

## TSM Verification Report

### Facility Information

Name of company	Pan American Silver (PAS)
Name of facility	Timmins West and Bell Creek (Timmins operation) - Lake Shore Gold (LSG)
Address	8215 Hwy 101 West, Timmins, Ontario, Canada
Country of operation	Canada
Products/metals produced on site	Gold
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 checked="" 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> )	PAS Timmins operation consists of two underground mines (Timmins West and Bell Creek) feeding the Bell Creek mill. Infrastructure includes haul roads, processing plant, and tailings facilities. The processing circuit includes: crushing, semi-autogenous grinding (SAG) and ball milling, leaching Carbon-in-leach (CIL) and carbon-in-pulp (CIP), stripping and refining to produce gold doré bars. A tailings facility (TSF) exists at the Bell Creek mine. Timmins operation recently added a paste backfill plant at Bell Creek to improve ground stability and ore recovery in deeper zones and a new haul road is under construction to reduce truck traffic through Timmins city centre and minimize environmental impact.

### Verifier Information

Name of lead verifier	Michelle Gillen as Lead VSP (Verification Service Provider) Judy Fedorowick as VSP
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)	<p>Kick-off Meeting: 16/10/2025</p> <p>Document Review: 28/10/2025 – 5/12/2025</p> <p>Site Visit: 17/11/2025-20/11/2025</p> <p>Corporate Crisis Interview: 3/12/2025</p> <p>COI Interviews: during site visit</p> <p>Reporting: 1/12/2025 – 5/12/2025</p>
Verification period	<p>2023-2025</p> <p>Verifiers focused on the 2025 self-assessments provided by the site, with reference to the period of 2023 - 2025.</p>

### Verification Process

Summary of the verification methodology	<p>The Verification process conducted by ERM verifiers included the review of the self assessment, the evaluation of the documentation that was shared and the interviews. ERM verifiers selected a sample of documents, including procedures, work instructions, records, assessments, and spreadsheets, to verify compliance with TSM requirements. This analysis allowed us to assess the documentation aspect of the Management Systems in place. In addition, we conducted process-based sampling by evaluating inputs, processes, and outputs to confirm compliance with established procedures. A site visit was performed to assess how is incorporating aspects of TSM into site operations. Our approach also included Communities of Interest (COI) interviews via remote discussions.</p>
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.</p> <p>A request for key COI representatives was made, and arrangements were made to have short interviews during the site visit. A schedule of verification activities was prepared prior to kick-off meeting and shared with site representatives. The schedule included a focused interview with the lead for each TSM protocol and selected site tours. A separate remote meeting was scheduled to review the Corporate Crisis Management protocol following the site visit.</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 VSP reviewed this material in advance of the site visit and during verification activities requested some additional information and data.</p>

	<p><u>Site Visit</u></p> <p>A visit to Timmins operation was conducted over four days. In accordance with the schedule, an opening meeting was held with site staff, including site leadership.</p> <p>The subsequent interviews focused on reviews of the Timmins operation's self-assessments for each protocol. Evidence was reviewed and where required, the VSP requested additional information or adjustments to the self-assessment.</p> <p>Sampling of evidence was limited to certain monitoring reports, minutes of meetings, and other periodically scheduled activities.</p> <p>A tour of the mill and a separate two-hour tour of the facilities and general views of the Bell Creek Mine and virtual tour of the Timmins West Mine were conducted, including tailings.</p> <p>Interviews were conducted with operational personnel as well as with individuals responsible for systems verification, procedures implementation and processes management. For certain protocols, multiple site personnel participated in the discussions. Refer to Appendix A for a list of LSG and PAS participants.</p> <p><u>COI Interviews</u></p> <p>COI interviews were conducted in person or by Microsoft Teams, depending on participant availability. Refer Appendix B for a list of COI participants engaged by VSP.</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	Internal and external COI were interviewed composing approximately 35 individuals. Internal COI included both workers and those within leadership as outlined in Appendix A. A Joint Health and Safety Committee Member (JHSC) was interviewed in relation to the overall health and safety standard, as well as Impact Benefit Agreement Coordinator through the Wabun Tribal Council and represents Mattagami and Flying Post First Nations. ERM also interviewed External COI including the General Manager of the Mattagami River Conservation Authority and the Engineer of Record (EoR) for the TSF to further understand how the Timmins operation is managing key aspects related to biodiversity and tailings management.
Has the facility developed an action plan to address gaps to achieve Level A or Yes on any TSM performance indicators?	NA

## 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	A
Climate Change	1. Corporate Climate Change Management	A*
	2. Facility Climate Change Management	A
	3. Facility Performance Targets and Reporting	AA
Crisis Management and Communications Planning - Corporate	1. Crisis Management and Communications Preparedness	YES
	2. Review	YES
	3. Training	YES
Crisis Management and Communications Planning - Facility	1. Crisis Management and Communications Preparedness	YES
	2. Review	YES
	3. Training	YES
Indigenous and Community Relationships	1. Community of Interest (COI) Identification	A
	2. Effective COI Engagement and Dialogue	A
	3. Effective Indigenous Engagement and Dialogue	A
	4. Community Impact and Benefit Management	A
	5. COI Response Mechanism	A
Prevention of Child and Forced Labour	1. Preventing Forced Labour	YES
	2. Preventing Child Labour	YES
Safe and Healthy	1. Commitments and Accountability	A
	2. Planning and Implementation	A
	3. Training, Behaviour and Culture	AA
	4. Monitoring and Reporting	A
	5. Performance	AA
Tailings Management	1. Tailings Management Policy and Commitment	A
	2. Tailings Management System and Emergency Preparedness	A
	3. Assigned Accountability and Responsibility for Tailings Management	A
	4. OMS Manual	A
	5. Annual Tailings Management Review	A
Water Stewardship	1. Water Governance	A
	2. Operational Water Management	A
	3. Watershed-scale Planning	AAA
	4. Water Reporting and Performance	A

\*Verification from 2023

Criterion	Rating C, B, A, AA or AAA (unless otherwise indicated)	Summary of Findings, Identified Gaps, and Examples of Evidence Consulted
<b>Biodiversity Conservation Management</b>		
1. Corporate biodiversity conservation commitment, accountability, and communications	AAA	<p><b>Summary of Findings</b></p> <p>There is a corporate commitment to biodiversity management outlined in the PAS Environmental Standard for Biodiversity and Mine Closure. The document outlines biodiversity conservation accountabilities at the company-level and at the site-level. This commitment is cascaded to the Timmins operation and is adopted through the site-specific LSG Biodiversity Management Program which also includes accountabilities, roles and responsibilities related to biodiversity conservation management. LSG has developed a risk assessment to address biodiversity management and a continual improvement plan. Both the PAS and LSG biodiversity management program reference the hierarchy to negate biodiversity impacts.</p> <p>LSG shares its commitment to biodiversity management during open houses with Communities of Interest (COI) and through participation on several committees such as the Mattagami River Conservation Authority.</p> <p>A corporate internal environmental audit occurred in 2023 and included a review of biodiversity and closure aspects. Monitoring of both the aquatic and terrestrial components are part of the program.</p> <p>PAS Environmental Policy includes a commitment to achieve no net loss with respect to biodiversity, and to engage in open and transparent dialogue and consultation with COI on environmental matters.</p>
		<p><b>Identified Gaps to Achieve Level A</b> (if applicable)</p> <p>NA</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• PAS Biodiversity and Closure Standard</li> <li>• PAS Environmental Policy</li> <li>• ADM ENV PLN-01 – Biodiversity Management Program</li> <li>• ADM-Biodiversity Risk Assessment and Continual Improvement Plan</li> <li>• LSG job descriptions for Environmental Coordinator and Environmental Technician</li> <li>• Monthly environmental scorecard</li> <li>• 2025 Environmental Operating Budget</li> <li>• CAR Example Sustainability Review</li> <li>• PAS Sustainability Report – 2024</li> <li>• Annual Environmental Training PowerPoint and sign in sheets</li> </ul>

		<ul style="list-style-type: none"> <li>• ADM Communities of Interest List</li> <li>• 2025-02-13 LSG update presentation Mattagami First Nation</li> <li>• 2024 01 17 LSG Update Presentation Apitipi Nation</li> <li>• 2022 01 27 LSG Update Metis Nation of Ontario</li> <li>• 2024 – 10 Annual Stakeholder ESG Survey</li> <li>• Corp-Env 2023 LSG Environmental Audit Report Final</li> </ul>
2. Biodiversity conservation planning and implementation	AAA	<p><b>Summary of Findings</b></p> <p>LSG Biodiversity Management Program describes biodiversity monitoring initiatives (i.e. references to baseline biodiversity data assessments and ongoing biodiversity monitoring including closure plans). There have been several biodiversity baseline studies completed for the Timmins operation where significant species are identified and management programs adopted. The most recent baseline was completed in 2023.</p> <p>The biodiversity plan is based on a Timmins operation specific risk assessment that was completed and tied to a continual improvement plan (CIP) that is tracked. The CIP includes programs completed, in progress or planned for the following year. The plans are included as part of the annual budgeting process.</p> <p>Annual environmental training includes biodiversity aspects. Roles and responsibilities are assigned to the environmental coordinators and technicians.</p> <p>Biodiversity management is also a key component of the open house presentations that are provided for the First Nations and other interest groups. LSG is part of the Ontario Mining Association (OMA) environmental committee where biodiversity information is also shared. The list of COIs includes those that have a biodiversity interest. Minutes of meetings with these groups outline LSG's active participation. An interview with one of the key stakeholder, the Mattagami River Conservation Authority, (MRCA) was conducted to verify LSG's participation in biodiversity conservation management program.</p> <p>A corporate internal environmental audit occurred in 2023 and included a review of biodiversity and closure aspects.</p> <p>Emerging research and development investments as well as contributing to biodiversity outside of the mine site include the Mattagami Sturgeon Restoration Project, Mattagami First Nation Fish Hatchery, and Biodiversity Wetland Habitat Enhancement Plan (e.g. Moose Aquatic Feeding Areas), and Bee City with the City of Timmins. LSG is also supporting an environmental DNA (eDNA) survey for Blanding's Turtles, (Species at Risk), which is an emerging technology.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• PAS Biodiversity and Closure Standard</li> <li>• PAS Environmental Policy</li> <li>• ADM ENV PLN-01 – Biodiversity Management Program</li> </ul>

		<ul style="list-style-type: none"> <li>• ADM-Biodiversity Risk Assessment and Continual Improvement Plan</li> <li>• Monthly scorecard - 2025</li> <li>• LSG job descriptions for Environmental Coordinator and Environmental Technician</li> <li>• Monthly environmental scorecard</li> <li>• 2025 Environmental Operating Budget</li> <li>• Little Goose Creek Habitat Assessment eDNA 2025 02 24</li> <li>• EEM Cycle 5 report – 2024-10-23</li> <li>• Species at Risk supplemental Memo – Phase 6 2025 02 24</li> <li>• Biodiversity Sighting master spreadsheet</li> <li>• 2025-06-27 Exploration Vegetation Clearing Direction</li> <li>• Annual environmental training and sign-in sheets</li> <li>• DSR-2024 50 Wintergreen Fund-Bee City</li> <li>• 2025-04-24 Minutes Bee City Pollinator Team</li> <li>• Mattagami Fish Hatchery Participation list</li> <li>• Information sheets on biodiversity regarding timing restrictions and feeding wildlife posted at facility</li> <li>• Interview with the General Manager, Mattagami River Conservation Authority</li> </ul>
3. Biodiversity conservation reporting	A	<p><b>Summary of Findings</b></p> <p>The Timmins operation ensures transparency and accountability in biodiversity conservation through public reporting. Pan American Silver provides annual disclosure of environmental targets and performance in its Sustainability Performance Data Book, specifying achieved goals and future commitments. The Timmins operation provides biodiversity information to the corporate office for inclusion in the Sustainability Reports through a structured workbook. Highlights of projects conducted by Timmins operation that appear in the Sustainability Report include the Fish Hatchery project.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Annual Sustainability Report (2024).</li> <li>• Environmental spreadsheet tab SP1-E7</li> <li>• ADM Communities of Interest List</li> <li>• 2025-02-13 LSG update presentation Mattagami First Nation</li> <li>• 2024 01 17 LSG Update Presentation Apitipi Nation</li> <li>• 2022 01 27 LSG Update Metis Nation of Ontario</li> </ul>
<b>Climate Change</b>		
	A	<b>Summary of Findings</b>

1. Corporate climate change management		Verification conducted at Corporate level in 2023.
		<b>Identified Gaps to Achieve Level A</b>
		NA
2. Facility climate change management	A	<b>Summary of Findings</b>
		<p>The Timmins operation has an environmental and energy management (EEM) plan that outlines roles and responsibilities and provides guidance on how energy data is collected, reviewed and reported. It includes risks and risk mitigations, action plan development, and key objectives. The EEM includes all the major steps of a management system including identifying material data, collection processes, monitoring activities, roles and responsibilities, and an annual management review.</p> <p>The plan outlines the major sources of energy at Timmins operation and how the amount of energy is estimated (measurements, consumption records etc). This plan is used to annually determine the energy used and Greenhouse Gas (GHG) emissions for reporting purposes which was third party verified in 2023 and 2024. There is an energy and GHG dashboard that is used for tracking purposes.</p> <p>An energy management team has been developed and is inclusive of various positions that can have an impact on energy management (i.e. Environment Superintendent, Operations and Maintenance leaders, Project Engineers, and co-ordinators)</p> <p>Two climate change risk assessments have been completed to date, both including the Timmins operations: 1) Analysis of Climate Change Impacts to Operations and Projects (Knight Piesold, 2020) and 2) Climate Assessment to Support Task Force on Climate - Related Financial (TCFD) Disclosures - Climate Risk Screening Assessment (WSP, 2024). The assessment used validated climate indicators to predict risk to the Timmins operation including closure and post closure scenarios.</p> <p>Awareness of climate change is promoted through the annual environmental training required of employees. Ongoing awareness is through information posted around the site which was observed at the wicket and several information boards.</p> <p>In meetings with the First Nations conducted in 2023 and 2024 LSG reported their progress to the TSM Energy and Climate Change Protocol. The presentations also included energy reduction project that the Timmins operation is undertaking such as trial of an electric scoop and use of renewable diesel.</p> <p>Energy management is incorporated into business planning and is a key operational component for LSG which participate in Ontario peak shaving project. Through participation in the project, the Timmins operation is able to shut down the SAG mill when energy demand is high thereby reducing operating costs and saving energy consumption. Other examples of business planning are replacing existing equipment with more energy efficient equipment where possible.</p>
		<b>Identified Gaps to Achieve Level A</b>
		NA
		<b>Examples of Evidence Consulted</b>



		<ul style="list-style-type: none"> <li>• Analysis of Climate Change Impacts to Operations and Projects (Knight Piesold, 2020)</li> <li>• ADM- Climate Risk Screening Assessments</li> <li>• ADM-ENV-PLN-03 Energy and GHG Management Plan</li> <li>• LSG- Energy and GHG Emissions Policy</li> <li>• CAR Example – Electric Scoop Purchase</li> <li>• Energy and GHG Management Team Meeting Examples</li> <li>• Workbench notification examples of peak shaving</li> <li>• 2025-02-13 LSG update to the Mattagami First Nation</li> <li>• 2024-01-17 Update Presentation AAN</li> <li>• LSG Energy Assessment and EMIS 2025-07-13</li> <li>• Review of HMI and online energy measurement</li> <li>• Annual environmental awareness training and sign off sheets</li> <li>• Interviews with the Electrical Supervisor and Mill Manager</li> </ul>
3. Facility performance targets and reporting	AA	<p><b>Summary of Findings</b></p> <p>The company has set clear energy and GHG reduction targets aligned with international agreements. The Timmins operation participates in the PAS corporate reporting program. A common spreadsheet is used to identify the energy and GHG sources, and standard conversion factor and quantification methods are used to estimate overall emissions that are measured against targets.</p> <p>The Timmins operation action plans include reduction initiatives such as the Bell Creek Surface Fan Summer Shut down program and the adjustment to the Bell Creek Compressors which were the 2025 targets for the mine site. Progress on the projects are tracked and reported and projected in terms of energy and GHG savings. Targets have been met.</p> <p>Performance data are disclosed in public reports, using standard methodologies for energy and emissions calculations. The PAS Environmental Policy supports climate management and aims for Level A performance, covering Scope 1 and Scope 2 emissions with action plans.</p> <p>Progress is monitored via the “ATENTO24 system”, with annual reporting in the Sustainability Report. Currently, no offsets are used; reductions come from efficiency projects. Climate risk assessments are shared, with internal monitoring ensuring alignment with mitigation plans.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p>

		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• 2025 Environmental SPI Goals – Timmins</li> <li>• PAS Sustainability Report</li> <li>• ADM-ENV-PLN-03 Energy and GHG Management Plan</li> <li>• CAR Example – Electric Scoop Purchase</li> <li>• Provincial EPS GHG Reporting 2024</li> <li>• LSG NEAP quarterly reporting</li> </ul>
<b>Crisis Management and Communications Planning - Corporate (YES or NO)</b>		
1. Crisis Management and Communications Preparedness	Yes	<b>Summary of Findings</b> <p>The Corporate Crisis Management Plan (CMP) is updated annually, controlled, and not distributed outside the crisis team. The CEO is actively involved as a member of the crisis team, reviews and comments on the crisis plan, and attends crisis trainings. The COO, as Crisis Chair, signs off on the plan.</p> <p>The company uses an Enterprise Risk Management (ERM) structure to identify, evaluate, and mitigate material risks. Regular country updates and risk reviews are conducted at both asset/regional and corporate levels. The crisis plan includes guidance and procedures for managing various risks, including a recently updated plan for IT cyber incidents. The corporate office reviews risk registers/reports from operations and discusses them with sites and the Board.</p> <p>Defined roles and responsibilities for crisis team members, with individualized role-specific guidance packs, including two trained spokespersons are assigned, with documented experience and training.</p> <p>The Noggin Crisis Management Platform is used to notify team members via email, SMS, and voice message.</p> <p>The key media and stakeholder contact information reviewed or updated at least every two years and maintained by VP Corporate Affairs; this plan is shared with a backup if the VP is unavailable.</p> <p>The Board Room serves as the crisis meeting room, and evidence shown that it is equipped appropriately.</p> <b>Identified Gaps to Achieve</b> <p>NA</p> <b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Signed Corporate crisis plan; verifier walkthrough (no physical copy shared due to sensitivity).</li> <li>• ERM presentation (with sensitive risks removed); screenshots of meetings discussing risks; quarterly country risk reports</li> <li>• Sample role-specific packages reviewed during a virtual call.</li> <li>• Screenshots of communications checks with Noggin.</li> <li>• Screenshots of CEO interviews; VP Investor Relations' credentials; group training session details.</li> </ul>

		<ul style="list-style-type: none"> <li>• Examples of communication to CMT members receiving the plan and contact information.</li> <li>• Key Media and Stakeholder Contact Lists distribution</li> <li>• Photos and equipment lists of the Crisis Control Centre.</li> </ul>
2. Review	Yes	<p><b>Summary of Findings</b></p> <p>The Corporate Crisis Management Plan (CMP) is reviewed and approved annually or as needed, especially when there are changes in personnel or business operations. The most recent review was in April 2025. New members are confirmed on the team after they have received the CMP and completed the orientation.</p> <p>The Noggin notification system is tested at least twice per year. During these tests, core members of the Crisis Management Team are notified and assess the incident level.</p> <p>The key media and stakeholder contact information reviewed or updated at least every two years and maintained by VP Corporate Affairs; this plan is shared with a backup if the VP is unavailable.</p> <p><b>Identified Gaps</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• The Corporate Crisis Management and Communications Plan</li> <li>• Screenshots of Noggin communications tests from August and November.</li> <li>• Review of Media and Stakeholder Contact Information</li> <li>• Key Media and Stakeholder Contact Lists distribution</li> <li>• Screenshot of an annual mass notification email sent by HR to employees.</li> <li>• Screenshots of email introductions with the plan, training session invites, and documentation of when new members were identified.</li> </ul>
3. Training	Yes	<p><b>Summary of Findings</b></p> <p>The Corporate Crisis Management Team completes annual table top exercises. The last one was November 21, 2025.</p> <p><b>Identified Gaps</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Crisis training plan; internal review and external consultants report Annual Table tops completed. Last one Nov 21, 2025.</li> <li>• Full scale Crisis Drill OPEC Fuel Shortage CMT exercise 2024</li> </ul>
<b>Crisis Management and Communications Planning - FACILITY (YES or NO)</b>		
1. Crisis Management and	Yes	<p><b>Summary of Findings</b></p> <p>Annual Threat and Risk Assessments: The Security Manager conducts annual assessments, with business unit risks updated quarterly and uploaded to the Resolver system. Health, safety, and environmental risks are</p>

Communications Preparedness		<p>also reviewed and documented. Protocols for Threats/Risks: Protocols are established at multiple levels, including security, investigations, and discipline. Risk assessments are regulated by the Ministry of Labor, and both corporate and site-level frameworks are in place.</p> <p>Communication to Corporate: Facilities communicate regularly with the corporate office through reports, meetings, and briefs. Quarterly risk reports are sent to corporate security, and daily/weekly operational updates are available.</p> <p>Facility Crisis Management Team: All facilities have an Emergency Management Plan with a dedicated crisis management group. Roles and responsibilities are detailed in the CMP.</p> <p>Notification Mechanisms: Embedded in emergency procedures and managed by Security. The crisis team is activated for escalated incidents, with notification systems including phone, SMS, and email.</p> <p>Media Spokesperson: Primary and alternate spokespersons are assigned and formally trained, with roles detailed in the CMP. Media/Stakeholder Contacts: Contact lists are maintained as part of the CMP, with systems for tracking engagement.</p> <p>Controlled Plan: Crisis Management Plans are controlled documents, accessible only to authorized team members or via controlled sites. All team members receive training and know how to access the plan and contact lists. New members are trained within a month of joining.</p>
		<p><b>Identified Gaps to Achieve</b></p> <p>NA</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Facility Crisis Management Plan</li> <li>• Business unit risks updated quarterly, uploaded to Resolver.</li> <li>• Protocols for Threats/Risks</li> <li>• Protocols established for security, investigations, discipline.</li> <li>• Corporate and site-level documents.</li> <li>• Communication to Corporate</li> <li>• Facility Crisis Management Team</li> <li>• Emergency Management Plan with dedicated Control group.</li> <li>• Embedded in emergency procedures, managed by Security.</li> <li>• Media Spokesperson training</li> <li>• Primary and alternate assigned, formally trained.</li> <li>• Media &amp; Stakeholder Contacts</li> <li>• Team Members Provided Plan</li> <li>• Training records, access via Teams site.</li> <li>• Crisis Control Centre</li> <li>• Employee Alert Mechanisms (alarms, notifications, HR platform, Noggin.)</li> </ul>

		<ul style="list-style-type: none"> <li>Emergency planning with Timmins stakeholders (2025-1.10)</li> <li>Mine Rescue, Timmins Fire Department, EMT. (2025-1.11.)</li> </ul>
2. Review	Yes	<p><b>Summary of Findings</b></p> <p>The City of Timmins and relevant stakeholders are involved in emergency planning. There are no communities directly adjacent to the mine sites, but outreach and coordination occur as part of the planning process. The Timmins Fire Department and other stakeholders are invited to participate in drills, such as recent cyanide spill exercises. The facility meets regularly with local emergency response authorities, including Mine Rescue, Hazmat vendors, and the Timmins Fire Department. Mine Rescue trains monthly and is the primary responder. Coordination with local emergency services is documented through correspondence and training records.</p> <p>The Crisis Management Plan (CMP) is reviewed and approved annually or as needed, especially when there are changes in personnel or business operations. The most recent review was in December 2024, with updates made for changes in communication and site management.</p> <p>Notification systems are tested at least four times per year. During these tests, core members of the Crisis Management Team are notified and assess the incident level. Multiple notification methods are used, including phone, SMS, and email. Alert mechanisms are tested at least four times per year. All members are notified by radio and site notification systems; underground employees may be notified by stench gas release and the Femco phone system. Off-duty employees are contacted by email and phone.</p> <p>The section of the CMP covering media and stakeholder contacts is updated by the Community and Sustainability director. No changes were made for 2024, but the CMP was updated for 2025.</p> <p><b>Identified Gaps</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>CMP review tracking</li> <li>Records of on-boarding new team members</li> <li>Employee Alert Mechanisms Tests</li> <li>Correspondence with PAS Corporate team</li> <li>Emergency planning with Timmins stakeholders (2025-1.10)</li> <li>Mine Rescue, Timmins Fire Department, EMT. (2025-1.11.)</li> </ul>
3. Training	Yes	<p><b>Summary of Findings</b></p> <p>Each year 8 underground scenarios and at minimum 2 surface emergency scenarios are conducted. These include table top and simulated crises incidents.</p> <p>The Timmins operation tests the Crisis Management team at many levels during the Year and at minimum annually has a test of a full crises event.</p> <p><b>Identified Gaps</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p>

		<ul style="list-style-type: none"> <li>• Stench exercise Bell Creek</li> <li>• Stench exercise Timmins West</li> <li>• Full scale Crisis Drill OPEC Fuel Shortage CMT exercise 2024</li> </ul>
<b>Indigenous and Community Relationships</b>		
1. Community of Interest (COI) Identification	A	<p><b>Summary of Findings</b></p> <p>There is a formal, documented process for identifying COIs at the facility level, capable of determining a wide range of interests and concerns. This process is outlined in the COI Outreach Program and the Communities of Interest List. The process includes mechanisms for COIs to self-identify, such as stakeholder-led research, company-led assessments, ministry-led consultations, feedback mechanisms (e.g., PAAS Listens, Whistleblower Policy), annual community visits, surveys, and public comment opportunities via the Environmental Registry of Ontario</p> <p>The COI list contains relevant attributes (contact info, areas of interest, etc.) and is reviewed annually to ensure information is current. Revision history and update records are maintained.</p> <p>Confidentiality provisions are in place, including Non-Disclosure Agreements and Impact and Benefit Agreements. The Outreach Program emphasizes protecting confidentiality when requested by COIs.</p> <p>COIs are reconsidered periodically throughout the mine's life cycle, especially during new projects or changes. Annual reviews and government updates (e.g., adding/removing COIs) are standard practice.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• ADM-COM-PLN-01 Community of Interest Outreach Program</li> <li>• ADM - Communities of Interest List</li> <li>• ADM-COM-SOP-01 Community of Interest Feedback Procedure</li> <li>• PAS Annual Sustainability Report</li> <li>• Ministry Notification of Consultation Requirements</li> <li>• Company contact info on website: <a href="https://www.panamericansilver.com/company/contact-us/">https://www.panamericansilver.com/company/contact-us/</a></li> <li>• Environmental Registry of Ontario: <a href="https://ero.ontario.ca/">https://ero.ontario.ca/</a></li> <li>• COI Engagement Log</li> <li>• Social Investment Committee Summary</li> <li>• Annual Stakeholder Survey</li> <li>• Impact Benefit Agreement Coordinator through the Wabun Tribal Council and represents Mattagami and Flying Post First Nations.</li> </ul>
2. Effective COI Engagement and Dialogue	A	<p><b>Summary of Findings</b></p> <p>The facility provides assistance to ensure COIs (Communities of Interest) can participate in engagement and dialogue processes. Examples include financial support for communities, tailored engagement processes, and</p>

		<p>accommodations for language or meeting preferences. There are documented COI engagement and dialogue processes, designed with input from COIs, and implemented through collaboration agreements and regular meetings.</p> <p>Engagement activities and outcomes are reported internally through regular management meetings, scorecard reports, and corporate communications. These are documented in the COI Outreach Program and annual sustainability reports.</p> <p>Formal engagement processes exist, including collaboration agreements (IBAs, MOUs, Exploration Agreements) with Indigenous communities. Occasional dialogue occurs with other COIs, and activities are tracked in the COI Engagement Log.</p> <p>Communications are written in clear, understandable language and, if requested, in the local language. All agreements are currently in English, with translation available if needed.</p> <p>Relevant materials are provided to COIs for review in advance of plans or projects. COIs are informed of incidents and given opportunities to provide feedback on permits and closure plans.</p> <p>The facility identifies COI needs for capacity building and provides support through education, training, and participation in environmental monitoring programs.</p> <p>Designated personnel receive training in engagement and dialogue, including cultural awareness and respectful engagement. Training examples include “Working Effectively with Indigenous Peoples” and participation in Indigenous awareness events.</p> <p>Public reporting on COI engagement is conducted through annual sustainability reports, which include survey results, engagement initiatives, and feedback mechanisms.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• ADM-COM-PLN-01 Community of Interest Outreach Program</li> <li>• Impact Benefit Agreement Overview</li> <li>• COI Engagement Log</li> <li>• ADM - MAC TSM Action Plan and Implementation Schedule</li> <li>• COI Engagement Accommodation Example – Invoice</li> <li>• Weekly Senior Management Reports</li> <li>• Senior Management Scorecard Reports</li> <li>• Corporate Communications Reports</li> <li>• PAS Sustainability Report</li> <li>• LSG Social Business Plan Report - 2025 KPIs and Budget</li> <li>• Environmental Registry of Ontario: <a href="https://ero.ontario.ca/">https://ero.ontario.ca/</a></li> <li>• Director of Environment, Sustainability and Security experience</li> </ul>

		<ul style="list-style-type: none"> <li>Employee-Contractor Training &amp; Awareness Examples</li> <li>Impact Benefit Agreement Coordinator through the Wabun Tribal Council and represents Mattagami and Flying Post First Nations.</li> </ul>
3. Effective Indigenous Engagement and Dialogue	A	<p><b>Summary of Findings</b></p> <p>The commitment to Indigenous engagement is reflected in corporate and site policies, as well as the negotiation of Impact and Benefit Agreements (IBAs) with Indigenous communities. This ongoing engagement is evidenced through regular meetings, community events, site tours, and correspondence. Activities are recorded in the COI Engagement Log.</p> <p>The engagement efforts align with the TSM Mining and Indigenous Peoples Framework, which emphasizes early engagement, the incorporation of Traditional Knowledge, and support for community development. The IBAs include frameworks for consultation, education, employment, business opportunities, environmental stewardship, and economic benefits.</p> <p>The facility collaborates with Indigenous communities to identify opportunities in education, training, employment, business, and economic development. Efforts are made to reach mutual agreements regarding culturally significant sites that may be affected by operations. This was also confirmed through COI interviews.</p> <p>Continued training for designated employees focuses on consultation requirements, Indigenous history, and intercultural engagement, ensuring sustained commitment to these important areas.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>ADM-COM-PLN-01 Community of Interest Outreach Program</li> <li>Impact Benefit Agreement Overview</li> <li>COI Engagement Log</li> <li>ADM - MAC TSM Action Plan and Implementation Schedule</li> <li>Site Induction and Training Video</li> <li>Cultural Awareness Training.</li> <li>PAS Sustainability Report</li> <li>Archaeological Assessments</li> <li>Impact Benefit Agreement Coordinator through the Wabun Tribal Council and represents Mattagami and Flying Post First Nations.</li> </ul>
4. Community Impact and Benefit Management	A	<p><b>Summary of Findings</b></p> <p>Timmins operation's senior management prioritizes addressing negative impacts on communities of interest (COI), especially Indigenous communities, through consultations, Impact Benefit Agreements (IBAs), and regular meetings. This was confirmed through interviews with COI.</p> <p>Roles and responsibilities for community commitments are defined in policies and monitored via engagement logs.</p> <p>Timmins operation assesses potential adverse impacts through risk assessments and feedback mechanisms, negotiating IBAs to protect treaty</p>



		<p>rights. The company implements IBAs and improvement plans, engages in social investment programs, and manages environmental and health concerns, as an example the current project to re-route the haul road to minimize the environmental and social impacts on the City of Timmins.</p> <p>Community contributions are documented in IBAs and Social Investment Programs. Strategies include involving under-represented groups and developing action plans with COI input, which are systematically tracked and managed.</p> <p>Public outcomes are shared through media and reports, while confidential contributions remain undisclosed. Baseline data and metrics are established to monitor action plan effectiveness, with regular reviews conducted with affected COI.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• COI Engagement Log</li> <li>• Impact Benefit Agreement Overview</li> <li>• ADM-COM-PLN-01 Community of Interest Outreach Program</li> <li>• ADM-COM-PLN-02 Social Investment Program</li> <li>• Social Investment Committee Summary</li> <li>• MAC TSM Action Plan and Implementation Schedule</li> <li>• Social Risk Assessment and Continual Improvement Plan</li> <li>• LSG Social Business Plan Report – 2025 KPIs &amp; Budget</li> <li>• PAS Sustainability Report</li> <li>• LSG HSEC Policy</li> <li>• Environmental Registry of Ontario (<a href="https://ero.ontario.ca/">https://ero.ontario.ca/</a>)</li> <li>• Company Website (for contact and reporting)</li> <li>• Diversity and Inclusion Committee – Terms of Reference</li> <li>• Annual Environmental Awareness Training</li> <li>• Traffic Study – Timmins Operations – LSG</li> <li>• Employee-Contractor Training &amp; Awareness Examples</li> <li>• Impact Benefit Agreement Coordinator through the Wabun Tribal Council and represents Mattagami and Flying Post First Nations.</li> </ul>
5. COI Response Mechanism	A	<p><b>Summary of Findings</b></p> <p>Timmins operation has implemented feedback processes for communities of interest (COI). Feedback can be gathered through various channels, including phone calls, emails, traditional mail, public engagement sessions, stakeholder meetings, and casual conversations. Formal procedures, the Community of Interest Feedback Procedure and the Community of Interest Outreach Program are supported by Isometrix tracks which formalize grievances, and an engagement log which tracks more general feedback and responses.</p>

		The mechanisms for feedback are also supported by consultation processes led by the Ministry for Indigenous and Metis communities (when needed), as well as corporate programs, such as PAAS Listens and the Whistleblower Policy, which are advertised in the PAS sustainability report and around site.
		<b>Identified Gaps to Achieve Level A</b> NA
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"><li>• ADM-COM-PLN-01 Community of Interest Outreach Program</li><li>• ADM-COM-SOP-01 Community of Interest Feedback Procedure</li><li>• PAS Sustainability Report</li><li>• COI Engagement Log</li><li>• Company contact info on website: <a href="https://www.panamericansilver.com/company/contact-us/">https://www.panamericansilver.com/company/contact-us/</a></li><li>• Environmental Registry of Ontario (<a href="https://ero.ontario.ca/">https://ero.ontario.ca/</a>)</li><li>• Attendance, participation and support of several community events</li><li>• COI Survey</li><li>• ISOMetrix log</li><li>• Impact Benefit Agreement Coordinator through the Wabun Tribal Council and represents Mattagami and Flying Post First Nations.</li></ul>
<b>Preventing of Child and Forced Labour (Indicate YES or NO)</b>		
1. Preventing Forced Labour	Yes	<b>Summary of Findings</b> <p>LSG's Recruitment Policy (section 1.5) explicitly prohibits forced labour, including bonded, indentured, or involuntary prison labour. The policy ensures freedom of movement, prohibits retention of personal documents, and bans recruitment fees or deposits. Employees can terminate employment with reasonable notice, as per law.</p> <p>Age and identity are confirmed before hiring, including criminal background checks. A new hire was interviewed as they were on-boarded and confirmed the New Hire sign-on checklists were being used to confirm compliance.</p> <p>Temporary agency contracts as well as on site contractors' contracts are structured to prevent forced and child labour. Supplier Questionnaire and Certification asks vendors to confirm if they have any incidents of, or are at significant risk for, child, forced or compulsory labour. This is a compliance checkpoint for suppliers to demonstrate adherence to minimum age and labour standards. Supplier questionnaires and certifications are tracked, and supplier evaluation is ongoing. A new corporate GAN Integrity Program is being rolled out to monitor suppliers and supply chain risks, including human rights transgressions and whistleblower reports.</p>
		<b>Identified Gaps</b> NA
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"><li>• Occupational Health and Safety Act</li></ul>

		<ul style="list-style-type: none"> <li>• HSEC Policy</li> <li>• Employment Standards Act, 2000</li> <li>• Supplier Code of Conduct</li> <li>• Vendor Questionnaire &amp; Certification</li> <li>• LSG Recruitment Policy</li> <li>• Global Human Rights Policy</li> <li>• New Hire Screening forms</li> <li>• Contractor tracking database</li> <li>• GAN Integrity training materials and tracking</li> </ul>
2. Preventing Child Labour	Yes	<p><b>Summary of Findings</b></p> <p>The PAS Human Resources policy prohibits hiring anyone under 18 for hazardous work. Ages are confirmed during onboarding and background checks. The Mines and Mining Plants Regulation prohibits persons under 16 from working in mining plants/surface mines and under 18 from underground mines. As noted above HR maintains age records for all employees. Proof of age is required on the first day of work. Co-op students and contractors must also meet minimum age requirements.</p> <p>Temporary agency contracts as well as on site contractors' contracts are structured to prevent forced and child labour. Supplier Questionnaire and Certification asks vendors to confirm if they have any incidents of, or are at significant risk for, child, forced or compulsory labour. This is a compliance checkpoint for suppliers to demonstrate adherence to minimum age and labour standards. Supplier questionnaires and certifications are tracked, and supplier evaluation is ongoing. A new corporate GAN Integrity Program is being rolled out to monitor suppliers and supply chain risks, including human rights transgressions and whistleblower reports.</p> <p><b>Identified Gaps</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Occupational Health and Safety Act</li> <li>• HSEC Policy</li> <li>• Employment Standards Act, 2000</li> <li>• Supplier Code of Conduct</li> <li>• Vendor Questionnaire &amp; Certification</li> <li>• LSG Recruitment Policy</li> <li>• Global Human Rights Policy</li> <li>• New Hire Screening forms</li> <li>• Contractor tracking database</li> <li>• GAN Integrity training materials and tracking</li> </ul>

Safety and Health		
1. Commitments and Accountability	A	<b>Summary of Findings</b> <p>The Timmins operation is committed to health and safety through its Health, Safety, Environment, and Community (HSEC) Commitments, which are communicated to all employees through the employee handbook and are consistent with the MAC Health and Safety Framework. These commitments focus on prevention, shared responsibility, continuous improvement, and compliance with both legal and internal standards. Every individual is expected to contribute to a safe and healthy work environment. These commitments include accountabilities for management, employees, and contractors. They also promote the Internal Responsibility System (IRS). These commitments are supported by additional policies that address:</p> <ul style="list-style-type: none"> <li>• Zero tolerance for workplace violence and harassment.</li> <li>• Strict drug and alcohol policy to prevent impairment at work.</li> <li>• Structured return-to-work program for injured employees.</li> <li>• Clear emergency, first aid, and reporting procedures.</li> <li>• Annual reviews and risk assessments by the Joint Health and Safety Committee.</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> NA
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• LSG Employee Handbook, including Health and Safety Commitments</li> <li>• Workplace Violence and Harassment</li> <li>• Work-Life Balance Policy</li> <li>• Drug and Alcohol Policy</li> </ul>
2. Planning and Implementation	A	<p>The Timmins operation has documented health and safety systems including:</p> <ul style="list-style-type: none"> <li>• Formal incident reporting procedures,</li> <li>• Written procedures for standard tasks,</li> <li>• Annual objectives and targets,</li> <li>• Risk identification and control processes, including documentation within the Resolver Program.</li> <li>• An industrial hygiene program,</li> <li>• Workplace inspections and records,</li> <li>• Document control system,</li> <li>• Roles and responsibilities are documented within the LSG handbook as well as within specific plans and procedures.</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> NA
		<b>Examples of Evidence Consulted</b>

		<ul style="list-style-type: none"> <li>• LSG Employee Handbook</li> <li>• Health and Safety Management System</li> <li>• A-HSE-SOP-04 Document Control Procedure</li> <li>• A-HSE-SOP-07 Non-Routing Hazardous Tasks</li> <li>• A-HSE-SOP-012A Hazard Reporting</li> <li>• A-HSE-SOP-20 Planned Inspections</li> <li>• A-HSE-SOP-22B Risk Assessment</li> <li>• A-HSE-SOP-31 Orientation and Initial Instruction</li> <li>• A-HSE-SOP-36 Supervisor Competency, Coaching &amp; Mentoring Program</li> <li>• A-HSE-SOP-58 First Aid</li> <li>• A-HSE-SOP-268 Management of Change</li> <li>• CRM Implementation Plan</li> <li>• X-HSE-JDS-371 Front Line Supervisor</li> </ul>
3. Training, Behaviour and Culture	AA	<p><b>Summary of Findings</b></p> <p>The Timmins operation maintains a comprehensive and documented safety and health training program for all employees and contractors. Training requirements are identified by job class and duty assignment, tracked in Sofvie. The program is governed by government-mandated modules (Common Core) and in-house training. Trainers undergo regular audits, and the program is reviewed annually. Competency is verified before training completion, and regular job observations ensure ongoing effectiveness.</p> <p>Safety and health criteria are integrated into core business processes, including business planning, procurement, performance appraisals, and compensation. Contractor management processes enforce adherence to safety standards. Health and wellness are promoted through programs such as healthy lifestyle rebates, mental health initiatives, and monthly wellness themes, supported by occupational health nurses and a social committee.</p> <p>Management demonstrates visible commitment through participation in Joint Health and Safety Committee (JSHC) meetings, site tours, and regular communications. A JHSC member was interviewed to confirm this performance.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• A-31 Orientation and Initial Instruction, Mill and Underground MTCU mandatory training modules per job task, Induction sign off not including any mandatory MTCU modules</li> <li>• Trainer Job Description, Copy of yearly audit, U - 542 Training Program, U-621 Signing Authority Audit, WSN WSIB Training program audit evidence story ongoing.</li> <li>• Train the Trainer screenshot</li> </ul>

		<ul style="list-style-type: none"> <li>• July screenshot showing job observations completed and example of a job observation.</li> <li>• A-304 Term of Reference for the JHSC, Example of JHSC meeting minutes showing a review of various documents and risk assessments</li> <li>• Section 2 Lake Shore Gold Corp. Health and Safety Management System section 1.2, Q1 Employee Update ppt,</li> <li>• A-268 Management of Change Guidelines, Contractor Management Policy, Suppliers Code of Conduct</li> <li>• Example of performance reports, Contractor Policy</li> <li>• Memo Hourly bonus change, staff bonus email</li> <li>• Inclusion and Diversity Policy, Copy of Occupational Health Programs, Occupational Health Board Postings. Wellbeing Survey, Wellness Spending account, Workplace Postings</li> </ul>
4. Monitoring and Reporting	A	<p><b>Summary of Findings</b></p> <p>There are regular evaluations in senior management and operational meetings of the Health and safety performance. Leading safety performance tracking established and maintained including, JHSC tours and inspections, Job Observations, training hours, as well as lagging indicators (injury rates, fatalities).</p> <p>The facility also assesses the adequacy and effectiveness of its safety and health systems through Workplace Safety North audits, corporate audits, Internal IRS assessments, external checks by a certified hygienist.</p> <p>Results posted on the JHSC billboard for all employees to see and review and the PAS Sustainability Performance Data book posted on our Corporate website includes safety and health performance.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Q1 Employee Report</li> <li>• Month End Report</li> <li>• Corporate report</li> <li>• June Scorecard</li> <li>• Workplace Culture Maturity Awards application with Workplace Safety North</li> <li>• JHSC meeting minutes and Interview with JHSC member</li> <li>• Employee and Supervisor Interviews</li> <li>• Industrial Hygiene compliance numbers by agent sampling examples</li> <li>• Safety Excellence Program examples by WSIB WSN</li> <li>• IRS assessment</li> <li>• Traffic Management Plan audit</li> </ul>

		<ul style="list-style-type: none"> <li>Refuges, Cap Mags, Escapeway monthly audit example</li> <li>PAS Sustainability Performance Data book</li> </ul>
5. Performance	AA	<p><b>Summary of Findings</b></p> <p>Performance targets are set for both leading and lagging indicators and carefully tracked. Results are reviewed monthly at the scorecard meeting. Results are also compared against other industry competitors doing similar work both locally and nationally.</p> <p>Records are posted internally and externally. WSIB also collects and reports the data from each of the industry groups in Ontario (WSIB Safety Check).</p> <p>The Timmins operation has not had a fatality in the last 4 years.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>November 2024 Month-End Report</li> <li>Safety Performance Tracking Sheet</li> <li>June Scorecard meeting safety slides</li> <li>Weekly Report</li> <li>WSIB Neer rebate sheet</li> <li>WSIB Safety Check</li> <li>JT Ryan Technology award</li> <li>JHSC meeting Minutes October 2024</li> <li>Monthly Compliance tracker from Sofvie</li> <li>Senior Safety Management site tour correspondence</li> <li>Salaried Performance Evaluation - 2024 example</li> <li>Monthly Safety Meeting example showing statistics shared with all crews</li> <li>JHSC October meeting minutes (statistical review)</li> <li>Workplace postings including hygiene sampling results</li> </ul>
<b>Tailings Management</b>		
1. Tailings management policy and commitment	A	<p><b>Summary of Findings</b></p> <p>The PAS Environmental Policy establishes the foundation of accountability for tailings management and empowers operational leaders to design local management systems. These systems are guided by operational Key Performance Indicators (KPIs), health and safety standards, and environmental best practices that have been cascaded down to the Timmins operation and include having a tailings management system to be in alignment with corporate commitments.</p> <p>The Tailings policy for the Timmins operation is incorporated into the LSG Operations, Maintenance and Surveillance (OMS) Manual which was last reviewed and updated in 2025. The policy statements and commitments</p>

		<p>satisfy the intent provided in MAC guides. An internal audit of the facility using the table of conformance was most conducted in 2024 and 2025.</p> <p>Compliance with the policies and commitments related to tailings management is fully supported by both the local administration and Pan American's headquarters. Budget allocation is in alignment with best practices for tailings management, as outlined in the MAC Tailings Guide and the TSM 2022 protocol.</p> <p>It was verified that the policies related to tailings management are communicated to employees, contractors and consultants through posters displayed in various site offices and workplaces such as the Mill. During interviews with tailings management team, a clear understanding of their respective roles and responsibilities was evidenced.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Environmental Policy</li> <li>• PAS Tailings, Water Dam and Heap Leach Facilities – Corporate Standard</li> <li>• BC-E-PCY-002 Tailings and Water Management Policy</li> <li>• Tour of the Mill and Safety offices</li> <li>• Internal audit 2024 and 2025.</li> <li>• Interviews with tailings management team</li> </ul>
2. Assigned accountability and responsibility for tailings management	A	<p><b>Summary of Findings</b></p> <p>The responsibilities, roles, and accountabilities for tailings management have been defined and documented for in the OMS - Operations, Maintenance and Surveillance Manual (2025), in accordance with Version 3.2 of the Tailings Guide. It was verified that the manual explicitly includes the role of the Engineer of Record (EoR).</p> <p>Corporate accountability (Accountable Executive Officer – AE) is designated as the VP, Mineral Processing, Tailings and Dams) and responsibilities for tailings management are well defined and aligned with MAC's guidelines. A description is included in the OMS manual including a RASCI (Responsible, Accountable, Supportive, Consulted, Informed), inclusive of all key internal and external roles from construction to operations and administration. Furthermore, key roles such as EoR - Engineer of Record and RP - Responsible Person are clearly identified by LSG.</p> <p>The Responsible Person, Mill Manager, is outlined in the RASCI and has been assigned the responsibilities outlined in Version of the Tailings Guide. Ongoing communication is demonstrated through the bi-weekly meetings that include the EoR, Design Engineers and the Timmins operation Tailings Team (Mill Manager and others depending on topics). Minutes of the meetings are maintained.</p> <p>The AE's role and the connection to the TSF is demonstrated in the RASCI that is outlined in the OMS, Appendix B and is inclusive of the requirements outlined in the Tailings Guide.</p>



		<p>LSG has an EoR, with demonstrated competencies that performs the duties as outlined in the MAC Tailings Guide. The EoR supports the Timmins operation through direct involvement in OMS activities, conducts risk assessments and inspections. There is ongoing communication between the EoR and the Timmins operation Tailings Team.</p> <p>It was reviewed and verified that during the internal audit (2025) conducted by the Corporate Director of Tailings from PAS, the 2022 Conformance Table was used to verify compliance with the established requirements.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Environmental Policy</li> <li>• PAS Tailings, Water Dam and Heap Leach Facilities – Corporate Standard</li> <li>• BC-E-PCY-002 Tailings and Water Management Policy</li> <li>• Tour of the Mil, Tailings Facility and Safety offices</li> <li>• RASCI Matrix OMS Manual, Appendix B</li> <li>• OMS Section 3.1</li> <li>• 2023 – Dam Safety Risk Assessment – KCB</li> <li>• Minutes/Emails of By-Weekly Meetings</li> <li>• 2025 Table of Conformance</li> <li>• Interview with Andy Small, EoR</li> </ul>
3. Tailings management system and emergency preparedness	A	<p><b>Summary of Findings</b></p> <p>The site has thorough documentation showing progress on tailings management per MAC guidelines, including an internal audit spreadsheet, OMS manual, defined roles, EoR contacts, risk management processes, management of change program, Quality Assurance/Quality Control (QA/QC) records, communication protocols, and regular maintenance and inspections. PAS standards and the corporate tailings strategy are accessible, with an updated inundation study compliant with Canadian Dam Association (CDA) guidelines.</p> <p>The EoR has conducted performance evaluations, including inspections and quarterly data reviews. A risk assessment is performed every two years and is documented with conclusion and improvement opportunities, where valid. Critical controls are clearly identified in the OMS and associated Trigger Action Response Plans (TARPs).</p> <p>A tailings management summary spreadsheet is maintained by the Timmins operation and as a means for documenting data related to the performance objectives (maintenance, inspections, TARP activation and controls, training, pond levels and other operational data). It is a “live” document that is shared with the EoR.</p> <p>Construction records are maintained and include daily observation reports as well as weekly meetings with LSG and the Constructor. LSG has hired an independent third party that oversees the construction work and is</p>

		<p>responsible for QA/QC. The design of Phase 6 of the TSF was developed by Klohn Crippen Berger (KCB) and independently reviewed.</p> <p>An internal audit is completed once a year using the MAC 2022 Table of Conformance. Legal requirements are clearly outlined in the OMS and area reviewed during the annual review. Any non-conformances are tracked and communicated as per the OMS. Other reviews include annual dam safety inspection and an Independent Dam Safety Review every 5 years. A dam breach inundation study was conducted in 2021 and informs the emergency response plan (ERP) that was updated in 2025. Clear communication plans are included in the ERP. Annual training and testing of the ERP is conducted with the EoR and Timmins operation employees with tailings responsibilities. The most recent mock test was in 2022 and included members of the crisis management team.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Environmental Policy</li> <li>• PAS Tailings, Water Dam and Heap Leach Facilities – Corporate Standard</li> <li>• BC-E-PCY-002 Tailings and Water Management Policy</li> <li>• RASCI Matrix OMS Manual, Appendix B</li> <li>• OMS for Bell Creek Mine, 2025-01-09</li> <li>• 2023 – Dam Safety Risk Assessment – KCB</li> <li>• Deformation Assessment, October 16 2025</li> <li>• 2021 05 14 Dam Safety Review – Stantec</li> <li>• BCTF Tailings Management Summary 2025</li> <li>• 2021 05 06 Dam Breach and Inundation Study – Stantec</li> <li>• Emergency Preparedness and Response Plan, updated 2025</li> <li>• BCTF Trigger Action Response Plan, 2025 Rev 5</li> <li>• Tailings management summary spreadsheet (2025)</li> <li>• Emails between LSG and EoR</li> <li>• Completed inspections (2024, 2025)</li> <li>• 2022/11/02 Mock Tailings Emergency – Summary Report</li> <li>• 2024 Annual Tailings Review</li> <li>• Climate Risk Assessment – WSP 2024</li> <li>• MOC 16 and MOC 17</li> <li>• Operating and CAPEX budget for Mill</li> <li>• Daily Observation Reports on Tailings construction</li> <li>• Progress Updates on Tailings construction – meeting records</li> </ul>
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		<ul style="list-style-type: none"> <li>• Dam Safety Services, contract with KCB, designation of EoR and schedule of activities</li> <li>• Tour of the Mill, Tailings Facility and Safety offices</li> <li>• Interview with Andy Small, EoR</li> </ul>
4. Operation, maintenance, and surveillance	A	<p><b>Summary of Findings</b></p> <p>The site has completed the update of the Operations, Maintenance, and Surveillance (OMS) Manual for 2025. Facility-specific documents were developed by the Designated Responsible (DoR) personnel, incorporating contributions from both site and corporate teams. These documents require ongoing review and updates by the Engineer of Record (EoR) to ensure accuracy and completeness.</p> <p>The OMS includes:</p> <ul style="list-style-type: none"> <li>• Confirmation of roles and responsibilities.</li> <li>• Detailed descriptions of key design elements.</li> <li>• A comprehensive list of required documentation and permits.</li> <li>• Specifications of critical controls and principal operational components for the Tailings Storage Facility (TSF), transport systems, and water recovery systems.</li> <li>• General maintenance and monitoring procedures, including protocols and links to monitoring files and routine inspection reports.</li> </ul> <p>Additionally, the manual integrates Trigger Action Response Plans (TARPs) for instrumentation and other key performance indicators to support proactive risk management and operational reliability. The tailings management spreadsheet is a concise recording of inspection, maintenance and operational activities that are performed daily and weekly. Additional inspections sheets and maintenance activities (Oracle review) to support the spreadsheet was observed.</p> <p>The OMS is a controlled document that is available to those with tailings responsibilities which are clearly outlined in the OMS. The revision history outlines the annual review that is conducted.</p> <p>Verifiers evidenced the OMS update communication to employees via email. The tailings management summary and online pond levels that are monitored are directly accessible to the EoR.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• OMS for Bell Creek Mine, 2025-01-09</li> <li>• ML-T-PRO 004 Management of change 2025-11-17</li> <li>• ML-T-PRO-001 Electrical Maintenance and Inspection</li> <li>• ML-T-PRO-002 Geotechnical Instrumentation</li> <li>• ML-T-PRO-005 Measuring Pond Levels and Flows</li> <li>• ML-T-PRO-008 Tailings Facility Maintenance</li> <li>• ML-T-PRO-009 Tailings Facility Inspection</li> </ul>

		<ul style="list-style-type: none"> <li>• Reviews of completed Inspection records – mechanical, electrical, instrumentation</li> <li>• Tour of the Mill, Tailings Facility and Safety offices</li> <li>• Interview with Andy Small, EoR</li> </ul>
5. Annual tailings management review	A	<p><b>Summary of Findings</b></p> <p>It was reviewed and verified that Annual Review for 2024 was conducted on December 2, 2024 with the review meeting all Level A requirements. The next annual review was scheduled for December 2025.</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. This management review addressed:</p> <ul style="list-style-type: none"> <li>• Role and Responsibilities</li> <li>• The results of the 2024 dam safety inspections</li> <li>• Maintenance activities completed.</li> <li>• EoR observations and key recommendations</li> <li>• Progress on TSM</li> <li>• A discussion of the tailings management system</li> <li>• A review of the emergency preparedness and response plan</li> <li>• Risk Assessment (completed in 2023 and issued in 2024)</li> <li>• 2024 and 2025 workplans</li> <li>• Plans for the development of the new haul road</li> </ul> <p>On quarterly basis the tailings management system for PAS, including the Timmins operation, are reported to the Board of Directors.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• OMS for Bell Creek Mine, 2025-01-09</li> <li>• Annual Tailings Management Summary December 2, 2024</li> <li>• List of Attendees Annual Tailings Management Summary</li> </ul>
<b>Water Stewardship</b>		
1. Water Governance	A	<p><b>Summary of Findings</b></p> <p>Pan American Silver values water as a shared resource and commits to its management in its Environmental Policy. The LSG tailings and water management policy (BC-E-PCY-002) last revised September 19, 2024, is signed by the PAS country Manager and commits to TSM as well as maintain compliance. The LSG Water Stewardship program (2025-09-11) outlines responsibilities for risk assessment, water monitoring, watershed scale planning, COI identification, continual improvement plans and communication and reporting,</p>


		<p>Processes are in place to track and correct non-compliance with water-related regulatory requirements and commitments using the Sofvie software system. Corrective actions are documented within the software.</p> <p>Sharing with stakeholder is through various mechanisms including open houses where water is a key theme. The IBA implementation schedule also requires sharing of water quality data for example. Other groups engaged on water management include the Metis. Annual environmental training for all employees includes water stewardship information.</p> <p>Water risk assessment was completed and is updated annually. This informs the water continuous improvement plans which are tracked monthly on a scorecard.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• ADM-Water Stewardship Risk Assessment and Continual Improvement Plan</li> <li>• Monthly environmental scorecard</li> <li>• 2025 Environmental Operating Budget</li> <li>• CAR Example Sustainability Review</li> <li>• ADM-ENV-PLN-02 Water Stewardship Program</li> <li>• LSG-Tailings and Water Management Policy</li> <li>• PAS- Environmental Policy</li> <li>• PAS Sustainability Report – 2024</li> <li>• PAS- Tailings, Water Dam and Heap Leach Facilities – Corporate Standard</li> <li>• PAS-Water Management – Corporate Standard</li> <li>• LSG Water Stewardship program (2025-09-11)</li> <li>• Sofvie software incident management software review.</li> <li>• Water Management Open House Flyer</li> <li>• Annual Environmental Training PowerPoint and sign in sheets</li> <li>• 2025-02-13 LSG update presentation Mattagami First Nation</li> <li>• 2024 01 17 LSG Update Presentation Apitipi Nation</li> <li>• 2022 01 27 LSG Update Metis Nation of Ontario</li> <li>• 2024 – 10 Annual Stakeholder ESG Survey</li> <li>• Corporate Environmental Audit Report 202306</li> <li>• Corporate Environmental Audit Guideline</li> </ul>
2. Operational Water Management	A	<p><b>Summary of Findings</b></p> <p>Water risk assessment was completed and is updated annually. This informs the water continuous improvement plans as well as the controls which are operationalized in the OMS and various standard operating procedures.</p>

		<p>Water Balance has been developed and is reviewed annually by a consultant. Monitoring data is managed through EQWin and spreadsheets, with trends produced over time. Monitoring is inclusive of surface and groundwater.</p> <p>Roles and responsibilities for operational management are clear and include environmental technicians that perform the sampling as well as the Operators, metallurgist and Mill Manager that have responsibility for actively managing the water infrastructure throughout the Site. Training is provided based on the role of the individual.</p> <p>The Timmins operation maintains a spill response procedure, emergency preparedness and response plan a spill prevention contingency plan.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• ADM-Water Stewardship Risk Assessment and Continual Improvement Plan</li> <li>• ADM-ENV-PLN-02 Water Stewardship Program</li> <li>• Review of EQWin</li> <li>• 2024 07 24Water Balance Update KCB</li> <li>• Water Balance Tracker – TW and BC (spreadsheet)</li> <li>• 2025 03 25 BCTF Spring 2025 Water Management – KCB</li> <li>• 2024 10 23 EEM Cycle 5 Report – Story</li> <li>• Bell Creek Environmental Monitoring Data 2025</li> <li>• Bell Creek Tailings Dashboard – 2025</li> <li>• Environmental Dashboard – 2025</li> <li>• Sampling of Environmental Inspections Sheets for 2025</li> <li>• 2025 08 13 Phase 6 Permitting Meeting Minutes</li> <li>• TW and BC Spill Response Procedures</li> <li>• BC – Spill Prevention Contingency Plan</li> <li>• BC – Effluent and Surface Water Monitoring SOP</li> <li>• BC – Bell Creek Site Inspection Procedure</li> <li>• 2024-05-31 Surface and Groundwater Geochemistry Review – Stantec</li> <li>• LSG Permitting overview</li> <li>• Interviews with CIL circuit operator, metallurgist,</li> <li>• Tour of Mill. CIL process, water ponds, tailings ponds</li> <li>• Review of HMI for the plant</li> <li>• 2025 09 Environmental Awareness Training PPT and records of attendance</li> </ul>

3. Watershed-scale Planning	AAA	<p><b>Summary of Findings</b></p> <p>LSG has formed an Integrated Watershed Management Steering Committee in partnership with industry partners, the City of Timmins and the Mattagami Region Conservation Authority (MRCA) that defines a watershed boundary. LSG also was part of the development of the MRCA Watershed Based Resource Management Strategy</p> <p>Stakeholder lists from these participants have been identified and shared and outlined the interest of the COI. Engagement activities occur through the above committee and through the Timmins operation led open hours. Site tours are often provided to interested COI.</p> <p>The Timmins operation participates in several studies including environmental effects monitoring and assimilative capacity studies to understand how operational practices may impact the watershed. Watershed program supported by the Timmins operation include Mattagami River Sturgeon Project, Mattagami Fish Hatchery project (LSG and Mattagami FN).</p> <p>LSG and other members of the Committee share monitoring results to understand the overall impact to the watershed. A report card for the watershed is under development based on a consolidation of this information. Based on minutes of meeting both technical aspects such as water monitoring results and community events such as the Timmins Children's Water Festival are discussed demonstrating a wide boundary of discussion topics.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• 2025-01-22 Sub Watershed Names</li> <li>• 2025-02-21 Watershed Sampling Comments – LSG</li> <li>• 2025-04-16 Watershed Sampling Data – TW</li> <li>• Cumulative risk spreadsheet</li> <li>• 2024-10-23 EEM Cycle 5 Reports</li> <li>• ADM-Cumulative Effects – Water – Timmins Operation</li> <li>• LSG list of stakeholders</li> <li>• Integrated Watershed Management Steering Committee meeting minutes – 2024-11-07, 2025-01-15, 2025-04-25</li> <li>• MAC TSM Water Stewardship Event Poster</li> <li>• Friends of the Porcupine River open house attendance</li> <li>• 2025-08-19 LSG Update Presentation – COT- MRCA</li> <li>• Interview with the General Manager (David Vallier) of the Mattagami River Conservation Authority</li> </ul>
4. Water Reporting and Performance	A	<p><b>Summary of Findings</b></p> <p>The Timmins operation has set objectives based on the PAS corporate goals and objectives and provide data through a platform on water use to be incorporated into the company wide reporting of these objectives that is</p>

		<p>shared publicly through the PAS Sustainability Report. Progress tracking to these objectives is outlined in the report. For the Timmins operation the main goal is not extracting any new water for processing and using reclaim water throughout the facility.</p> <p>At the site level the goal of achieving compliance is reviewed weekly and formerly monthly through the scorecard that outlines any compliance events. The sustainability report indicates that Timmins operation met this goal. In addition, there were no reported non-compliances for Timmins operation in 2024 and 2025 to date in relation to water.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>NA</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• PAS- Environmental Policy</li> <li>• PAS Sustainability Report – 2024</li> <li>• 2024 Annual Performance Report</li> <li>• ECA#2679-AW6LF3 Annual Report 2024</li> <li>• Monthly Environmental report examples, 2025-01, 2025-03</li> </ul>

#### 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	15/12/2025
Signature of lead verifier	



## Appendix A List of PAS participants and LSG participants

Name	Position	Company
Nakandakari, Karina	ESG Standards Compliance Manager	PAS
Christian Del Valle,	ESG Standards Compliance Director	PAS
Leo Aubone	Senior Engineer, Tailings and Dams	PAS
Bill Shand	Country Manager	LSG
Richard Graves	Director of Security & Crisis Management	PAS
Felipe de la O Lopez	Human Rights Officer	PAS
Antonio Arrascue	VP, Legal Operations and Compliance	PAS
Juliette Meneses	Legal and Compliance Sub Manager	PAS
Eric Lachapelle	Director of Operations	LSG
Melanie Jenkins	Environment Senior Manager	PAS
Dave Felcher	Mill Manager	LSG
Marcel Cardinal	Director of Environment and Sustainability	LSG
Ben St Amour	Supervisor Environmental Services	LSG
Chad Burke	Health and Safety Superintendent	LSG
Paul Primeau	Security Manager	LSG
Dwayne Hoven	Tailings and Water Management Coordinator	LSG
Hillary Laughren	Supply Chain Manager	LSG
Angela Tremblay	Human Resources Director	LSG
Employee	JHSC Member	LSG

## Appendix B COIs interviewed

#	Name	Position
1	David Vallier	General Manager, Mattagami River Conservation Authority
2	Andy Small	Engineer of Record - EOR for Tailings Facility - KCB
3	David Stephens	Electrical Supervisor
4	David Felcher	Mill Manager
5	Alejandro Mackay	Metallurgy department
6	Eric Luhta	Metallurgy department
7	Natalie Ayala	Metallurgy department, Junior Metallurgist
8	Tyler Boulard	CIL Operator
9	Andrew Stewart	Senior Operator, Mill Trainer
10	Shane Woodhouse	IBA Coordinator
11	Employee	JHSC Rep
12	Front Line Worker	UG
13	Front Line Worker	UG
14	Front Line Worker	UG
15	Front Line Worker	UG
16	Supervisor	UG
17	Supervisor	UG
18	Supervisor	UG
19	Employee	New hire