

Mine Tailings Disclosure Table

Overview question:
Please
a) Provide an overview of your tailings management system, and how you manage risk
b) Confirm whether your approach to tailings management has changed or will change in light of the recent tailings disasters at Brumadinho, Mariana, Mt Polley and others. Have you, for example, reviewed all tailings storage facilities with upstream dam construction, and taken steps necessary to protect local communities and the environment e.g. buttressing, evacuation?

Overview answer)
a) There are three tailings storage facilities located at AMG's mining operation in Nazareno, Brazil. Daily inspections are performed by AMG employees and the results are submitted on a bi-weekly basis to the National Mining Agency of Brazil (ANM). AMG engages third-party tailings facility and geotechnical consultants to inspect the dam which assists in risk management of the tailings facilities. All stability declarations are reported to the National Mining Agency of Brazil (ANM). Piezometers are installed to monitor for any structural changes of the tailings facilities; namely water level, drain flow, and surface displacement. The data is collected regularly and analyzed by both AMG employees and third-party consultants. All three tailings facilities have "Stability Condition Declarations" issued by a third-party geotechnical firm; the most recent declaration was issued March 2019.

b) AMG has always recognized the need to carefully manage the risk associated with tailings dams within its operations and takes its commitment to ensuring the safety of its workforce and the surrounding communities very seriously. Following the Brumadinho accident, Brazilian legislators reacted by proposing several new regulations. AMG leadership commissioned a study that was conducted by a third-party to ensure that its three dams are legally compliant and technically sound. The outcome of the legal study demonstrated that we are compliant with applicable regulation as they related to the three tailings facilities. AMG has petitioned the Brazilian Government for permission to decommission its two upstream dams by processing tailings and feeding them into the recently commissioned Spodumene Concentrator Plant.

The remaining questions should be answered by listing all of the tailings facilities you are responsible for or associated with, per the disclosure letter of the 5th April 2019.

1. "Tailings Dam" Name/Identifier	2. Location	3. Ownership	4. Status	5. Date of initial operation	6. Is the Dam currently operated or closed as per currently approved design?	7. Raising method	8. Current Maximum Height	9. Current Tailings Storage Impoundment Volume	10. Planned Tailings Storage Impoundment Volume in 5 years time.	11. Most recent Independent Expert Review	12. Do you have full and complete relevant engineering records including design, construction, operation, maintenance and/or closure.	13. What is your hazard categorisation of this facility, based on consequence of failure?	14. What guideline do you follow for the classification system?	15. Has this facility, at any point in its history, failed to be confirmed or certified as stable, or experienced notable stability concerns, as identified by an independent engineer (even if later certified as stable by the same or a different firm).	16. Do you have internal/in-house engineering specialist oversight of this facility? Or do you have external engineering support for this purpose?	17. Has a formal analysis of the downstream impact on communities, ecosystems and critical infrastructure in the event of catastrophic failure been undertaken and to reflect final conditions? If so, when did this assessment take place?	18. Is there a) a closure plan in place for this dam, and b) does it include long term monitoring?	19. Have you, or do you plan to assess your tailings facilities against the impact of more regular extreme weather events as a result of climate change, e.g. over the next two years?	20. Any other relevant information and supporting documentation.	
Instructions to support completion	Please identify every tailings storage facility and identify if there are multiple dams (saddle or secondary dams) within that facility. Please provide details of these within question 20.	Please provide Long/Lat coordinates	Please specify: Owned and Operated, Subsidiary, JV, NOJV, as of March 2019	Please specify: Active, Inactive/Care and Maintenance, Closed etc. We take closed to mean: a closure plan was developed and approved by the relevant local government agency, and key stakeholders were involved in its development; a closed facility means the noted approved closure plan was fully implemented or the closure plan is in the process of being implemented. A facility that is inactive or under C&M is not considered closed until such time a closure plan has been implemented.	(date)	Yes/No. If 'No', more information can be provided in the answer to Q20	Note: Upstream, Centerline, Modified Centreline, Downstream, Landform, Other.	Note: Please disclose in metres	Note: (m3 as of March 2019)	(m3 as planned for January 2024)	(date) For this question we take 'Independent' to mean a suitably qualified individual or team, external to the Operation, that does not direct the design or construction work for that facility.	(Yes or No) We take the word "relevant" here to mean that you have all necessary documents to make an informed and substantiated decision on the safety of the dam, be it an old facility, or an acquisition, or legacy site. More information can be provided in your answer to Q20			(Yes or No) We note that this will depend on factors including local legislation that are not necessarily tied to best practice. As such, and because remedial action may have been taken, a "Yes" answer may not indicate heightened risk. Stability concerns might include toe seepage, dam movement, overtopping, spillway failure, piping etc. If yes, have appropriately designed and reviewed mitigation actions been implemented? We also note that this question does not bear upon the appropriateness of the criteria, but rather the stewardship levels of the facility or the dam. Additional comments/information may be supplied in your answer to Q20.	Note: Answers may be "Both".	Note: Please answer 'yes' or 'no', and if 'yes', provide a date.	Please answer both parts of this question (e.g. Yes and Yes)	(Yes or No)	Note: this may include links to annual report disclosures, further information in the public domain, guidelines or reports etc.
	Tailing Volte Grande 01	21°05'10.0"S 44°35'14.9"W	Owned and Operated	Inactive/Care and Maintenance	2001	Yes	Upstream	40 m	658 m³	0	10-Mar-19	Yes	Low Risk and High Potential Damage per Brazilian Mining Agency guidelines. Application for reclassification of Associated Potential Damage "DPA" pending.	Brazilian Mining Agency guidelines to classify its dams on the basis of both Risk Classification "CRI" and Associated Potential Damage "DPA".	No	Both	Yes: 2018	Yes and Yes	Yes	
	Tailing Volte Grande 02	21°05'17.8"S 44°35'17.7"W	Owned and Operated	Inactive/Care and Maintenance	2012	Yes	Upstream	32 m	1,258,000 m³	0	10-Mar-19	Yes	Low Risk and High Potential Damage per Brazilian Mining Agency guidelines. Application for reclassification of Associated Potential Damage "DPA" pending.	Brazilian Mining Agency guidelines to classify its dams on the basis of both Risk Classification "CRI" and Associated Potential Damage "DPA".	No	Both	Yes: 2018	Yes and Yes	Yes	
	Tailing Volte Grande 03	21°04'32.0"S 44°35'24.2"W	Owned and Operated	Active	2018	Yes	Centerline	19 m	264,000 m³	511,000 m³	25-Mar-19	Yes	Low Risk and Medium Potential Damage per Brazilian Mining Agency guidelines.	Brazilian Mining Agency guidelines to classify its dams on the basis of both Risk Classification "CRI" and Associated Potential Damage "DPA".	No	Both	Yes: 2018	Yes and Yes	Yes	

Dr. Heinz Schimmelbusch, Chairman and Chief Executive Officer