

TSM Verification Report

Facility Information

Name of company	Pan American Silver (PAS)
Name of facility	El Peñon Mine – Minera Meridian Ltda
Address	Antofagasta
Country of operation	Chile
Products/metals produced on site	Gold and Silver
Types of operations included in scope:	
Mining	<input checked="" type="checkbox"/>
Milling	<input type="checkbox"/>
Smelting	<input type="checkbox"/>
Hydrometallurgical	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Other (<i>please explain</i>)	
Types of infrastructure included in scope:	
Roads	<input checked="" type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	<p>El Peñon is an underground and open-pit gold-silver mine. The process flowsheet includes crushing, grinding, cyanide leaching in tanks, followed by gold–silver recovery using the Merrill-Crowe process and smelting of precipitates. Tailings are filtered and deposited in a dry-stack tailings storage facility.</p> <p>The operation includes full supporting infrastructure such as a processing plant, camps, personnel transportation, and auxiliary services. Water supply is obtained from deep wells located several kilometers from the mine site (approximately 16 km), due to the arid conditions of the region.</p>

Verifier Information

Name of lead verifier	Cecilia Tejada
Verification firm	Environmental Management Resources (ERM)
Confirmation that all verifiers involved in the verification are accredited TSM verifiers	Yes
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	From 06 th to 09 th October 2025
Verification period	2023-2025

Verification Process

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 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	<p><u>Planning</u></p> <p>Planning for the verification was organized with Pan American Silver (PAS) corporate Environment, Social and Governance (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.</p> <p><u>Document Review</u></p> <p>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 Verification Service Provider (VSP) reviewed this material in advance of the site visit and in several cases requested some additional information.</p> <p><u>Site Visit</u></p> <p>A visit to the El Peñon Mine was conducted over four days. In accordance with the</p>

	<p>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.</p> <p>Sampling of evidence was limited to a selection of monitoring reports, minutes of meetings, and other periodically scheduled activities.</p> <p>A tour of the facilities and general views of the operation were conducted.</p> <p>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.</p> <p>See Appendix A for a list of PAS participants.</p> <p><u>COI Interviews</u></p> <p>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.</p>
Was a site visit conducted?	Yes
Did the facility provide advance notice of the verification to communities of interest?	Yes
Number and types of communities of interest interviewed to support the verification	See Appendix B
Has the facility developed an action plan to address gaps to achieve Level A or Yes on any TSM performance indicators?	Yes

Summary of Findings

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

Protocol	Criterion	ERM Verified Rating
Biodiversity Conservation Management	1. Corporate biodiversity conservation commitment, accountability, and communications	AAA
	2. Biodiversity conservation planning and implementation	AAA
	3. Biodiversity conservation reporting	AAA
Climate Change	1. Corporate Climate Change Management*	A
	2. Facility Climate Change Management	AAA
	3. Facility Performance Targets and Reporting	A
Crisis Management and Communications Planning	1. Crisis Management and Communications Preparedness	Yes
	2. Review	Yes
	3. Training	Yes
Indigenous and Community Relationships	1. Community of Interest (COI) Identification	AA
	2. Effective COI Engagement and Dialogue	AA
	3. Effective Indigenous Engagement and Dialogue	NA
	4. Community Impact and Benefit Management	AA
	5. COI Response Mechanism	A
Prevention of Child and Forced Labour	1. Preventing Forced Labour	Yes
	2. Preventing Child Labour	Yes
Safety and Health	1. Commitments and Accountability	AA
	2. Planning and Implementation	AA
	3. Training, Behaviour and Culture	AAA
	4. Monitoring and Reporting	A
	5. Performance	AA
Tailings Management	1. Tailings Management Policy and Commitment	AAA
	2. Assigned Accountability and Responsibility for Tailings Management	AA
	3. Tailings Management System and Emergency Preparedness	AA
	4. OMS Manual	AA
	5. Annual Tailings Management Review	AAA
Water Stewardship	1. Water Governance	AA
	2. Operational Water Management	AA
	3. Watershed-scale Planning	AA
	4. Water Reporting and Performance	A

*Verification from 2023

Summary Comments On Conformance Ratings

Criterion	Rating C, B, A, AA or AAA (unless otherwise indicated)	Summary of Findings, Identified Gaps, and Examples of Evidence Consulted
Biodiversity Conservation Management		
1. Corporate biodiversity conservation commitment, accountability, and communications	AAA	<p>Summary of Findings</p> <p>El Peñon Mine (El Peñon) has an Environmental Policy approved by the General Manager (2024), aligned with PAS's Corporate Environmental Policy (March 2021) and TSM's Mining and Biodiversity Conservation Framework.</p> <p>Commitments are communicated to all employees via induction, training, and audiovisual materials. Contractors are informed of the policy through contracts that include Regulations for Contractor and Subcontractor Companies.</p> <p>Roles and responsibilities for implementation are defined in Environmental Committee meetings, with specific wildlife responsibilities outlined in the Wildlife Sighting Procedure.</p> <p>An independent verification by B&CA Asesorías confirmed the implementation of biodiversity commitments within the three-year period (July 2025).</p> <p>The mine site also follows the PAS Corporate Environmental Policy and has a commitment to no net loss of biodiversity, with responsibilities assigned to Health, Safety, Environment, and Community (HSEC) Management and a reviewed budget for these activities.</p> <p>Identified Gaps to Achieve Level A (if applicable)</p> <ul style="list-style-type: none"> • NA <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Environmental Policy, approved in 2024. • PAS Corporate Environmental Policy, approved in March 2021. • Minutes No. 41: 2025 Update – Environmental Committee (July 10, 2025). • Special Regulations for Contractor and Subcontractor Companies (January 2025). • New Employee Induction – El Peñon.

		<ul style="list-style-type: none"> • El Peñon Informa (EPI) – El Peñon Biodiversity Management. • Wildlife Sighting Work Procedure (April 2024). • Service Contract for Catering, Cleaning, and Maintenance of Camp and Industrial Areas – Minera Meridian Ltda. / SODEXO. • Documentary Audit Report on Water, Biodiversity, and Climate Change Standards – B&CA Asesorías (Bordoli & Consultores Asociados E.I.R.L.) (July 2025). • Environmental Department (LOM) Budget 2022–2025.
2. Biodiversity conservation planning and implementation	AAA	<p>Summary of Findings</p> <p>El Peñon has a Biodiversity Management Work Plan (2023–2025) approved by management. An Environmental Characterization Study established a biological baseline for flora, fauna, and ecosystems, supported by at least 10 biodiversity studies.</p> <p>The company has Wildlife Sighting and Site Release Procedures, with monthly reports on wildlife sightings.</p> <p>Applicable biodiversity stakeholders include public authorities and internal parties, with community engagement actions for the distant Taltal community. An agreement with the University of Antofagasta aims to create a wildlife rescue centre.</p> <p>An Integrated Risk Matrix identified three High Risks: Impact on Wildlife, Non-compliance with Regulations, and Legal Deadlines.</p> <p>Biodiversity training sessions and a wildlife protection video were implemented for staff awareness. Consultations occur through public platforms for effective biodiversity management. An Environmental Restoration Project in Taltal has improved regional biodiversity.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Biodiversity Management Work Plan (2023–2025) • Human Environmental Study (2025) • 10 biodiversity studies • Wildlife Sighting Procedure • Site Release Procedure • Monthly Environmental Report June 2025 • Monthly Environmental Report July 2025

		<ul style="list-style-type: none"> • External Stakeholders • Internal Stakeholders Analysis • Risk Matrix 2025 • Biodiversity awareness training 2025 • Training register • Wildlife protection video • Documentary Audit Report on Water, Biodiversity, and Climate Change Standards – B&CA Asesorías (Bordoli & Consultores Asociados E.I.R.L.) (July 2025). • Environmental Restoration Project
3. Biodiversity conservation reporting	AAA	<p>Summary of Findings</p> <p>Monthly Environmental Management Reports and quarterly reports on biodiversity are submitted to authorities via government portals. Public reports are accessible through the Environmental Monitoring System. An independent audit confirmed this information's availability to El Peñon. Feedback from the General Directorate of the Environment (DGA) was reviewed, showing comments on flora and fauna from a Wildlife Sighting Report. El Peñon updated the report based on DGA feedback, which was subsequently approved.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Monthly Environmental Report June and July 2025. • Technical-Economic Proposal – Wildlife Rescue on Weekends and Holidays – El Peñon Site (May 2025) • Environmental Performance System (https://ssa.sma.gob.cl/)
Climate Change		
1. Corporate climate change management	A	<p>Summary of Findings</p> <p>Verification conducted at Corporate level in 2023.</p>
2. Facility climate change management	AAA	<p>Summary of Findings</p> <p>The site has an Environmental Policy promoting careful energy use and renewable energy to mitigate climate change, which is approved by General Management. Roles are outlined in the Energy Committee Minutes (March 2025), with the HSEC Manager leading climate strategy and the Environmental Superintendent handling operations.</p> <p>An Inventory of Energy Sources and Carbon Footprint is maintained to assess significant Greenhouse Gas (GHG)</p>

	<p>emissions and offsets. A Data Management System (SGI) ensures monthly and quarterly environmental data reporting. Energy performance indicators are monitored, maintaining a variance within 2% of targets. The energy and emissions management system also applies to contractors, integrating their data into corporate reporting.</p> <p>To assess the level of importance of climate change mitigation and adaptation in relation to the stakeholders (COI), a Perception Survey (September 2024) evaluated climate change importance among contractors. Additionally, an HSEC audit was conducted at the contractor level, and the degree of implementation of its requirements was verified, including the identification of its GHG emission sources, with the aim of being able to report them as Scope 3 in 2026.</p> <p>A Climate Assessment Report (WSP, 2024) indicates low climate risks projected to 2100. Energy management aligns with strategic planning, evidenced by the ongoing Photovoltaic Project. Flood and drought risks are low and managed by site design.</p> <p>A training program on energy management is active, with records and awareness initiatives.</p> <p>An external Energy Management Audit was conducted in September 2025, with an additional independent audit in July 2025.</p> <p>Identified Gaps to Achieve Level A</p> <p>Not Applicable</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Environmental Policy, approved 2024 • Energy Efficiency Policy, approved 2025 • Table 1 of the Energy Committee Minutes (March 2025) • Operational Procedures • Inventory of Energy Sources and Carbon Footprint 2025 • Climate Assessment Report (WSP, 2024) • Instruction Quantification of Greenhouse Gas Emissions at El Peñon (June 2025) • Instruction Collection of Environmental Data at El Peñon (January 2025) • Monthly reporting of data to the corporate ATENTO 24 system. • Quarterly to Chile's Environmental Impact Assessment System (SEIA)
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		<ul style="list-style-type: none"> • Photovoltaic Project • Climate Risk Matrix and the ARClim system • Training Program on Energy Management • Climate Change Video broadcast on the internal TV channel • HSEC Contractor Audit • Emails for participated in the course “Emissions and Emission Offsetting” and in the Seminar “Regulatory Update on Climate Change: Implications for the Mining Industry 2024 • Presentation of Biodiversity and Climate Change Seminar in the Taltal community • External TSM Audit by B&CA Asesorías (July 2025). • Annual Energy and Climate Change Management Review (July 2025)
3. Facility performance targets and reporting	A	<p>Summary of Findings</p> <p>The Annual Energy and Climate Change Management Review (July 2025) aimed to monitor energy and climate management per national regulations and Pan American Silver standards, enhancing operational practices for energy efficiency and renewable energy integration to lower El Peñon’s carbon footprint. Projects transitioning to renewable energy have successfully reduced energy consumption from the National Electric System and decreased GHG emissions.</p> <p>Public reports evaluating GHG emissions (Scopes 1 and 2) include the Information Transparency System and the 2024 Corporate Sustainability Report, detailing energy inventories and GHG emissions for El Peñon. The Work Instruction “Quantification of Greenhouse Gas Emissions at El Peñon” (June 2025) utilizes IPCC conversion factors and includes offsets in the Carbon Footprint Report for the Green Bond System (SISAT).</p> <p>The Energy and Climate Change Committee sets objectives aligned with national energy efficiency regulations, with a Work Plan for 2024-2025 covering Energy Efficiency, Renewable Energy, Carbon Footprint, and Reporting. El Peñon’s studies show low climate change impacts, requiring no adaptation measures.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p>

		<ul style="list-style-type: none"> • Annual Energy and Climate Change Management Review (July 2025) • Print screen of Information Transparency System, a Chilean government portal • 2024 Corporate Sustainability Report • Instruction “Quantification of Greenhouse Gas Emissions at El Peñon” (June 2025) Carbon Footprint Report 2025 • Table 1 of the Energy Committee Minutes (March 2025) • Print screen Chile’s Environmental Impact Assessment System (SEIA) • 2022–2026 Work Plan and Implemented Projects • GHG Emissions Offset – El Peñon Carbon Footprint_2025 • GG-R04_Manual_Energy Management System • GG-P01_R04_Energy Control • GG-P02_R04_Management Review • GG-P03_R04_Energy Review • GG-P04_R04_Energy Design Criteria • GG-P05_R04_Purchasing Criteria • Print screen Atmospheric Monitoring System (SISAT)
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Crisis Management and Communications Planning – Facility

1. Crisis Management and Communication s Preparedness	Yes	<p>Summary of Findings</p> <p>The site has an updated Hazard Identification and Risk Assessment (IPER – Crisis) as of July 15, 2025, which considers both operational and non-operational risks with the potential to trigger a crisis. This analysis is complemented by the Country Risk Assessment Chile Q1 (January–March 2025) and the Crisis Management Procedure (GH-P30/R10), along with the Emergency and Disaster Preparedness and Response Regulation (GH-R10), which define preventive actions and response measures for credible threats. The updated procedure was communicated to the corporate office on July 31, 2025, and is approved by the General Manager. The site has used the NOGGIN platform since 2023 to activate, notify, and manage crises. Alert mechanisms include cell phones, radios, and alarms, prioritizing verbal communication according to the established flowchart; the radio system was tested on September 9, 2025. Additionally, there is a contingency plan for crisis alerts in case of connectivity issues, using satellite phones located at strategic points on-site.</p>
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		<p>Identified Gaps</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • GH-P30/R10 – Crisis Management Work Procedure • GHRI-10 – Emergency and Disaster Preparedness and Response Regulation • Hazard Identification and Risk Assessment – Crisis (IPER – Crisis) • Mutual Aid and Emergency Assistance Protocol • Email to Director, Security and Crisis Management (PAS Corporate) regarding the Crisis Management Procedure • WhatsApp coordination slide • Emergency contact list • Attendance record for crisis management training • Curriculum vitae of Director, Human Resources (El Peñon)/Crisis Spokesperson • Professional degree certificate of Director, Human Resources (El Peñon)/Crisis Spokesperson • Images of hybrid crisis centres
2. Review	Yes	<p>Summary of Findings</p> <p>The Crisis Management Procedure is reviewed annually and updated as needed based on operational changes or committee composition. The most recent updates were on October 8 and July 30, 2025, and were recorded in NOGGIN to ensure proper dissemination. Over the past three years, six updates have been made: August 2022, September 2023, October 2024 (twice), and the two mentioned in 2025.</p> <p>El Peñon keeps all Crisis Committee members registered in NOGGIN, the platform used for notifications and committee activation, with semi-annual tests; the latest were on September 4 and 8, 2025, the latter including a desktop drill. The list of critical contacts is also reviewed annually, and</p>

		<p>communication tests are conducted, such as the radio notification on September 29, 2025.</p> <p>Each new member receives training on the procedure and NOGGIN use, along with the relevant documents and role description; the most recent onboarding occurred on September 9, 2025. The updated procedure was also communicated to corporate on July 31, 2025.</p>
		<p>Identified Gaps</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • GH-P30/R10 – Crisis Management Work Procedure • PDF of notification test on the NOGGIN platform • Email coordinating notification through NOGGIN • Presentation of employee communication test • Email to Director, Security and Crisis Management (PAS Corporate) regarding the Crisis Management Procedure • Attendance record for training and delivery of the Crisis Management Procedure
3. Training	Yes	<p>Summary of Findings</p> <p>On September 8, 2025, the site conducted a desktop drill simulating a fire in the main electrical room (Switchgear). The previous desktop drill took place on April 23, 2024, and addressed an accident on the Peñon route. Additionally, on October 22, 2025, the site carried out a full-scale crisis drill based on a potential underground mine collapse, which involved activating the entire crisis committee. The previous full-scale drill occurred on October 2, 2022, and focused on a strike at the El Peñon site.</p>
		<p>Identified Gaps</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Presentation of the desktop drill – September 8, 2025 • Presentation of the desktop drill – April 23, 2024 • Crisis Management Drill Report: Collapse in Underground Mine – Chiquilla Chica 2025 • Presentation of the drill with Yamana Gold – October 2, 2022
Indigenous and Community Relationships		
	AA	Summary of Findings

1. Community of Interest (COI) Identification	<p>The site, according to its environmental management instrument (2024), stated that its operations do not generate impacts on human groups, including indigenous peoples. However, Communities of Interest (COI) have been identified with a genuine interest in the organization's performance and activities.</p> <p>To address this, the site has a procedure for identifying stakeholders and interested parties, which outlines steps to gather local context, identify, classify, and prioritize COIs. This procedure includes self-identification and relevant attributes, and all information is recorded in the Isometrix platform.</p> <p>The site holds regular meetings with COIs, authorities, and civil society representatives to consult on expectations regarding social investment. These meetings help prioritize activities and identify new COIs, with updates reflected in the Isometrix platform.</p> <p>Identified COIs include:</p> <ul style="list-style-type: none"> • Community organizations and neighbourhood boards • Public and municipal institutions • Health and wellness organizations • Education and religious institutions • Productive organizations and unions • Social, cultural, and environmental organizations • Emergency and security institutions • Media, etc. <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Environmental Qualification Resolution: “Update of Resources and Reserves Part II, Underground Mining Pampa Augusta Victoria of Minera El Peñon” • Procedure for Identifying Stakeholders and Interested Parties • COI Self-Identification • Stakeholder Excel list • ISOMETRIX Interest Groups • Communities of Interest (COI) Meeting Minutes
2. Effective COI Engagement and Dialogue	<p>Summary of Findings</p> <p>The site has an engagement framework with Communities of Interest (COIs), facilitating municipal procedures and monthly</p>

	<p>meetings via radio and email. Participation methods include in-person/email surveys, a feedback channel (comunidad.minerameridian@cl.panamericansilver.com), and publicly available guidelines under the Productive Activities Financing Program (FAP). Monthly Corporate Social Sustainability Reports detail COI engagement, survey results, and program updates, all communicated in Spanish.</p> <p>The site promotes inclusion of vulnerable COIs, offering educational programs for environmental stewardship. An ongoing “Citizen Consultation” survey shows high satisfaction with the programs developed by the site (62%-78%) and highlights priorities like economic development, education, and health. Initiatives based on feedback include a Tourism Development Plan, scholarships, and early education support.</p> <p>Regular COI meetings assess Pan American Silver Foundation programs, leading to adjustments based on evaluations. HSEC Manager and HSEC Coordinator represent COIs, trained in social responsibility. An annual Corporate Sustainability Report is published, and records of COI engagement are meticulously maintained.</p>
	<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
	<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Email Distribution: General Scholarship Base 2025 • Public Account Disclosure 2025 • Program Financing Distribution Taltal • Taltal Integration Day 2025 Distribution • Pan American Silver – Public Account Disclosure 2025 Taltal • Monthly Corporate Social Sustainability Report • Corporate Report Email • Email for Budget Execution and Action Report • Citizen Meeting Minutes • Communal Tourism Board Meeting • Taltal Hospital Meeting – June 2025 • Citizen Meeting – September 2025 • Citizen Participation Survey • Citizen Meeting Invitation • Survey Manual and Results

		<ul style="list-style-type: none"> • Budget 2025 • Presentation: FAP Program – Pan American Silver Foundation • FAP Guidelines • FIC Guidelines • Tentative Community Budget 2026 • Certificates: Diploma in Corporate Social Responsibility and Sustainable Development • Sustainability Report 2024 • Isometrix Interest Group • Productive Activities Financing Program (FAP) • Email to address COI comments: comunidad.minerameridian@cl.panamericansilver.com
3. Effective Indigenous Engagement and Dialogue	NA	<p>Summary of Findings</p> <p>The site has stated in its environmental management instrument, specifically in the Environmental Impact Statement (DIA) titled <i>“Update of Resources and Reserves Part II: Underground Mining at Pampa Augusta Victoria – El Peñon Operation”</i> (2024), that the nearest indigenous community is the Atacameña Community of Peine, located approximately 150 km from the project, which places it outside the defined area of influence. Likewise, the closest human settlement is the informal camp La Negra, located in the Antofagasta municipality, about 100 km away. Therefore, it is concluded that there are no settlements or territorial uses by indigenous or non-indigenous groups within the project’s area of influence.</p> <p>This conclusion is supported by the characterization of the Human Environment included as an annex in the DIA, which is a public document available through the official Chilean government portal: https://seia.sea.gob.cl/busqueda/buscarProyectoResumen.php.</p> <p>Additionally, Pan American Silver (PAS) periodically updates its annual TSM Progress Profile on the public platform https://mining.ca/companies/pan-american-silver/, where it has reported the non-applicability of Indicator 3, without assigning any performance level to that indicator, in alignment with what was declared in its DIA.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p>

		<ul style="list-style-type: none"> Environmental Qualification Resolution: "Update of Resources and Reserves Part II, Underground Mining Pampa Augusta Victoria of Minera El Peñon"
4. Community Impact and Benefit Management	AA	<p>Summary of Findings</p> <p>The El Peñon mining site, operated by Pan American Silver, has adopted the Sustainability Policy communicated across all business units as the foundation for its management practices. As part of its social engagement strategy, the site has identified various Communities of Interest (COI), including community organizations, public institutions, healthcare entities, educational institutions, labor unions, cultural and environmental organizations, sports groups, security agencies, and media outlets. To prioritize opportunities and allocate resources effectively, the site conducts the "Citizen Consultation" survey, the results of which are used to adjust the budget and define programs for the following year.</p> <p>During the audit, it was verified that the site does not present direct adverse impacts on COI, in accordance with the Environmental Impact Statement (EIS) approved in 2024. The analysis confirms that there are no settlements or territorial uses within the area of influence, with the nearest settlement being Campamento La Negra (approximately 100 km away) and the closest indigenous community located 150 km away, both outside the area of influence.</p> <p>Although there is no direct operational relationship with these communities, the site maintains an active engagement program with COI, holding monthly meetings to gather feedback and define work plans. In 2025, initiatives were implemented in education, economic development, community infrastructure, healthcare, and donations, primarily benefiting residents of Taltal.</p> <p>Finally, environmental impacts have been classified as non-significant, and monitoring is conducted whenever there are changes in processes or management instruments. The site promotes continuous feedback from COI to optimize benefits and ensure transparency in resource allocation.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> Environmental Qualification Resolution: "Update of Resources and Reserves Part II, Underground Exploitation Pampa Augusta Victoria of El Peñon Mining Site" Pan American Silver Sustainability Policy Job Profiles

		<ul style="list-style-type: none"> • HSEC Organizational Chart • Financing of Productive Activities (FAP) and Financing of Community Initiatives (FIC) • Citizen Meeting Minutes • Community Tourism Roundtable Meeting • Taltal Hospital Meeting – June • NI 43-101 Technical Report for the El Peñon Gold-Silver Mine, Antofagasta Region, Chile
5. COI Response Mechanism	A	<p>Summary of Findings</p> <p>The site has a formal process for collecting feedback and comments from Stakeholder Communities (COI). This is carried out through the “Citizen Consultation” survey, promoted by the Pan American Silver Foundation and El Peñon, which allows COIs to share their opinions. Additionally, the email address comunidad.minerameridian@cl.panamericansilver.com has been enabled as an alternative channel for submitting feedback.</p> <p>The site also has a mechanism for handling complaints and grievances, which begins with submitting the request to the same email address. The information is then recorded in the Isometrix system, where it is categorized according to its nature. Once the case is registered, it moves to the Initial Response stage, where the information is reviewed and it is determined whether a specific solution is required. This mechanism includes several follow-up steps, such as objection management, technical evaluation, and case closure, ensuring a systematic and traceable process. Furthermore, the system allows supporting documentation to be attached, reinforcing transparency and accountability for each interaction.</p> <p>Finally, the site has communicated email address for inquiries and complaints through direct emails and monthly meetings with COIs, ensuring that all stakeholders are aware of the available channels to participate and express their concerns.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Citizen Meeting Minutes September 2025 • Community Tourism Roundtable Meeting, August 2024 • Taltal Hospital Meeting – June 2025 • Citizen Meeting – September 2025

		<ul style="list-style-type: none"> • Email for dissemination of the whistleblower channel, October 3, 2024 • Isometric Response Mechanisms • Presentation of Monthly Meetings
Preventing of Child and Forced Labour (Indicate YES or NO)		
1. Preventing Forced Labour	Yes	<p>Summary of Findings</p> <p>The site has a Global Human Rights Policy that prohibits forced labor, servitude, and child labor. Based on this policy, processes have been implemented for the detection of forced labor during talent selection, training on human rights, and grievance mechanisms. There is also a procedure for addressing workplace harassment and sexual harassment complaints, applying corrective measures and termination in verified cases, with follow-up managed by the Legal and Compliance department.</p> <p>Additionally, the site has a Special Regulation for Contractors and Subcontractors (January 2025), which requires compliance with labour and human rights standards. This includes guidelines through the Supplier Code of Conduct, dissemination of policies, and annual audits. Evidence from a sample review of contractors confirmed that have incorporated these guidelines into their internal regulations.</p>
Identified Gaps		
		NA
Examples of Evidence Consulted		
		<ul style="list-style-type: none"> • Human Rights Policy • Human Rights Policy Dissemination – El Peñon Employees • Human Rights Policy Dissemination – Contractor Companies • Contractor Company Accreditation • GR-R03 – Special Regulation for Contractor Companies • Monitoring of Third-Party or Supplier Evaluation Procedures via GAN Integrity Platform • Contractor Audit Reports • Attendance Record for Contractor Training (EECC)
2. Preventing Child Labour	Yes	<p>Summary of Findings</p> <p>The site has a Global Human Rights Policy that prohibits forced labor, servitude, and child labor, incorporated into El Peñon's Internal Rules on Order, Hygiene, and Safety. To ensure compliance, official documents verifying legal age,</p>

		<p>such as a Criminal Record Certificate and national ID, are required and periodically audited by the Human Resources department. Each position has a defined job profile to guarantee that workers possess the necessary skills to perform their duties safely.</p> <p>For contractor oversight, the site uses the Web Control platform, where contractors upload all legally required documents and those mandated by Pan American Silver standards for verification and approval. If any irregularity is detected, such as documentation belonging to a minor, access is denied. It is noteworthy that no such cases have been recorded in recent years. Additionally, the personnel entry procedure restricts access to individuals under 18 years of age, and annual audits are conducted to ensure contractors do not employ minors.</p>
Identified Gaps		NA
Examples of Evidence Consulted		
<ul style="list-style-type: none"> • Screenshot in Web Control of documentation requested from contractors for personnel accreditation • Contractor audit reports • Internal Regulations El Peñon - 2025 • New worker induction checklist • Hiring documents • New worker information form • Subcontracting services contract template 		
Safety and Health		
1. Commitments and Accountability	AA	<p>Summary of Findings</p> <p>The site has corporate and local commitments to prevent workplace accidents, outlined in the Occupational Health and Safety Policy signed by senior management on December 26, 2024. This policy is supported by control programs, a management system, and monthly performance monitoring.</p> <p>A senior management representative (HSEC Manager) oversees occupational health and safety.</p> <p>Inductions for new employees and contractors, monthly and quarterly safety meetings, and Safety Committee sessions are conducted. Internal Rules of Order, Hygiene, and Safety define worker responsibilities, shared during annual meetings.</p> <p>An internal audit on August 4, 2025, confirmed compliance with TSM criteria.</p>

		<p>Safety programs include:</p> <ul style="list-style-type: none"> - Forwood Application for inspections - Managerial inspections for unsafe conditions - Improvement suggestion campaigns <p>The Safety Department conducts monthly evaluations and reviews indicators, with companies like ICEM participating in cross-audits to enhance risk prevention.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Occupational Health and Safety Policy • Safety, Occupational Health, Environment, and Community Plan (2025) • HSEC Manager Job Profile • Site Organizational Chart / El Peñon Organizational Chart • Email Confirmation for Safety Induction Enrollment • Internal Rules on Order, Hygiene, and Safety – El Peñon • Job Profiles • TSM MAC 2025 Audit Tool • Performance Recognition Presentation 2025 • Ideas Campaign 2025: HSEC Management Projects Meeting (July 23, 2025)
2. Planning and Implementation	AA	<p>Summary of Findings</p> <p>The site has an Integrated Occupational Health and Safety Management System. The Incident Management Procedure uses Root Cause Analysis for minor incidents and ICAM for major ones, with notifications communicated organization-wide. Corrective measures are verified and approved by management.</p> <p>For critical risk management, the Forwood platform is utilized for inspections, alongside the Critical Risk Management (CRM) system for compliance data. Tasks are identified through IPER and updated by management.</p> <p>A comprehensive Safety, Occupational Health, Environment, and Community Plan is in place, submitted to local authorities, including an Industrial Hygiene Program monitoring over 70% of personnel exposed to hazards, supported by Mutuality.</p> <p>Responsibilities for HSEC management are clearly defined, with adequate resources allocated. The annual budget is monitored monthly. Control methodologies like Bow Tie and</p>

		<p>field verification are applied, with hygiene and safety records maintained. Internal audits identify improvement opportunities. A qualified industrial hygienist oversees critical controls, defined as barriers to prevent fatalities, requiring continuous management and verification.</p>
<p>Identified Gaps to Achieve Level A</p> <p>NA</p>		
<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Safety, Occupational Health, Environment, and Community Plan, 2025 • GH-P07-R01: Work Procedure – Incident Management and Investigation • SGRN Antirion Course • Critical Risk Management (CRM) – Forwood • IPER Mine Production • Action Plan Indicator II Level B – Compliance with Level A Requirements • IPERC Management Areas • Bow Tie – Critical Tasks • Forwood Platform • Health Surveillance Program 2024 • Qualitative Evaluation of HSEC, Geomechanics • Organizational Chart – El Peñon • Job Profile – Hygienist • Managerial Meeting Presentation • Follow-up on Inspection Development using Forwood Application • Measurement and Monitoring Records – Chemical Laboratory • 2025 Budget – Safety & Medical Unit 		<p>Summary of Findings</p> <p>The site has an Annual Training Program addressing hazards and risks, managed by the Training Department. It includes safety induction, four days of onboarding for new hires, and monthly monitoring. Training needs are identified and documented through OTIC.</p> <p>Well-being is promoted via healthy eating programs, awareness campaigns, regular check-ups, and recreational facilities like sports courts and a gym. Mental health</p>

	<p>monitoring shows an 88% participation rate with low risk results. The organization encourages using recreational areas for better outcomes.</p> <p>The safety culture is supported through weekly inspections by the Resident Manager, quarterly safety performance meetings, and weekend inspections involving supervisors. Engagement with contractors and union representatives aligns internal programs with corporate safety standards.</p> <p>Organizational safety objectives are set for supervisors and managers, and evaluated annually based on specific indicators, affecting performance assessments. A quarterly safety incentive bonus is individual awarded for no lost-time accidents. Contractors are evaluated annually on safety compliance indicators.</p>
	<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
	<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Safety and Occupational Health Induction • Training and Development Plan 2025 • Action Plan Indicator III Level B – Level A Requirements (Health and Safety) • Safety, Occupational Health, Environment, and Community Plan 2025 • Emails Reviewing Training Needs • Training Evaluation • Training Records • Induction Records • Instructor CVs and Training Certificates • Performance Recognition Presentation 2025 • Ideas Campaign 2025 – HSEC Management Projects Meeting (July 23, 2025) • Antirion Verification Report • OPT Report • Budget Review Meeting Record – HSEC 2025 • Email on PPE Evaluation • Emails Reviewing PPE Technical Specifications for Purchase • Safety Evaluation of Contractor Companies for HVAC Service

		<ul style="list-style-type: none"> • Legal Contract Indicating Safety Bonus Conditions • Wellness Presentation – HSEC 2025 • Interviews with representatives of the company ICEM • Safety & Occupational Health Policy • Values of El Peñon • Weekly Inspection Presentation • Photo of Quarterly Meeting Dissemination • Psychosocial Risk Assessment Results – El Peñon
4. Monitoring and Reporting	A	<p>Summary of Findings</p> <p>The Site has the Safety, Occupational Health, Environment, and Community Plan 2025, which establishes systematic monitoring of key management indicators, including lagging and leading indicators.</p> <p>These indicators are analyzed monthly to identify trends and implement timely corrective or preventive measures. Based on annual results, objectives and targets are reviewed and adjusted to address negative trends or improvement opportunities. Information is continuously communicated through biweekly and quarterly meetings, as well as meetings with contractors and the Occupational Health and Safety Committee. Additionally, the annual sustainability report shares the site's performance publicly on Pan American Silver's website.</p> <p>For control and assurance, Pan American Silver (PAS) conducts scheduled audits to verify regulatory compliance and the effectiveness of the site's management system. In August 2025, an audit focused on the verification of critical controls was carried out, considering the implementation of a new management platform during the year. Additionally, the Site audits its contractors to ensure compliance with legislation and proper application of their management systems.</p> <p>The Occupational Health, Environment, and Community Plan is reviewed annually and approved by General Management. As part of this review, an annual accident analysis report is prepared, serving as the basis for defining action plans, objectives, and targets for the next period. Quarterly progress reports are also generated and presented by the General Manager in meetings with employees and contractors, reinforcing transparency and commitment to comprehensive management.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p>

		<ul style="list-style-type: none"> • Biweekly Safety and Health Activity Summary Presentation • Quarterly Meeting Presentation • Meeting Photographs • Attendance Record for Semiannual Meeting • Metrics Tracking and Comparison Report • Action Plan Indicator III Level B – Level A Requirements (Health and Safety) • Audit Scheduling Email • Audit Results Excel File • Critical Controls Monitoring Activity Program 2025 “Group 1-4” • Safety, Occupational Health, Environment, and Community Plan 2025 • HSEC Budget Review Record • Accident Analysis 2024 and Action Plan Definition for 2025 • Sustainability Report
5. Performance	AA	<p>Summary of Findings</p> <p>The Site has set annual safety and hygiene performance objectives for supervisors and managers, impacting individual assessments. Personal safety and quarterly incentive bonuses are offered for achieving zero accidents, formalized in contracts and communicated to employees. Contractor companies are included in safety evaluations, assessed monthly and discussed in meetings.</p> <p>The Safety, Occupational Health, Environment, and Community Plan 2025 outlines goals, including:</p> <ul style="list-style-type: none"> - Proactive: Investigate all incidents and ensure compliance. - Retrospective: Achieve full compliance with the Safety Program. - Trend: Reduce accident frequency by 10% compared to 2024. <p>The General Manager monitors compliance with these goals in follow-up meetings. The Site reported zero fatalities from 2022 to 2025 and benchmarks its performance against Chilean mining industry standards.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p>

		<ul style="list-style-type: none"> • Legal Contract with the Union • Supervisors' Contract • Safety, Occupational Health, Environment, and Community Plan 2025 • Monthly Meeting Presentation – Experts (June 2025) • Monthly Meeting Presentation – Administrators (July 2025) • HSEC Management Meeting Record (July 2025) • Risk Indicator Certificate • Evidence Presentation – Performance Goals for Retrospective Indicators HSEC 2025
Tailings Management		
1. Tailings management policy and commitment	AAA	<p>Summary of Findings</p> <p>The Operations, Maintenance, and Surveillance (OMS) Manual, approved by the General Manager, establishes in Section 1.8 the commitments of the Tailings Management Policy. This section refers to Module 1. The policies related to tailings management are aligned with Version 3.2 of the Tailings Guide and include the following:</p> <ul style="list-style-type: none"> • Environmental Policy • Occupational Health and Safety Policy (OHS) • Chemical Laboratory Policy • Social Responsibility and Community Relations Policy <p>An internal audit was conducted in December 2024 by the Corporate Director of Tailings from PAS, using the 2022 Conformance Table to verify compliance with the established requirements.</p> <p>It was verified that the policies related to tailings management are communicated to employees through posters displayed in various site offices.</p> <p>During interviews with the tailings facility operator and the Engineer of Record (EoR), a clear understanding of their respective responsibilities was evidenced.</p> <p>The budget review confirmed that it includes the costs associated with the company operating the tailings facility, as well as the maintenance of the EoR contract for 2025.</p> <p>An external audit was conducted in April 2024 by GA Consultores, which also used the 2022 Conformance Table and concluded that there was conformity and effectiveness in the implementation of the policies related to tailings management.</p>

		<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • The OMS Manual (October 1, 2024, Version 4) • Environmental Policy, approved 2024 • Occupational Health and Safety Policy, approved 2024 • Chemical Laboratory Policy, approved 2024 • Social Responsibility and Community Relations Policy, approved 2024 • Internal audit for Tailing Management (December 2024) • The budget 2025. • External audit (April 2024) by GA Consultores
2. Assigned accountability and responsibility for tailings management	AA	<p>Summary of Findings</p> <p>The responsibilities, roles, and accountabilities for tailings management have been defined and documented in the OMS Manual. It was verified that the manual explicitly includes the role of the Engineer of Record (EoR).</p> <p>It was reviewed and verified that during the internal audit (December 2024) conducted by the Corporate Director of Tailings from PAS, the 2022 Conformance Table was used to verify compliance with the established requirements.</p> <p>In the 2024 Annual Tailings Management Review Presentation, the Tailings Management Governance structure was updated with new positions and names. It was further verified that this governance structure was formally assigned by the Corporate Director of Tailings and designates Vice President, Mineral Processing, Tailings & Dam as the Accountable Executive for El Peñon, who reports directly to the Board of Directors.</p> <p>It was also reviewed that an external audit was conducted in April 2024 by GA Consultores, which utilized the 2022 Conformance Table and confirmed compliance with Level A requirements.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • The OMS Manual (October 1, 2024, Version 4) • 2024 Annual Tailings Management Review Presentation Internal audit for Tailing Management (December 2024)

		<ul style="list-style-type: none"> External audit (April 2024) by GA Consultores
3. Tailings management system and emergency preparedness	AA	<p>Summary of Findings</p> <p>It was reviewed and verified that tailings management is developed and implemented in accordance with the Tailings Guide, Version 3.2, and that the Emergency Preparedness and Response Plan (EPRP) align with the Tailings Guide, Version 3.3.</p> <p>An internal audit was conducted in October 2024 by the Corporate Director of Tailings, using the 2022 Conformance Table to verify compliance with requirements and alignment with Tailings Guide Version 3.2.</p> <p>An external audit was performed in April 2024 by GA Consultores, which used the 2022 Conformance Table and verified compliance with Level A requirements. However, it was noted that the audit did not include an evaluation of the quality of the controls nor an assessment of the effectiveness of the emergency plan.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> OMS Manual (October 1, 2024, Version 4) Emergency Preparedness and Response Plan for the Dry Filtered Tailings Storage Facility (01-10-2024, vs 3) Emergency drills “collision” April 2024 Emergency drills “cyanide” September 2024 2024 Annual Tailings Management Review Presentation Internal audit for Tailing Management (December 2024) Internal audit for Tailing Management (December 2024) External audit (April 2024) by GA Consultores
4. Operation, maintenance, and surveillance	AA	<p>Summary of Findings</p> <p>The OMS Manual was approved by General Management and provides a detailed description of the key aspects of design, protocols and documentation, permits, roles and responsibilities, maintenance and monitoring procedures, including identified failure modes and critical controls.</p> <p>An internal audit was conducted in October 2024 by the Corporate Director of Tailings, using the 2022 Conformance Table to verify compliance with the requirements of OMS Guide Version 2.1.</p> <p>Additionally, an external audit was carried out in April 2024 by GA Consultores, which verified that the operation is in compliance with the OMS Guide.</p>

		<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • OMS Manual (October 1, 2024, Version 4) • 2024 Annual Tailings Management Review Presentation Internal audit for Tailing Management (December 2024) • Internal audit for Tailing Management (December 2024) External audit (April 2024) by GA Consultores
5. Annual tailings management review	AAA	<p>Summary of Findings</p> <p>It was reviewed and verified that Annual Tailings Management Reviews for 2023 and 2024 were conducted, with the 2024 review meeting all Level A requirements.</p> <p>An internal audit was performed in December 2024, using the 2022 version of the Conformance Table. The Annual Review (December 2024) was carried out in accordance with Tailings Guide Version 3.2. It was also verified that the results of the review were communicated to the Board and the EOR.</p> <p>An external audit conducted in April 2024 by GA Consultores determined that the Annual Review met all Level A requirements, and evidence was found demonstrating the effectiveness of the actions derived from previous tailings management reviews.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Annual Reviews for 2023 and 2024 • 2024 Annual Tailings Management Review Presentation Internal audit for Tailing Management (December 2024) • External audit (April 2024) by GA Consultores
Water Stewardship		
1. Water Governance	AA	<p>Summary of Findings</p> <p>The Water Committee was approved by the General Manager, and outlines responsibilities for water management and includes operational procedures.</p> <p>A Water Improvement Plan for El Peñon ensures compliance with General Directorate of Water regulations and addresses regulatory observations. In the case of internal corrections at the site, these are presented to the General Water Committee.</p> <p>El Peñon has an Environmental Policy (2024) supporting water management, aligned with Pan American Silver's</p>

		<p>Corporate Environmental Policy and Water Stewardship Framework, and is communicated to all staff.</p> <p>A Risk Matrix identifies risks related to extraction limits and aquifer impacts, with budget allocations for addressing these risks and ongoing studies.</p> <p>Internal audits of the Water Extraction Reporting System and the Pan American Silver Water Management Standard were conducted in 2023 and 2025, confirming defined roles and responsibilities.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Monthly Water Committee Record (July 2025) • Environmental Policy 2024 • Environmental Policy of Pan American Silver (2022) • Risk Matrix related to the water aspect • Hydrogeological studies 2023-2024-2025. • Internal audit of the Water Extraction Reporting System (April 2023) • Internal audit of the Pan American Silver Water Management Standard (CORP-ENV-ST-005) 2025. • External Water Management Audit was conducted by B&CA Asesorías (Bordolo & Consultores Asociados EIRL) July 2025
2. Operational Water Management	AA	<p>Summary of Findings</p> <p>An updated Risk Matrix, including water management, is in place, identifying risks related to extraction limits and aquifer impacts. Monthly Water Committee meetings monitor these risks as well as technical studies, like the 2024 Hydrogeological Model, that address aquifer risks.</p> <p>Water quality and quantity data are recorded and reported via the General Directorate of Water web portal and semi-annual internal reports. An operational water management system is established, requiring monthly updates on water balance, with the latest from August 2025.</p> <p>A monitoring program focuses on cyanide concentration and flow rate, with specific control procedures. An Early Warning Plan for the Pampa Buenos Aires aquifer monitors flow rate and cyanide traces, addressing potential emergencies from a reverse osmosis plant failure.</p> <p>Training and awareness for employees and contractors are conducted, including a “Water Care” video on internal TV.</p>

		<p>Opportunities for improvement in water management are identified in meetings, such as selling extraction well MC1 and enhancing basin recharge studies.</p> <p>Semi-annual trend analysis of water monitoring results are submitted to the National Geology and Mining Service of Chile (SERNAGEOMIN).</p> <p>Internal audits of the Water Extraction Reporting System and the Water Management Standard were conducted in 2023 and 2025, confirming compliance with Level A requirements.</p> <p>El Peñon's Water Extraction Management Control Plan aligns with Environmental Qualification Resolutions, the Water Code, and the Closure Plan.</p>
	NA	<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Risk Matrix 2025 • Monthly Water Committee meetings. • 2024 Hydrogeological Model • Records of water quality and quantity data reported through the web portal of the General Directorate of Water of Chile • Water Balance Procedure • Water Balance (august 2025). • Monitoring Program 2025 • Early Warning Plan • Training and awareness program • Video "Water Care" • Print screen of Trend analysis of water quality and quantity monitoring results of SERNAGEOMIN. • Internal audit of the Water Extraction Reporting System was conducted in April 2023. • Internal audit of the Pan American Silver Water Management Standard (CORP-ENV-ST-005) 2025 • Water Extraction Management Control Plan, • External Water Management Audit was conducted by B&CA Asesorías (Bordolo & Consultores Asociados EIRL) July 2025.

		<p>Hydrogeological Model, and Environmental Characterization Study.</p> <p>Watershed management is assigned to the Geology Department. Relevant stakeholders include employees, contractors, and the Environmental Assessment Service (SEA). To demonstrate interactions with stakeholders, El Peñon participated in a Regulatory Update Seminar on Law 21.740 (June 18, 2025), aimed at allowing users to contribute to the new law.</p> <p>El Peñon is the sole user of the Pampa Buenos Aires aquifer, with no community interactions. Although not part of formal watershed governance, the company engages with public institutions like the General Directorate of Water through public information systems and contributes to scientific publications. A watershed recharge study is underway to assess cumulative effects on the aquifer, with plans for measurable objectives and performance tracking to be defined in the future.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>NA</p>
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • 2022 Water Study and Hydrogeological Model • 2024 Hydrogeological Model • Environmental Characterization Study • Water Management Committee • Evidence of participation in Regulatory Update Seminar on Law 21.740 (June 18, 2025) • Evidence of participation in a corporate Environmental and Communities Summit (May 2025). • Hydrogeological studies from 2022 to 2025 • Evidence of participation in Scientific Journal of Hydrogeology and Basins. • Risk Matrix 2025.
4. Water Reporting and Performance	A	<p>Summary of Findings</p> <p>It was reviewed and verified that El Peñon has established objectives related to the risks and opportunities of water management, as reflected in the 2025 Water Management Committee. The progress of these objectives is monitored monthly, with the participation of the General Manager, and it was verified that the objectives are being met as planned.</p> <p>The performance of the water management objectives is reported biweekly to the public system of the General</p>

	<p>Directorate of Water. To follow this system, a QR code is available that provides access to the monitoring results for each well and its corresponding reference value. If any discrepancies or issues are identified during this process, the state authority notifies the site for immediate analysis and corrective action. Since the reports submitted to the Chilean government are publicly accessible, the information is available to all stakeholders (COIs), who may provide comments or request detailed information.</p> <p>Identified Gaps to Achieve Level A</p> <p>NA</p> <p>Examples of Evidence Consulted</p> <p><u>https://www.consejotransparencia.cl/portal-de-transparencia/</u></p> <p><u>https://portal.sma.gob.cl/</u></p> <p><u>https://dga.mop.gob.cl/derechos-de-agua/</u></p> <p><u>https://www.sea.gob.cl/</u></p>
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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>Terms of Reference for Verifiers</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	NA
Date of statement of verification	
Signature of lead verifier	

Appendix A List of PAS participants and El Peñon participants

Name	Position	Company
Karina Nakandakari	Manager, ESG Standards Compliance	Pan American Silver
Christian Del Valle	Senior Director, Corporate Affairs and ESG Engagement	Pan American Silver
Nelson Olmos	Superintendente de Planta	El Peñon
Miguel Zúñiga	Metalurgista (Ingeniero de Relaves)	El Peñon
Sara Cortés	Superintende de Permisos y Medio Ambiente	El Peñon
Leonardo Fabio	Coordinador Ambiental	El Peñon
Lorena Cea	Coordinador Ambiental	El Peñon
Maite Bustamente Cuevas	Ingeniero de Gestión de Medio Ambiente	El Peñon
Carlos Pizarro	Jefe de servicios a las personas	El Peñon
Juan Fuentes Lopez	Gerente de Geología	El Peñon
Sergio Castro	Gerente General	El Peñon
Marcelo Echeverria Gara	Gerente Planta	El Peñon
Miguel Donoso	Gerente HSEC	El Peñon
Jose Naddaf	Coordinador de Gestión HSEC	El Peñon
Marco Retamales	Jefe Departamento HSEC	El Peñon
Cristian Riquelme	Coordinador HSEC	El Peñon
Luis Benvenuto	Vocero de gestión de crisis/Director de Recursos Humanos	El Peñon
Rolando Luza	Superintendente Recursos Humanos	El Peñon
Francisco Laferte Torrejon	Jefe HSE - Humanos	El Peñon
Daniela Gamez Ubeda	Líder de brigada de Emergencia	El Peñon

Appendix 2 COIs interviewed

Name	Position	Company
Bruno Espinace	Gerente General and EOR	GA Consultores
Maria Jose Zubieta	Líder de Gestión de Relaves y Permisos	GA Consultores
René Molina	Ingeniero de Proyectos	GA Consultores
Jamet Huanca	Administradora de Contratos	Trek Rental
Leonel Alvarez	Supervisor de turno	Trek Rental
Christian Herrea	Hidrogeólogo	Consultor Independiente
Javier Urrutia	Hidrogeólogo	Consultor Independiente
Mauricio Angustin Zamaro Cruz	Gerente de Proyecto	Liemun
Yobany Abarzua Carter	Jefe de Terreno	ICEM
Myckel Villaseca Carbajar	H&S Terreno	ICEM
Freddy Garrido Ayllen	Jefe de SSOMA	ICEM
Varina Asterga Diaz	Dirigente	Asociación Camanchacos del Salitre Taltal
Mario Solari	Presidente del Sindicato de Supervisores de El Peñon	El Peñon