



Aura's Progress in the Governance of the Responsible Gold Mining Principles (RGMPs)



Responsible Gold Mining Principles

In continuity with Aura's public commitment to the **Responsible Gold Mining Principles (RGMPs)**, established by the World Gold Council (WGC), the company presents, through this progress communication, the recent advances in the consolidation of its corporate controls and in the standardization of practices across its operations.

BACKGROUND

Since 2022, Aura Minerals has been conducting the **structured implementation** of the **Responsible Gold Mining Principles (RGMPs)**, a World Gold Council initiative that establishes global guidelines for responsible gold mining. Throughout this period, the company carried out internal assessments, independent audits and the progressive implementation of operational and management improvements, with the objective of **strengthening adherence to the principles and consolidating practices aligned with the best international references in the sector**. This process involved different audit cycles, gap diagnostics and the development of action plans aimed at the continuous evolution of operations.

In 2024, the independent audit conducted by the consultancy Kumi marked the conclusion of this first verification cycle, including additional reviews of earlier stages and technical visits to the operations. Although the company has not yet achieved the condition of *full conformance*, the process made it possible to identify recommendations, points of attention and improvement opportunities that began to guide a **structured evolution plan** for practices related to the RGMPs.

INTRODUCTION

Throughout 2025, the focus was on transforming identified recommendations and gaps into **structural initiatives** and **management tools**, broadening the robustness of the governance system, the consistency across operations and the ability to demonstrate compliance through evidence. Among the main advances, the following stand out: the contracting to structure a **corporate Human Rights Due Diligence program**, the development of the **Guideline for Managing Interactions with Local Communities** and of the **Corporate Sustainability Guideline**, the progress of the corporate **Diversity, Equity and Inclusion (DEI) plan** and the consolidation of sustainability topic monitoring in a monthly executive committee with senior leadership, strengthening the integration of the ESG agenda into the company's governance and decision-making processes.

These initiatives reflect the unfolding of the **action plan resulting from the independent audit conducted in 2024**, whose recommendations were addressed throughout 2025 through the corporate workstreams presented in this report.

Additionally, the Borborema and Serra Grande operations, incorporated into Aura's portfolio in 2025, did not participate in the previous audits and are currently in the **process of integration into the Aura RGMP program**. This process includes the adoption of corporate guidelines, the alignment of processes and the preparation for the application of the same evaluation criteria, evidence and continuous improvement adopted at the other operations.

In this context, this progress report reflects the **consolidation of the structural initiatives implemented**, reinforcing Aura's trajectory of continuous evolution and responsible management.

COMPLIANCE WITH RGMP PRINCIPLES

Sub-principles

1.2 We will maintain a code of conduct to make clear the standards we expect our employees and those we do business with to comply with. We will actively promote awareness of our code and implement systems to monitor and ensure compliance.

1.6 We will pay the taxes and royalties required by the laws of the host country. We will seek to ensure that transfer pricing outcomes are consistent with fair business practices and value creation.

1.7 We will determine accountability for our sustainability performance at the Board and/or Executive Committee level. Every year, we will publicly disclose our implementation of the Responsible Gold Mining Principles (RGMPs).

Aura Compliance Actions

All contracts entered into with third parties include the **Aura Code of Conduct and mandatory acknowledgement and compliance clauses**. Training is provided locally on an annual basis for both direct employees and contractors, covering onboarding and periodic refresher sessions at all operations.

Aura maintains a **Tax Compliance Policy** that establishes guidelines for the full compliance with tax obligations, ethical dealings with tax authorities and the adoption of responsible tax planning, prohibiting artificial or abusive tax avoidance practices. It further reinforces transparency in accountability and the understanding of tax payments as an essential contribution to the development of local communities.

Aura holds a monthly **Executive Committee for guidance and monitoring of health, safety, environment and geotechnical structure topics** with the participation of external consultants and senior leadership.

COMPLIANCE WITH RGMP PRINCIPLES

Sub-principles

2.1 We will maintain systems to identify and prevent or manage both the risks our operations face and the risks our activities may pose to others.

2.3 In a systematic and regular manner, we will conduct due diligence procedures to identify human rights, corruption and conflict risks associated with our activities and our supply chain, in order to avoid adverse impacts. We will prepare risk-based due diligence on the companies to which we sell our products.

3.1 We will adopt and publish a Supply Chain Policy and support our contractors and suppliers to operate responsibly, as well as in relation to performance standards in ethics, safety, health, human rights and environmental/social matters comparable to our own. We will also monitor compliance on a risk basis.

5.1 We will adopt and implement policies, practices and systems based on the UN Guiding Principles on Business and Human Rights.

5.2 We will seek to ensure that we neither cause nor are complicit in human rights abuses, whether directly or through our business relationships.

5.3 We will manage security-related human rights risks through the implementation of the Voluntary Principles on Security and Human Rights.

6.3 We prohibit child labour, forced labour and modern slavery in our operations and our supply chains.

7.7 We will seek to preserve cultural heritage against adverse impacts associated with project activities, including through our impact assessments. We will put in place chance find procedures at all relevant operations

Aura Compliance Actions

Aura is developing a technical specification and conducting a request-for-proposals process to hire a specialized consultancy to structure and support the **implementation of a corporate Human Rights Due Diligence (HRDD) program**, applicable to all operations, covering both own operations and on-site third parties. The contracting has been formally addressed and execution of the work is planned for 2026.

The proposed approach is risk-based, with methodology to **identify, assess and prioritize potential and actual risks and impacts**, as well as to **define prevention and mitigation measures and establish treatment and monitoring plans**. The program's governance provides for oversight and integration with corporate risk management processes, as well as the consolidation of evidence supporting continuous management improvement and the prevention of direct and indirect adverse impacts.

Within the scope of the HRDD, requirements for business relationships and suppliers will also be considered, with the objective of **strengthening minimum expectations and compliance controls (ethics, safety, health, environment, human rights and environmental/social aspects)**, as well as guidelines for **monitoring and engagement or capacity-building** where applicable. Critical topics will also be addressed, such as the interface between security and human rights, with reinforcement of operational expectations and integration into service provider management tools.

COMPLIANCE WITH RGMP PRINCIPLES

Sub-principles

2.2 We will listen to what stakeholders have to say and meet with them to better understand their interests and concerns, as well as to incorporate this information into the way we do business.

2.5 We will establish fair, accessible, effective and convenient mechanisms through which grievances and complaints related to our activities can be raised and resolved, and solutions implemented. Those who raise such grievances in good faith will not face discrimination or retaliation as a result of voicing their concerns.

4.4 We will identify and eliminate or minimize significant health and safety risks to local communities as a result of our activities and those of our contractors. We will develop, maintain and test Emergency Response Plans, based on best practice guidelines and national and international standards, ensuring the involvement of potentially affected stakeholders.

6.7 We will provide a confidential mechanism through which employees and others associated with our activities can raise ethical issues, and which will give protection against retaliation to those who raise such issues in good faith.

7.1 We will regularly and in good faith consult communities connected to our operations on matters of interest to them and take their perspectives and concerns into account

2.4 We will carry out impact assessments covering significant environmental and socioeconomic components (including human rights, where relevant) and cultural elements, ensuring that these are updated periodically. We will seek to identify and take account of cumulative local impacts. We will ensure that such assessments are accessible to affected communities and include plans to avoid, minimize, mitigate or compensate for significant adverse impacts.

Aura Compliance Actions

Aura maintains the [Corporate Guideline for Managing Interactions with Local Communities](#), with the objective of [standardizing, across operations, the minimum requirements for engagement and consultation](#). The document organizes the relationship cycle (planning, execution, recording and feedback), defining responsibilities, listening methods and criteria for stakeholder and community contributions to be incorporated, in a traceable manner, into the conduct of operations and decision-making.

As part of this same scope, parameters are established for [strengthening and standardizing the grievance and complaints mechanism](#), with a focus on effectiveness. The guideline defines minimum flows for receiving, triaging, handling, responding to and recording grievances, and also guides communication with stakeholders and review routines aimed at promoting predictability, transparency and continuous improvement of the mechanism. Throughout 2026, operations will also need to assess management system solutions (software) to support the implementation of these mechanisms, including functionalities associated with the recording, tracking and handling of grievances and complaints.

Additionally, [requirements for a safe and confidential mechanism for reporting concerns and ethical issues are established](#), applicable to employees and parties associated with the activities. The guidance consolidates governance, channel integration and investigation and handling procedures, reinforcing confidentiality, traceability and consistency of responses, with protection against retaliation as a structural principle for good-faith reports.

Aura maintains a [Corporate Sustainability Guideline](#) also considering the review of Materiality (Double Materiality) as a corporate reference for standardizing minimum requirements for impact assessments and their periodic updating. This guidance [strengthens methodological consistency in the consolidation of results, in the consideration of cumulative impacts and in the integration of socioeconomic and human rights components where relevant](#), and guides the communication of findings in an accessible manner to potentially affected stakeholders, supporting decisions and response plans (avoid, minimize, mitigate or compensate for relevant adverse impacts).

COMPLIANCE WITH RGMP PRINCIPLES

Sub-principles

6.5 We will implement policies and practices that promote diversity at all levels of the company, including the representation and inclusion of historically under-represented groups, and will report on our progress.

6.6 We are committed to identifying and addressing impediments to the advancement and equal treatment of women in our workplaces. Through our employment, supply chain, training and community investment programs, we aim to contribute to the socioeconomic empowerment of women in the communities where we operate

7.4 We will seek to obtain and maintain broad community support from communities affected by our activities.

7.6 We will respect the collective and customary rights, culture and connection of indigenous peoples with the land. We will work to obtain the free, prior and informed consent of this population if the operation may bring significant adverse impacts during exploration, project design, operation and closure, including in relation to the delivery of sustainable benefits.

Aura Compliance Actions

The Company maintains a **Diversity, Equity and Inclusion (DEI) Guideline**, with the objective of promoting this topic and reinforcing these aspects in all of Aura's work environments. The initiative seeks to strengthen assertiveness in decision-making and ensure fair conditions. Through the document, minimum institutional commitments are established, such as respect and appreciation for each individual, the promotion of equal opportunities across all operations and levels, as well as the guarantee of fair recruitment, promotion, development and remuneration processes, based on merit and free from discriminatory bias.

Structured and monitored **social impact indicators** are maintained to monitor engagement (e.g., number of interactions handled), with systematic recording of demands and feedback. This continuous monitoring strengthens the capacity to identify trends, direct improvements and sustain community relationship management.

Aura conducts **systematic situational diagnostics**, engaged through specialized consultancies, to support the **assessment of social and territorial context and guide the management of operations**. The tool supports the **identification of potential interfaces with indigenous peoples and the definition of engagement and consultation strategies**, including, where applicable, requirements associated with free, prior and informed consent (FPIC).

COMPLIANCE WITH RGMP PRINCIPLES

Sub-principles

8.2 We will design, build, manage and decommission tailings storage and heap leach facilities and large-scale water supply infrastructure through continuous management and governance practices, aligned with widely supported best practice guidelines. We will not develop a new mine involving the use of riverine tailings or shallow submarine tailings.

9.2 We will not explore nor seek to develop new mining operations in areas designated as World Heritage Sites (WHS).

9.4 We will prepare a plan for the socio-environmental aspects of mine closure in consultation with authorities, our workers, affected communities and other relevant stakeholders. We will make financial and technical provisions to ensure the delivery of planned commitments for closure and post-closure, including land rehabilitation, future land use benefit, preservation of water sources and prevention of acid rock drainage and metal leaching.

10.3 We support the objectives of global climate agreements, through the prevention, reduction or mitigation of carbon emissions. Where relevant, we will work to improve the resilience of our operations and neighbouring communities to the effects of climate change.

Aura Compliance Actions

A **corporate policy and governance framework for the management of geotechnical structures and tailings dams is maintained**, with recurring independent verifications of the structures. The set of instruments reinforces standardization, documentary consistency and risk management, ensuring adherence to applicable global standards.

Aura formalized in a public report (2025 Sustainability Report) the **corporate commitment to not explore or develop new mining operations in areas designated as World Heritage Sites**. The declaration reinforces transparency and adherence to international expectations for the protection of areas of high socio-environmental value.

The company is developing **corporate technical bases to guide responsible closure and progressive recovery**, covering socio-environmental aspects, restoration alternatives and guidelines for provisions and planning. Standardization improves consistency across operations and strengthens management capacity for closure and post-closure.

Aura is advancing in the **corporate greenhouse gas (GHG) inventory and emissions reporting process, broadening governance and management capacity on the climate topic**. This foundation creates conditions for operation-level rollout, integration with management routines and progressive advancement in the definition of climate commitments and plans.

SUB-PRINCIPLES WITH PROVEN COMPLIANCE

In addition to the sub-principles presented above, there are those whose action plans are scheduled for 2026, specifically sub-principles 1.3, 1.4, 6.6, 7.8 and 10.4, and those that are already addressed within the corporate and operational scope, based on policies, procedures, controls and management routines already implemented and operational, including: legal and regulatory compliance, integrity and anti-corruption, transparency of government payments and political contributions, requirements and practices for local procurement and supplier development, health and safety management systems with training and PPE, labour rights guarantees and freedom of association, community relations and social investment programs focused on community benefits, migration risk management associated with operations, controls for handling/transport/storage of hazardous materials (including cyanide where applicable), commitment to not using or accepting gold produced with mercury, mitigation of operational impacts such as noise and dust, land use and occupation guidelines focused on minimizing clearing and protecting biodiversity, as well as water management aimed at efficiency, footprint reduction and protection of water quality and availability for other users.

Building on this foundation, the company maintains a continuous improvement guideline, reviewing and strengthening its management tools, training programs, monitoring systems and indicators, so as to ensure permanent adherence to best practices and consistent evolution of performance in responsible mining.



ONGOING COMMITMENT

ONGOING COMMITMENT

For the coming cycles, the company plans the **extension of this process to the new Borborema and Serra Grande operations**. In 2026, a **self-assessment** is planned for Borborema, in line with the stages set out by the RGMP framework itself.

In parallel, Aura will also follow the **evolution of the standards consolidation initiative promoted by the Consolidated Mining Initiative (CMI)**, assessing how the eventual adoption of a single standard for the sector will unfold.

Depending on this evolution, in 2027 the company intends to conduct a new independent audit covering all eligible operations — including those previously audited and the new operations — **reinforcing the ongoing commitment to the evolution of responsible mining practices** and the pursuit of full compliance with the principles.





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360° MINING

