IRMA

Initiative for Responsible Mining Assurance

IRMA Surveillance Audit Report Packet SQM Salar de Atacama

17 MARCH 2026

Responsiblemining.net

Announcement

Questions and Answers

Surveillance Audit Report

SQM's Salar de Atacama Lithium Mine Completes IRMA Surveillance Audit

On **17 March 2026** – the Initiative for Responsible Mining Assurance (IRMA) released the surveillance audit report of SQM's Salar de Atacama Lithium mine, located in Chile's Salar de Atacama. IRMA-approved audit firm ERM CVS conducted the audit and assessed the progress made on the corrective action plan that the operation committed to in the initial audit report.

IRMA's independent assessment cycle occurs in 3 stages: (1) initial audit, (2) surveillance audit, and (3) reassessment audit. Mines in the IRMA system must undergo a surveillance audit during each 3-year audit cycle, and this audit must occur between 12 and 18 months after an initial audit report has been publicly released. Surveillance audits are not full audits, meaning that conformance with all requirements reviewed in the initial audit does not need to be re-established. Typically, during a surveillance audit the audit team verifies that the mine's systems and controls are still in place and are functioning effectively, that no major changes have occurred since the initial audit that negatively affect the mine's performance. The surveillance audit includes confidential interviews with workers and engagement with Indigenous rightsholders and community stakeholders. The initial and surveillance IRMA audit reports for the operation are available on the SQM Salar de Atacama Mine audit page on the IRMA website.

As the IRMA Standard is recognized and adopted around the globe, these audits are important steps in a deepening dialogue between mining companies and those affected by their operations. Because the IRMA process is always improving from the experience of the most recent audit, audit results should be reviewed and interpreted accordingly.

The independent IRMA system is the only global mining standard that provides equal power to the public sector (communities and Indigenous rights holders,

mine workers, and environmental and human rights advocates) alongside the private sector (mining companies, mined materials purchasers and investors).

For More Information:

- Adan Olivares Castro, Regional Lead, Americas and the Caribbean contact@responsiblemining.net +1.360.217.9080 (WhatsApp)
- SQM Salar de Atacama Mine surveillance audit packet: https://responsiblemining.net/sqm-atacama-srv-audit-packet-en
- SQM Salar de Atacama Mine IRMA audit page: responsiblemining.net/sqm-atacama

March 2026

Questions & Answers

IRMA audit of SQM Salar de Atacama operation

Do IRMA audits certify these mining operations as "responsible"?

IRMA audits do not yield "certification", nor do they declare at what point a mine operation becomes a "responsible mine". The IRMA system is built to facilitate transparent conversation about mine impacts, at a table where civil society and labor have voice equal to the private sector, and to create greater value for all Indigenous rightsholders and stakeholders.

In doing this surveillance audit, SQM continued to volunteer their Salar de Atacama operation to be measured against a standard more rigorous, requiring more public engagement, and more transparent sharing of results than any other global standard. It is a continuing act of leadership and commitment to increase dialogue across diverse stakeholder sectors and community members.

IRMA does not use the word "sustainable" but rather brings attention to best practices for more responsible mining practices. The IRMA process also creates incentives for reducing waste, supporting a circular economy, addressing inequity in the use and benefits of mined materials, and supporting innovation that reduces the need for new extraction.

What do IRMA achievement levels mean?

IRMA recognizes four levels of achievement for an independent audit.

- **IRMA Transparency** means a mine has been independently audited against all relevant requirements in IRMA's Standard and has publicly shared its audit scores and the basis for auditors' findings. By sharing such extensive information, a mine provides diverse stakeholders with the information needed to understand the mine's operations and encourage improvement as needed.

- **IRMA 50 and IRMA 75** indicate a mine has been independently audited and met at least 50% or 75% of the possible score within each of the four principle areas of the IRMA Standard—business integrity, positive legacies, and social and environmental responsibility.

- A mine receiving IRMA 50, IRMA 75 or IRMA 100 must at least substantially meet all IRMA's critical requirements.

- **IRMA 100** indicates an independently audited mine meets all requirements applicable to the mine operation. To date, no mine has achieved the level of IRMA 100.

What is the difference between SQM Salar de Atacama's initial audit and this surveillance audit?

The initial IRMA audit of the SQM Salar de Atacama operation was completed on September 6, 2023, with the public release of the audit report. The operation achieved the level of IRMA 50. This surveillance audit is an interim measure that serves to verify that achievement level is still warranted – halfway between the initial and renewal audits.

Surveillance audits are not full audits, meaning that conformance with all requirements reviewed in the initial audit does not need to be re-established. Surveillance audits involve a review of the operating company's management systems, status of compliance with host country laws, review of any changes to host country regulations (if applicable), status of conformity with IRMA critical requirements, status of progress in closing nonconformities (if applicable), and review of performance related to issues identified by the auditors, the operating company or stakeholders as being high-risk issues (i.e., those with high potential to cause significant impacts to the environment, communities or worker health and safety if not managed well).

An IRMA Surveillance audit is another opportunity for constructive engagement between the mine, area residents, workers, customers, investors, and other stakeholders to explore priorities for improvement.

The SQM Salar de Atacama operation is scheduled to undergo a full renewal audit by September 6, 2026 to maintain recognition in IRMA.

What confidence can I have that the audit report is accurate?

The information in this audit report represents the work of an independent audit firm to measure a mining company's performance against IRMA's Standard for Responsible Mining. The Standard includes more than 400 requirements – it's more rigorous and detailed than any other mining standard in the world.

Auditors review thousands of pages of documents shared by the company, spend a week or more at the mining operation, and speak with workers and community members without the company present. This audit team included a total of 3 auditors with qualifications in social performance, worker health and safety, and environmental management. Auditors consider the feedback from workers and stakeholders alongside evidence provided by the operation to enable a balanced perspective of the mine's performance. Auditors consider this collective information to help determine a rating for each requirement. Their rationale is documented, including a reference to the evidence that was considered. Approximately half of IRMA's requirements include an expectation of the auditors to seek additional perspectives from workers, community members and others on an operation's performance.

If you have questions or concerns that information in the report isn't accurate, or if you have information and opinions different than what you read here, we encourage you to contact IRMA to make it more accurate: https://responsiblemining.net/feedback

Companies participating in IRMA audits are sharing a broad range of information with more transparency than has ever been done. Their effort is a work in progress and will further improve as communication increases with the people who are potentially most impacted by their operations.

Why was the surveillance audit not completed between 12 to 18 months after the initial audit report's publication?

On November 9, 2023, the Chilean Production Development Corporation (CORFO), a Chilean State led agency, announced the start of a five stage Indigenous Consultation Process. Although the estimated completion timeline by CORFO for the process was August 2024, the process was not concluded until September 2025. Based on feedback received by impacted community members, including community leaders and members of the Council of Atacameño Communities (CPA), it was recommended for the audit to be postponed to at least July 2025 to minimize the potential risk of a voluntary process interfering with a State led process.

Since the release of the initial audit report, the IRMA Secretariat has taken important steps to build trust with rightsholders and other stakeholders by conducting in-person outreach between October 15 to 19, 2023, March 25 to 26, 2024, March 27 to 29, 2025, and September 10 to 13, 2025. Outreach focused on addressing inquiries related to understanding the results of the initial audit, grievances posted on the IRMA website and conducting workshops to define audit report dissemination tools.

Does an IRMA audit mean a mine is "safe"?

An IRMA audit does not declare a mine "safe" or "unsafe". An IRMA audit measures how an operation's performance compares to best practices at a moment in time and transparently reports the results to the public. The audit reports provide unprecedented transparency so that stakeholders can make informed decisions as they engage with the mining company on areas for improvement that are most important to them.

How does IRMA compare to other standards and how does achievement in IRMA differ?

IRMA's audit reports offer more independently verified information and insights into a mine's performance than any other system. The IRMA Standard requirements are detailed, specific and comprehensive, providing clear visibility into a mine's operations. This level of transparency is new for the industry and provides immense value for civil society, labor unions, investors, and purchasers alike.

Audits which lack specificity and clear reporting create opacity and potential risks, as it becomes difficult to objectively assess which mining operations truly align with best practice. Transparency is the first critical step toward the IRMA's ultimate goal: to drive value for improved practices in mining.

The mine is now operated by a new partnership. How does this affect the IRMA recognized achievement?

On December 27, 2025, [SQM announced the completion of the partnership between the Company and the National Copper Corporation of Chile (Codelco)](#) for the mining, production, commercial, community, and environmental development of the Salar de Atacama mine – through the merger of Codelco's subsidiary, Minera Tarar SpA, into the Company's subsidiary, SQM Salar SpA. The merger has resulted in Nova Andino Litio SpA operating the mine.

This name change does not, as of December 27, 2025, imply any changes in operations, in the continuity of production processes, or in staffing levels, with current functions, responsibilities, and operational conditions remaining unchanged.

I'm a mining company contemplating doing an independent audit – if I do one, will civil society appreciate my effort, or just further criticize our work? Is this level of transparency going to be appreciated or just create greater risk for us?

Trust is deeply broken between many mining companies and the stakeholders, community members and Indigenous rights holders impacted by their operations. Key to building trust is sharing information, being responsive to concerns about impacts, and demonstrating timely responsiveness to community and worker concerns.

Changing the current context won't happen overnight. We appreciate the effort of companies voluntarily stepping forward during this time of change and uncertainty to increase sharing of information, making commitments to improve practices, and showing positive progress.

Many stakeholders, community members and Indigenous rights holders don't trust auditors or audit processes, broadly speaking. Could there have been "cheating" or inappropriate influence of auditors involved in this process?

IRMA and approved firms are aware of some stakeholders' deep distrust of audit processes. This can happen when "independent audits" are actually consulting work done by experts hired to serve a particular company. IRMA audits are different from these type of consulting contracts in several ways.

To date, IRMA has approved, trained, and works closely with three firms (applications for new firms to join are always being accepted). While the mining company must pay for the costs of the audit, the right to do an IRMA audit is conferred by IRMA. IRMA can remove that right to audit if a firm has not met expectations in terms of competency, has not demonstrated freedom from conflict of interest, and is not working in service to the IRMA system and its commitment to all stakeholders, community members and Indigenous rights holders.

IRMA-approved audit firms must be accredited to ISO 17021 or a similar standard for third-party auditing and are required to meet strict requirements associated with maintaining impartiality and managing conflict of interest. Audit firms cannot provide consulting or internal auditing services to a mine operation being audited, they must have systems to assess and mitigate risks to impartiality and must conduct an internal review of the audit methodology and report by someone not involved in the audit to verify compliance. Accredited audit firms are trained by IRMA, assessed annually by an external accreditation body, and also by an independent oversight body that specifically considers expectations for the IRMA assurance process. Audit firms that fail to properly manage and preserve impartiality could lose their accreditation and therefore their license to operate.

Why would a mining company agree to do a rigorous audit like IRMA?

It's best to ask this question to each mining company engaged to hear their perspective. To date, the first mining companies engaging in IRMA audits have done so because their local community members have asked them, or a customer or investor has asked. Mining companies are evaluating which standards systems bring the greatest value for the time and effort to engage. While the IRMA process is more rigorous, which requires more time and financial investment to participate—and while the high-bar requirements don't yield an easy pass, mining companies are finding that this type of robust assessment is better informing specific improvements and supporting better relationships with communities, customers and investors.

How can community members and other stakeholders use this report?

Community members, NGOs, workers and other stakeholders can use the audit findings to engage directly with SQM.

An IRMA audit report is a tool that helps increase access to information about the impacts of a mining

operation. It assists rights-holders by putting them on a more equal information footing when engaging with an operator directly, or in public.

The findings of an IRMA audit report can internationally amplify the voices of rights-holders that participated in the audit. The findings of an audit report provide data on a company's practices that can be cross-referenced with other sources of information by interested stakeholders including metals purchasers.

IRMA is the only voluntary mining standard in the world actively reaching out to potentially impacted communities to encourage them to use the IRMA system as a tool to drive more responsible business practices, and to train and support them on how to do this.

How can governments/regulators use this report?

A voluntary initiative like IRMA will never replace, nor be as valuable, as the role that governments serve, and the laws they set which apply to all operators. Where mining companies have agreed to do an independent IRMA audit, they are often sharing information on performance beyond legal compliance. We encourage mining companies and their regulatory government agencies to communicate together about the information shared in the IRMA audit report.

IRMA staff offer our time in direct support to government staff who want to learn more about the IRMA Standard and cross-stakeholder definitions for best practices to drive more responsible mining practices. We support governments doing gap analysis work to measure where IRMA goes beyond regulatory structure and considering the opportunity and value to strengthen laws using the IRMA Standard as a template.

How can purchasers of mined materials, like a car maker, or investors in mining companies use, these audit reports? What can companies buying materials from this operation say about their sourcing?

Purchasers of mined material, and investors in mining companies, can use IRMA audit reports to better understand environmental and social impacts at operations that supply minerals for their products or in which they invest. We encourage purchasers and investors to look beyond an IRMA achievement level and take an in-depth look at audit reports to understand the scores and performance for each chapter. IRMA reports can provide significant insights into a broader effort of due diligence to understand

risks in the supply chain and support mining's customers and investors to be active participants in reducing potential impacts.

In being audited, SQM and other companies doing IRMA audits are sharing with purchasers, investors, workers, and civil society metrics on their performance for more than 20 different areas of impact. This means that interested readers can understand more, and ask for further insights, so that performance isn't just about single issues like greenhouse gas emissions, or worker health and safety, or protecting water resources—but can be evaluated against a comprehensive range of issues relevant for large-scale mining.

As purchasers and investors learn more about mining companies' operations, they can encourage operations to further share information on impacts, seek context and ask for improvement in areas of challenge, and value areas of strong performance. They can appreciate the effort SQM has made to be audited and can encourage in further dialogue between the company and its stakeholders, community members and Indigenous rights holders.

In terms of specific sourcing claims, IRMA's new Chain of Custody Standard (responsiblemining.net/coc) provides a way to independently audit a purchaser's supply chain and ensure claims of responsible sourcing can be verified.

If I have questions or feedback about this report, who do I contact?

IRMA's intention is to increase direct dialogue and information sharing between mining companies and diverse stakeholders, community members and Indigenous rights holders affected by the operations.

If you have questions about the mining operations' practices in this audit report, we encourage you to directly contact SQM at:

Valentin.Barrera@sqm.com

If you have questions about the process that auditors followed or the evidence they reviewed, contact the audit firm ERM CVS and IRMA at:

post@ermcvs.com / contact@responsiblemining.net

If you have questions about the IRMA Standard and the metrics there for measuring mining company performance, or IRMA rules for auditing, or IRMA's governance, accountability or other aspects of how the IRMA system works, please contact IRMA using the information below.

IRMA staff are dedicated to helping all stakeholders and community members get answers to questions

related to this audit report. Please contact us if you need help getting answers to questions.

For more information

IRMA SQM Salar de Atacama audit page:
responsiblemining.net/sqm-atacama

Aimee Boulanger, Executive Director
Adan Olivares Castro, Regional Lead, Americas and the Caribbean
Initiative for Responsible Mining Assurance (IRMA)
contact@responsiblemining.net +1.360.217.9080 (WhatsApp)

Or visit responsiblemining.net

IRMA SURVEILLANCE ASSESSMENT PUBLIC REPORT

MINE SITE

SQM Salar de Atacama

OPERATING COMPANY

SQM Salar SpA

COUNTRY OF OPERATION

Chile

17 MARCH 2026

Acknowledgements

IRMA believes that third-party, independent audits are most credible when there is robust participation not only from participating mines, but also from workers and stakeholders, particularly those from affected communities.

IRMA Initiative for Responsible Mining Assurance

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Audit Details

Name of Mine:	SQM Salar de Atacama mine
Operating Company:	Sociedad Química y Minera (SQM) Salar de Atacama S.A.
Mine Owner:	Sociedad Química y Minera de Chile S.A.
Country of Operation:	Chile
Mined Material(s):	Lithium Chloride, Lithium Sulphate, Potassium Chloride, and Sulfate of potash (SOP).
# Employees / contractors:	1,640 employees and 2,775 contractors at the time of audit
IRMA audit webpage:	responsiblemining.net/sqm-atacama
Audit Type:	Surveillance Audit
Audit Dates:	Surveillance Desktop audit: 16 May 2025 Surveillance Onsite audit: 7-11 July 2025
Audit Firm:	ERM CVS
Audit Team:	Lead/EHS Assessor (1) Social Assessor (1) EHS Assessor (1)
Audit Firm Declaration:	✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers, and stakeholders) considered within the scope of the Surveillance audit activities. ✓ The audit team members were deemed to have no conflicts of interest with the mine. ✓ The audit team members were professional, ethical, objective, and truthful in their conduct of audit activities. ✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.
Scope of Audit:	The scope includes brine extraction, concentration, and waste disposal areas at SQM's Salar de Atacama site, located in the Salar de Atacama sector (commune of San Pedro de Atacama), El Loa Province, Antofagasta Region of Chile.
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
IRMA Achievement Level:	IRMA 75
Achievement Decision Date:	6 September 2023
Achievement Expiration Date	5 September 2026
Authorized Representative:	Glenn Keays, ERM CVS, Director, Operations (Mining)
Representative Signature:	
IRMA Reference Number:	IRMA-0119-STD1.0-01-SRV *OLD: IRMA-STD-ERM-001-V-03629*

1. Mine Site Overview

1.1. Overview of location

The Sociedad Quimica y Minera (SQM) Salar de Atacama mine is located in the Antofagasta Region in northern Chile, approximately 210km east of the coastal city of Antofagasta and within the Atacama Desert, the driest non-polar desert in the world. The region is a globally unique landscape with salt flats and volcanic mountains and lagoons, attracting both scientific interest and eco-tourism.

The mine operations are located in the southwest of the Salar de Atacama salt flat, a salt-encrusted area created by the evaporation of brine and rain from desert basin, and the largest active evaporative basin in the Region de Antofagasta. It is located in a depression from which the underground groundwater and brine cannot flow off, thus forming a so-called endorheic reservoir. Salar de Atacama is considered one of the largest lithium deposits in the world.

While the Atacama Desert is one of the driest places in the world, experiencing rainfall of less than 2 mm/year, the basin of the Salar de Atacama falls under marginal high desert climate. This is due to its proximity to the Andes Mountain range, which provides rainfall, snow and glacier melt from the high mountains. There are four sources of potable water in the area: rivers, creaks and minor streams from the Andes; springs that emerge upstream of the Salar from melting snow infiltration; aquifers in the surroundings of the Salar which are made potable after minor treatment; and high salinity water under the salt lake, which is not potable unless desalinized.

Beneath the salt crust of the Salar de Atacama is a large reservoir of a salt-rich brine. Deposits in the area, located within porous sodium chloride rock, are rich in lithium, potassium, boron and other dissolved salts, making it one of the most lithium-concentrated areas globally. Due to its high salt concentration, the brine is neither suitable for drinking nor for agricultural purposes. Other physical characteristics of this area include intense solar radiation and high altitude (around 2,300-2,500 meters above sea level).

Historically, the region's economy centered around small-scale agriculture and tourism. In the 19th century, after the initial discovery of sodium nitrate deposit in the Atacama Desert, the area experienced high mining activity.

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Most of its nitrate mining towns are now abandoned, however there has been a surge in industrial activity in the past two decades driven by global demand for lithium for use in batteries and electric vehicles. The rise of lithium mining has transformed the local economic landscape, bringing infrastructure development and employment opportunities. It has also however led to environmental challenges, in particular concerns about water usage and depletion, environmental degradation and indigenous rights. Indigenous Atacameño groups, (including Río Grande, Machuca, Catarpe, Quitor, San Pedro de Atacama, Solcor, Larache, Yaye, Séquitor, Cúcuter, Coyo, Toconao, Talabre, Camar, Socaire, Peine, Solor, Huatín), are localized around the east, west, and south of the Salar de Atacama. However, the area is sparsely populated, with small communities serving as local hubs. In addition to water rights, these communities also hold the Salar de Atacama as culturally significant.
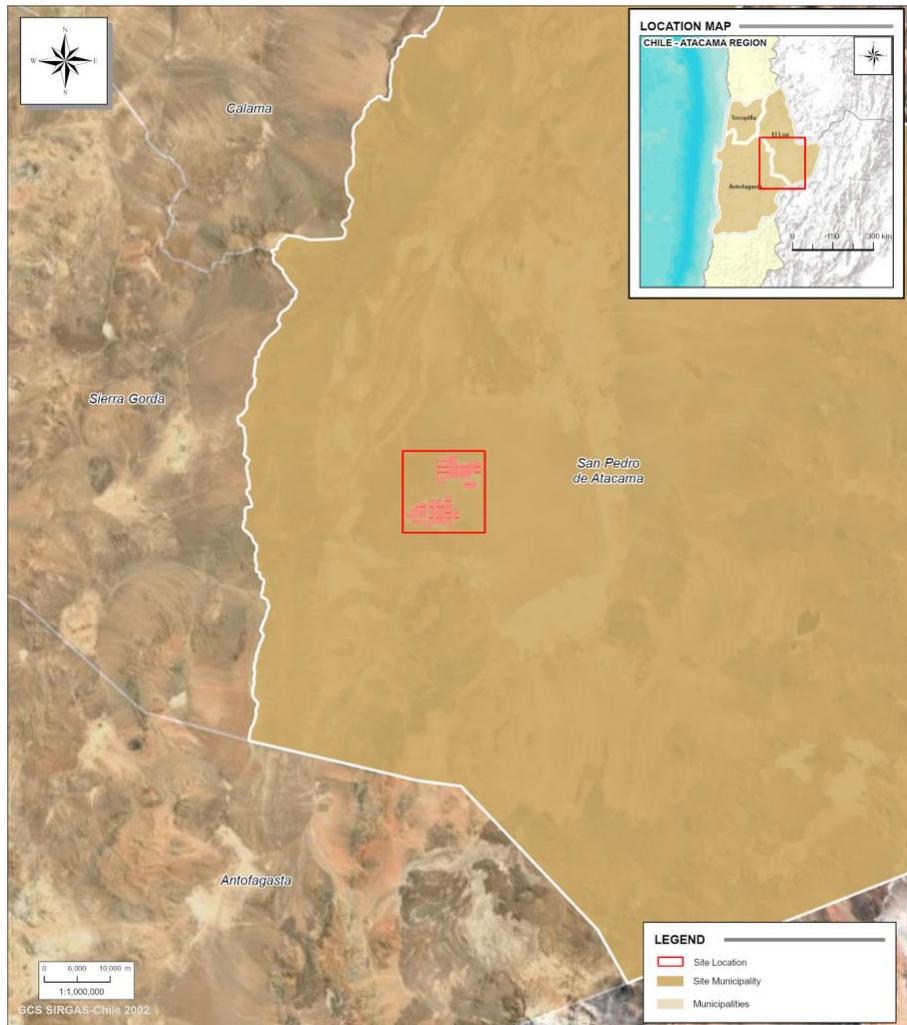
Figure 1: Global Location of Site

Figure 1 provides a general map indicating the global location of the mine site, and Figure 2 provides a more detailed view of the region.

Figure2: Regional Location of Site

MINE SITE SURVEILLANCE ASSESSMENT – PUBLIC REPORT
SQM Salar SpA's Salar de Atacama Mine | Chile | 17 Mar 2026

IRMA Initiative for Responsible Mining Assurance
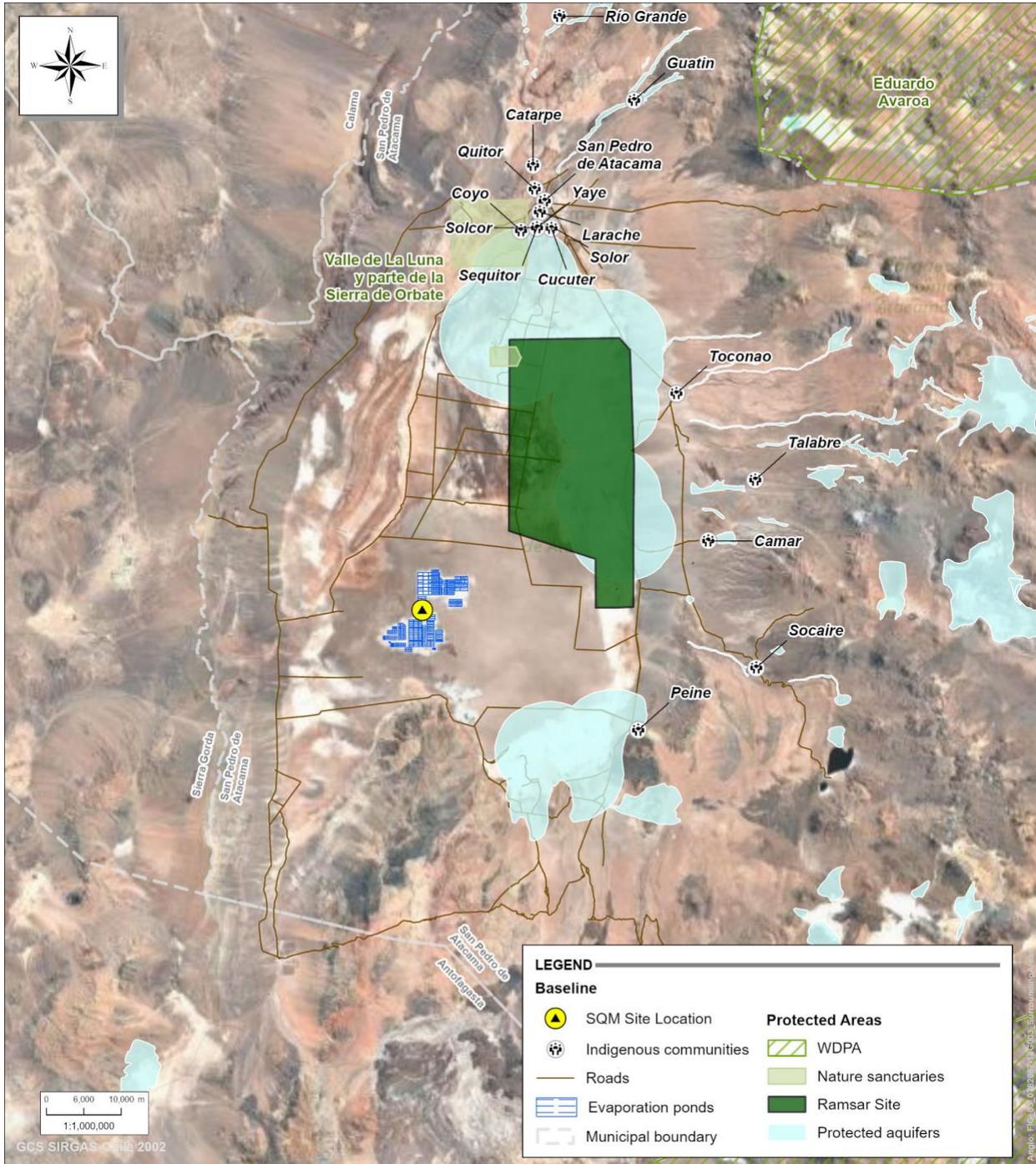
1.2. Overview of operation

SQM operates in the Salar de Atacama in northern Chile, an area known as the "lithium triangle" due to its large deposits of lithium. Exploration rights are owned by CORFO, Chile's economic development agency, and leased to SQM. The current lease agreement was entered into in 1993 and expires in 2030.

In 2024, in preparation for an alliance with CODELCO, Chile's state-owned mining company, SQM consolidated all its assets, permits and operations under a single structure and restructured its legal entity from SQM Salar SA to SQM Salar SpA. CODELCO and SQM plan to jointly produce refined lithium from 2025 to 2060.

SQM extracts and concentrates lithium, and potassium from mineral-rich brine using evaporation ponds. The saline brine is pumped from underground reservoirs beneath the salt flat, from depths of 1.5 to 150 meters below the surface, through a pipeline system and into extraction basins (ponds). The extraction basins are built with salts left over from potassium and lithium production and lined with a geotextile membrane, so no concrete or cement is required.

Lithium extraction requires a multi-stage evaporation and purification process, which is controlled by advanced modeling of the thermodynamic conditions. Solar energy is used to concentrate lithium from the brine, a method particularly suited due to the region's high solar radiation and low precipitation. The brine is sequentially pumped to other ponds, depending on the concentrations reached at each state of the process.

This process simplifies and optimizes the purification of the brine and the precipitation of salts and impurities and is completed after about 13 to 16 months. What is left at the final step is a highly concentrated brine containing up to six percent Lithium (30-35% lithium chloride). Once the desired concentration is reached, it is transported to processing plants near Antofagasta, where boron is extracted and lithium carbonate and lithium hydroxide are refined for export. Both are exported for the manufacture of cathode materials, which are used in rechargeable batteries.

In addition, the operations include secondary activities such as hauling operations, maintenance activities, laboratories, storage facilities, worker camp, and administrative offices.

Figure 3 presents the physical configuration of site operations.

Figure 3: Layout of Site Operations

MINE SITE SURVEILLANCE ASSESSMENT – PUBLIC REPORT
SQM Salar SpA's Salar de Atacama Mine | Chile | 17 Mar 2026
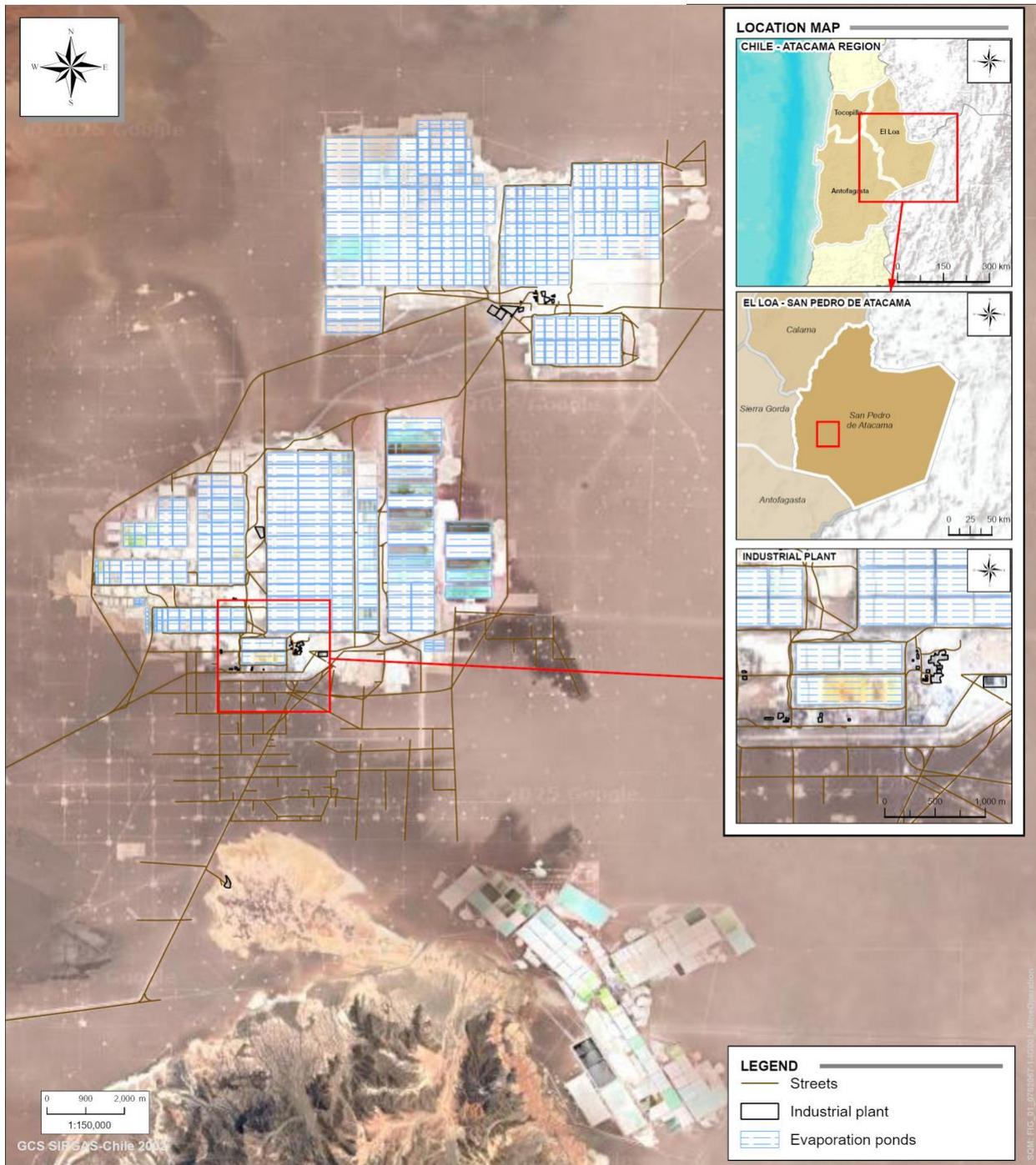
1.2.1. Scope of activities and facilities included in audit

The surveillance assessment audit for the Salar de Atacama Mine included the visit of onsite operational and processing facilities. This included:

Operational and processing areas:

- Halite Pools, Sylvinite Pools, Lithium Pools
- Pozas de Evaporación (Evaporation Ponds)
- MOP Brine Wells
- SDD (Sistema de Distribución) Tank ARPES (TK-ARPES)
- Processing Plants: MOP-H-I, MOP-H-II, SOP-H, MOP G III

Other facilities:

- Maintenance and Reparations Workshops and storage facilities
- GHS Operations Patio, GHS Lubricants Room
- Laboratories
- GHS (Gerencia Hidrogeología Salar) Salar Hidrogeology Management
- Canaleta ARPES (Channel ARPES)
- Hazardous and non-hazardous waste storage areas
- Offices, site restrooms, dining rooms
- COM (Centro Operaciones Mina) Mine Operations Center
- Dispatch
- Campamento Andino (Andino Mine Camp)

1.2.2. Activities or facilities excluded from scope of audit

No activities, operations or facilities were excluded from the scope of the audit.

1.2.3. Limitations of audit

No limitations to the audit were encountered. The audit team was able to access and visit all areas that were planned as part of the audit scope.

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2. Mine Site Assessment Process

2.1. Overview of IRMA Process

There are three primary types of assessment in the IRMA process: a full audit (including the initial audit and subsequent renewal audits), where the mine site is assessed against all relevant IRMA requirements; a surveillance audit, typically conducted 12-18 months after the initial audit, and special audits which are conducted in addition to the normal cycle of audits to assess progress on corrective actions, review significant changes to operations, or follow up on grievances or incidents.

This audit report reflects the outcomes of the surveillance audit. Surveillance audits are intended to be abbreviated audits conducted midway through the audit cycle to verify continued conformity of critical requirements, progress on completing corrective actions, and any focus areas identified by the audit firm. In addition, the audit considers feedback from stakeholders since the previous audit and material changes to operations, personnel, management systems, or the surrounding environment to determine if changes have affected the site's ability to continue to deliver achieved performance scores.
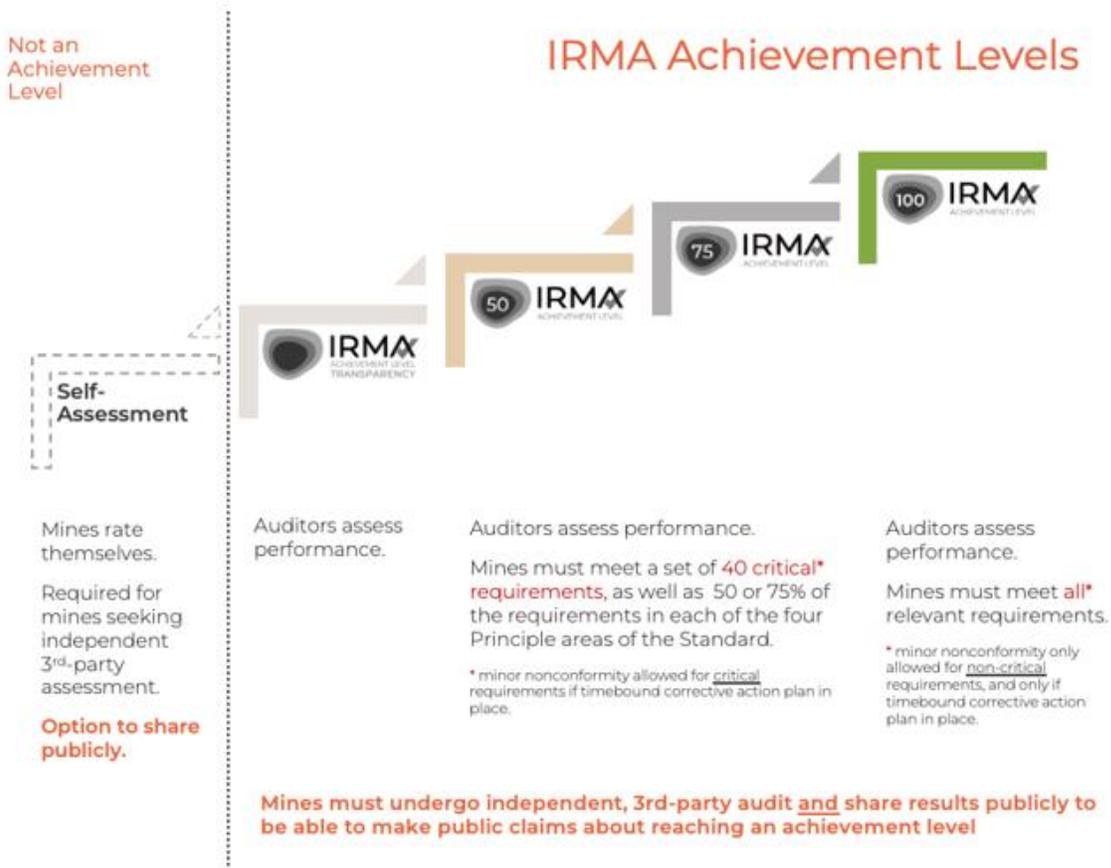
IRMA recognizes four levels of achievement. For a complete description of the assessment process and achievement levels, see IRMA's Certification Body Requirements, available on IRMA's web site.

2.1.1. Scope and Limitation of Audits

Within the IRMA system, independent, third-party assessment is a process by which mines are assessed against the IRMA Standard for Responsible Mining by external auditors. Audits are conducted by approved audit firms using auditors who have undergone IRMA training, meet IRMA competency requirements, and have been deemed to have no conflicts of interest with the mine site under assessment.

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011). In addition to document review, audits include on-site observation of operations and the surrounding environment, review of documents and records, and interviews with site personnel and relevant stakeholders.

IRMA surveillance audits are not full audits, meaning that conformance with all requirements reviewed in the most recent full audit (e.g., initial audit or renewal audit) does not need to be re-established. Typically, surveillance audits are intended to allow the audit firm, who has issued a public verification of performance, to assess the site's ongoing status, review any incidents, confirm regulatory compliance, and review progress on corrective actions to verify that no changes have occurred that would materially affect the site's ability to maintain the achievement level.

Auditor evaluations are based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed in auditor comments are based on the facts available at the time of the audit within the limits of the existing data, scope of work, budget, and schedule.

Audit evidence is based on samples of available information. Therefore, there is an element of uncertainty in auditing, and those acting upon the audit conclusions should be aware of this uncertainty.

2.1.2. IRMA Complaints Process

IRMA stakeholders who wish to file a complaint related to the mine site assessment process may submit feedback on the IRMA website. Details on

the complaints process can be found in IRMA's Issues Resolution Procedure which can be accessed from the main IRMA website.

2.2. Surveillance Audit Process

The surveillance audit process includes a desktop review and onsite audit by the audit firm. The on-site audit can include a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs) if any, governmental agencies, documentation review, and visits to operational areas, surrounding area, and other locations including surrounding communities.

2.3. Stakeholder Engagement

IRMA requires that stakeholders be engaged as part of the mine site assessment process. Audits are announced by IRMA and audit firms, and prior to the on-site audit there is additional outreach carried out by audit firms.

2.3.1. Written comments/inquiries

No formal or informal comments were received from stakeholders between the initial audit and the surveillance audit.

Thirty days prior to the onsite surveillance visit, the assessment was announced on ERM CVS website, IRMA's website and LinkedIn page and through IRMA's free distribution newsletter. The announcement included an invitation to stakeholders to submit written comments about the environmental and social performance of the Salar de Atacama mine to the audit firm via email, online stakeholder feedback form or a dedicated voicemail line, and invitation to participate in the assessment. The announcement was prepared in English and Spanish.

To inform external stakeholders and indigenous rightsholders about the audit and invite them to participate in the interview process or to submit formal or written feedback, SQM informed auditors that they posted the audit announcement on their website and distributed posters announcing the audit to the local communities and to workers and sent letters to the stakeholders.

During the onsite visit, the social auditor observed no evidence of public disclosure or announcement distribution at visited external location, including indigenous community headquarters, the municipal government office, the SQM cultural center, or any other community gathering points or municipal offices. This observation was formally presented during the closing meeting of the onsite visit.

To provide information to onsite personnel, the mine informed auditors that they held in-person discussions with internal team leaders and disseminated an audit poster via closed-circuit television at the mine and workers' camp restaurant.

Following the onsite audit, the mine team submitted photographs of a poster announcing the audit distributed in San Pedro, Toconao office, and by workspace entrances. It was noted that the content of the posters was different to the prepared audit announcement, and it was unclear if ERM CVS contact information was directly shared with workers to allow them to confidentially and anonymously provide feedback. SQM also shared evidence of email communication to the CPA, and to the Camar, Peine, Socaire, Toconao and Talabre communities. These invitations to participate contained the audit announcement and auditor contact information.

The auditor directly contacted four representatives from local institutions, the Consejo de Pueblos Atacameños (CPA), the Larache community, the Cucuter community, and the SQM Workers' Union, to invite them to participate in the interview process during the onsite visit. No responses were received from representatives of the Cucuter community and the SQM Workers' Union. An interview with the representative from the Larache community was not scheduled due to stakeholder availability. The interview was scheduled prior to the week of the onsite visit; however, the community representative was required to travel on the agreed date. The audit team attempted to arrange alternative options for an in-person or virtual interview by contacting the representative directly via telephone, but they were not available. No additional options, such as submitting comments by email, were offered at the time.

An interview with a CPA representative was scheduled in advance of the onsite visit.

Efforts to engage with Indigenous communities beyond the five communities near the mine were carried out through the Consejo de Pueblos Atacameños (CPA), the representative institution of the 18

Indigenous communities in the region, including those located outside the project's direct area of influence but that claim recognition of the impact of mining activities on their water resources.

2.3.2. Mine Staff

The following individuals were interviewed as subject matter experts in one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit.

Position/Role
Supplier, Contractors
Legal Area Manager
Environmental Compliance Leader
Legal department
Human Resources Vice President
Risk Management Superintendent
Salar de Atacama Operations Manager
Head of Taxes of the Lithium Division
Assistant Comptroller Manager
Compliance Lawyer
Sustainability Engineer
Risk Management Leader Salar Atacama
Health and Safety Advisor
Corporate Risk Manager
Deputy Manager of Community Affairs
Community Relations Officer
Responsible for Environmental Assessments Human Environment
Environmental Deputy Manager
Compliance and internal audit officer
Compliance and risk team member
Sustainability Deputy Manager
Sustainability and Community Manager

2.3.3. Workers/Contractors

During the surveillance audit from the total of 1,640 employees and 2,775 contractors at the time of audit, ERM CVS conducted a total of 11 scheduled

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worker engagements, including 8 individual interviews, and three group interviews (2-3 people). Interviews included a total of 15 workers. Scheduled worker interviews were supplemented by 36 additional impromptu interviews with individuals or groups in various areas of the mine during the environmental, health, and safety portion of the onsite audit. In total, 51 workers were interviewed during the surveillance audit.

Prior to the onsite audit, ERM CVS selected a sample of workers and contractors for interviews. The selection aimed to include diversity in age, gender, length of service at the SQM mine (ranging from a few months to approximately 10 years), and role or function (including managers, coordinators, technicians, and machine operators).

The list of workers selected for interviews was made up of both company and contractor employees, and for each selected worker, there was a backup worker of the same gender or position within the company or contractor. Due to the shift work schedule, there were few instances where the selected worker was replaced by a backup, but all scheduled workers were interviewed.

At the scheduled and impromptu worker interviews, topics discussed included working conditions, freedom of association, health and safety, and grievance reporting. The scheduled engagements took place onsite in designated conference rooms and offices. These worker interviews were conducted without SQM management personnel present. Participants for group interviews were selected by ERM CVS to avoid bias or influence employee responses.

Date	Meeting Type	# Attendees *	Notes
08/07/2025	Individual Interview	1M	Direct worker, Plant Operator
08/07/2025	Individual Interview	1F	Direct worker, Community Affairs Assistant
08/07/2025	Individual Interview	1M	Direct worker, RCI Technician
08/07/2025	Individual Interview	1F	Contractor, Construction Manager
08/07/2025	Individual Interview	1M	Direct Worker, Operations Superintendent
08/07/2025	Individual Interview	1M	Contractor, Industrial services
08/07/2025	Individual Interview	1F	Contractor, Technical Secretary
08/07/2025	Individual Interview	1F	Contractor, Risk Prevention Advisor
08/07/2025	Group Interview	3F	Direct Work, Quality Advisor Contractor, APR

			Contractor, Administrative
08/07/2025	Group Interview	1F 1M	Contractor, HSEQ Supervisor Contractor, Risk Prevention Advisor
08/07/2025	Group Interview	2F	Contractor, Mechanic Contractor, Technical Secretary
Total		15 (5M, 10F)	

* M = Male; F= Female

2.3.4. Government Agencies

ERM CVS conducted interviews with five government agency representatives identified as having authority over or a relationship with the SQM mine. The interviews were conducted without mine personnel present.

Government Institution
Administrator of the Municipality of San Pedro de Atacama – 2F
San Pedro de Atacama Environmental Secretariat (DIMAO) – 2M
Mayor of the Municipality of San Pedro do Atacama - 1M
Total 5 (3M; 2F)*

* M = Male; F = Female

2.3.5. Participating Communities and Civil Society Groups

To identify stakeholders and interested groups to interview during the onsite audit, ERM CVS specialists undertook a media scan, consulted with the mine team and reviewed the updated stakeholder database provided by the mine.

During the onsite visit, ERM CVS conducted community meetings with a total of 14 stakeholders with the potential to be impacted by the mine. Meetings were held in or near the communities with locations selected to facilitate ease of access. Organization of meetings was supported by the SQM mine team, however all meetings were conducted by ERMCVS auditors without any mining personnel present.

During the surveillance audit, interviews were conducted with leaders and representatives from the five Indigenous communities located along the east edge of the Salar, in proximity to SQM's mining operations. Additional interviews included other indigenous community members (residents of villages not connected to the formal leadership of the communities) and municipal representatives from San Pedro de Atacama, covering key areas such as health, education, culture, and institutions associated with the Atacameno people.

Efforts to engage with Indigenous communities beyond the five communities near the mine were carried out through the Consejo de Pueblos Atacameños (CPA), the representative institution of the 18 Indigenous communities in the region, including those located outside the project's direct area of influence but that claim recognition of the impact of mining activities on their water resources.

Date	Community, NGO Name	Location of Meeting	# of Attendees
8/07/2025	President of the Atacameña Community of Peine	Via Teams	1M
09/07/2025	Vice President of the Consejo de Pueblos Atacameños, CPA	At the institution's headquarters	1F
09/07/2025	President of the Neighborhood Council of San Pedro de Atacama	At the institution's headquarters	1F
09/07/2025	Historian of popular culture	At the San Pedro de Atacama City Center	1F
09/07/2025	Founding Leader of the Atacameña Women's Association (AMA)	At the San Pedro de Atacama Cultural Center	1F
10/07/2025	Nurse at the Toconao Health Center	At the institution's headquarters	1F
10/07/2025	Artisan / Farmer from Toconao	at the stakeholder property	1F
10/07/2025	Camar health unit representative	At the institution's headquarters	1F
10/07/2025	Community member of the Camar community	In Camar Square	1M
10/07/2025	President and Secretary of the Atacameña Community of Talabre	At the institution's headquarters	2M
11/07/2025	President of the Atacameña Community of Camar	Via Teams	1M
11/07/2025	President of the Atacameña Community of Socaire	Via Teams	1M
11/07/2025	President of the Atacameña Community of Toconao	Via Teams	1M
Total			14 (7M, 7F)

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2.4. Summary of Mine Facilities Visited

The following areas were visited or observed during the on-site visit:

Operational areas	Processing Plants: MOP-H-II, SOP-H, MOP G III, MOP-H-I
	Pozas de Evaporación (Evaporation Ponds)
	GHS (Gerencia Hidrogeología Salar) Salar Hidrogeology Management
	GHS Operations Patio, GHS Lubricants Room, GHS Reparations Workshop
	COM (Centro Operaciones Mina) Mine Operations Center
	MOP Brine Wells (ARPES-01 Well)
	SDD (Sistema de Distribución) Tank ARPES (TK-ARPES)
	Canaleta ARPES (Channel ARPES)
	Halite Pools, Sylvinite Pools, Lithium Pools
	Dispatch.
	BOSATA (Bodega Salar Atacama) Materials and spare parts warehouse.
	MOP II Maintenance Workshop, EXCON Workshop, Mine Maintenance Workshop
Non-operational areas visited	Dining Rooms
	Site restrooms and showers
	Administrative offices
	Laboratories
	Campamento Andino (Andino Mine Camp)
	Patio 3 (Hazardous and non-hazardous waste storage area)
Surrounding Communities	Peine Community
	Camar Community
	Socaire Community
	Talabre Community
	Toconao Community
	Municipal Headquarters of San Pedro de Atacama

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3. Summary of General Scope Items

General information regarding the mine's ongoing performance is summarized in this section. Summary of information related to specific chapters is provided in Section 4.0.

The surveillance assessment concluded the mine has continued to maintain the basic systems identified in the prior assessment.

3.1. Regulatory compliance status

3.1.1. General outcome of compliance monitoring/audits

The mine undergoes an annual regulatory compliance audit by the National Geology and Mining Service (SERNAGEOMIN) government agency. At the last audit in June 2024, 43 findings were raised. These were all closed out by the surveillance onsite visit. Evidence of the findings is uploaded to the SIMINONLINE platform. According to the audit report from June 13th, 2024, there are no pending issues with SERNAGEOMIN. Reportedly, other inspections are also carried out to confirm compliance with the CORFO contract, conducted by external auditors (one focused on environmental aspects and the other on the compliance of the contract.

3.1.2. Regulatory inspections, violations, enforcement actions

On June 18, 2025, an inspection was carried out by the DGA (General Directorate of Water) to monitor effective groundwater extractions (DGA Report No. 00308). According to site contacts, all water wells were extracting the authorized amounts. DGA requested additional information to support SQM's claims. The mine has provided this evidence and is currently awaiting a resolution (a ruling) on the inspection visit.

An inspection of boilers and autoclaves was conducted in December 2024 by the Ministry of Health (Report No. 0017513) to assess compliance with the operation of boilers and/or autoclaves. During the inspection, the operation of one boiler (BABCOCK CHILE S.A. boiler) was halted; however, after additional evidence was provided by the mine to show compliance, the measure was lifted and the operation of this boiler has resumed.

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3.1.3. Lawsuits and other external legal, non-regulatory actions

Environmental Court Ruling (2019):

The Chilean environmental court upheld a complaint in December 2019 from Indigenous communities (notably from Peine and Camar) against SQM over its water usage. The court found that SQM's compliance plan, submitted after a multi-year investigation by Chile's environmental regulator (SMA), was insufficient to mitigate the environmental damage caused by over-extraction of lithium-rich brine. The court emphasized the fragility of the Atacama ecosystem and the scientific uncertainty surrounding the water table's behavior and upheld the complaint, citing the high level of scientific uncertainty surrounding the impact of lithium mining on water in the region. It ordered SQM to revise its plan and the SMA to reinstate sanctions against the company. The SMA said it would appeal before the Supreme Court. In 2020, before the appeal was heard, the SMA withdrew its appeal. In 2022, the SMA approved SQM's revised compliance plan. The regulator said SQM's revision of a previous plan, mandated by a local environmental court in 2020, provides for the gradual reduction of the company's water and brine extraction in Chile's northern Atacama salts flat. The plan establishes a staggered reduction in the maximum brine extraction limit until it reaches 822 liters per second in 2028, slightly less than 50% of the authorized extraction. The plan also allows for a 50% decrease in the total usage of industrial water and the mine reports compliance with the approved plan. These monitoring activities are being validated by independent entities in an annual external audit.

3.1.4. Summary of major events, health and safety incidents, and performance records

Significant Incidents:

A total of 560 year to date (2025) incidents were reported across various departments. The most affected areas included Operations and Energy & Automation, with notable values assigned to incident severity. Monthly and cumulative data were tracked to monitor trends in both injuries and material damage.

Incident reports were distributed across multiple locations. Incident severity ranged from low to significant, with 95 cases involving injuries and 170 involving material damage. Most incidents occurred during the night shift (20:00–07:00), and the majority of all incidents were attributed to unsafe

conditions rather than actions. Incident rates were also compared across shifts and departments, showing consistent patterns year-over-year.

1,631 corrective measures were generated as a result of the reported incidents. Of these, 84% were closed at the time of the surveillance audit and none were overdue. All departments reported 100% compliance with corrective actions. Measures were categorized by potential severity and type of control, including administrative actions, elimination, restriction, segregation, substitution, and use of personal protective equipment. Weekly updates showed consistent closure rates and no extensions or overdue actions.

Hazard Detection (DP) Management:

A total of 4,369 hazard detections were reported, with a high verification rate of 93%. Most detections were successfully closed or verified, and overdue cases were minimal. Compliance rates across departments were strong, with several departments achieving 100%. Weekly tracking showed a reduction in overdue detections and steady progress in verification and closure.

A "significant incident" is an event that actually occurred that resulted in harm, damage or disruption (typically involving injury, equipment failure or production loss). A "hazard detection" is the proactive observation or findings that helps identify potential sources of hazard before they can cause an incident, usually raised during inspections or routine checks. Typically, if the hazard detection increases, the amount of incidents and significant incidents should decrease.

In 2024, in preparation for an alliance with CODELCO, Chile's state-owned mining company, SQM consolidated all its assets, permits and operations under a single structure and restructured its legal entity from SQM Salar SA to SQM Salar SpA. CODELCO and SQM plan to jointly produce refined lithium from 2025 to 2060.

There were no reported labor strikes by SQM workers at the Salar de Atacama mine during the last three years (2023–2025).

However, there was an operational disruption in January 2024, where SQM was forced to suspend operations due to road blockades and protests by Indigenous communities. These protests were related to the agreements between SQM and Codelco. That demanded for government consultation. SQM's operations were effectively suspended for about 4 to 5 days (January

9–13, 2024). After reaching an agreement with authorities, the communities agreed to lift the roadblocks on January 13.

3.2. Stakeholder considerations

3.2.1. Stakeholder feedback/complaints received by site since prior audit

According to data presented by SQM regarding the performance of its worker grievance mechanism, there were 7 reported cases of workplace harassment in 2023, and 27 cases of workplace harassment and one case of sexual harassment in 2024. Following the enactment of Law No. 21,643 ("Karin Law") on 1 August 2024, additional 22 cases of workplace harassment and two cases of sexual harassment were recorded, totaling 49 cases of workplace harassment and 3 cases of sexual harassment along the year 2024.

Law No. 21.643, enacted on January 15, 2024, and effective as of August 1, 2024, introduces significant amendments to the Chilean Labor Code and other legal frameworks to strengthen the prevention, investigation, and sanctioning of workplace harassment, sexual harassment, and violence. Commonly referred to as the "Karin Law," it mandates both public and private sector employers to implement formal protocols for handling complaints, ensure protective measures for victims, and promote a safe and respectful work environment.

The law also modifies statutes governing public administration (Law No. 18.575), the general administrative statute (Law No. 18.834), and the municipal administrative statute (Law No. 18.883), establishing institutional responsibilities for proactive prevention and response. Its implementation poses operational and cultural challenges, particularly in aligning internal procedures with the law's requirements for transparency, accountability, and victim protection.

From August 2024 to June 2025, a total of 57 complaints were recorded under the Karin Law. Of these, 33 cases have been closed, while 24 remain under investigation.

Following the enactment and publication of Law No. 21.643 ("Karin Law"), workers became aware of the new legal requirements mandating companies to comply with the provisions of the law. This increased awareness among employees has led to a noticeable rise in the number of complaints formally

submitted through the mechanisms made available by the operating company. In total, SQM reported a 169% increase in complaints related to workplace harassment, sexual harassment, or workplace violence in 2025 as compared to 2024. As of August 1, 2025, SQM had registered 29 cases of workplace harassment, one case of sexual harassment, and three cases of workplace violence.

3.2.2. Stakeholder feedback/complaints received by auditors or IRMA since prior audit

No stakeholder feedback was received by the auditors following the initial audit or prior to or during the surveillance audit.

On 12 July 2025, one day after the end of the surveillance onsite visit, the Consejo de Pueblos Atacameños (CPA) submitted a formal letter to ERM.

The CPA specifically presented its concerns regarding the volume of extracted groundwater, which may impact water sources used by northern communities located near springs, as well as the lowering of the water table due to brine extraction in the lithium production process.

The letter asserted that the mine consultation and participation process did not reach all affected communities and emphasized the need for scientific studies to assess the effectiveness of the region's water balance. These studies should, in their view, consider water availability in relation to the volume extracted by the mine, the water use needs of communities, and the recharge capacity of local aquifers.

The CPA also raised concerns about the exclusion of 13 northern communities also considered affected by mining operations. According to the CPA, there are 18 Indigenous communities belonging to the Atacameño peoples in the region - 13 located in the northern part of the Salar, and 5 in the southern part. SQM has signed cooperation agreements with the five southern communities to address their demands and promote sustainable development and social well-being.

From the CPA's perspective, the northern communities are also impacted by SQM's use of water resources, as they are situated near the sources of the contributing watershed that feeds the Salar aquifer. During the surveillance audit, CPA representatives reported that another operating company in the region recognizes all 18 communities and has signed agreements with each

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of them, based on a framework agreement with the CPA for the transfer and management of resources.

In response, SQM clarified that the agreements with five Indigenous communities located in the south of Salar are based on their determination of direct potential influence from operations, and from the outcomes of participatory impact assessments. They stated that they see the focus on bilateral agreements with the five southern Indigenous communities as appropriate because these communities are situated within the project's potential impact area and therefore subject to its risk and impact management measures.

At the same time, SQM emphasized that the existence of specific bilateral agreements does not limit its openness to broader engagement with all communities regarding their performance. The online monitoring system is publicly available to allow all interested stakeholders to review the results and raise questions or inquiries regarding the monitoring outcomes.

The mine company also claimed that while they acknowledge CPA concerns, they maintain an open-door policy to all communities and that their groundwater and brine extraction are subject to monitoring and conducted in compliance with environmental permits.

The audit team was unable to directly interview community members from the 13 Indigenous communities located north of the mine during the surveillance audit. Representatives from the CPA were interviewed on the behalf of these 13 communities. Because the July 2025 letter referred to above was only received after the closing of the surveillance audit, this topic will be further followed up at the renewal audit.

3.3. Summary of Material Operational or Administrative Changes at Site Since the Previous Audit

In 2024, in preparation for an alliance with CODELCO, Chile's state-owned mining company, SQM consolidated all its assets, permits and operations under a single structure and restructured its legal entity from SQM Salar SA to SQM Salar SpA. CODELCO and SQM plan to jointly produce refined lithium from 2025 to 2060.

No other material operational or administrative changes were reported to have occurred since the previous audit.

3.4. Site-Specific Issues Identified for Follow-Up Review in Previous Audit

No issues were identified for follow-up during the initial audit.

3.5. Progress on Previous Corrective Actions

The following table provides a summary of the corrective action plan provided in the previous audit report and notes where progress has been made. If auditors believe a change in rating is warranted, this is documented in the critical requirements summary table in Section 5. In addition, ongoing management of corrective actions, including those below and any new corrective actions arising from this audit, are addressed in Section 6 of this report.

Requirement #	1.1.1.1
Requirement	The operating company shall comply with all applicable host country laws in relation to the mining project.
Critical	**Yes**
Previous rating	Substantially meets
Justification from previous report	SQM is under a complex regulatory framework, including strict financial, mine, and water rights; labor, environmental, ethical, and human rights; and occupational health and safety regulations.
	SQM has developed a legal compliance process involving different levels and areas of the organization. There is a legal vice presidency with a pool of lawyers with different specialties to advise the company and operational areas regarding the application of these regulations.
	Each department (HR, Environment, H&S, etc.) also maintains processes to verify compliance. SQM maintains contracts with law firms (VCG abogados and Minute & Olavarria) to facilitate the identification of new regulations. Legal sends this information to operational areas potentially impacted by the new regulation or modification.
	The impacted areas need to evaluate applicability and define mechanisms to comply with them. Once conducted and the applicability confirmed, the new requirement is included in a compliance matrix.

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SQM recently began the formalization/documentation for these processes to systematize them and ensure consistency in their implementation, including developing procedures and matrices of legal requirements for each area (environmental, H&S, labor, contract, human rights, anti-corruption, etc.). The level of development of these new procedures differs from area to area, with the environmental area being the most advanced in its implementation.

The risks and compliance management area are working on implementing a compliance management system based on the ISO 37301 standard, which will allow the organization to have a better understanding of all compliance obligations, with an initial focus on ethics and anticorruption issues.

SQM is subject to strict scrutiny by government agencies including CORFO (Corporación de Fomento de la Producción, owner of the Atacama Salar de Atacama), Environmental Superintendence, Health Service, and National Geology and Mining Service (SERNAGEOMIN), which conduct annual inspections and audits. In case of findings, corrective actions are defined, implemented, and verified for closing. Reports are prepared to notify the agencies of the status of correction. In addition, internal compliance audits and third-party audits are periodically performed. From these findings, corrective actions are defined and use a tracking process to verify that implementation is in place.

Verification of the effectiveness of the new compliance tools should be performed during the next surveillance assessment.

Planned Corrective Action(s) from previous report	SQM certified its environmental and health & safety management system by ISO 14.001 and 45.001 at the beginning of 2023. On the other hand, SQM Salar is working to certify its Energy management system. Through this type of certification, we are including all legal compliance and making sure there are internal processes to have it updated. Part of the IRMA management system is to develop the tools and procedures to have an integrated system to comply fully with all requirements incorporating risk management, compliance systems, contractor management along with environmental, energy and health & safety requirements to make sure all of them are integrated as an overall process that we expect to have fully integrated during 2024 managed by Sustainability area.
Comments on Progress	At the time of the surveillance audit, SQM was in the process of updating the system used to track site compliance with legal requirements. It was observed that while some departments, including legal, environment, H&S and energy, have been fully transitioned to the SIGEA Legal Compliance Platform (a total of 1,073 requirements), not all topics have been migrated. These gaps included labour requirements, contractor obligations and taxes.

In the absence of a fully integrated system to ensure that the site complies with all its legal requirements, requirement 1.1.1.1. remains rated as 'Substantially Meets'.

Requirement #	1.2.2.2

Requirement	The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: a. Providing relevant information to stakeholders in a timely manner; b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Soliciting feedback from stakeholders on issues relevant to them; and e. Providing stakeholders with feedback on how the company has taken their input into account.
Critical	Yes
Previous rating	Substantially meets
Justification from previous report	Sustainability, Ethics and Human Rights Policy states on 5.A.I the requirement for informed and transparent participation with indigenous communities, in a culturally appropriate manner. Pertinent participation is mentioned along with several mechanisms of dialogue, such as cooperation agreements, worktables, community rounds, information channels, participatory monitoring, and grievance management. Documents provided evidence of the working mechanisms of the working tables such as the environmental one or the emergency one.
Planned Corrective Action(s) from previous report	The action plan for the community involves continuing the dialogue within and outside the working groups already established through the long-term and short-term agreements. On the other hand, to evaluate the effectiveness of the actions carried out, we will establish continuous evaluation mechanisms for all our projects based on perception surveys, impact measurement and direct feedback from the communities. Additionally, all the information gathered will be taken into account as part of the continuous improvement cycle of the management system that is being formalized, and we expect to have fully implemented during 2024.

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Comments on Progress	SQM has conducted a comprehensive stakeholder mapping process, including the identification of vulnerable groups, and developed a Stakeholder Engagement Plan (SEP) with active participation from neighboring and Indigenous communities. The identification and analysis of social actors were carried out through a participatory methodology, ensuring the inclusion of Indigenous peoples.
	To strengthen its engagement capacity, the company expanded its community relations team by hiring professionals from the five Indigenous communities near to the mine operations. These individuals have been positively recognized and reported during interviews by community representatives for their role as cultural and communication intermediaries.
	The company utilizes Environmental and Social Working Groups (Mesas de Trabajo) as the primary mechanism for addressing community-raised concerns. These participatory forums are supported by SQM-contracted experts and facilitate information exchange with local and regional authorities.
	Additionally, topic-specific meetings are held, particularly on environmental monitoring (e.g., water and air quality), where communities are empowered to contract their own technical experts to oversee compliance with agreements established with the company.
	As part of cultural integration efforts, the communities of Talabre and Camar have conducted training sessions for SQM personnel and subcontractors, focusing on local customs and cultural practices.
	Although the working groups serve as a reference for integration and dialogue, providing a space where communities are heard through their representatives, the reviewed documentation did not present evidence of how the company records and follows up on the feedback received from the community, nor how it provides feedback to stakeholders. Additionally, feedback received from the Consejo de Pueblos Atacameños indicated that the mine has not engaged with all 18 indigenous communities in the area.
	No evidence was found to confirm that the management system developed by the company was fully implemented in 2024, as outlined in its stated objectives and targets.
	As there was insufficient evidence provided to demonstrate the site has implemented clear mechanisms for receiving and responding to feedback, and gaps were observed in engagement with local indigenous communities, this requirement remains rated as Substantially Meets.
Requirement #	1.5.5.1
Requirement	The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.

Critical	Yes
Previous rating	Substantially meets
Justification from previous report	SQM has developed and implemented an Ethics and Compliance Program based on the SQM Code of Ethics and the Anti-Bribery and Anti-Corruption (ABAC) Policy, and other specific procedures have also been implemented. All these documents apply to the operation and extend to contractors and suppliers. Several initiatives, including the reinforcement of the compliance area and new compliance verification mechanisms, have been recently implemented. These new processes will be monitored for effectiveness.
Planned Corrective Action(s) from previous report	We expect to continue consolidating the company's integrity value for our workers through various campaigns of dissemination, internalization and training that have been developed during 2023 with the objective of reaching all our workers. Bribery is a fundamental part of this. Additionally, the plan is to incorporate our contractors more directly into our integrity value, with whom we have already worked with a specific supplier development area, and we expect to continue evaluating a critical mass through our supplier sustainability self-assessment platform that measures categories such as ethics, human rights, environment, among others. This platform is aligned with our responsible sourcing policy, which we launched this year and intend to continue maturing during 2024 and continue with the training programs every two months that the contractors area is developing along with the periodic review of the controls that allow us to verify compliance.
Comments on Progress	has developed and implemented an Ethics and Compliance Program based on the SQM Code of Ethics and the Anti-Bribery and Anti-Corruption (ABAC) Policy, and other procedures and policies that include anti-bribery and anti-corruption mandates have also been implemented. All these documents apply to the operation and extend to contractors and suppliers.
	The Internal Regulations establish disciplinary measures to be taken in cases of bribery and corruption. Article 124 of the Internal Regulations on Order, Hygiene and Security, establishes in Title XIX on the Prevention of the Crimes of Money Laundering, Terrorist Financing, Bribery, Receiving, Incompatible Negotiations, Corruption between Private Parties, Unfair Administration, Misappropriation, and Other Illegal Acts.
	There is a reporting channel (NAVEX) to report any bribery or corruption cases. It is completely anonymous and can be found on the SQM Global website.
	In order to ensure contractors are trained and aware of the ABAC policy, the mine continues to implement a bimonthly training

program along with the periodic reviews of contractor compliance and adherence to the ABAC policy through the supplier sustainability self-assessment platform. This requirement has been upgraded to 'Fully Meets'.

Requirement #	2.5.1.1
Requirement	All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining.
Critical	Yes
Previous rating	Substantially meets
Justification from previous report	SQM has had a corporate emergency plan since 2019, which covers all work fronts and offices in Antofagasta and Santiago. It also has had emergency plans since 2005 in case of fuel spills in sensitive areas.
	In December 2021, the company IdeAmbiente carried out a risk analysis report at the Salar de Atacama Mine that identified the risks of the operation and the risks that could affect the communities. In March 2022, the final version of the Salar de Atacama Emergency Response Plan was approved.
	However, no meetings have been held with the community to discuss SQM's intention to update its Emergency Response Plan in compliance with APPEL, nor have they discussed what risks they consider should be included in the plan and what they think about the risk assessment conducted by SQM, nor have any meetings been established with the communities.
	In April, SQM delivered the updated 2022 Emergency Response Plan so that the communities can submit comments or observations to the plan. These activities were carried out in April 2022. For example, the community of Peine was provided with a physical copy of the document, as were the communities of Camar and Socaire. In the community of Toconao, a presentation of the emergency response plan was given to the community board, and in Talabre the presentation was given to the community assembly. To date, the only ones that have made a statement regarding the plan is the community of Peine, in which they suggest that SQM's community relations area consider external emergencies that occur within the territory of Peine, such as hazardous substances spills, robberies, or assaults on roads.
	SQM has reviewed its Emergency Response Plan, and a new version (November 2022) was issued to include emergency communication flow with communities and community emergencies participation.

Socialization of the plan and the communication flow is under implementation. An emergency plan workshop with Talabre community representatives was carried out on October 14, 2022. Workshops with the rest of the communities are planned for 2023.

Planned Corrective Action(s) from previous report	We expect to continue improving our emergency plan including APELL guidelines. Additionally, we continue to work on the emergency plans of the communities where we have had specific meetings and workshops for the implementation of their own emergency plans, which we seek to integrate with our internal operations and those of the municipality of San Pedro de Atacama, where we also have regular meetings. In particular, we are actively working with the support of an external party with 3 communities for the hazard and risk analysis and later the emergency plans, while with 1 community we are in the early stages of implementation.
Comments on Progress	The emergency plan, which is updated annually, was updated, following the 10 APELL points in consultation with third-party consultant. At the time of the surveillance audit, the Municipality of San Pedro de Atacama was in the process of developing an integrated disaster prevention and response plan with support from SQM through a third-party consultant. The mine has carried out meetings in April 2025 within the framework of APELL, with the communities of the commune of San Pedro de Atacama, to help them develop the plan. However, as the municipality is still in the early stages of development of its own emergency response plan, SQM has not been able to integrate a disaster prevention and response plan with the community as per UN APELL. This requirement therefore remains rated as Substantially Meets.
Requirement #	2.5.2.1
Requirement	The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan and include their participation in emergency response planning exercises.
Critical	Yes
Previous rating	Substantially meets
Justification from previous report	SQM has corporate and site emergency response plans. It also has emergency subprograms for the Antofagasta site. Among SQM's activities are that in 2011 it communicated to the Antofagasta Water

Authority about the development of a contingency response plan against spills of hazardous substances in the Loa River, in 2011 and 2019 it made a presentation on aid management for heavy rains and cold conditions to the community of San Pedro de Atacama. SQM has a new Emergency Response Plan that was approved in March 2022.

SQM has reviewed its Emergency Response Plan, involving operational, support and community relations areas related to emergency response. SQM has held communications, meetings and workshops with community representatives (Atacameño communities of Peine, Talabre, Socaire, Camar, Toconao) and the mayor of San Pedro de Atacama. In addition to requesting comments on the Emergency Plan, not all communities have sent their comments. From the meetings held between SQM and some communities, the need to support the communities in developing their own emergency plans was identified. SQM is currently implementing a support plan for the communities to develop their own emergency plans.

It has also implemented a new community emergency communication system, which is in the process of being socialized. The results of this plan will be reviewed in the next evaluation.

Planned Corrective Action(s) from previous report	We expect to continue improving our emergency plan including APELL guidelines. Additionally, we continue to work on the emergency plans of the communities where we have had specific meetings and workshops for the implementation of their own emergency plans, which we seek to integrate with our internal operations and those of the municipality of San Pedro de Atacama, where we also have regular meetings. In particular, we are actively working with the support of an external party with 3 communities for the hazard and risk analysis and later the emergency plans, while with 1 community we are in the early stages of implementation. Once we finish and integrate all the emergency plans, we seek to generate integrated drills in case of natural hazards and how to coordinate the communities, municipality and companies.
Comments on Progress	The mine has been able to plan emergency response planning exercises with tabletop emergency drills, workshops and earthquake drill conducted with communities that have been invited to participate in emergency response planning exercises. Several drills and workshops have been conducted since the initial audit. A tabletop emergency drill was conducted on April 10, 2025, with the participation of 40 people from the Talabre community. A workshop was held with each of the neighboring communities to guide them on the implementation of their own emergency plans. These integrated response plans were disseminated through training courses provided by SENAPRED of Antofagasta.

An earthquake drill was conducted on December 6, 2024, with the participation of the fire department, the police, and the community of San Pedro.

Although, through these exercises some progress has been made to develop the emergency response plan in consultation with affected communities, the mine still has efforts to incorporate their input into the mine emergency response plan. As the site emergency plan has not yet included the participation of all neighboring or affected communities in emergency drills, this requirement remains at Substantially Meets.

Requirement #	3.1.3.3
Requirement	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.
Critical	Yes
Previous rating	Substantially meets
Justification from previous report	SQM has a policy to combat all forms of harassment, as well as programs to promote the hiring and expansion of space for female workers at the mine. Evidence of the functioning, monitoring, recording, and follow-up of the system for reporting harassment or other workers' complaints was also presented. However, there were no effective actions to prevent harassment, including to women. Thus, the requirement was not fully complied with.
Planned Corrective Action(s) from previous report	We hope to successfully implement in our facilities including Salar the Nch 3262 standard, which is voluntary and establishes the requirements to be met by a management system for gender equality and reconciliation of work, family and personal life. It is an opportunity for organizations to identify and make visible the gender gaps, barriers and inequities present in order to generate actions aimed at addressing them. It is a structure that is installed and allows for continuous improvement. We expect to have fully integrated by the end of 2024.
Comments on Progress	The site launched the "Violencia Intrafamiliar (VIF)" campaign to raise awareness and address issues related to domestic violence. In addition, harassment prevention training was implemented for all employees. Further training was provided through "charlas" (talks)

and online meetings to ensure compliance with the newly enacted Ley Karin.

Following the enactment of the Karin Law in August 2022, employers became required by law to implement protocols for handling complaints, ensure protective measures for victims. Increase in complaints since the law enactment was noted at the time of the surveillance audit, however with a significant proportion of the complaints still under investigation and the operational and cultural challenges of aligning internal processes with the legal requirements, the effective implementation of the measures taken against harassment will need to be further verified at the renewal audit.

This requirement remains Substantially Meets.

Requirement #	3.2.4.1

Requirement	The operating company shall implement measures to protect the safety and health of workers including: a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means; c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities; d. Providing, at no cost to workers, education and training/retraining programs and comprehensible instructions on the work assigned and on safety and health matters; e. Providing adequate supervision and control on each shift; and f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.
Critical	Yes: Critical (a and b)
Previous rating	Substantially meets
Justification from previous report	SQM complies with items a, b, c, and d. Is detailed below: a. SQM has an occupational health and safety policy and a procedure for identifying hazards and risks. Both documents are shared with workers so that they can identify the risks and hazards associated with their work, as well as mitigation actions for each work area. SQM

also has a labor insurance policy to respond to workers' health emergencies.

b. SQM has a risk analysis for on-site activities. Based on the results of this analysis, the type of personal protective equipment (PPE) required by each worker is determined, and the delivery of these PPEs is recorded on a PPE delivery form that SQM has.

c. SQM has an emergency response team including transfer vehicles and a medical area to attend to preliminary injuries. Depending on the medical evaluation, it is determined that the worker will be transferred to the nearest health center, since SQM has identified the nearest health centers in case more specialized medical attention is required. SQM also showed evidence of its actions and procedures in the event of an occupational injury or accident. They also carry out occupational health surveillance in accordance with Chilean law to follow up on workers' health.

d. SQM has an internal training program for the safety and health area on the ZYGHT platform, including workshops on safe behavior and leadership, which is ongoing and has three other topics planned for the year: communication, process safety, and ISO 45001. This has been carried out for 2 months by the company La Murete. A training session was held on May 25, 2022, and 141 people have already attended. In addition, there is mandatory training on the company's website for each former employee and as a new hire.

e. Based on this point, SQM does not comply, since during the on-site tours of the operating areas several inconsistencies were found in the levels of implementation of Health and Safety tools such as inspections, work permits, hazard identification and supervision verification. Some examples are coordination of equipment maintenance, observations made by workers are not reported by supervisors, there is no adequate quality control of the report of observations made by workers and that it is coordinated by supervisors and the maintenance area, delivery of equipment and tools after maintenance without the signatures of the corresponding personnel, and safety observations related to the handling of chemicals and electrical safety.

f. Not applicable, since SQM has no underground activities.

Planned Corrective Action(s) from previous report	SQM certified its health & safety management system by ISO 45.001 at the beginning of 2023. In addition, SQM Salar is working on continuous improvement and continuously addressing the culture of safety through different elements such as training, dissemination, and a permanent prevention dynamic that all the teams carry out. Our plan incorporates the execution of all the plans defined in our management system in order to measure the effectiveness of the actions taken.
Comments on Progress	The mine has standardized the management of hazards and risks both with SQM workers and contractors. Through the use of

standardized Work Risk Analysis (ARTs, Analisis de Riesgo de Trabajo), and the Risk Control Sheet (HCRs, Hoja de Control de Riesgos), the use, of inspection checklists, and work procedures (the mine has developed 12 work procedures for routine activities). For non-routine activities the mine relies on the ARTs and HCRs.

SQM Salar reported addressing safety culture through training using the SQM APRENDE Platform for compliance training not only for workers but also suppliers and contractors, and the SQM internal training program for the safety and health area on the ZYGHT platform. Worker interviews included no additional concerns related to supervisors. This requirement can be upgraded to Fully Meets.

Requirement #	3.3.1.1
Requirement	The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community Health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:
	a. General mining operations;
	b. Operation of mine-related equipment or vehicles on public roads;
	c. Operational accidents;
	d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);
	e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);
	f. Mining-related effects on community demographics, including immigration of mine workers and others;
	g. Mining-related impacts on availability of services;
	h. Hazardous materials and substances that may be released as a result of mining-related activities; and
	i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease or others) that could occur as a result of the mining project.
Critical	Yes
Previous rating	Substantially meets
Justification from previous report	SQM has environmental licenses that have considered the impacts generated by the project on the community and the management measures to mitigate the impacts. In addition, SQM hired IdeAmbiente to carry out a survey of information on the risks of the

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operation to the community and the natural environmental risks that may affect the community. Based on this document, SQM updated their Emergency Response Plan (2022) and shared it with stakeholders.

Based on the studies carried out for the environmental license and by Ideambiente, it was indicated that there are no risks to the communities from SQM's operations, since SQM has a map of the communities, which are located at a great distance from the operations. In addition, SQM indicates that the transportation of substances to and from the mine site is along route B-385, in the opposite direction to the location of the community's towns. The chemical substances do not pass through the area of the communities located in SQM's area of influence.

With respect to health risks from contagious and sexually transmitted diseases (e.g., HIV/AIDS, tuberculosis, malaria, Ebola virus), these diseases have a minimal rate of presence in the country of Chile.

Planned Corrective Action(s) from previous report	Through our relationship with community worktables, we seek to identify any potential health and safety risks with the community in order to address them in a timely manner. From our previous analysis we have not identified a previous risk with respect to the issues in the standard although it is aligned with completing our support for community emergency plans that include safety as well as health issues. On the other hand, we continue with our participatory monitoring and full transparency of the results of hydrogeological and biotic monitoring, which involves making all new results available on our website www.sqmsenlinea.com.
Comments on Progress	The site continues to implement a scoping process that identifies potential risks and impacts to community health and safety associated with mining related activities. This process is supported by the implementation of a DPS risk assessment, which is reviewed annually or whenever significant operational changes occur. The assessment is conducted collaboratively by the Environmental, Prevention, Operational, and Sustainability teams to ensure a comprehensive evaluation.

Key risk sources considered include general mining operations, use of heavy equipment on public roads, operational accidents, structural failures (e.g., tailings dams and waste dumps), ecosystem service disruptions, demographic shifts due to workforce migration, strain on local services, and the release of hazardous substances.

As part of the evidence supporting this process, the site has documented procedures for the handling and disposal of inert salts (halite) from solar evaporation ponds. These materials are transported by truck to designated stockpile areas. Safety protocols require clear delimitation of work zones based on machinery dimensions for example, placing cones at 1.5 times the excavator

boom length and securing access points when working in sensitive areas such as ponds or containment walls.

The identified health risks include but are not limited to silica exposure, UV exposure, and noise. While the scoping exercise was structured and covered all IRMA-required risk categories, the assessment lacks evidence of community participation, prioritization of risks based on stakeholder input, and integration with broader emergency systems. This requirement therefore remains rated as Substantially Meets.

Requirement #	3.5.1.2

Requirement	The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that:
	a. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force;
	b. If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and
	c. Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury.
Critical	Yes
Previous rating	Substantially meets
Justification from previous report	SQM has corporate standards, the ISS Global Personnel Standards, which state firearms training will be provided to personnel and will include personal and police background checks. It also has codes of conduct for staff and suppliers. The company ISS, which provides physical security services to SQM, does not use firearms, since in Chile only people with security guard accreditation can use firearms. The service contracted by SQM is only of the security guard category and therefore cannot and are not authorized to use firearms. To be classified as a security guard, they must be approved by Zosepcar - Zona de Seguridad Privada, Control de Armas y Explosivos (Carabineros de Chile).
	It should be noted that ISS has created a procedure called "Human Rights on the IRMA Protocol for SQM Salar de Atacama Industrial Security." However, no policy has been established regarding the use of force that conforms to the best practices expressed in the United Nations Basic Principles on the Use of Force and Firearms.

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Planned Corrective Action(s) from previous report	We are working to include voluntary security and human rights principles in our contracts with all current and future companies that will be in charge of surveillance in our operations. Additionally, we are working on an internal security services policy that includes voluntary principles, training and procedures to avoid human rights violations such as the use of force. We expect to have this completed during the first months of 2024.
Comments on Progress	Since the initial audit, the operating company established a comprehensive policy and procedure framework governing the use of force and firearms, aligned with both national legislation and international best practices, including the UN Basic Principles and the Voluntary Principles on Security and Human Rights. The procedures emphasize restraint and the prioritization of non-violent means, requiring that force be used only when strictly necessary and in proportion to the threat. Firearms are restricted to situations involving imminent threats of death or serious injury.
	Security personnel were observed to be trained to assess proportionality based on factors such as urgency, severity, and reading the situation on a case-by-case situation. A structured escalation model guides responses, beginning with cooperative behavior and progressing through passive and active resistance. Mandatory induction and ongoing training are in place so that personnel understand and apply these principles consistently. Contractual obligations with security providers were seen to reinforce compliance, with violations treated as serious breaches subject to immediate termination. No individuals have firearms on site. The rating of this requirement can be upgraded to Fully Meets.

Requirement #	4.1.4.1
Requirement	A risk-based approach to mine waste assessment and management shall be implemented that includes:
	a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;
	b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle;
	c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and
	d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c).
Critical	Yes

Previous rating	Substantially meets

Justification from previous report	SQM has implemented a risk-based approach to mine waste assessment and management, including: a. Identification of potential chemical risks during the project conception and planning phase of the mine life cycle. Physical risk assessments are completed by a third party (for 30 m high piles & 34 deg slopes, all maximum). Physical risks are not significant. b. Risk assessments to evaluate the potential impacts of mine waste facilities on health, safety, environment, and communities early in the life cycle. c. Updated risk assessments. d. Documented risk assessments. Some hazardous materials storage weaknesses were observed that were not identified, such as storing acids on top of wooden pallets, weak labelling, lack of" aisle space in storage of waste tires and lube oil drums, incompatibility of chemicals in hydrogeology lab, and bench material. Transformers are free of PCBs. No asbestos survey (unknown location and status). Asbestos was not identified as a potential waste. Asbestos regulations were established in 2001. All facilities constructed prior to 2001 have the potential to contain asbestos materials.
Planned Corrective Action(s) from previous report	SQM certified its environmental and health & safety management system by ISO 14.001 and 45.001 at the beginning of 2023. Part of both management system we will be carrying out assessment when necessary to make sure we are meeting fully this requirement.
Comments on Progress	The audit team reviewed documentation related to chemical and hazardous waste management. Hazardous waste is classified and stored based on characteristics including acute and chronic toxicity, reactivity, flammability, and corrosivity to minimise potential harm to both human health and the environment. Risk assessments were observed to be updated regularly, with frequencies aligned to the risk profile of each facility. A comprehensive asbestos inspection has been completed across the site. However, it was noted that the mine has no current formal process to confirm that electrical transformers and other equipment that potentially can contain PCBs are PCBs free. An oil stain of dielectric oil was observed at Patio 3 (waste storage area) from decommissioned electrical transformers; however, it was not known whether this contained PCBs. No repeat observations were raised during site tours related to unsafe hazardous materials storage. This requirement can be upgraded to Fully Meets.

Requirement #	4.1.5.6

Requirement	On a regular basis, the operating company shall evaluate the performance of mine waste facilities to: a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5); b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3); c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and d. Inform the management review to facilitate continual improvement (see 4.1.5.8).
Critical	**Yes**
Previous rating	Substantially meets
Previous justification	On a regular basis, when there are changes to the operation, SQM evaluates the risks of mine waste facilities. a. Reports to the authority are evidence that the compliance performance objectives are being met, but SQM's goal is 50% reduction by 2025; the current trend does not show reduction. b. Risk management process effectiveness is evaluated as are measures on effectiveness of critical controls; however, they are not tracked as a key performance indicator. c. Updates to the risk management process are duly informed. d. Top management is informed of their review and approval, to facilitate continual improvement, as declared. Documentation of performance of mine waste facilities: objectives are set, started in 2020. Goal: 50% reduction by 2025. Performance from 2019 to 2020 = increase of 30%; from 2020 to 2021 = increased by 77%; from 2021 to projected 2022 = reduction estimated at 44%. There is no trend analysis done regularly
Planned Corrective Action(s) from previous report	We are continuously working to incorporate circularity within our sustainability strategy that allows us to reduce the amount of industrial and domestic waste generated in our Atacama operation from the source. To this end, we seek to continue working with the different areas from supply, operation, sustainability and obtaining the necessary permits for the disposal of everything that we cannot

reduce in order to valorize it and that the amount that ends up in a landfill is the minimum with a focus on 2025 of no more than 50%.

Comments on Progress	A structured DPS risk assessment process has been implemented and is reviewed at least annually or whenever significant operational changes occur. This process is carried out by a multidisciplinary team including Environmental, Prevention, Operational, and Sustainability departments.
	The current system supports the assessment of risk management measures and critical controls, particularly in relation to operational safety and environmental handling.
	Furthermore, the site has not yet fully documented how these assessments inform updates to the Operational Management System (OMS) or feed into management reviews. As such, the rating remains Substantially Meets.

Requirement #	4.2.4.4
Requirement	The operating company shall develop and implement an adaptive management plan for water that:
	a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and
	b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.
Critical	Yes
Previous rating	Substantially meets
Justification from previous report	According to the narrative, SQM has developed and implemented an adaptive management plan for water that:
	a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project.
	b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds, or trigger levels (TARP) are reached, and timelines for their completion.
	RCA 226 are the commitments of SQM with the authority, SMA (Environmental Superintendence). These commitments meet IRMA's requirements.

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The plan exists and was submitted to the authorities; it is on review to be approved at the time of the audit.

Planned Corrective Action(s) from previous report	Our adaptive management plan for the better use of the mining resource continues to be implemented, although we are still awaiting qualification from the authority. We continue to reduce our brine extraction and also include more monitoring in a transparent manner on our website www.sqmsenlinea.com. On the other hand, in terms of water, we are working directly with the local authority and institutions such as CAPRA to support water security in the area, in particular the provision of wells and infrastructure, understanding that the effects of climate change are becoming evident in the environment. In terms of communities, we continue to develop Projects such as with Camar regarding the installation of a treatment plant to avoid dependence on water trucks, and our agricultural programs also seek to improve water efficiency. We intend to continue developing all these projects together with the hydrogeological and biotic monitoring plan for the area and the reduction of our water and brine consumption. To this end, we expect to continue with the 4 environmental roundtables that we have implemented with the communities where studies and monitoring of environmental variables are carried out with a strong focus on the water component. Additionally, we seek to continue our contribution within initiatives such as the multistakeholder roundtable led by GIZ with a focus on the water component (https://www.mesamultiactor.cl/).
Comments on Progress	At the time of the surveillance audit, the adaptive management plan was still under regulatory review and has not yet been fully implemented. Therefore, the rating remains Substantially Meets.
Requirement #	4.3.2.1
Requirement	If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.
Critical	Yes
Previous rating	Substantially meets
Justification from previous report	Evidence shared (ESIA's baseline and impact assessment sections) do not indicate significant potential impacts on air quality. No specific air quality management plan was made available. The company updated the environmental monitoring plan (2006), which indicates

(in alignment with the Environmental Statement - DIA "Planta de Secado y Compactado de Cloruro de Potasio") that no further air quality monitoring will be required.

There is only one air quality monitoring station between the site and communities, in between the Camar community; therefore, there is no evaluation of air quality over other areas.

Notwithstanding the fact that the environmental evaluations and air quality measurements carried out have ruled out significant potential impacts on air quality, based on the perception expressed by some of the surrounding communities, the company has defined a strategy to develop the study of air quality of the Salar de Atacama, in order to make an additional effort to complement the information available on this component.

Several actions have been performed including: a) selection of accredited suppliers to develop an air quality management plan, dispersion, and meteorological models; b) installation of the monitoring stations web for PM10 and PM2.5 (Particulars and Sercoam); and c) meeting with communities. To ensure transparency, SQM has agreed with the communities that the monitoring results will be received and evaluated first by the community and later sent to SQM through the community representative. So far, the SPM measurements at the 11 installed stations show measurements well below the reference standard (150 mg/m2/day) and the value indicated in IRMA requirement 4.3.4.3 (350 mg/m2/day), coinciding with the historical results of environmental impact assessments. An air quality management plan and dispersion and meteorological models are begin developed and are expected to be finalized in 2023, as well as the communication and agreement with other communities in addition to Socaire (which is the priority community due to the concern expressed for air quality).

Planned Corrective Action(s) from previous report	We seek to continue with the operation and maintenance of a monitoring station for particulate matter under 10 microns (MP10) and particulate matter under 2.5 microns (MP2. 5), this within the Campamento Andino area in addition to a monitoring station for sedimentable particulate matter (SPM), located in the northern sector of the eastern edge of the Salar de Atacama and identified as L2-25 along with a monitoring station for sedimentable particulate matter (SPM), located in the southern sector of the eastern edge of the Salar de Atacama and identified as LZA7-2. These reports are developed and continuously disseminated through stakeholder reports. In addition, we seek to increase the number of air quality stations in accordance with the recommendations of the IRMA audit along with making available publicly on our website www.sqmsenlinea.com
Comments on Progress	The Air Quality Management Plan scheduled for completion in 2023 has been finalized, and the planned actions such as maintaining particulate and sediment matter monitoring stations and increasing

the number of air quality stations have been implemented. Reports are publicly available and shared with stakeholders.

The company regularly monitors air quality around its operations in the Salar de Atacama. Monthly data is collected from several stations and includes dust particles and gases like sulfur dioxide, nitrogen dioxide, and carbon monoxide.

All measured levels were observed to be well below regulatory and IRMA environmental standards, showing that current activities are not harming air quality. The monitoring includes community involvement.

The rating of this requirement can be upgraded to Fully Meets.

3.6. Notable Performance Improvements

Principle 1 (Business Integrity) notable performance improvements observed by the auditors include:

- Use of Project *Minsus* for benchmarking IRMA requirements against national legal frameworks.
- At the SQM Salar level, efforts are currently underway to develop a standalone income statement specific to SQM Salar operations.
- External stakeholders consulted confirmed the strengthening of SQM's relationship with local communities and acknowledged the company's efforts to foster dialogue. These efforts are particularly recognized due to the inclusion of Indigenous community members within SQM's community relations team, who bring contextual awareness and cultural sensitivity to the engagement process.

Principle 2 (Planning and Managing for Positive Legacies) notable performance improvements observed by the auditors include:

- The Emergency Response Plan has been updated to align with the APELL (Awareness and Preparedness for Emergencies at the Local Level) standard, developed by the United Nations Environment Programme.
- The Closure Plan was approved in June 2023 and formally communicated.

Principle 3 (Social Responsibility) notable performance improvements observed by the auditors include:

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- Hazard and risk management has been standardized across both SQM employees and contractors, incorporating tools such as ARTs (Activity Risk Tables), HCRs (Hazard Control Registers), inspection checklists, and formalized work procedures.
- A new risk assessment tool, Mapa de Procesos, has been introduced to enhance risk rating and process mapping.
- SQM has continued implementing community programs such as the 'Escuela de Monitor de Violencia'. These initiatives were confirmed by stakeholders during interviews and are documented in the site's community engagement records.

Principle 4 (Environmental Responsibility) notable performance improvements observed by the auditors include:

- Electric vehicles and front loaders, including hybrid front loaders operated by the contractor Excon, are being utilized to reduce the operation's carbon footprint.
- The application of new technology in the SQM/CODELCO project, aimed at reducing continental water consumption in SQM's operations, has been positively received by Indigenous leaders, who view it as a step toward addressing water use concerns without compromising regional water sources.
- A comprehensive asbestos inspection has been completed across the site.
- An air quality monitoring program, Monitoreo de Calidad del Aire por MPS, has been established.
- Baseline noise monitoring has been initiated to support future noise impact assessments.

3.7. Concerns Related to Continued Maintenance of Achievement Level

Following the surveillance assessment, no evidence was found indicating a deterioration in performance that could pose a risk to maintaining the previously awarded IRMA 75 achievement level. Nonetheless, divergent perceptions of performance were identified between the site and stakeholders, reflecting differing viewpoints. Key areas of risk are noted below and are then summarized in greater detail in Section 4 of this report.

Indigenous Rights

SQM has a publicly available policy recognizing the rights of Indigenous Peoples, which is referenced in the agreements signed with five Indigenous communities neighboring the mine, identified by the company as affected by its operations. However, the Consejo de Pueblos Atacameños (CPA), the representative body of Indigenous communities within the Commune of San Pedro de Atacama and the broader region, emphasizes that while agreements were signed with the five communities located in the southern sector of the Salar, closest to the mine, the remaining 13 communities situated to the north, also CPA members and considered equally affected by the mining activities, were excluded.

Critical requirement 2.2.2.2. states that mines have to obtain a free, prior and informed consent (FPIC) of all potentially affected Indigenous Peoples. Following the surveillance audit, formal allegations were submitted by the Consejo de Pueblos Atacameños (CPA concerning the potential impacts of the mining operations on vital resources of 13 additional Indigenous communities located north of the Salar. These 13 communities are not considered impacted by SQM and are therefore not consulted, as part of FPIC. During the surveillance audit, auditors' interviews were carried out only with CPA as an institution involved with the 13 additional indigenous communities. This issue will be further examined in the next audit to validate SQM's current score against IRMA requirements. The operating company will be expected to formally respond to the CPA's claims and present the measures undertaken to ensure broader alignment of its engagement practices with Indigenous communities as part of the corrective action plan update for this surveillance audit. Alternatively, SQM must provide a substantiated justification for maintaining formal agreements exclusively with the five Indigenous communities located in the southern area of the Salar. Additional information regarding the site's ongoing performance against Chapter 2.2 can be found in Section 4.2.

Water management

There is a pending resolution of the inspection that was carried out by the DGA (General Directorate of Water) to monitor effective groundwater extractions (DGA Report No. 00308) which will need to be further reviewed during the renewal audit.

Additionally, there is a need for scientific studies to assess the effectiveness of the region's water balance. Such studies should consider water availability in

relation to the volume extracted by the mine, the water use needs of communities, and the recharge capacity of local aquifers. These will help better understand the water balance and address CPA concerns regarding the volume of extracted groundwater, which may impact water sources used by northern communities located near springs, as well as the lowering of the water table due to brine extraction in the lithium production process. Additional information regarding the site's ongoing performance against Chapter 4.2 can be found in Section 4.4.

4. General Performance by IRMA Standard Principle and Chapter

Because the surveillance audit is limited in scope, this audit did not include assessment of every requirement in every chapter. An overview of current performance from the surveillance audit for each chapter that was audited (partially or wholly) is provided in the following subsections.

4.1. Principle 1: Business Integrity

During the previous audit, this principle received an overall score of 81.5 %. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 1.1—Legal Compliance

Chapter 1.1. was fully audited during the surveillance audit.

This chapter focuses on Legal Compliance, requiring that mining operations comply with applicable laws and regulations, including those related to labor, the environment, health and safety, and community rights.

At the time of the surveillance audit, the Legal Compliance department was in the process of migrating to a Legal Compliance Platform (SIGEA).

In 2024, SQM was involved in the Minsus Project, led by a third-party contractor, which supported the site in assessing alignment between IRMA standards and Chilean regulations. Following the completion of the analysis, the company has committed to conducting a regulatory review every three years to maintain alignment between IRMA requirements and Chilean regulations.

Legal noncompliance is identified through various mechanisms, including audits, inspections, oversight activities, and operational reviews. Audits have been conducted semiannually since the initial audit, and the SAE Platform is continued to be used to monitor risk management progress. In cases of environmental, health and safety, energy, or quality noncompliance, a root cause investigation has been initiated, and findings were tracked through a dedicated matrix. Monthly meetings are held across departments to resolve outstanding issues, with progress monitored via the SMARTSHEET platform.

Qualification audits have also been conducted to verify compliance, in the integrated management system (covering ISO 14001, 45001, 50001 and 9001) and integrated assessments are used to evaluate adherence to IRMA requirements based on contractor regulations. Each contractor maintains its own legal compliance matrix.

SQM is continues to be a member of the national mining association, which facilitates the dissemination of new regulatory updates. To date, there have been no external requests for information regarding the status of regulatory compliance. All follow-up reports are submitted to the Environmental Superintendency and uploaded to the National Environmental Information System (SNIFA).

Chapter 1.2—Community and Stakeholder Engagement

Chapter 1.2 was partially audited during the surveillance audit. Nine requirements from this chapter were audited, including critical requirement 1.2.2.2. and eight requirements which did not achieve a Fully Meets rating at the initial audit.

At the initial audit, an observation was raised related to the absence of a systematic and structured stakeholder engagement plan. To comply with its action plan, SQM commissioned an independent consultancy to conduct comprehensive stakeholder mapping in 2022, with focus on vulnerable groups, and to develop a Stakeholder Engagement Plan (SEP). This process was carried out with active participation from neighboring and indigenous communities, with a participatory approach to the identification and analysis of social actors, in order to support the preparation of an appropriate SEP.

Following this, the company revised its sustainability policy, with the community relations section currently undergoing final review. Although specific consultation protocols for each community are not publicly available due to confidentiality of community statutes, SQM maintains ongoing dialogue through structured working groups (Mesas de Trabajo). These groups include legal representatives and attorneys from each community and serve as the primary mechanism for addressing community concerns.

Since the initial audit, SQM hired two professionals from local indigenous communities to its community relations team. This addition has been positively acknowledged by interviewed communities' representatives (indigenous associations leaders that formally represents the indigenous

communities in the region) for their role in facilitating communication and understanding.

The Environmental and social working groups (Mesas de Trabajo) function as key platforms for issue resolution and information exchange with local indigenous people leadership and regional authorities. According to the evidence provided by SQM, topics raised at these meetings included water and air quality monitoring. Communities were allowed to engage their own experts to oversee compliance with agreements, however it was not clear if this was funded by SQM. Communities like Talabre and Camar have conducted cultural training for SQM personnel and subcontractors.

Since the initial audit, participatory monitoring processes have been implemented for groundwater management, with communities using their own equipment and receiving training from SQM. Monitoring results are periodically disclosed by the company, and community teams independently collect and compare data. Interviews conducted with indigenous communities' representatives during the surveillance audit confirmed indigenous community participation in working groups and monitoring activities. Monitoring results are available on the company website.

Although the working groups serve as a reference for integration and dialogue, providing a space where communities are heard through their representatives, the reviewed documentation did not present evidence of how the company records and follows up on the feedback received from the community, nor how it provides feedback to stakeholders. There is also no formal procedure for providing written justification when the company is unable to promptly address stakeholder concerns.

Despite these efforts, the Consejo de Pueblos Atacameños (CPA) noted limited dissemination of monitoring results and restricted access to information for some northern communities in the Salar de Atacama region

Following the surveillance audit, a formal allegation was submitted by the Consejo de Pueblos Atacameños (CPA) concerning the 13 additional Indigenous communities located north of the Salar that are not consulted however could potentially be impacted by the mining operations. This issue will be further examined in the next audit to validate SQM's current score against IRMA requirements. The operating company will be expected to formally respond to the CPA's claims and present the measures undertaken to ensure broader alignment of its engagement practices with Indigenous communities. or provide a substantiated justification for maintaining formal

agreements exclusively with the five Indigenous communities located in the southern area of the Salar.

Chapter 1.3—Human Rights Due Diligence

Chapter 1.3 was partially audited during the surveillance audit. Six requirements from this chapter were audited, including three critical requirements (1.3.1.1., 1.3.2.1., 1.3.3.3.) and three requirements which did not achieve a Fully Meets rating at the initial audit.

SQM's commitment to human rights is embedded within its Sustainability, Ethics, and Human Rights Policy, established in April 2021. The policy aligns with key international frameworks, including United Nations Guiding Principles on Business and Human Rights; Universal Declaration of Human Rights; ILO Convention No. 169 on Indigenous and Tribal Peoples; International Covenant on Civil and Political Rights; International Covenant on Economic, Social and Cultural Rights.

As presented during the IRMA Initial Audit (December 2022), SQM conducted a human rights study incorporating both primary and secondary data sources. This study included a risk and impact assessment of its operations and involved internal and external stakeholders, notably indigenous communities. The findings were shared with employees, contractors, and community representatives.

The company has a Human Rights Policy that has to be reviewed periodically. A draft update to the human rights policy was mentioned during interviews with subject matter experts (SMEs), though the document was not available during the surveillance audit. The updated version was later published in October 2025. The policy outlines mechanisms for monitoring adverse human rights risks, but interviews revealed that feedback on monitored indicators is not consistently provided to internal or external stakeholders. While some employees were aware of the policy, they lacked familiarity with its practical implementation. Among external stakeholders, there was no evidence of awareness regarding the policy or its applicability.

The surveillance audit found no evidence of human rights violations or failures in the company's due diligence process related to mining operations. There were no indications that SQM has caused, directly or indirectly, any human rights abuse.

Chapter 1.4—Complaints Mechanism/Access to Remedy

Chapter 1.4 was partially audited during the surveillance audit. Five requirements from this chapter were audited, including a critical requirement 1.4.1.1. and four requirements which did not achieve a Fully Meets rating at the initial audit.

SQM has implemented a publicly accessible grievance mechanism available via telephone, email, and a dedicated link on its corporate website. The system provides confidentiality for both internal complainants (employees and subcontractors) and external stakeholders. The community relations team also serves as a recognized channel for receiving grievances.

The community grievance mechanism is managed through the Salesforce platform, which supports case tracking and resolution. Although the company asserts that the mechanism was developed in consultation with social actors, no verifiable evidence was provided to confirm a participatory process in defining culturally and linguistically appropriate criteria.

According to interviews with the grievance management team, semiannual reporting of grievance outcomes is conducted for internal stakeholders. However, no formal procedure exists for communicating grievance outcomes to external stakeholders, aside from annual consolidation in the company's Sustainability Report.

Interviewed employees demonstrated awareness of the mechanism and its confidentiality features but were unable to specify how or when results are communicated. External stakeholders acknowledged the accessibility of the community relations team and the use of working groups (Mesas de Trabajo) as informal spaces for raising grievances directly with company representatives.

SQM is actively tracking and reporting workers' complaints, and there is a clear increase in grievance registration suggesting improved access and awareness by workers. The cases closed under SQM's responsibility were resolved through conciliation. However, no evidence was found in the documentation reviewed regarding how the proceedings were conducted to reach case closure, as outlined in the company's flowchart to be aligned with the Karin Law. This will be further reviewed during the renewal audit.

The company promotes the grievance mechanism through community bulletin boards and its website, including access via QR code.

A tutorial video for workers has been developed to guide users through the complaint submission and tracking process, with anonymity preserved throughout.

Despite these efforts, no evidence was found of systematic feedback to external stakeholders regarding grievance outcomes, nor of a structured process to ensure stakeholder-informed improvements to the mechanism, or to ensure stakeholder involvement in grievance mechanism design, as per IRMA requirements.

Chapter 1.5—Revenue and Payments Transparency

Chapter 1.5 was partially audited during the surveillance audit. Six requirements from this chapter were audited, including critical requirement 1.5.5.1. and five requirements which did not achieve a Fully Meets rating at the initial audit.

The mine continues to its financial statements on a consolidated basis, adhering to International Financial Reporting Standards (IFRS), which are aligned with EU directives. These statements are audited annually by an independent external entity. Although the current financial reporting does not provide project-level details, SQM includes specific disclosures such as payments made under its contract with CORFO and taxes paid, offering insight into its financial contributions.

Efforts are underway to develop a standalone income statement for the Salar de Atacama project, which will allow for more granular financial transparency. This initiative is part of a broader corporate reorganization expected to be completed by the third quarter of 2025; however, this was not completed by the time of the surveillance audit.

SQM is also actively engaged in the Extractive Industries Transparency Initiative (EITI), reinforcing its commitment to responsible and transparent mining practices. Chile is in the process of implementing EITI nationally, and SQM's Sustainable Development Policy explicitly incorporates EITI principles, particularly in Section 6.

In terms of ownership transparency, SQM publishes the names of its 12 main shareholders, identifying the key beneficiaries of its mining operations. The company has also established a comprehensive Ethics and Compliance Program, which includes a Code of Ethics, an Anti-Bribery and Anti-Corruption (ABAC) Policy, and procedures that extend to contractors and

suppliers. Due diligence is performed on third parties to ensure adherence to these standards.

SQM continues to provide an anonymous reporting channel (NAVEX) accessible through its global website. Internal regulations clearly outline disciplinary measures for violations such as bribery, corruption, and other financial crimes, in accordance with Chilean Law No. 20,393 and its amendments.

4.2. Principle 2: Planning for Positive Legacies

During the previous audit, this principle received an overall score of 79.4 %. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 2.1—Env/Soc Impact Assessment and Management

Chapter 2.1 was partially audited during the surveillance audit. Twelve requirements from this chapter were audited, including critical requirement 2.1.3.1. and eleven requirements which did not achieve a Fully Meets rating at the initial audit.

Since the initial IRMA audit, no new ESIA was undertaken. Monitoring and compliance audits remain in place, with results shared with regulators and stakeholders. The Consejo de Pueblos Atacameños (CPA) submitted a formal letter to ERM CVS one day after the onsite visit (on July 12, 2025), citing gaps in participation and impact assessment management plans, particularly regarding groundwater extraction and brine-related impacts. These allegations will be further reviewed at the next onsite assessment.

Chapter 2.2—Free, Prior and Informed Consent

Chapter 2.2 was partially audited during the surveillance audit. Thirteen requirements from this chapter were audited, including a critical requirement 2.2.2.2. and twelve requirements which did not achieve a Fully Meets rating at the initial audit.

SQM has a publicly available policy on the recognition of Indigenous peoples' rights, which references international standards including the United Nations Declaration on the Rights of Indigenous Peoples. This policy is cited in the agreements signed with five Indigenous communities neighboring the mine.

While community leaders confirmed the existence of these agreements, they did not demonstrate full awareness of the policy itself.

At the time of the initial audit, SQM had signed agreements with four of the five Indigenous communities within its operational area. The fifth agreement was finalized between the initial and surveillance audits. The engagement process adhered to IRMA requirements for operating mines and included:

a) Consultation with elected Indigenous representatives, defining agreement terms, documentation, and consultation frequency.

Documentation of concerns regarding past and present mining impacts.

Participatory monitoring and mitigation programs aligned with community-defined methods and scope.

Verification was based on signed meeting records and interviews with community representatives.

The five communities are members of the Consejo de Pueblos Atacameños (CPA). Representatives of the five communities confirmed that the consultation process was respectful, participatory, and culturally appropriate, with no evidence of coercion.

During the surveillance audit, however, the CPA submitted a formal letter to the audit body concerns about the exclusion of 13 northern communities also considered affected by mining operations.

Although the consultation process followed principles consistent with Free, Prior, and Informed Consent (FPIC), SQM has not provided evidence of having a formal FPIC protocol aligned with ILO Convention 169, as required by IRMA. The agreements and consultation records are confidential at the request of the communities, limiting public verification. Nonetheless, documentation reviewed indicates that the process respected Indigenous customs and decision-making practices.

Agreements are monitored through Mesas de Trabajo (Working Groups), which serves as the primary mechanism for tracking implementation. Plans addressing community needs were jointly developed and formalized in the agreements, with individualized negotiation strategies tailored to each community's context. These include life plans with specific territorial objectives and long-term initiatives aimed at economic and financial autonomy post-closure.

The critical requirement (2.2.2.2) was previously assessed as fully met during the initial audit. During the surveillance audit, no deterioration was observed

on relationships identified in the initial audit, but the presence of other communities not considered by the site in their agreement activities raised the question of whether the site's engagement efforts are comprehensive.

Interviewed Indigenous communities acknowledged that SQM maintains ongoing dialogue with affected communities, considering their concerns and needs. Collaborative efforts have been made to address key issues, such as water consumption. Given that the mine is already in operation, stakeholder dialogues are conducted in alignment with the principles of Free, Prior, and Informed Consent (FPIC), specifically focused on the five Indigenous communities located in the southern area of the Salar, which are recognized by the operating company as being within the direct area of influence of the mining operations. However, this approach contrasts with the position of the Consejo de Pueblos Atacameños (CPA), who claims that the remaining 13 Indigenous communities located in the northern area of the Salar are also impacted, particularly due to water resource usage, and should therefore be included within the mine's area of influence. CPA maintains that these communities have not been adequately engaged, highlighting a potential gap in the company's stakeholder engagement strategy

In light of the formal allegation submitted by the CPA following the surveillance audit, this issue will be further examined in the next audit to validate SQM's current score against this IRMA requirement.

Chapter 2.3—Community Support and Benefits

Chapter 2.3 was partially audited during the surveillance audit. One requirement (2.3.3.6.) from this chapter was audited, which did not achieve a Fully Meets rating at the initial audit. There are no critical requirements in this chapter.

SQM continues with the broader community through educational programs, mentorship initiatives, and partnerships with schools and universities.

In relation to IRMA requirement 2.3.3.6, which mandates that the operating company periodically monitor the effectiveness of mechanisms or agreements developed to deliver community benefits, SQM has conducted regular review meetings with Indigenous community representatives within the framework of the Mesas de Trabajo (Working Groups). These meetings served as the primary platform for discussing the scope, prioritization, and implementation of actions outlined in the signed agreements. Evaluation of

results and adjustments to planned activities were carried out collaboratively during these sessions.

In addition to the formal agreements, SQM has initiated development and support health, cultural and educational projects for Indigenous communities beyond the scope of the individual agreements. However, not all such projects are subject to systematic monitoring, and there is no evidence of consistent application of agreed-upon indicators across all initiatives.

While the working groups provide a participatory mechanism for tracking agreement-related actions, the lack of comprehensive monitoring for all community benefit projects indicates an area for improvement in ensuring full alignment with IRMA's expectations for periodic evaluation and adaptive management.

Chapter 2.4—Resettlement

Chapter 2.4 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue not to be applicable at the mine site.

During this surveillance audit, the audit team confirmed that there were no physical resettlement or economic displacement processes related to the operation of the mine. The planned expansion with the adoption of new extractive technology will be limited to the operational area currently in use. This confirms the initial audit determination, and this chapter remains not relevant.

Chapter 2.5—Emergency Preparedness and Response

Chapter 2.5 was partially audited during the surveillance audit. Five requirements from this chapter were audited, including critical requirements 2.5.1.1. and 2.5.2.1. and three requirements which did not achieve a Fully Meets rating at the initial audit.

SQM has made strides in strengthening its emergency preparedness and response systems to align its processes with the expectations of IRMA Chapter 2.5. The company's emergency plan is updated annually, following the ten APELL (Awareness and Preparedness for Emergencies at Local Level) principles, with input from external consultants. The updated emergency plan includes regularly updated emergency contact information and is

supported by ten specialized subplans addressing specific scenarios, such as vehicle accidents.

A structured annual drill schedule has been implemented since the initial audit to test and prepare emergency capability scenarios across a wide range of emergency situations, including fires, hazardous substance spills, food poisoning, power outages, earthquakes, adverse weather, volcanic eruptions, serious or fatal accidents, and vehicle incidents. Drills are conducted monthly and cover both operational shifts, with different scenarios practiced in various areas of the site. By mid-2025, five drills had already been completed.

On April 10, 2025, a tabletop emergency drill was conducted with the participation of 40 members of the Talabre community. Additionally, a major earthquake drill took place on December 6, 2024, involving the fire department, police, and the community of San Pedro. SQM is also currently supporting the development of an integrated disaster prevention and response plan led by the Municipality of San Pedro de Atacama and in collaboration with a third-party consultant. This plan has been disseminated through workshops and training courses provided by SENAPRED (Chile's National Disaster Prevention and Response Service) in Antofagasta.

While occupational accidents are managed separately through the Mutual Insurance Company, SQM maintains comprehensive insurance coverage. Policies are renewed annually and currently run from December 18, 2024, to December 18, 2025. Coverage includes SQM Salar Spa, with a pollution liability limit of $20 million USD and a Mapfre policy covering up to $500 million USD for physical damage and business interruption. This includes risks such as earthquakes, landslides, and flooding that protect the company from costs and claims from third parties of losses caused by the mine activities. However, the policy does not explicitly state that the public can file claims against the policy.

Overall, SQM's emergency preparedness framework reflects a proactive, well-integrated approach that combines internal planning, community collaboration, and robust insurance coverage—meeting the core requirements of IRMA's emergency response standards.

Chapter 2.6—Planning/Financing Reclamation & Closure

Chapter 2.6 was partially audited during the surveillance audit. Thirteen requirements from this chapter were audited, including critical requirements

2.6.2.1., 2.6.2.6., and eleven requirements which did not achieve a Fully Meets rating at the initial audit.

The closure plan was first approved in 2015 and has since undergone several updates, with the most recent version officially approved in 2023. These updates reflect changes in operations, environmental conditions, and stakeholder feedback. The plan outlines how the site will be returned to a stable and safe condition after mining ends, with a clear post mining land use that supports long term environmental health and community safety.

The closure plan and its updates were confirmed to be publicly accessible through Chile's national environmental platforms, allowing stakeholders to review the site's commitments and progress and be involved in decisions that affect their land and resources.

4.3. Principle 3: Social Responsibility

During the previous audit, this principle received an overall score of 83.4 %. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 3.1—Fair Labor and Terms of Work

Chapter 3.1 was partially audited during the surveillance audit. Six critical requirements from this chapter were audited (3.1.2.1., 3.1.3.3., 3.1.5.1., 3.1.7.2., 3.1.7.3., 3.1.8.1.).

SQM continues to implement its grievance mechanism, which allows employees to report concerns anonymously, minimizing fear of retaliation. The Ethics Point platform provides online and phone-based reporting options. The system does not interfere with other legal or contractual remedies.

SQM has implemented formal procedures for investigating workplace violence and harassment, with clear roles assigned to compliance and HR departments. Beyond policy, SQM has continued to promote gender equality through initiatives such as mentorship programs for female engineering students, inclusive internship opportunities, and targeted recruitment strategies. The company tracks female participation across roles against measurable goals to increase representation in technical and leadership positions. Internal campaigns and educational talks, including those focused

on intrafamilial violence and workplace protections under Chilean law, have taken place since the initial audit.

In alignment with international standards, SQM strictly prohibits child labor in hazardous roles. The company's training and internship programs are designed for students from high schools and universities. These programs support youth development. The company's hiring policy clearly states that only individuals over the age of 18 are eligible for employment (aligning with Chilean labor law). This policy was observed to be applied across recruitment procedures and validated through internal oversight.

SQM also maintains strong safeguards against forced labor and human trafficking. The company has communicated its ethical labor standards to partner organizations through new initiatives that promote gender equity and training among contractors.

Law No. 21.643 ('Karin Law'), enacted on January 15, 2024, and effective as of August 1, 2024, introduced significant amendments to the Chilean Labor Code and other legal frameworks to strengthen the prevention, investigation, and sanctioning of workplace harassment, sexual harassment, and violence. The law mandates both public and private sector employers to implement formal protocols for handling complaints, ensure protective measures for victims, and promote a safe and respectful work environment (See section 3.2.1. for more details). Following the enactment, SQM recorded a rise in the number of workplace harassment complaints formally submitted through the grievance mechanisms in the second half of 2024 and 2025. With a significant proportion of the complaints under investigation at the time of the surveillance audit, the effective implementation of the measures taken against harassment will need to be further verified at the renewal audit.

Chapter 3.2—Occupational Health and Safety

Chapter 3.2 was partially audited during the surveillance audit. Ten requirements from this chapter were audited, including critical requirement 3.2.4.1. and nine requirements which did not achieve a Fully Meets rating at the initial audit.

The organization has implemented systems to inform workers about workplace hazards and preventive measures. This includes detailed risk identification processes, communication strategies, and the integration of safety culture into daily operations. Preventive activities such as safety walks, incident analysis, and hazard specific protocols are actively promoted. With

all these efforts workers are made more aware of the risks associated with their tasks and the controls in place to mitigate them.

Protective equipment and risk control measures are embedded within operational procedures. Workers are provided with appropriate gear, and supervisors are tasked with verifying the availability and correct use of critical controls before and during task execution. These practices are supported by leadership roles that reinforce accountability and continuous improvement in safety performance.

The company has also established systems to respond to workplace injuries and illnesses. During the site visit it was observed that workers have access to first aid and medical facilities when needed. This is further supported by the integration of occupational health program that is evaluated with metrics into performance dashboards and strategic objectives.

Chapter 3.3—Community Health and Safety

Chapter 3.3 was partially audited during the surveillance audit. Six requirements from this chapter were audited, including critical requirement 3.3.1.1.and five requirements which did not achieve a Fully Meets rating at the initial audit.

A detailed risk assessment was conducted across the communities of Camar, Talabre, Socaire, and Toconao. This assessment identified and categorized key risks affecting these areas, forming the foundation for targeted health and safety planning. However, while the scoping exercise was comprehensive to identify risks and mitigation measures, it did not include detailed quantitative modeling (exposure levels, probability of occurrence) or formal linkages to external emergency frameworks (e.g. integration with regional or governmental plans).

The risk categories assessed included natural risks (geological threats such as earthquakes and volcanic activity; floods; and extreme weather conditions), forest fires and risks associated with external transport of hazardous substances, and technological risks, covering potential incidents involving chemical spills, explosions, structural failures, and transport accidents linked to industrial operations. Other risks, such as environmental degradation, livestock attacks and biological risks including communicable diseases such as COVID-19, were also assessed. Each community was evaluated for its exposure to these risks, with severity levels marked as low, medium, or high.

Seven community meetings were held, including participation from women's groups. Environmental teams were involved in discussions and planning. All interactions were documented through meeting minutes, attendance records, and email correspondence.

Chapter 3.4—Conflict-Affected and High-Risk Areas

Chapter 3.4 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue not to be applicable at the mine site. As the mine is not located in a conflict-affected or high-risk area, this chapter remains not relevant.

Chapter 3.5—Security Arrangements

Chapter 3.5 was partially audited during the surveillance audit. Twelve requirements from this chapter were audited, including critical requirement 3.5.1.2. and eleven requirements which did not achieve a Fully Meets rating at the initial audit.

Security services continue to be provided by a third-party contractor, with a deployment of day and nighttime personnel. The site is monitored by a surveillance system, for continuous oversight and early detection of potential risks. Importantly, security personnel are unarmed, and no explosives are present on-site.

Since the initial audit, SQM Salar has developed and implemented a formal procedure titled "Sobre el Uso de la Fuerza, Seguridad y Derechos Humanos", which governs the conduct of security personnel. This procedure is explicitly aligned with:

The UN Basic Principles on the Use of Force and Firearms.

The Voluntary Principles on Security and Human Rights (VPSHR).

Chilean national legislation, particularly Decreto 261 Exento, which regulates private security operations.

The company also references a wide array of internal corporate policies, including those on sustainability, human rights, responsible sourcing, anti-corruption, and ethical conduct. These documents form a framework that set the responsible and lawful security practices.

The governance of security procedures is clearly defined across several key roles:

- The Risk Manager oversees risk identification, mitigation, and monitoring.
- The Audit Manager ensures independent validation of the procedure's effectiveness and compliance with best practices.
- The HR Manager is responsible for implementing training programs on human rights and the use of force policy.
- The Controls Efficiency Manager verifies that the policy is embedded in all security service contracts.

According to site security procedures, the use of force would be applied only when strictly necessary, proportionate to the threat.

Chapter 3.6—Artisanal and Small-Scale Mining

Chapter 3.6 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue not to be applicable at the mine site. During the review this chapter auditors did not identify the presence of artisanal or small-scale mining in the region of the mine. This chapter remains as not relevant.

Chapter 3.7—Cultural Heritage

Chapter 3.7 was partially audited during the surveillance audit. Four requirements from this chapter were audited, which did not achieve a Fully Meets rating at the initial audit. There are no critical requirements in this chapter.

In accordance with environmental licensing protocols, SQM provided public access to project documentation and environmental studies via the Chilean Ministry of the Environment's website. As verified during the initial audit, cultural heritage assessments were conducted in compliance with regulatory requirements and included consultation with Indigenous communities to collect primary data for cultural diagnostics.

The company reported that an updated cultural heritage study was under community review prior to publication; however, no evidence was provided confirming either community approval or public disclosure of the updated study at the time of the surveillance audit.

According to the mine, the updated cultural assessment was developed through participatory processes with Indigenous communities, (not confirmed during the indigenous communities interviews) and identified elements of intangible cultural heritage. While no direct impacts from mining operations on these elements were observed, the company has implemented preventive and mitigation measures in collaboration with the communities. These include actions to assess, control, and mitigate potential impacts, as well as initiatives to promote cultural expression.

The company's 2025 document titled "Historical and Cultural Heritage / Salar de Atacama – Initiatives and Projects" outlines over 15 cultural projects co-developed with Indigenous communities in the San Pedro de Atacama commune. These initiatives focus on cultural revitalization, including traditional festivals, reading programs, and intergenerational workshops.

4.4. Principle 4: Environmental Responsibility

During the previous audit, this principle received an overall score of 90.5 %. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 4.1—Waste and Materials Management

Chapter 4.1 was partially audited during the surveillance audit. Nine requirements from this chapter were audited, including four critical requirements (4.1.4.1., 4.1.5.1., 4.1.5.6., 4.1.8.1.), and five requirements which did not achieve a Fully Meets rating at the initial audit.

The mine has a system in place for waste handling and material management through structured procedures, safety protocols, and regulatory compliance.

Risk assessments have been updated regularly, with frequencies aligned to the risk profile of each facility. Stockpile volumes and heights have been measured quarterly and reported annually since the initial audit, in accordance with environmental regulations. These measurements were carried out by specialized personnel and are supported by strict access protocols to provide safety during data collection. Topographic surveys were conducted using GPS and VZ-400 scanners, with pre-survey inspections to identify break lines and assess terrain stability.

Hazardous waste continues to be managed in accordance with national regulations, including D.S. No. 148/2003. Operators are required to review safety data sheets and identify associated risks before handling any hazardous materials. Waste types include used oils, batteries, solvents, and contaminated materials, all of which were stored in labeled, resistant containers within restricted access areas, as confirmed during site tours. However, during the site tour to waste handling/storage area it was observed that the mine has no current formal process to confirm that electrical transformers and other equipment that potentially can contain PCBs are PCB free. Additionally, an oil stain of dielectric oil was observed at Patio 3 (waste storage area) from decommissioned electrical transformers (of unknown PCB content).

Historical context on asbestos use in Chile was reviewed, and site inspections confirmed that no asbestos was in use or present in any buildings or infrastructure at the time of the surveillance audit.

All procedures and assessments reviewed were formally documented, coded, and approved by relevant operational departments. These documents included hazardous and non-hazardous waste management standards, topographic survey methods, and operational safety protocols. They provide clear instructions, classification systems, and visual aids. The documentation also reflected alignment with national standards, such as NCh 2190 for hazardous waste management.

Chapter 4.2—Water Management

Chapter 4.2 was partially audited during the surveillance audit. Nine requirements from this chapter were audited, including two critical requirements (4.2.4.1., 4.2.4.4.), and seven requirements which did not achieve a Fully Meets rating at the initial audit.

At the time of the surveillance audit, the company operated 225 monitoring points across the region, including wells and meteorological stations, to track water levels, chemical composition, and environmental conditions. Monitoring is conducted daily, monthly, and bi-annually, in a continuous effort to have a comprehensive understanding of water dynamics.

The water management plan initiated in 2022 remains active. All activities are documented and supported by annexes detailing access authorizations, monitoring data, chemical analyses, extraction volumes, and meteorological

records. The mine uses meteorological data (precipitation, evaporation, wind speed trends) to guide water management decisions.

The site maintains monitoring and reporting practices aligned with regulatory requirements and IRMA standards, including monthly water balance reviews and verification of abstraction points. Monitoring activities were observed to be validated by independent entities. The mine monitors water extraction and consumption with monthly compliance rates against aspirational targets and detailed flow rates from various sources. Total water consumption across facilities exceeded 1.4 million cubic meters.

Long-term trend analysis shows a pronounced decline in water levels in the West Block, while the East Block exhibits a mild, continuous decrease of approximately one meter over 25 years, and marginal zones remain stable. Flow measurements for Quebrada Aguas Blancas indicated extraction rates fluctuating around 167 L/s, with strong correlation between SQM and community measurements. Validation is performed through historical comparisons and ionic/mass balance checks. Laboratory analysis is conducted by certified facilities, and contractor certifications are regularly reviewed.

SQM has committed to reducing water extraction by 65% by 2040, with current extraction rates at 240 liters per second. At the time of the surveillance audit, the site had reduced water usage to 55% of the initial values. Water is recirculated within the system, and the mine continues to implement a zero-discharge policy.

Chemical monitoring reviewed included quarterly sampling of groundwater and surface water. Parameters such as alkalinity, arsenic, calcium, chloride, and pH are measured at key wells, including Mullay-1 and Allana. The monitoring program includes all parameters listed in the IRMA water quality table and tracks water levels through a network of wells, with trends analyzed over decades.

The Consejo de Pueblos Atacameños (CPA) submitted a formal letter one day after the onsite visit (on July 12, 2025) to the audit firm, citing gaps in impact assessment management plans, particularly regarding groundwater extraction and brine-related impacts. The CPA emphasized the need for scientific studies to assess the regional water balance, including aquifer recharge capacity and water availability for community use. It also presented its concerns regarding the volume of extracted groundwater, which may impact water sources used by northern communities located near springs, as

well as the lowering of the water table due to brine extraction in the lithium production process. In response, the mine has highlighted that the groundwater extractions are subject to strict environment monitoring and regulatory oversight, with results reported to the authorities and made publicly available. As the feedback from the CPA was received after the surveillance audit closing meeting, this topic was not reviewed further as part of the surveillance audit scope, which focuses on changes to operations since the initial audit. The CPA concerns will be further reviewed during the renewal audit.

At the time of the surveillance audit, the adaptive water management plan was still under regulatory review and has not yet been fully implemented. The environmental monitoring plan was observed to contain objectives related to hydrogeological oversight, including the characterization of environmental variables, monitoring methodologies, and contingency planning. It includes detailed data on groundwater and surface water levels and flows, as well as chemical quality.

Chapter 4.3—Air Quality

Chapter 4.3 was partially audited during the surveillance audit. Six requirements from this chapter were audited, including critical requirement 4.3.2.1., and five requirements which did not achieve a Fully Meets rating at the initial audit.

Since the initial audit, the site has finalized and implemented an updated air quality monitoring plan which incorporates on site and community monitoring. Monitoring at Campamento Andino, the station closest to the Talabre community is conducted daily and compiled monthly. Although elevated levels of material particulate sediment (MPS) and dust were occasionally observed, analysis confirmed these were not caused by operational activities. Investigations indicated that these occurrences were primarily linked to natural wind erosion and road conditions near the community, rather than site operations. Monthly reports (SOCADE) were presented to communities every few months.

 Monitoring was attempted at Talabre 1 and 2; however, the samples were invalid because the community did not authorize their collection. As a result, no valid data was obtained from these stations. Valid data from CAMAR 1 and CAMAR 2 showed concentrations of 23 and 33 mg/m²/day respectively, well below the regulatory limit of 150 mg/m²/day.

Campamento Andino also monitors MP10, MP2.5, SO_2, NO_2, CO, COV, and NH_3, along with meteorological variables. All regulated pollutants were below national standards. COV and NH_3 were not regulated at the time of the surveillance audit, but their concentrations were low.

All monitored variables at Campamento Andino met the minimum data validity threshold of 75%, with most exceeding 96%. Daily MP10 concentrations ranged from 6 to 28 µg/m³, with an average of 14 µg/m³. All values were significantly below the daily limit of 130 µg/m³. A visual graph confirmed this trend, with all daily values well below the regulatory threshold.

The emissions inventory for 2024 aimed to estimate emissions of MP10, MP2.5, MPS, CO, NO_x, and SO_2 was reviewed during the audit. It identified key sources such as dryers, compacting areas, grinding and classification zones, boilers, machinery engines, wind erosion, and unpaved road traffic. Emission factors were derived from EPA AP-42 and regional guidelines. For example, drying operations used a formula based on particle size factors, while compacting and loading/unloading used fixed and dynamic formulas respectively.

Parameters such as wind speed, humidity, precipitation days, and fine content were used to calculate emission factors for loading/unloading and road traffic. These values were sourced from monitoring stations and technical inputs. For example, material humidity was set at 6.5% for stockpiles and 0.01% post-drying.

Chapter 4.4—Noise and Vibration

Chapter 4.4 was partially audited during the surveillance audit. Three requirements from this chapter which did not achieve a Fully Meets rating at the initial audit were audited. There are no critical requirements in this chapter.

Since the initial audit, the mine has carried out noise and vibration assessments in accordance with Decreto Supremo N°38/2011 of the Ministry of the Environment, which establishes maximum permissible noise emission levels. Assessments are performed during both daytime and nighttime periods, with voluntary monitoring conducted twice a year. Measurements are taken at six receptor points identified near operational sources, with three readings taken per point.

Noise limits are defined by territorial zoning, with varying thresholds for different environments. Measurements showed low vibration levels and no operational limitations due to noise or vibration. Daytime readings ranged from 29 to 44 dBA; nighttime levels averaged around 43 dBA. All measured values remained below the maximum permissible limits. Sources included diesel generators, distant traffic, wind, birds, and insects.

The site operates 65-tonne trucks and bus transportation from the man camp, though bus-related data being still too early to evaluate at the time of the surveillance audit. Voluntary monitoring has been implemented, and a baseline has now been established following the last IRMA assessment. The evaluations conducted in December 2024 confirmed that noise emissions from SQM Salar de Atacama remain within regulatory limits. No exceedances were recorded, and the site continues to operate without restrictions related to noise or vibration.

Chapter 4.5—Greenhouse Gas Emissions

Chapter 4.5 was partially audited during the surveillance audit. Three requirements from this chapter were audited, including critical requirement 4.5.1.1., and two requirements which did not achieve a Fully Meets rating at the initial audit.

in alignment with IRMA requirement 4.5.4.2, the company has prepared annual greenhouse gas emissions inventories for the mining project. These were shared with IRMA auditors during the surveillance audit, including progress toward reduction targets and actions taken to reduce emissions. The company has also published corporate-level and site-level greenhouse gas emissions and reduction efforts through its sustainability reports and online disclosures. At the time of this audit, the most recent report had been completed but was not publicly released until August 2025, following internal review and assurance processes.

In addition, the mine has continued to prepare an annual greenhouse gas in accordance with the GHG Protocol and ISO standards and is subject to independent limited assurance by a third-party body.

Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas

Chapter 4.6 was partially audited during the surveillance audit. Four critical requirements from this chapter were audited (4.6.2.1., 4.6.4.1., 4.6.5.3., 4.6.5.4.).

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The SQM environmental monitoring plan, in place since the initial audit, covers a study area of the eastern edge of the Salar de Atacama, including the Quebrada de Camar, with a surface area of 4,044.04 hectares. Continuous monitoring has been conducted at 24 monitoring points since the initial audit. Vegetation monitoring has been combined with satellite imagery analysis and field characterization to establish baseline conditions and track changes over time. In 2024, 99 vegetation samples were analyzed, showing that 58.59 percent were in normal growth condition, while others ranged from weak to dry. These results have been used to monitor ecosystem health and identify any potential impacts from operations. Monitoring also includes soil moisture, pH, and salinity measurements, and species identification through samples analyzed at the University of Chile Herbarium.

Ongoing monitoring of fauna included assessments of species richness and abundance for reptiles, birds, and mammals. Aquatic biota monitoring evaluated physicochemical parameters and ecological diversity in lacustrine systems.

Temperature trends from meteorological stations showed a slight increase in summer temperatures, which may affect plant vitality, particularly Algarrobo trees. Sensor data indicated limited water infiltration in some areas, suggesting the need for irrigation adjustments. Irrigation reports for Algarrobo trees detail infrastructure evaluations and water demand analysis. Sensor data from plants like A-44 showed minimal response to irrigation, highlighting areas for improvement.

Community campaigns such as Gran Desafío Bienestar Animal and Operación Rescate Animal continued to promote responsible pet management and fauna protection in industrial areas.

Chapter 4.7—Cyanide Management

Chapter 4.7 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue to not be applicable at the mine site. Because cyanide is not used in any of the mine's ore processing activities, this chapter is considered not relevant.

Chapter 4.8—Mercury Management

Chapter 4.8 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in

the chapter continue to not be applicable at the mine site. Because the mine does not use thermal processes to treat any material containing mercury, this chapter is considered not relevant.

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5. Performance on Critical Requirements

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve full certification (IRMA 100) must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, demonstrate progress over time, and fully meet all critical requirements within specified time frames.

A snapshot of achievement against the critical requirements, as determined by the audit firm during this surveillance audit, is provided below.

Table 5-1 Review of Ratings for Each Critical Requirement

Principle 1: Business Integrity

Req #	Previous Rating	Current Rating	Comment from Auditor
1.1.1.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
1.2.2.2.	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
1.3.1.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.3.2.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.3.3.3.	Not Relevant	Not Relevant	This critical requirement is not applicable
1.4.1.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.5.5.1.	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.

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Principle 2: Planning for Positive Legacies

Req #	Previous Rating	Current Rating	Comment from Auditor
2.1.3.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.2.2.2	Fully Meets	Substantially Meets	Evidence reviewed in this assessment validates downgrading the rating to 'Substantially Meets'.
2.4.7.1	Not Relevant	Not Relevant	This critical requirement is not applicable
2.5.1.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
2.5.2.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
2.6.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.2.6	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

Principle 3: Social Responsibility

Req #	Previous Rating	Current Rating	Comment from Auditor
3.1.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.3.3	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions

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3.1.5.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.7.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.7.3	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.2.4.1.a , b	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
3.3.1.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
3.4.2.1	Not Relevant	Not Relevant	This critical requirement is not applicable
3.5.1.2	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.

Principle 4: Environmental Responsibility

Req #	Previous Rating	Current Rating	Comment from Auditor
4.1.4.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
4.1.5.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.1.5.6	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
4.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

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4.2.4.1. a-e	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.2.4.4	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
4.3.2.1	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
4.5.1.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.5.3	Not Relevant	Not Relevant	This critical requirement is not applicable
4.6.5.4	Not Relevant	Not Relevant	This critical requirement is not applicable
4.7.1.1	Not Relevant	Not Relevant	This critical requirement is not applicable
4.8.2.3	Not Relevant	Not Relevant	This critical requirement is not applicable
4.8.2.2	Not Relevant	Not Relevant	This critical requirement is not applicable

6. Next Steps

6.1. Corrective Action Plans

The following critical requirements were reviewed during the surveillance audit to assess progress on corrective actions proposed following the initial audit. These requirements, along with the initial audit finding, the proposed corrective action, and the outcome of this audit, are summarized in Section 3.5 of this report.

The summaries below represent the performance gaps that remain for these requirements to be fully met according to IRMA guidance. Per IRMA protocols, one of the criteria that must be met for the site to maintain their current achievement level is to successfully complete these corrective actions and be verified as fully meeting the requirement at the time of the renewal audit, which must be completed within 36 months of the publication of the initial audit.

Principle 1 Outstanding Corrective Action

Critical requirement 1.1.1.1. – Legal Compliance

While SQM has started the process of implementing an integrated system to manage their legal compliance, it was observed that this system was not fully in place for all site departments at the time of the surveillance audit.

Critical requirement 1.2.2.2. - Engagement Processes

The mine has conducted a comprehensive stakeholder mapping process, however not all 18 indigenous communities have been identified as impacted stakeholders and engaged with. Additionally, the reviewed documentation did not present evidence of how the company records and follows up on the feedback received from the community, nor how it provides feedback to stakeholders.

Principle 2 Outstanding Corrective Action

Critical requirement 2.2.2.2. - FPIC

While the consultation process followed FPIC principles, the absence of formal FPIC protocol and exclusion of northern communities limits full alignment. Not all 18 indigenous communities have been recognized as

impacted and the mine has only entered into agreements with 5 Indigenous communities located to the south of the Salar.

Critical requirement 2.5.1.1. – Emergency Response Plan

Although some progress has been made to develop the emergency response plan in consultation with affected communities, the municipality of San Pedro de Atacama is still in the early stages of development of its own emergency response plan and therefore SQM has not been able to integrate all neighbouring or affected communities in its emergency plan.

Critical requirement 2.5.2.1. - Community and Worker Consultation

The mine has conducted several drills and workshops since the surveillance audit; however, efforts still remain to ensure that all neighbouring or affected communities participate in emergency planning exercises, and they are consulted on the development of the emergency response plan.

Principle 3 Outstanding Corrective Action

Critical requirement 3.1.3.3. - Non-Discrimination and Equal Opportunity

The site launched harassment prevention training and implemented protocols for handling complaints following the enactment of the Karin Law, however further evidence is required to assess effectiveness of the measures taken against harassment.

Critical requirement 3.3.1.1. - Health and Safety Risk and Impact Scoping

While the provided evidence of a community health and safety scoping exercise was structured and covered all IRMA-required risk categories, the assessment lacked evidence of community participation and prioritization of risks based on stakeholder input.

Principle 4 Outstanding Corrective Action

Critical requirement 4.1.4.1. - Waste Facility Assessment

It was noted that the mine has no current formal process to confirm that electrical transformers and other equipment that potentially can contain PCBs are PCBs free.

Critical requirement 4.1.5.6. - Mitigation of Risks and Management of Mine Waste Management Facilities

The site has not yet fully documented how the structured DPS risk assessments inform updates to the Operational Management System (OMS) or feed into management reviews.

Critical requirement 4.2.4.4. - Monitoring and Adaptive Management

The adaptive water management plan is still under regulatory review and has not yet been fully implemented.

6.2. Timing of Future Audits

In the IRMA system, a surveillance audit is a mid-point between full audits. The next required activity will be a renewal audit, which must be completed within 36 months of the publication date for the previous full audit.

6.3. Focus Areas for Next Audit

During the surveillance audit, progress was noted in addressing previously identified corrective actions. However, several gaps remain, particularly in relation to:

- The resolution of the inspection was carried out by the DGA (General Directorate of Water) to monitor effective groundwater extractions (DGA Report No. 00308).

- In light of the formal allegation submitted by the Consejo de Pueblos Atacameños (CPA) concerning the potential impacts of the mining operations on water resources for 13 additional Indigenous communities located north of the Salar, communities that were not consulted, this issue will be further examined in the next audit to validate SQM's current score against IRMA requirements. The operating company will be expected to respond to the CPA's claims and present the measures undertaken to ensure broader alignment of its engagement practices with Indigenous communities. Alternatively, SQM's justification for maintaining formal agreements exclusively with the five Indigenous communities located in the southern area of the Salar will need to be further substantiated.

- CPA also raised concerns regarding the volume of extracted groundwater, which may impact water sources used by northern communities located near springs, as well as the lowering of the water

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table due to brine extraction in the lithium production process. This will be further reviewed during the renewal audit,

- Following the enactment of Law No. 21,643 ("Karin Law") on 1 August 2024, the mine recorded an increased number of complaints related to workplace harassment, sexual harassment and workplace violence. The resolution of the complaint investigation and implementation of measures taken against harassment will be further verified at the renewal audit. These topics will be considered priority focus areas on the next renewal audit, where the audit team will evaluate both the completion of outstanding corrective actions and the effectiveness of measures taken to address identified gaps.

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Appendix A: Revised Corrective Action Plan

The following plan was authored by the mining company in response to this Surveillance Audit.

Req #	Req Text	Next steps	Próximos pasos
1.1.1.1.	The operating company shall comply with all applicable host country laws in relation to the mining project.	1. Strengthen the Integrated ISO Management System to ensure that legal matrices, as well as the gender equality and work-life balance management system (NCh3262), are periodically updated. 2. Ensure that all company inspections by authorities are recorded in the single registry established for this purpose during 2025. 3. Document and formalize the legal compliance procedure for SQM Salar SPA. 4. In the case of tax reporting, a legal matrix with a risk-based approach will be consolidated.	1. Fortalecer el Sistema de Gestión Integrado ISO para asegurar que estén actualizadas periódicamente las matrices legales al igual que el sistema de gestión de igualdad de género y conciliación de la vida laboral, familiar y personal NCh3262. 2. Asegurar que todas las fiscalizaciones de la compañía por parte de autoridades estén en el registro único establecido durante 2025 para ello. 3. Documentar y formalizar el procedimiento de cumplimiento legal de SQM Salar SPA. 4. En el caso de tax reporting, se consolidará una matriz legal con enfoque de riesgos.
1.2.2.2	The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: a. Providing relevant information to	1. Formally document the Stakeholder Engagement Plan (SEP), explicitly identifying the communication channels and the records used to document how stakeholder feedback is incorporated into the relevant processes. 2. Formalize the procedure for the requirements and complaints channel,	1. Documentar formalmente el Plan de Participación de las Partes Interesadas que explicitamente mencione los canales de comunicación y los registros de incorporar el feedback en los procesos involucrados. 2. Formalizar el procedimiento de canal de requerimientos y reclamos en el cual

Req #	Req Text	Next steps	Próximos pasos
	stakeholders in a timely manner;	detailing the steps to be followed for its processing, strengthening the channels and flows to incorporate it into the systems.	se detallarán los pasos a seguir para su canalización, fortalecimiento de los canales y flujos para incorporarlo en los sistemas.
	b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;		"
	c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;		
	d. Soliciting feedback from stakeholders on issues relevant to them; and		
	e. Providing stakeholders with feedback on how the company has taken their input into account.		
2.2.2.2	New mines shall not be certified* by IRMA unless they have obtained the free, prior and informed consent (FPIC) of potentially affected indigenous peoples. The circumstances for obtaining FPIC include situations where mining-	Regarding stakeholder engagement, SQM maintains formal cooperation and sustainability agreements with the five indigenous communities located in the southern sector of the Salar, recognized as potentially directly affected by the company's operations. These agreements are based on proximity, direct interaction with operational areas, and the results of impact assessments.	En cuanto al compromiso con las partes interesadas, SQM mantiene acuerdos formales de cooperación y sostenibilidad con las cinco comunidades indígenas ubicadas en el sector sur del Salar, reconocidas como potencialmente afectadas directamente por las operaciones de la empresa. Estos acuerdos se basan en la proximidad, la interacción directa con las áreas

| | related activities may affect indigenous peoples' rights or interests, including those that may: impact on lands, territories and resources; require the physical relocation of people; cause disruption to traditional livelihoods; impact on critical cultural heritage; or involve the use of cultural heritage for commercial purposes. | Nevertheless, we have direct relationships with all groups, as well as with the CPA, as demonstrated by our management focused on the future of the new project with early participation not only with the five communities in the south. Therefore:

1. By 2026, we will progressively engage with 24 Indigenous communities recognized under Chilean Indigenous Law (including those located in the northern area of the Salar), which are part of the association agreement.

In these instances, the communities will define the topics to be addressed, which will also include environmental issues, particularly water.

2. We will formally establish an intercultural governance framework that addresses territorial, executive, and board-level matters to discuss and manage the issues raised. | operativas y los resultados de las evaluaciones de impacto. De todas maneras, tenemos relacionamiento directo con todos los grupos y además con el CPA , así lo demuestra nuestra gestión pensando en el futuro del nuevo proyecto con una participación temprana no sólo con las 5 del sur. Por lo tanto:

1. Para el 2026 trabajaremos de forma paulatina con 24 comunidades reconocidas bajo la ley indígena chilena (incluyendo las del norte del Salar) y que son parte del acuerdo de asociación.

En estas instancias ellos definirán los temas a tratar en la cual tambien se contemplan temas ambientales y en particular agua.

2. Instalaremos formalmente una gobernanza intercultural que considere temas territoriales, ejecutivo y directivo para tratar las temáticas levantadas. |
| 2.5.1.1 | All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, | Considering that the assessment of anthropogenic risks derived from our industrial activity was found to be not significant:
1. We will continue to reinforce our willingness to collaborate with the | Considerando que la evaluación de riesgos antrópicos derivados de nuestra actividad industrial resultó en no ser significativa:
1. Continuaremos reforzando nuestra disposición a la colaboración con el ente |

Req #	Req Text	Next steps	Próximos pasos
	Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining.	coordinating municipal authority on this matter. 2. We will continue to carry out the assessment of anthropogenic and natural risks every three years or whenever significant changes occur. 3. We will align ourselves with the new standard, which according to the new draft proposal, clarifies the intent of this chapter much more clearly.	coordinador de la municipalidad respecto a esta materia. 2.Continuaremos realizando cada 3 años o cuando ocurran cambios significativos la evaluación de riesgos antrópicos y naturales. 3. Nos alinearemos al nuevo estándar que de acuerdo a la nueva propuesta borrador deja mucho más claro el espíritu de este capítulo.
3.3.1.1	The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered: a. General mining operations; b. Operation of mine-related equipment or vehicles on public roads; c. Operational accidents;	Considering that the assessment of anthropogenic risks derived from our industrial activity was found to be not significant with respect to health, we commit to aligning ourselves with the new standard, which according to the new draft proposal, clarifies the intent of this chapter much more clearly. 1. We will continue to reinforce our willingness to collaborate with the coordinating municipal authority on this matter. 2. We will continue to carry out the assessment of anthropogenic and natural risks every three years or whenever significant changes occur. 3. We will align with the new standard, which according to the new draft proposal, clarifies the intent of this chapter much more clearly.	Considerando que la evaluación de riesgos antrópicos derivados de nuestra actividad industrial resultó en no ser significativa respecto a la salud, nos comprometemos a alinearemos al nuevo estándar que de acuerdo a la nueva propuesta borrador deja mucho más claro el espíritu de este capítulo. Considerando que la evaluación de riesgos antrópicos derivados de nuestra actividad industrial resultó en no ser significativa: 1. Continuaremos reforzando nuestra disposición a la colaboración con el ente coordinador de la municipalidad respecto a esta materia. 2.Continuaremos realizando cada 3 años o cuando ocurran cambios significativos la evaluación de riesgos antrópicos y naturales.

Req #	Req Text	Next steps	Próximos pasos
	d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1); e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6); f. Mining-related effects on community demographics, including in-migration of mine workers and others; g. Mining-related impacts on availability of services; h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that		3. Nos alinearemos al nuevo estándar que de acuerdo a la nueva propuesta borrador deja mucho más claro el espíritu de este capítulo.

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Req #	Req Text	Next steps	Próximos pasos
	could occur as a result of the mining project.		
4.1.5.6	On a regular basis, the operating company shall evaluate the performance of mine waste facilities to: a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5); b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3); c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and d. Inform the management review to facilitate continual improvement (see 4.1.5.8).	We will formalize the OMS (Operational Management System) document for the DPS (Process Safety Documents) to include its effectiveness review	Formalizaremos el documento de OMS de los DPS para incluir su revisión de efectividad
4.2.4.4	The operating company shall develop and implement an adaptive management plan for water that:	We will continue with our adaptive management plan by reducing our water and brine consumption, in alignment with the sustainability plan and the future project.	Continuaremos con nuestro plan de gestión adaptativa al reducir nuestros consumos de agua y salmuera alineados al plan de sostenibilidad y el proyecto futuro.

IRMA Initiative for Responsible Mining Assurance

Req #	Req Text	Next steps	Próximos pasos
	a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.	Formally establish the water management plan to achieve zero extraction in the medium and long term.	Formalizar el plan de gestión agua para reducción a cero extracción en el mediano y largo plazo.

* IRMA no longer uses the word "certified":: https://responsiblemining.net/2024/03/21/why-irma-doesnt-use-the-word-certified/

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