including water) and water management, available to both internal and external COIs. This is supported by training materials and attendance records. Communities directly impacted were invited to the training, but they declined to attend.</p>
2. Operational Water Management	A	<p>San Vicente has identified and assessed its facility risks regarding surface and groundwater, in accordance with its procedure for identification of environmental aspects (PASBOL-MAB-PA-01-21, version 03 effective March 2024). The baseline risk assessment was submitted to the environmental authority as part of the Environmental Impact Assessment.</p> <p>The process to monitor the water performance at San Vicente is implemented through the Water Monitoring Program. This program is aligned and compliant with the environmental commitments of the San Vicente mine to the Bolivian government.</p> <p>The program monitors water consumption and quality parameters (versus Maximum Permissible Limits set in Bolivian regulations). Results are reported monthly to management and published on informative boards, and an annual report is prepared and sent to government for legal compliance.</p>

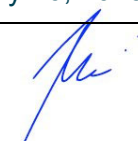
		<p>The water balance is completed monthly based on weekly measurements. Water quality monitoring data is reported monthly, along with the water balance, for both surface and groundwater water, in accordance with the water balance procedure (PASBOL-MAB-PA-16-21, version 02 effective March 2024).</p> <p>Records (reviewed from January 2022 to September 2024) are kept for monthly and semi-annual monitoring of pH, conductivity, total suspended solids, oils and greases, ammonium, antimony, arsenic, cadmium, free cyanide, copper, hexavalent chromium, trivalent chromium, tin, iron, mercury, lead, sulfides, zinc, BOD5, COD and fecal coliforms. These values are compared with the permissible limits established by Environmental Law No. 1333 of Bolivia.</p> <p>The environmental aspects and impacts matrix (PASBOL-MA-MAT-01-19, 2024 update per area) outlines the control measures for the risks associated with water use. Currently, the optimization of water use and consumption is being implemented based on environmental objectives for each area of the mine. This strategy is based on physical risk analysis (issued by WSP consultancy in 2024).</p> <p>San Vicente has implemented a standard for classification of environmental incidents (PASBOL-MA-EST-05-20, version 02 effective March 2024). The standard outlines the measures and resources to deal with spill and non-compliance on effluent quality events with a potential effect of contamination in the waters and for the case of tailings dam there is a specific ERP/EPP (issued by WSP consultancy, in force February 2023) to respond to tailings water spilled from the dams.</p> <p>The environmental management system training program includes a topic on optimal use and care of water, which is taught to all personnel and contractors as</p>
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		part of the environmental induction training.
3. Watershed-scale Planning	A	<p>The boundaries of the Honda watershed are identified and recorded in the Rio San Vicente map (PAA-NoCAR-DSC-ES-NUM) and supported by the hydrological characterization study of the Rio Honda micro-watershed – Oploca watershed.</p> <p>San Vicente maintains a record (PASBOL-MAB-FO-99-22, updated August 2024) and a map of identified relevant COIs related to water in the area of direct influence of the site.</p> <p>The Environmental Superintendent has a letter of designation, signed by the Operations Manager, outlining responsibility for full compliance with water stewardship. In this role, the Superintendent engages with watershed governance representatives.</p> <p>As part of the community relations process, a record of internal and external COIs (PASBOL-MAB-FO-99-22, updated in August 2024) has been created, identifying those with relevance to the use of water, biodiversity, solid waste, tailings and climate change. This record is based on the execution of the communication procedure with COIs and the "I identify myself with pride" surveys.</p> <p>The "I identify myself with pride" surveys and interviews with COIs show that while most individuals consider respect for Mother Earth important, they do not express specific beliefs, customs or local knowledge about water. Instead, they are interested in its availability and responsible use for consumption and its connection to their economic activities.</p> <p>Participation in watershed governance is indirect, through attendance at outreach and training sessions organized by the administrators of the Tupiza River basin master plan. This plan operates under the Bolivia Watch Phase II program, sponsored by the Swedish government.</p>

		<p>The most recent invitation to the San Vicente mine was in November 2024 to attend a training session for people serving as community monitors for the basin, although San Vicente mine does not have this type of role.</p> <p>A Hydrogeological Study of the Rio Honda Watershed was conducted to verify any impact on the watershed and that the maximum consumption volume complies with what is established by current environmental legislation; an annual report of environmental monitoring is delivered to environmental authorities at State and Federal levels (latest report covers the August 01, 2023, to July 31, 2024 period).</p>
4. Water Reporting and Performance	A	<p>San Vicente has established the 2024 sustainability performance indicators (SPI) goals. Those SPI are aligned with corporate objectives. SPI-E3 is specific for water, with a goal of reducing consumption by 6590m³ in 2024.</p> <p>The monthly reports from the environmental department for the period from January to September 2024 were reviewed. The progress report on actions related to water responsibility is presented to site management as part of the monthly indicator review meetings. The information is consolidated in an electronic dashboard, and once reviewed by site management, it is sent to corporate-level representatives.</p> <p>All results are reported to general management, and included in the Pan American Silver Sustainability Report; the 2023 report is available to the public at https://panamericansilver.com/wp-content/uploads/2024/08/PAS-Reporte-de-Sostenibilidad-2023-Esp.pdf</p> <p>2021, 2022, and 2023 sustainability reports include data tables with the performance of each site; for San Vicente, it is highlighted that there is no water stress in the region according to the World Resources Institute. The data is consistent with the records of</p>

		environmental goals performance monitoring, which are reported monthly by the site.
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Statement of Verification

Statement of Verification	
The external verification was conducted in accordance with the <i>Terms of Reference for 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.	<input checked="" type="checkbox"/> The external verification was conducted in accordance with the <i>TSM Verifier Terms of Reference</i> .
The scores indicated in this report are verified as being accurate based on the evidence reviewed during the external verification of this facility.	<input checked="" type="checkbox"/> The scores in this report are considered accurate based on this verification.
Limitations	No limitations to how this verification was to be planned and completed were encountered.
Additional comments	The Pan American Silver and San Vicente teams demonstrated exceptional preparation throughout the verification process. Their self-assessments were thorough and detailed, reflecting a deep understanding of the requirements. Additionally, they showcased a high level of transparency by sharing documents and data openly, which significantly facilitated the review and ensured a smooth and efficient evaluation.
Has an additional assurance statement been provided by the verifier?	No
Name of lead verifier	Omar Rios
Date of statement of verification	January 20, 2025
Signature of lead verifier	



Appendix A List of PAS participants

Christian del Valle – Senior Director, Corporate Affairs and ESG Engagement

Winston Medrano – Operations Manager

Rafael Alberto Ballivian Donoso – Superintendent of Human Resources, Administration and Communities

Iván Toro – Environment Superintendent

Carolay Rodriguez – Environment Supervisor

Fadia Gutiérrez – Community Relations Superintendent

Gabriel Vargas – Community Analyst

Max Guachalla – Concentration Plant Superintendent

Oscar Rodriguez – Senior Safety Superintendent

Ruben Ramos – Safety Head

Appendix B List of COIs interviewed

- Ruan Juarez Castillo – Vice President of the Agrarian Union of San Vicente Community.
- Juan Carlos Cholquevilca – Mayor of Portugalete Community.
- Serafín Vásquez Choque – President of the Educational Council of San Vicente Community.
- Elizabeth Abecia – Head of Environment and Production of Atocha municipal government.
- Wilsa Angélica Arias Arroyo – Health and Safety Supervisor – Representative of contractor SAR Bolivia.
- Karla Alejandra Copa Hurtado – Security Guard – Representative of contractor Absolut SRL.