

## TSM Verification Report

### Facility Information

Name of company	Pan American Silver (PAS)
Name of facility	Jacobina Mine (Jacobina) – Jacobina Mineração e Comercio Ltda. (JMC)
Address	Jacobina Municipality
Country of operation	Brazil
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 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> )	The mine infrastructure comprises seven underground gold mines: Canavieiras (North, Central and South), João Belo, Morro do Cuscz, Morro do Vento (Central and South), processing facilities, existing tailing dam, wastewater and water management and treatment systems, waste rock storage facilities, maintenance shops, warehouses, laboratories, storage facilities, offices, power lines, access roads.

### Verifier Information

Name of lead verifier	Ricardo Camargo as Lead VSP (Verification Service Provider) Flavia Soares 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)	Kick-off Meeting: 25/09/2025 Document Review: 01/10/2025 – 08/10/2025 Site Visit: 20/10/2024 – 24/10/2024 Communities of Interest (COI) Interviews: during site visit

	Reporting: 10/11/2025 – 13/11/2025
Verification period	<p>2023-2025</p> <p>This is the first external verification of Jacobina. 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 Brazil verifiers included reviewing the self-assessment, evaluating the documentation shared, and conducting interviews. ERM Brazil 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 Jacobina Management System. 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 Jacobina Mine is incorporating aspects of TSM into site operations. Our approach also included 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.</p> <p>A request for key COI representatives was made, and arrangements were made to have short interviews. 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.</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 Jacobina Mine was conducted over four days. In accordance with the schedule, an opening meeting was held with site staff, including the mine general manager and other site leadership.</p> <p>The subsequent interviews focused on reviews of the Jacobina's self-assessments for each protocol. Evidence was reviewed and where required, the VSP</p>

	<p>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 2-hour tour of the facilities and general views of the operation were conducted.</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 Appendix A for a list of Jacobina and PAS participants.</p> <p><u>COI Interviews</u></p> <p>COI interviews were conducted remotely via telephone 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	<i>8 COI group leaders, composed of approximately 15 individuals, were interviewed.</i>
Has the facility developed an action plan to address gaps to achieve Level A or Yes on any TSM performance indicators?	<i>Yes, for Health and Safety</i>

## 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	AA
	3. Biodiversity conservation reporting	AA
Climate Change	1. Corporate Climate Change Management	A
	2. Facility Climate Change Management	AA
	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	AAA
	2. Effective COI Engagement and Dialogue	AAA
	3. Effective Indigenous Engagement and Dialogue	A
	4. Community Impact and Benefit Management	AA
	5. COI Response Mechanism	AA
Prevention of Child and Forced Labour	1. Preventing Forced Labour	YES
	2. Preventing Child Labour	YES
Safety and Health	1. Commitments and Accountability	AAA
	2. Planning and Implementation	AAA
	3. Training, Behaviour and Culture	AAA
	4. Monitoring and Reporting	AAA
	5. Performance	B
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	AAA
	2. Operational Water Management	AA
	3. Watershed-scale Planning	AAA
	4. Water Reporting and Performance	A

\*Verification from 2023

## Summary of Findings

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>Jacobina maintains a robust commitment to biodiversity conservation, guided by the principle of No Net Loss, strategic partnerships, and the allocation of clear responsibilities and resources to ensure effective implementation. This commitment is substantiated by multiple governance instruments and initiatives, including the Corporate Environmental Standard, PAS – Environmental Policy, and Formal partnership with the Macaqueiras Municipal Natural Park (REV.04_ART).</p> <p>Evidence includes participation in the Summit Water Session (20250502) focusing on spring and water resource protection linked to biodiversity, and the 6+6 Forecast – SSMA (Saúde Segurança e Meio Ambiente) budget for environmental actions.</p> <p>To uphold the No Net Loss principle, Jacobina establishes key performance indicators like species abundance and habitat diversity for ongoing monitoring. Continuous programs for fauna, flora, and ecosystems are maintained with strategic sampling points. In unavoidable impact cases, Jacobina implements environmental compensation and ecological restoration, ensuring biodiversity losses are offset by equivalent gains.</p> <p>These practices are documented through the Forest Inventory for Native Vegetation Suppression and the Fauna Survey Plan, demonstrating adherence to the No Net Loss principle, collaboration with external organizations, and robust structures for biodiversity conservation.</p> <p><b>Identified Gaps to Achieve Level A (if applicable)</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• 01. 20180808 EC-MA-02 Biodiversity Closure</li> <li>• 02. PAAS - Política Meio Ambiente</li> <li>• 03. PARQUE NATURAL MUNICIPAL DAS MACAQUEIRAS REV.04_ART</li> <li>• 04. 20250502 Cumbre - Sesión de Agua, Proyectos (JACOBINA) (nascentes) 1</li> <li>• 05. 6+6 Forecast - SSMA</li> <li>• 06. AVALIAÇÃO BIODIVERSIDADE JMC OUTUBRO 2024</li> <li>• 07. Inventário Florestal para Supressão de Vegetação Nativa</li> <li>• 08. Plano de Levantamento de Fauna</li> </ul>

2. Biodiversity conservation planning and implementation	AA	<p><b>Summary of Findings</b></p> <p>Biodiversity management is integrated into Jacobina's annual business planning via alignment with the SSMA department's goals. The 6+6 Forecast – SSMA consolidates biodiversity commitments, including monitoring activities. The Risk Assessment (rev. Aug/24) supports environmental considerations in planning.</p> <p>Annual budgeting allocates resources for environmental management, including monitoring, education, training, and community engagement, all aligned with conservation goals. Key evidence includes the 6+6 Forecast – SSMA and CT 23000939 OL-Manifesto 1.</p> <p>ABNT (Associação Brasileira de Normas Técnicas) verified Jacobina's biodiversity management compliance during the ESG audit in October 2024, supported by the Declaration of Conformity – ESG Pillars 2024 and the ESG Audit Report 2024.</p> <p>Jacobina engages in biodiversity initiatives with local communities, focusing on education and conservation, and is part of relevant management councils. Conformance is demonstrated through fauna management permits and reports to authorities, including the Open Doors Program and the Macaqueiras Municipal Natural Park Project.</p> <p>Jacobina also conducts stakeholder activities, such as environmental awareness campaigns and communications with local representatives, evidenced by the CAE (Comissão de Acompanhamento e Engajamento) Official Letter and the Environmental Awareness Plan 2024.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• 01. 6+6 Forecast - SSMA</li> <li>• 02. CT 23000939 OL-Manifesto 1</li> <li>• 01. Portas Abertas_2025</li> <li>• 02. PARQUE NATURAL MUNICIPAL DAS MACAQUEIRAS REV.04_ART</li> <li>• 03. 20250502 Cumbre - Sesión de Agua, Proyectos (JACOBINA) (nascentes) 1</li> <li>• 01. Oficio - CAE</li> <li>• 02. Sensibilização Ambiental 2024</li> <li>• 03. Calendário - PLANEJAMENTO DE COMUNICAÇÃO JMC -2025</li> </ul>
3. Biodiversity conservation reporting	AA	<p><b>Summary of Findings</b></p> <p>Jacobina ensures transparency and accountability in biodiversity conservation through public reporting and independent verification. The biodiversity conservation report was externally audited by ABNT in October 2024, confirming compliance with ESG (Environmental, Social and Governance) requirements. Furthermore, Pan American Silver provides annual disclosure of environmental targets and performance in its Sustainability Performance Data Book, specifying achieved goals and future</p>

		<p>commitments. This demonstrates a structured approach to monitoring, reporting, and continuous improvement in biodiversity management.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>01. Declaração de conformidade eixos ESG 2024 (579.001.25)</li> <li>02. Relatório de Auditoria ESG 2024 (RAT Nº 579-6261_2024)</li> <li>03. PAS-Sustainability-Report-2023</li> <li>04. PAS-Sustainability-Report-2024</li> <li>05. PAS-Sustainability Performance Data Book-2024</li> <li>06. RQ 254 planilha de autoavaliação ESG - regua e criteriosV1</li> <li>Independent ESG Audit (ABNT, Oct 2024) and Declaration of Conformity.</li> <li>Annual Sustainability Reports (2023 and 2024).</li> <li>Performance Data Book – Environ Goals tab, detailing site-specific targets.</li> <li>ESG Self-Assessment Spreadsheet, ensuring alignment with corporate standards.</li> </ul>
<b>Climate Change</b>		
1. Corporate climate change management	A	<p><b>Summary of Findings</b></p> <p>Verification conducted at Corporate level in 2023.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p>
		<p><b>Summary of Findings</b></p> <p>Jacobina has a robust environmental and energy management framework aligning with corporate standards on Energy, Emissions, and Climate Change. It operates under Environmental and Energy Management Policies, emphasizing resource efficiency and GHG (Green-House Gases) reduction via renewable strategies. Corporate responsibilities are outlined in the Corporate Standard, while the Internal Energy Conservation Committee (CICE – Comissão Interna de Conservação de Energia e Emissões de Gases de Efeito Estufa) manages site-level implementation and monitoring. Energy and GHG metrics are tracked using SPI (Specific Performance Indicator) and KPI (Key Performance Indicator), considering various energy sources.</p> <p>The company incorporates climate risk management, with a Climate Change Risk Assessment (CCRA) identifying risks like extreme heat and forest fires, informing strategic planning and stakeholder engagement through community programs. A Decarbonization and Compensation Program (2024–2026) is in progress, focusing on GHG inventory updates, GHG project reduction evaluations and a survey of compensation of potential projects. Energy and GHG factors are integrated into business planning and operational projects, supported by technological upgrades and biodiesel use. External ESG audits rate Jacobina's GHG mitigation and climate adaptation</p>

		<p>efforts positively. Future initiatives include partnerships for climate adaptation and expanding carbon offset projects. The management system encompasses the facility's life cycle, excluding suppliers and third parties.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• PAAS - Política Meio Ambiente.pdf</li> <li>• POL-04-00-3.4-001 - Política Integrada JMC.pdf</li> <li>• Análise Crítica Assinada pela Alta Direcao.pdf</li> <li>• Revisão Anual de Energia - Fev_2025.pdf</li> <li>• 2025-02_JC_Revisao_Anual_de_Energia_e_GEE_v0.docx</li> <li>• REGIMENTO INTERNO DA CICE.pdf</li> <li>• Objetivos e Metas 2025.pptx</li> <li>• Indicadores Ambientais 2025.xlsx</li> <li>• PAS-Sustainability-Performance-Data-Book-2024.xlsx</li> <li>• Relatório WSP Mudanças Climáticas 21495418-R-Rev0-CCRA for PAS Technical Report-June 13, 2024.pdf</li> <li>• Apresentação Portas Abertas - MEIO AMBIENTE 2025.pdf</li> <li>• Lista de presença_portas abertas_10_06_25 (1).pdf</li> <li>• 20210107 EC-MA-03 Energy Emissions and Climate Change.pdf</li> <li>• DDS com Temas Ambientais1.pptx</li> <li>• Treinamento de Integracao - Listas de Introdutorio 11.pdf</li> <li>• Treinamento de Integracao - Listas de Introdutorio 21.pdf</li> <li>• Treinamento - MEIO AMBIENTE 20251.pptx</li> <li>• Projetos Excelência Operacional Energia 2024.pptx</li> <li>• Projetos Excelência Operacional Energia 2025.pptx</li> <li>• 20210107 EC-MA-03 Energy Emissions and Climate Change.pdf</li> </ul>
3. Facility performance targets and reporting	A	<p><b>Summary of Findings</b></p> <p>The company has set clear energy and GHG reduction targets aligned with international agreements.</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>Initiatives include:</p> <ul style="list-style-type: none"> <li>- IREC certification for 100% renewable energy by 2026.</li> <li>- B14 diesel with 14% biodiesel for efficiency and emission reduction.</li> </ul> <p>Progress is monitored via the "ATENTO24 system", with annual reporting in the Sustainability Report. Currently, no offsets are used; reductions come</p>

		<p>from efficiency projects. Climate risk assessments are shared annually, with internal monitoring ensuring alignment with mitigation plans.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Objetivos e Metas 2025</li> <li>• Metas ambientais</li> <li>• Indicadores Ambientais 2025</li> <li>• Plano de ação</li> <li>• PAS-Sustainability-Performance-Data-Book-2024</li> <li>• Relatório de Sustentabilidade</li> </ul>
<b>Crisis Management and Communications Planning - FACILITY (YES or NO)</b>		
1. Crisis Management and Communications Preparedness	Yes	<p><b>Summary of Findings</b></p> <p>Jacobina has identified potential threats and risks through a comprehensive analysis by a multidisciplinary team. Key risks relate to people, environment, reputation, and assets. Established protocols for risk management include ongoing assessments, specific risk plans, employee training, continuous monitoring, and clear stakeholder communication, promoting sustainability.</p> <p>Crisis Committee members are registered in NOGGIN System for notifications and semi-annual simulations, with new members trained on procedures. Quick alert mechanisms for crises include radio broadcasts, alarms, dedicated phone lines, and email updates. Stakeholder communities contributed to the Emergency Response Plan for Mining Dams.</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>• PIS-04-00-2.2-001 - Aspectos e Perigos</li> <li>• REG:04-00-2.1-001 Rev.03 - Planilha de Perigos, Riscos, Aspectos e Impactos.</li> <li>• PIS-04-00-3.6-009 -Gerenciamento de Crises.</li> <li>• PIS-04-00-3.6-062 – Plano de Atendimento às Emergências.</li> <li>• YG-100-RL-00281-R12 PAEBM</li> <li>• Análise de Risco do Negócio pela área Júridica.</li> </ul>
2. Review	Yes	<p><b>Summary of Findings</b></p> <p>The plan is reviewed and updated whenever there are changes in the personnel responsible for its implementation, ensuring that new assignments are clearly defined.</p> <p>The Tailing Dam Emergency Plan (Plano de Emergência para Barragem de Mineração - PAEBM) is updated following any significant modification. The plan is also reviewed whenever simulated exercises or real incidents indicate</p>

		<p>the need for adjustments. Additionally, any change to the flood zone results in an update to the PAEBM to ensure that emergency responses remain appropriate. Finally, the plan is updated as required by the PGRBM (Plano de Gestão de Riscos de Barragens de Mineração), ensuring conformance with the latest guidelines and recommended practices.</p> <p>The notification mechanism is tested at least twice a year to ensure proper functionality in the event of an emergency. On February 26, 2025, a crisis notification test was conducted for the members, and the second test took place on August 15, 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>• PIS-04-00-2.2-001 - Aspectos e Perigos</li> <li>• REG:04-00-2.1-001 - Planilha de Perigos, Riscos, Aspectos e Impactos.</li> <li>• PIS-04-00-3.6-009 - Gerenciamento de Crises.</li> <li>• PIS-04-00-3.6-062 – Plano de Atendimento às Emergências.</li> <li>• PIS-04-00-3.6-009 - Gerenciamento de Crises. Revisão 11 em 29/05/2025, item 10 histórico de revisão pagina 67.</li> <li>• Aprovação via e-mail do gerente geral (pois tem contatos de pessoas de orgãos externo).</li> <li>• Fotografias e relatórios dos simulados.</li> <li>• PIS-04-00-3.6-009 -Gerenciamento de Crises. Comunicação em crise Comunicação interna, paginas 9 a 12.</li> <li>• PIS-04-00-3.6-062 – PAE. Item 8, pagina 36 a 40.</li> <li>• YG-100-RL-00281-R12 - PAEBM. Item 9, pagina 61 a 66.</li> <li>• PIS-04-00-3.6-062 – Plano de Atendimento às Emergências.</li> <li>• YG-100-RL-00281-R12 - PAEBM</li> <li>• Fotos do simulado da Barragem</li> </ul>
3. Training	Yes	<p><b>Summary of Findings</b></p> <p>Tabletop simulation exercises are conducted to assess and enhance the crisis management team's response capabilities. The 2024 and 2025 tabletop exercises simulated various scenarios including a tailings dam crisis, an underground mine fire, and internal and external traffic accidents.</p> <p>Simulations are carried out on a monthly and annual basis, covering all aspects of the Crisis Management Plan, PAE, and PAEBM, and involving all relevant stakeholders. These exercises follow predefined scenarios to ensure that all employees are properly prepared and trained to respond effectively to crisis situations. Full-scale drills were conducted on September 9, 2022, and July 19, 2024.</p> <p>Internal training sessions are conducted periodically, according to the established schedule, to ensure that all employees are prepared and equipped to respond effectively to crisis situations.</p>

		<p><b>Identified Gaps</b> NA</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Registros de presença, fotografias e relatórios do simulado PAEBM.</li> <li>• Simulado 09 de setembro de 2022</li> <li>• Simulado 19 de julho de 2024 PAEBM, item 14, página 104 a 107.</li> <li>• Registros de presença, fotografias e relatórios dos simulados.</li> <li>• Carterinha de autorização de treinamento do PAEBM.</li> <li>• Sistema de autorização com datas de validade de treinamento.</li> </ul>
<b>Indigenous and Community Relationships</b>		
1. Community of Interest (COI) Identification	AAA	<p><b>Summary of Findings</b></p> <p>Through socioeconomic studies and stakeholder assessment conducted in the mining area, Communities of Interest (COIs) were identified for participation in specific community meetings. Jacobina also identifies stakeholders and employs management tools to engage, monitor, and enhance communication.</p> <p>Forums with interested communities facilitate information sharing and are widely publicized to boost participation.</p> <p>An ombudsman channel allows confidential concerns. Jacobina updates stakeholder information annually or as needed, focusing on strategies for engagement and post-project activities, while maintaining data on vulnerable groups.</p> <p>Stakeholder processes assess group dynamics and relationships, inviting existing communities to help identify new groups and representatives. Communication channels are evaluated for effectiveness, with community voting determining member selection annually.</p> <p>The Engagement and Monitoring Committee (CAE - Comissão de Acompanhamento e Engajamento) allows for new stakeholder nominations, with all communications addressed per procedure.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Mapeamento Stakholders</li> <li>• Plano Estratégico de Relacionamento Comunitário</li> <li>• REUNIÃO DO GT ATA- LISTA DE PRESENÇA/FOTOS</li> <li>• Fluxo de Solicitação</li> <li>• Registro de Solicitação(Itapicuru e Jabuticaba)</li> <li>• REV_Base de dados -Familias Comunidades do Entorno</li> <li>• Matriz Riscos 2025</li> <li>• CAE (Lista Presença/ Ementa Regimento/Ata da Comissao de acompanhamento do empreendimento)</li> </ul>

		<ul style="list-style-type: none"> <li>• Regimento_Revisado_Assinado</li> <li>• Ofícios Enviados e Recebidos</li> </ul>
2. Effective COI Engagement and Dialogue	AAA	<p><b>Summary of Findings</b></p> <p>Jacobina shows strong commitment to community relationships via participatory processes, transparent communication, and inclusive strategies. It provides resources like transportation and community meetings for stakeholder accessibility. Engagement is documented under the Community Development Plan and overseen by the CAE.</p> <p>Jacobina maintains transparency by sharing weekly and monthly reports, conducting open meetings, and using communication channels like phone and WhatsApp. Meeting minutes are distributed electronically and via social media for feedback.</p> <p>A participatory monitoring program helps identify social risks, with capacity-building initiatives enhancing community engagement. Employees receive training in communication and conflict mediation.</p> <p>Since 2008, Jacobina has executed social, environmental, and economic projects focused on education and inclusion of underrepresented groups. Structured processes enable joint decision-making and community needs mapping.</p> <p>Jacobina publicly reports annually on social performance, including engagement indicators and complaint resolution. A recent review improved internal regulations of the GT (Grupo de Trabalho), enhancing its role as a dialogue channel.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Reunião GT e Aberta</li> <li>• Consulta Prévia Indígenas</li> <li>• Relatório Qualificar Consulta</li> <li>• Mapeamento de STKH</li> <li>• Ata do diálogo em Olhos Dágua.</li> <li>• COMISSÃO DE REPRESENTANTES DO PROGRAMA DE DESENVOLVIMENTO COMUNITÁRIO</li> <li>• Ementa Regimento CAE</li> <li>• Lista Presença</li> <li>• Participação Comunitária Pesquisa de interesse</li> <li>• Participação Comunitária Pesquisa de interesse 2024</li> <li>• DIA DA IMPRENSA - Pesquisa de Satisfação - 2025</li> <li>• Indicação CAE_Poder Público Jacobina</li> <li>• Fotos de doação</li> </ul>

		<ul style="list-style-type: none"> <li>• Ofícios</li> <li>• Histórico Dia Integrar</li> <li>• Resultado da Pesquisa BRAZIL</li> <li>• Ementa Regimento CAE</li> </ul>
3. Effective Indigenous Engagement and Dialogue	A	<p><b>Summary of Findings</b></p> <p>Although no indigenous Community is officially recognized within the direct area of influence, the company maintains a proactive and respectful relationship with the only Indigenous family residing in the municipality. This engagement is guided by the company's Sustainability Policy, which explicitly outlines its commitment to upholding the rights and cultural heritage of Indigenous and Quilombola peoples. The Community Relationship Plan further details this approach, including the mapping of these communities in the BIOTA Study for the Dam Emergency Plan.</p> <p>Jacobina has established a participatory dialogue process with the Indigenous family of Pontilhão. This includes documented meeting minutes and reports from prior consultations related to local development initiatives. The company also supports the family's socio-economic development through initiatives like the "Hands that Transform" project—an educational and cultural program focused on ceramics and traditional crafts.</p> <p>Jacobina's team has undergone training to deepen understanding of Indigenous cultures, reinforcing a respectful and inclusive approach to community engagement.</p> <p>Although no officially recognized Indigenous stakeholders have been identified or are potentially affected under Brazilian regulations, this requirement was considered.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Relatório Biota vide pag: 272, 273 e 274</li> <li>• SENAI_Diagnóstico Socioeconômico</li> <li>• Pesquisa sócio demográfica</li> <li>• Consulta Prévia e Avaliação - Pontilhão</li> <li>• Continuidade do Projeto kiriri-2026</li> </ul>
4. Community Impact and Benefit Management	AA	<p><b>Summary of Findings</b></p> <p>Jacobina shows commitment to responsible social governance, addressing social issues weekly in management meetings. Significant resources are allocated to mitigate social impacts, backed by a Social Risk Matrix and internal policies. Each risk is assigned to a manager for accountability through the Social Management Plan.</p> <p>Jacobina identifies potential impacts on most Impacted Communities (CDI) using tools like the Social Risk Matrix and Emergency Action Plan for Mining Dams. It has internal approval processes for social initiatives and promotes community participation through forums and working groups. An Integrated Management System monitors social impacts, with regular socioeconomic assessments informing decisions.</p>

		<p>Engagement processes are inclusive, targeting underrepresented groups. Jacobina's Community Development Program focuses on employability, health, and education, integrating community needs into action plans. Partnerships support social projects in education and culture.</p> <p>Jacobina maintains transparent communication about social performance and conducts ongoing evaluations of socio-environmental programs. Regular meetings foster trust-based relationships with communities. The Local Development Plan empowers communities to implement their own projects, with participatory processes documented through records and surveys.</p> <p>Jacobina utilizes stakeholder management tools for effective engagement, reinforcing its role as a responsible corporate citizen.</p>
<p><b>5. COI Response Mechanism</b></p>	<p>AA</p>	<p><b>Summary of Findings</b></p> <p>A formal procedure supported by IsoMetrix tracks community feedback and grievances, integrating them into risk management and decision-making. Jacobina uses various communication tools to enhance stakeholder participation and improve engagement strategies. Information about grievance mechanisms is actively shared during community meetings and through public announcements, empowering residents to voice concerns.</p> <p>Communities in Self-Rescue Zones are included in the Emergency Action Plan, prioritizing their needs in preparedness efforts.</p> <p>Response mechanisms were co-developed with Directly Impacted Communities through participatory processes, fostering transparency and mutual trust. Jacobina's collaborative approach ensures effective community response mechanisms aligned with local values and needs.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Procedimento de Comunicação com Partes Interessadas</li> <li>• Procedimento de Investimento Social</li> </ul>

		<ul style="list-style-type: none"> <li>• Canais Ouvidoria - JMC 2025</li> <li>• Manual IsoMetrix</li> <li>• Detalhes da reclamação (ISOMETRIX)</li> <li>• Carta de Protocolo do Município Canais divulgação</li> <li>• Interacciones IsoMetrix</li> <li>• PIS- COMUNICAÇÃO COM PARTES INTERESSADAS</li> <li>• Redes Sociais</li> </ul>
<b>Preventing of Child and Forced Labour (Indicate YES or NO)</b>		
1. Preventing Forced Labour	Yes	<p><b>Summary of Findings</b></p> <p>The site adheres to the PAS Global Human Rights Policy that prohibits forced labour, servitude, and child labour. Based on this policy, processes have been implemented for detection during talent selection, training on human rights, and grievance mechanisms.</p> <p>Internal procedures, policies, and codes of conduct—also applicable to suppliers—ensure that best practice guidelines are extended to both direct and indirect employees. These procedures are linked and verified monthly through official documentation related to hiring, contract management, and third-party labour compliance.</p> <p>Similarly, Jacobina maintains a process for investigation and action in response to workplace harassment complaints. The Legal and Compliance departments are responsible for monitoring and handling grievances, maintaining constant communication with Human Resources. According to internal procedures, any necessary relocation or other measures required to ensure a safe work environment are promptly implemented.</p> <p>To comply with this directive, the organization has implemented several processes, including:</p> <ul style="list-style-type: none"> <li>• Recruitment &amp; Selection Policy</li> <li>• Human Rights Policy</li> <li>• Integrated Policy</li> <li>• Training in the Human Rights Policy, Code of Conduct, and grievance mechanisms.</li> </ul> <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 confirms that contractors have incorporated these guidelines into their internal regulations.</p> <p><b>Identified Gaps</b></p> <p>Not Applicable</p>
<ul style="list-style-type: none"> <li>• Política de Direitos Humanos</li> <li>• Código de Conduta PAAS - Fornecedor</li> <li>• TREINAMENTO DE INTEGRAÇÃO (32h Obrigatórias)</li> </ul>		

		<ul style="list-style-type: none"> <li>• Código Global de Conduta Ética</li> <li>• 04-05-3.2-337 - Política de Recrutamento &amp; Seleção</li> <li>• POL-04-00-3.4-001 - Política Integrada JMC - Jacobina Mineração</li> <li>• Fighting-Against-Forced-Labour-and-Child-Labour-in-Supply-Chains-Act-Modern-Slavery-Report-May-28-Final.</li> </ul>
2. Preventing Child Labour	Yes	<p><b>Summary of Findings</b></p> <p>The site adheres to the PAS Global Human Rights Policy that prohibits forced labour, servitude, and child labor, incorporated into POL-04-00-3.4-001 - Política Integrada JMC Saúde - Segurança - Meio Ambiente e Responsabilidade Social.</p> <p>There are internal procedures and a Recruitment &amp; Selection Policy, as well as labour compliance audits, to ensure that no child under the age of 15/16 is employed. Due to the high-risk level (Grade 4) associated with underground mining activities, as defined by Brazilian legislation, Jacobina does not admit or run programs for individuals under 18 years of age. For these areas, hiring is restricted to candidates aged 21 and above.</p> <p>To ensure compliance, official documents verifying legal age, 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 an underage individual, 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 underage workers.</p> <p><b>Identified Gaps</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Código Global de Conduta Ética</li> <li>• 04-05-3.2-337 - Política de Recrutamento &amp; Seleção</li> <li>• POL-04-00-3.4-001 - Política Integrada JMC - Jacobina Mineração</li> <li>• Política de Direitos Humanos</li> <li>• Código de Conduta PAAS – Fornecedor</li> <li>• Fighting-Against-Forced-Labour-and-Child-Labour-in-Supply-Chains-Act-Modern-Slavery-Report-May-28-Final</li> <li>• Auditoria de Contratados.</li> <li>• Regulamento Interno.</li> <li>• Banco de Dados do Infocontrol</li> <li>• Questionário de Controle de Admissão e Contrato</li> </ul>

		<ul style="list-style-type: none"> <li>• Captura da tela do INFOCONTROL.</li> <li>• Relatório de auditoria de contratados</li> <li>• Lista de Documentos para Contratação</li> <li>• Regulamento Interno</li> <li>• Treinamento de Integração</li> <li>• Ficha de registro de pessoas</li> <li>• Modelo Contrato de Terceiros</li> </ul>
<b>Safety and Health</b>		
1. Commitments and Accountability	AAA	<p><b>Summary of Findings</b></p> <p>Jacobina is committed to health and safety through its HSEC Policy, aligned with the MAC Health and Safety Framework and integrated into its ISO 45001-certified management system. The policy defines responsibilities, allocates resources, and strives to ensure a safe working environment.</p> <p>Jacobina's Integrated Policy includes ten commitments, such as responsible gold extraction, legal compliance, respect for diversity, training, safe working conditions, environmental objectives, fair compensation, transparency, community relations, and stakeholder communication.</p> <p>An external audit by Bureau Veritas Certification in February 2025 confirmed Jacobina's compliance with the MAC Framework and international standards, leading to recommendations for ISO recertification. The audit highlighted effective implementation of the management system, minor non-compliances with corrective actions accepted, and strong employee understanding and leadership participation. These results demonstrate Jacobina's commitment to high health and safety standards and continuous improvement.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• (PAS) Política Saúde e Segurança-PT (2)</li> <li>• POL-04-00-3.4-001 - Política Integrada JMC assinada pela alta direção (última versão atualizada em Novembro de 2024 e Assinada pelo Antonio Marcos).</li> <li>• Treinamento INTRODUTÓRIO Relatório da auditoria externa ISO 45001.</li> <li>• Certificado ISO 45001.</li> </ul>
2. Planning and Implementation	AAA	<p>Jacobina shows commitment to health, safety, and environmental stewardship with a comprehensive Risk Matrix and an HSE Management System aligned with ISO 45001. The Risk Matrix identifies and mitigates risks across operations, categorizing them by type and assessing severity and probability. Controls follow a hierarchy of engineering, administrative, emergency, and personal protective measures.</p> <p>The Occupational Hygiene Program integrates risk management, focusing on health risk evaluation and control, supported by the LTCAT – Jacobina Execution 2024 report.</p>

		<p>High-risk tasks are identified through Bow Tie analysis, with critical controls defined and verified. Supervisors conduct monthly inspections, monitored for compliance. A qualified occupational hygienist oversees the process, reflecting Jacobina's dedication to workforce safety and continuous improvement in risk management.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Relatórios técnicos de avaliação de agentes ambientais (calor, ruído, poeira, agentes químicos).</li> <li>• Plano de ação derivado de avaliações de higiene lançadas em sistema online (Singular)</li> <li>• Laudos de avaliação de higiene ocupacional (LTCAT)</li> <li>• Certificados do higienista responsável (CREA).</li> <li>• Relatórios de higiene assinados ou emitidos pelo profissional.</li> <li>• Contrato_23000915 OL 00320 - Ambientec-Manifesto</li> <li>• Formulários de Lista de Controles Críticos (LVCC) .</li> <li>• Registros de verificação inspeções lançadas em sistema online (Singular).</li> <li>• Permissões de trabalho</li> <li>• Análises de risco Bow Tie - Espaço Confinado e Produtos Químicos Perigosos.</li> </ul>
3. Training, Behaviour and Culture	AAA	<p><b>Summary of Findings</b></p> <p>All employees at Jacobina undergo basic health and safety training during onboarding and periodically through an Annual Training Program, managed by Human Resources. Each department has a facilitator to ensure training completion. A mandatory 32-hour induction covers health risks, policies, and procedures, with role-specific training available.</p> <p>Jacobina promotes health and well-being through initiatives like educational campaigns, psychological support, and the "Medida Certa" program for employees with high IMC (índice de massa corporea).</p> <p>The "Prontus Program" assesses daily readiness, evaluating factors like fatigue and mental well-being. Employees must pass assessments to work, with repeated failures leading to psychological referrals.</p> <p>Leadership engages in safety through observation programs, daily dialogues, and inspections, reinforcing a culture of prevention. Weekly inspections by the Site Manager and KPI tracking for managerial inspections demonstrate commitment to safety, with updates provided in quarterly reviews.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Plano mensal de treinamentos.</li> </ul>

		<ul style="list-style-type: none"> <li>• Registro de treinamentos de integração e específicos (com lista de presença).</li> <li>• Conteúdo programático dos treinamentos (slides).</li> <li>• Matriz de Treinamento.</li> <li>• PIS-04-05-3.4-008 - Procedimento Treinamento.</li> <li>• Treinamento IntrodutórioRegistros de ações de saúde mental (palestrase apoio psicológico).</li> <li>• Programa Medida Certa.</li> <li>• Registros de participação nas campanhas (com fotos ou relatórios).</li> <li>• Programa de Ginástica Laboral.</li> <li>• Prontus</li> <li>• Observação comportamental (formulários).</li> <li>• Registros de observação comportamental lançadas em sistema online (Singular)</li> <li>• PIS 04-00-3.6-067 Diálogo Comportamental</li> </ul>
4. Monitoring and Reporting	AAA	<p><b>Summary of Findings</b></p> <p>Jacobina employs a proactive approach to health, safety, and environmental (HSE) management, with regular evaluations in senior management and operational meetings. The 2025 HSE Plan focuses on monitoring key indicators such as accident rates, Lost Time Injuries (LTI), and compliance with inspections.</p> <p>The HSE system tracks primary and secondary indicators, conducts health surveillance, and investigates incidents with corrective actions. Internal audits target high-consequence hazards and verify critical controls.</p> <p>Critical Risk Management Standards outline operational limits, with each risk assigned a Critical Risk Guardian for oversight.</p> <p>Monthly performance results are shared, adhering to Towards Sustainable Mining (TSM) principles, and Behavioural Dialogue programs foster a safety culture. Non-compliances and improvement opportunities are tracked electronically, emphasizing Jacobina's commitment to continuous improvement in health and safety.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• 04-SS-PIS-63-04-00-4 2-031- Comunicação, Classificação, Análise e Registro de Incidentes (2)</li> <li>• Relatórios mensais de indicadores SSMA.</li> <li>• Registros de inspeções.</li> <li>• Laudos e relatórios de higiene ocupacional.</li> <li>• Programa de saúde ocupacional (ASO, PCMSO).</li> <li>• Monitoramento de planos de ação de incidentes</li> </ul>

		<ul style="list-style-type: none"> <li>• Formulários de investigação de incidentes</li> <li>• 04-SS-PIS-71-04-02-2.4-069 - Programa de Prontidão Operacional</li> </ul>
5. Performance	B	<p><b>Summary of Findings</b></p> <p>The facility sets annual targets for both select indicators (such as the frequency rate of high-potential fatality incidents).</p> <p>In September 2025 a fatality occurred at the facility.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Pan American Silver has a formal procedure of implementing specific action plans to improve its performance in case fatalities occurs. There is an investigation procedure in place followed by disclosure of the fatality root cause which is presented in the PAS Sustainability report, maintaining a transparent performance management and continuous improvement. Reportedly, Jacobina action plan will be disclosed in the 2025 PAS Sustainability report linked to TSM results.</p> <p>On the Site perspective, Jacobina has a formal procedure to define general guidelines for communicating, classifying, analyzing, and recording incidents—whether personal or impersonal—related to HSEC (Health, Safety, Environment, and Community) and a specific form to be fulfilled FORM-41-04-01-3.5-333 - Relatório de Análise de Incidentes.</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Relatório estatístico mensal de SSMA</li> <li>• 04-SS-PIS-63-04-00-4 2-031- Comunicação, Classificação, Análise e Registro de Incidentes (1)</li> </ul>
<b>Tailings Management</b>		
1. Tailings management policy and commitment	A	<p><b>Summary of Findings</b></p> <p>Jacobina is committed at a corporate level to addressing environmental aspects of its operations, including the management of tailings. 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 KPIs, health and safety standards, and environmental best practices.</p> <p>The policy statements and commitments satisfy the intent provided in MAC guides. Internal audits were completed annually for the past 5 years since 2020 and since 2023 the site has been supporting their efforts by using the table of conformance.</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 prioritizes alignment with international 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, induction trainings and internal diary dialogs. Policies approved by the mine are shared with other Jacobina departments. 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>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Environmental Policy</li> <li>• Occupational Health and Safety Policy</li> <li>• JMC02-390-C-RL-0244-0-RCO B1</li> <li>• JMC02-390-C-RL-0244-0-RCO B2</li> <li>• Lista de presença - Política integrada</li> <li>• DDS Foto1 – Foto6</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 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 - AEO- clearly designated) and responsibilities for tailings management are well defined and aligned with MAC's guidelines. A description is included in the OMS manual including and updated org chart. Furthermore, key roles such as EoR - Engineer of Record and RP - Responsible Person are clearly identified by Jacobina.</p> <p>Jacobina has a 2025 updated organization chart and an updated RACI Matrix for B1 and B2 Tailing Dams. The OMS contains roles and responsibilities that have been well defined for the mine and corporate office, including the AEO, RE, EoR and DoR's for both facilities. Other key technical and management staff responsible for the TSF is also well identified. Since 2022, Jacobina has an ongoing Independent Tailings Review Board – ITRB. EoR, DoR contracts and ITRB ToR provide description of required qualifications and responsibilities for tailings management.</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>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Matriz RACI B1_B2 - Jacobina R07.xlsx.</li> <li>• SRKBR_023_22_CRP_GT_B00_001_Rev0</li> <li>• SRKBR_023_22_CRP_GT_B00_050_Rev0</li> <li>• YM08 - Organograma REV 38 – 23092025</li> </ul>
3. Tailings management system and	A	<p><b>Summary of Findings</b></p> <p>The site has thorough documentation showing progress on tailings management per MAC guidelines, including an audit spreadsheet, OMS</p>

emergency preparedness	<p>manual, defined roles, EoR contracts, risk management processes, QA/QC records, and regular inspections.</p> <p>Since 2024, the EoR has conducted performance evaluations, including inspections and quarterly data reviews.</p> <p>PAS standards and the corporate tailings strategy are accessible, with an updated inundation study compliant with CDA guidelines. The OMS manual features an updated RACI matrix and risk matrix.</p> <p>The site aligns with MAC's tailings management framework, completing: Regular risk assessments, Updated FMEA, testing and updated ERP Plan 2025, including dam break study results and installed sirens, Regular instrumentation and inspection reports. Performance evaluations by DoR and EoR, meeting regulations and standards. TARP for critical controls and alert levels.</p> <p>A DSR completed by SRK (2023), with regular inspections every 2 years as per Brazilian law.</p> <p>Improved as-built documentation in 2024 and 2025, with better records from contractors. EoR is updating DBM for both TSFs in 2025. QA/QC lab testing and procedures are suitable for site dynamics.</p>
<b>Identified Gaps to Achieve Level A</b>	<p>Not Applicable</p>
4. Operation, maintenance, and surveillance	<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• OMS Manual (2025)</li> <li>• Evidências Plano de Emergência R02</li> <li>• B1_ANM - Agência Nacional de Mineração B2_ANM - Agência Nacional de Mineração</li> <li>• PGRBM 2024 - Planilha FMEA - Barragem B1</li> <li>• PGRBM 2024 - Planilha FMEA - Barragem B2</li> <li>• SRKBR_023_22_RTV_GE_B00_009 R0</li> <li>• SRKBR_PR_023_2022_PT_003_R02</li> </ul> <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 scope of the review 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> </ul>

		<ul style="list-style-type: none"> <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.</p> <p>Verifiers evidenced the OMS update communication to employees via email.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>JMC02-390-C-MO-0006-2-MANUAL DE OPERAÇÃO</li> <li>Divulgação do Manual de Operação da 6ª Etapa - Fase 1 (em implantação)</li> <li>301024-JMC02-390-C-MO-0004-11-adaptacao_OMS B2-R01</li> <li>SRKBR_PR_023_2022_PT_005</li> <li>FG-2412-YAM-F-BA-MO01-02 (1)</li> <li>E-mail informando o OMS</li> </ul>
5. Annual tailings management review	A	<p><b>Summary of Findings</b></p> <p>It was reviewed and verified that Annual Reviews for 2024 was conducted in January 2025, 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 compliance 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>-The status of actions derived from the 2024 management review;</li> <li>-The adequacy, sufficiency, effectiveness, and need for changes in;</li> <li>- The tailings management system;</li> <li>- The ERP and EPP;</li> <li>- The OMS Manual;</li> <li>- The performance of the tailings facility;</li> <li>- The effectiveness of risk management;</li> <li>- The sufficiency of resources allocated to tailings management; and</li> <li>- The integration of the tailings management system with the safety and environmental systems.</li> </ul> <p>It was also verified that the results of the review were communicated to the Board and the EOR.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>250107-Reunião Anual de Rejeitos JMC R00.</li> </ul>

<b>Water Stewardship</b>		
1. Water Governance	AAA	<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 Jacobina water management directive (CORP-ENV-ST-005), established in February 2025, outlines responsibilities for optimizing water use, mitigating impacts, and collaborating with local communities.</p> <p>In March 2025, the Water Committee was formed, responsible for evaluating water risks, implementing the directive, planning projects, and communicating results to stakeholders.</p> <p>Risk assessments, including climate variability and water scarcity, are integrated into annual planning, prompting investments in water recirculation and treatment.</p> <p>An internal ESG audit in September 2024 verified water management roles and practices, while an external ESG assessment in October 2024 by ABNT Certificadora rated Jacobina's wastewater management and water use maturity at E5.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• 579.001.25 - Jacobina (1) report</li> <li>• DECLARAÇÃO DE CONFORMIDADE ESG 579.001.25</li> <li>• PAS-Sustainability-Report-2024</li> <li>• Avaliação de Risco - Rev ago24</li> <li>• Comitê de Recursos Hídricos</li> <li>• 2025.07 Organograma RHID - Definição de representantes CRHID</li> <li>• Comitê de Recursos Hídricos folder</li> <li>• CORP-ENV-ST-005 Padrão de Gestão de Recursos Hídricos</li> <li>• RAT 42.463.174/0001-30</li> <li>• Relatório de Auditoria ESG 2024 (RAT Nº 579-6261_2024)</li> <li>• Caminhada Ecológica</li> <li>• PAAS - Política Meio Ambiente</li> <li>• Jacobina Weekly HSE - Jun 02<sup>nd</sup> to Jun 08<sup>th</sup></li> <li>• POL-04-00-3.4-01 POLÍTICA INTEGRADA_2023</li> <li>• 04-SMA-DOC-44-04-14-3.5-001 - Plano de Gerenciamento de Recursos Hídricos da Jacobina Mineração.</li> </ul>
2. Operational Water Management	AA	<p><b>Summary of Findings</b></p> <p>The Water Resources Management Plan (PGRH – Plano de Gestão de Recursos Hídricos) outlines the matrix for impacts, infrastructure inventory, inspections, and monitoring for effective water management. An updated Risk Matrix identifies and assesses significant risks related to surface and groundwater, including effluent management, leaks, consumption, and</p>

		<p>contamination incidents. Prevention and monitoring measures are established.</p> <p>The 2025 Water Monitoring Plan details the monitoring network and updates to the water balance, including sampling modifications. The Global Water Balance spreadsheet for Jacobina encompasses the entire facility's water usage, updated monthly with flow meter data, and considers climate variability.</p> <p>Crisis Management (PIS 3.6-009) addresses environmental scenarios like leaks and flooding, detailing response protocols to mitigate impacts. The Emergency Response Plan (PAE – Plano de Atendimento a Emergência) includes procedures for hazardous substance spills and aquatic accidents.</p> <p>Monitoring data is analysed and reported through performance indicators, reviewed by leadership for decision-making. Monitoring frequencies include various sampling points for surface water, treated water, groundwater, effluents, and sediments.</p>
		<p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Risk Matrix 2025</li> <li>• Monthly Water Committee meetings.</li> <li>• JMC_RHID_WaterFlowChart_2024_, JMC_RHID_MedidoresBrutosConsistidos_2025_v1, PA-104-PL-01767-R02 3 (1) Records of water quality and quantity data reported</li> <li>• Water Balance Procedure</li> <li>• Water Balance</li> <li>• Programa de Monitoramento de Águas - JMC 2024 - Monitoring Program 2025</li> <li>• JMC - Proposta KPI Longo Prazo - Águas REV02</li> <li>• 20240722 CORP-ENV-FR-004 Reporte de auditoría.</li> <li>• RAT Nº 579-6261_2024 1</li> <li>• RQ 254 planilha de autoavaliação ESG - regua e criterios</li> <li>• Relatório de auditoria ISO 14001</li> <li>• 2025 Plano de monitoramento hídrico JMC - INEMA REV00</li> <li>• REG-04-00-2.1-001 Matriz de Risco JMC rev03</li> <li>• Agenda e checklist de inspeções ambientais</li> <li>• 04-SS-PIS-96-04-00-3.6-062 - Plano de Atendimento às Emergências</li> <li>• PAE-ANEXO SUPERFICIE_JMC</li> <li>• PAE-ANEXOS_SUBSOLO-JMC</li> </ul>
3. Watershed-scale Planning	AAA	<p><b>Summary of Findings</b></p> <p>Jacobina is part of the Itapicuru River Basin and the Basin Committee (CBHI – Comite da Bacia Hidrografica), engaging in water management discussions</p>

	<p>with various stakeholders. It contributes to formal governance forums and scientific publications. The "Estudo de Definição e Caracterização de Áreas De Influência" assesses Jacobina's cumulative impacts on the watershed, focusing on environmental factors and recommending continuous monitoring. Jacobina's water consumption reduction targets improve the basin's water availability, supported by collaborative monitoring initiatives.</p> <p>The Itapicuru River basin plan is pending, limiting integration of Jacobina's goals. To enhance transparency, Jacobina established a Participatory Monitoring Program with defined responsibilities across monitoring areas.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Ações de Comunicação;</li> <li>• Relatório diálogo comunidades;</li> <li>• Comitê Bacia Hidrográfica do Itapicuru</li> <li>• Monitoramento Participativo</li> <li>• CBHI_Quadro de Membros.png</li> <li>• CBH_Itapicuru_Banco_de_dados_julho_2024.pdf</li> <li>• ConviteSeminrioBarragensCBHItapicuru1.6626c4109bca46888532.webp</li> <li>• Mapa da Bacia Hidrográfica do Rio Itapicuru.jpg</li> <li>• Seminário de Barragens.png</li> <li>• R_PAN AMERICAN SILVER1649_1_HDQ_R02 - Estudo de Definição e Caracterização de Áreas de Influência (Meios Físico e Biótico)</li> <li>• R_PAN AMERICAN SILVER1649_2_HDQ_RF - Definição de Plano de Amostragem para Estudo de Background Geoquímico – Jacobina Mineração,</li> <li>• 1649_PLANOS_AMOST_PAN_AMERICAN_2025_V02</li> <li>• XII_RPGA_DO_RIO_ITAPICURU_2014_mod_v10_Logo_Eleitoral.pdf</li> <li>• ATA_60_Extraordinaria_CBHI_em_Queimadas_17_maio_2024.pdf</li> <li>• ATA_CBHI_64_ORDIN_RIA.pdf</li> <li>• ATA_CBHI_65_ORDIN_RIA.pdf</li> <li>• ATA_DA_59_extraordinaria_CBHI.pdf</li> <li>• ATA_DA_66_PLENARIA_ORDINARIA_DO_CBHI.pdf</li> <li>• 2025 Plano de monitoramento hídrico JMC - INEMA REV00.pdf</li> <li>• Matriz de Riscos 2025 .xlsx</li> <li>• Matriz de Riscos Sociambientais JMC 2024 .xlsx</li> <li>• CBH Itapicuru.html</li> <li>• CBHI_Quadro de Membros.png</li> <li>• CBH_Itapicuru_Banco_de_dados_julho_2024.pdf</li> </ul>
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		<ul style="list-style-type: none"> <li>ConviteSeminrioBarragensCBHItapicuru1.6626c4109bca46888532.webp</li> <li>Mapa da Bacia Hidrográfica do Rio Itapicuru.jpg</li> </ul>
4. Water Reporting and Performance	A	<p><b>Summary of Findings</b></p> <p>Jacobina has set water management objectives via the 2025 Water Management Committee. These goals are monitored monthly by the Site Management and executive team through indicators in the Management Plan. Progress is reported in an Environmental Report, covering Water Management achievements and KPIs, which are shared internally and discussed in daily Health and Safety (H&amp;S) chats.</p> <p>An annual report, part of the EHS (Environmental Health and Safety) management system, documents performance from January to December 2024 and is reviewed in management meetings. Public reporting includes Environmental Assurance Technical Reports and the Sustainability Report.</p> <p>The site tracks water consumption, aiming for a 5% reduction in make-up water use for 2025. While water indicators are discussed in management meetings, there is no external verification of this data.</p> <p><b>Identified Gaps to Achieve Level A</b></p> <p>Not Applicable</p> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>5.Gestão à Vista_SSMA_Maio, Junho, Divulgação Gestão a vista SSMA Junho, Maio.</li> <li>Análise critica pela direção;</li> <li>Protocolo RTGA 2023_2024 - PROTOCOLO RTGA</li> <li>PAS-Sustainability-Report-2024</li> <li>Jacobina 2024 Relatório Ambiental Mensal (MAY JUN JUL AGO OCTOBER)</li> <li>Jacobina 2025 Relatório Ambiental Mensal (JAN FEB MARCH APRIL MAY JUN)</li> <li>Envio de relatório mensal (corporativo)</li> <li>2025-03-18 JMC RHID - Reunião Gerencial, Água Potável REV00</li> <li>2025-04-01 Reunião Gerencial - Responsabilidades Água Potável REV00</li> <li>202301_JMC- Águas-Janeiro – Jun</li> <li>202310_Gestão de Águas_2024 Budget Tour</li> <li>202401_Gestão de Águas_Miguel Gonzalez</li> <li>202403_Gestão de Águas_CountryManager</li> <li>202405_Gestão de Águas_Americo Delgado</li> <li>Iniciativas e Metas SSMA 2025</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	11/18/2025
Signature of lead verifier	

## Appendix A List of Pan American Silver (PAS) participants and Jacobina Mine participants

Name	Position	Company
Karina Nakandakari	ESG Standards Compliance Manager	PAS
Isabel Balarezo	ESG Sustainability Report Manager	PAS
Christian Del Valle	ESG Standards Compliance Director	PAS
Rildo Jose Venancio	Esp. Segurança do trabalho Senior	Jacobina
Enilda Cristina Maranhão de Paula	Gerente de SSMA	Jacobina
Roseane da Cruz Santos	Esp. Meio Ambiente	Jacobina
Vanessa dos Santos de Souza	Analista de Meio Ambiente Pleno	Jacobina
Josevaldo Araújo de Oliveira	Eng. Segurança do Trabalho Pl	Jacobina
Emilia Aquino Pinheiro	Eng. Saúde do Trabalho	Jacobina
Pedro Advincula Falcão	Médico do Trabalho	Jacobina
Isadora Cerqueira Souza	Coordenadora Comunitária e Relações com Comunidade	Jacobina
Cassiana Souza Lima de Queiroz	Analista Socioambiental Pl.	Jacobina
Paulo Vitor Biulchi dos Santos	Ger. Rec. Hum.	Jacobina
David Carlos de Jesus Silva	Sup. RH	Jacobina
Atila Almeida Rios de Assunção	Coordenador de Recursos Hídricos	Jacobina
Valeria Carneiro dos Santos	Eng. Recursos Hídricos Pl.	Jacobina
Rubens Leitão Gripp –	Hidrogeólogo Sr.	Jacobina
Antonio Marcos Mendonça de Oliveira	Gerente Geral	Jacobina
Danilo Ribeiro dos Santos	Coordenador de Geologia	Jacobina
Rodolfo Reno	Coordenador de Geomecânica	Jacobina
Leonardo Estevam Pimentel Lima	Gerente de Serviços Técnicos	Jacobina
Edson Lima dos Santos	Gerente de Suprimentos	Jacobina
Carlos Iturralde	Senior Director, Critical Facilities	PAS
Ediherle Pereira de Souza Cruz	Coordenadora Celula de Gestão de Contratos	Jacobina
Patrick de Araujo Lima	Coordenador de Almoxarifado	Jacobina
Wesley Clenio da Silva	Coordenador de Manutenção Elétrica	Jacobina
Jessica Moura Oliveira Tavares	Eng. Barragem Jr.	Jacobina
Carlos Eduardo Alves da Silva	Coord Barragem	Jacobina
Elmano dos Santos Junior	Eng. Barragem Sr.	Jacobina
Girlei Santos Souza	Assistente Administrativa	Jacobina

## Appendix 2 COIs interviewed

#	Name	Position
1	Gustavo Negreiros	Presidente do comitê da bacia hidrográfica do Rio Itapicuru
2	Jucélio Melquides de Gois	Associação dos Moradores do Pontilhão
3	Geisilda Oliveira Vilela	Presidente da Associação de Moradores de Jaboticaba
4	Elisangela Lopes Braga,	Secretaria Municipal de Assistência Social
5	Major Rocha	Comandante do Corpo de Bombeiros
6	Claudio Damasceno M. Filho	Supervisores de Geologia
7	Edizael dos Santos Moreira	Supervisores de Amoxarifado
8	Sergio Luiz Santos dos Anjos	Supervisores de Barragem
9	Eduardo Silva Santos	Equipe do Laboratório
10	Edivaldo Moreira da Silva	Equipe do Almoxarifado
11	Daniel Souza Oliveira	Equipe do Geologia
12	Lázaro Henrique Passos Santos Miranda	Equipe do Manutenção de Frota
13	Roberto Dias do Nascimento	Contratados da área da Barragem
14	Ariana Almelia Santana Silva	Contratados da área da Geologia
15	Kayane Santos Silva de Lara	Contratados da área do Meio Ambiente