# CONTRANS S.A.C

# CYANIDE SUPPLY CHAIN SUMMARY AUDIT REPORT

FOR THE

INTERNATIONAL CYANIDE MANAGEMENT CODE

MAY 2023

Author: Bruno Pizzorni - Lead Auditor

BP Cyanide Auditors

Parque Federico Blume 142, Miraflores, Lima - Perú
Tel +51 947 259 440 | Email bpizzorni@cyanideauditor.com | Web CYANIDEAUDITOR.COM

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## Operation General Information

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|---|---|
| Name of Transport Operation: | Contrans S.A.C. |
| Name of Facility Owner: | Contrans S.A.C. |
| Name of Facility Operator: | Contrans S.A.C. |
| Name of operators in this Supply Chain | • Contrans S.A.C. – cyanide consignor<br>• Contrans S.A.C. - warehouse<br>• Transportes Meridian S.A.C. cyanide transporter trucking company - ICMI certified |
| Name of Responsible Manager: | Rosa Soria |
| Address: | Av. A Nro. 204 Ex-Fundo Oquendo |
| State / Province: | Callao |
| Country: | Perú |
| Telephone: | +511 612-3500 |
| Email: | rosa.soria@contrans.com.pe |

## Operation Location Detail and Description

Contrans S.A.C. (Contrans) is a company dedicated to the provision of logistics services, including the storage service of goods in general. Contrans is a subsidiary company of Transmeridian Group, a shipping and port agency with operations in Callao Port, and as such provides complementary services for its shipping activities and they agency to importers and exporters of cargo and logistics operations.

Contrans is certified in ISO 9001:2015 Quality Management, ISO 14001:2015 Environmental Management, ISO 45001:2018 Occupational Health and Safety Management and BASC (Business Alliance for Secure Commerce) World BASC Organization, among others .

Contrans Cyanide Supply Chain operation includes transport of sea containers from the port of Callao to its warehouse also located at Callao, where stores cyanide containers, and as request by the client unloads the cyanide from sea containers to its storage in Intermediate Bulk Containers (IBC) and subsequent dispatch as required by the cyanide owners, to the mine sites. Transport of sodium cyanide from Contrans warehouse to mine sites is performed by third parties and is not included under this Cyanide Supply Chain and therefore is out of the scope of this audit.

The cyanide transport operation in sea containers from Callao Port to Contrans warehouse is performed by Transportes Meridian S.A.C., (Transportes Meridian) an ICMI certified transporter, also a subsidiary company of Transmeridian Group.

Contrans facility is located 9 km from the port of Callao. With an area of 45,000 m2, has among others, an area designated to store hazardous materials (Hazmat) in sea containers including 20-foot sea containers with solid sodium cyanide, an area for cyanide empty containers, and an enclosed warehouse for deconsolidated hazmat materials (the warehouse), where sodium cyanide is stored in Intermediate Bulk Containers (IBC) appropriately segregated from incompatible substances.

During this certification period, the warehouse was expanded and, at the same time, the metal structure and roof coverage of the warehouse was replaced. The coverage consists of a hermetic awning supported on steel beams and columns.

The warehouse perimeter has a concrete wall on the back side with the other two side sides and the front of the warehouse protected by metal fences (trellis) with cyclonic mesh secured to each other. The roof is made of hermetic fireproof canvas, conditioned with gutters for the discharge of water on rainy days. With a maximum height of five meters, has two sliding metal doors for the entry of lifting equipment (forklift), it also has padlocks to close the doors when the operations are finished.

The area has a ventilated environment, with respective bins for the deposit of hazardous solid waste. The access control to the facilities is duly identified and registered to the authorized personnel for both entry and / or exit.

Personnel in charge of the operation is a warehouse supervisor, two assistants, two forklift operators and crews of operators / stevedores.

The warehouse safety devices include fire cabinets, dry chemical powder (PQS due to its acronyms in

Spanish) type fire extinguishers, a portable HCN (hydrocyanic gas) monitor, a portable emergency shower and low pressure eyewash station, first aids kit, and medical oxygen.

## Auditor's Finding

This operation is

✓ in full compliance

☐ in substantial compliance

☐ not in compliance

with the International Cyanide Management Code**.**

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

## Auditor Information

| | | |
|---|---|---|
| Audit Company: | BP Cyanide Auditors S.A.C. | |
| Lead Auditor and Transport Technical Auditor: | Bruno Pizzorni | bpizzorni@cyanideauditor.com |
| Dates of Audit: | February 21 and 22, 2023 | |

## Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

# TRANSPORT VERIFICATION PROTOCOL

## Principle 1 | TRANSPORT

Transport cyanide in a manner that minimizes the potential for accidents and releases.

### Transport Practice 1.1

*Select cyanide transport routes to minimize the potential for accidents and releases.*

| | | | |
|---|---|---|---|
| The operation is | ✓ | in full compliance with | Transport Practice 1.1 |
| | ☐ | in substantial compliance with | |
| | ☐ | not in compliance with | |

Contrans as the cyanide consignor, review the route selection process performed by its contracted trucking company Transportes Meridian , an ICMI certified transporter. These activity was addressed during auditing the consigner. The auditor reviewed meeting records where, among others, Contrans reviewed along with Transportes Meridian its route selection to transport cyanide from the port of Callao to Contrans warehouse, also at Callao. Transportes Meridian has written procedures for selecting the routes that minimizes the potential for accidents and releases.

The procedure require to evaluate alternative transport routes and to the extent practical, select the one that minimizes both the potential for accidents and releases and the potential impacts of such accidents and releases if they do occur. It considers security issues, population density, existing infrastructure conditions of the roads, pitch and grade and areas with presence of water bodies and visibility due to weather conditions. The procedure call for driver feedback and routes are re-evaluated when driving conditions change, or when driver feedback suggests that this is necessary.

Records were available to demonstrate that the current route was approved by Contrans. The evaluation and selection of the route was limited by the actual availability of road alternatives and the jurisdictional designations required routes for transport of dangerous goods.

Contrans reviews the route selection process performed by Transportes Meridian to determine if extra precautions are necessary at points along the route. The auditor reviewed meeting records describing that Contrans also reviewed with Transportes Meridian any area posing increased risks and if necessary precautions, such as safety issues or reducing vehicle speed are needed.

Contrans agreement with Transportes Meridian requires the transporter must reevaluate the routes used for cyanide transport to confirm that no new risks have developed. This is a formal administrative review along with the driver reports on route conditions by mean of a WhatsApp group and also by periodic inspection of the routes.

Transportes Meridian ´s procedure state to evaluate routes annually, or when changes are identified by

drivers travelling a route. Also, require the drivers to provide feedback on the route conditions. When feedback from a driver suggests that a route needs to be revised, the company revise the route and communicates latest information to drivers.

The cyanide consignor reviews periodically with Transportes Meridian  periodically. They also maintain various mechanisms for rapid, informal feedback on route conditions. Interviews with drivers and management personnel were used to confirm that feedback about driving conditions is communicated. Special conditions noted by customers are noted and communicated to all drivers assigned to the route.

Contrans agreement with Transportes Meridian requires the transporters documenting the risks identified along the selected route and to be available in writing both for driver training and as a reference. Features such as sharp turns, safety issues and high population density require special precautions.

Each truck transporter has listed the control measures in their route risk assessments. These control measures have been assigned to specific sectors of the road identified by kilometer markings. These controls include speed reduction, experienced drivers only, escorts, specialized training, among others. Transportes Meridian ´s route evaluation was complete, and records were available for review. Routes are also evaluated for security issues and for cell phone coverage.

Contrans agreement with Transportes Meridian requires the trucking company to seek such input in the selection of routes. The consignor supervise Transportes Meridian to ensure they are involved in consultation with communities, stakeholders and governmental agencies. These activities are reviewed during periodically Health & Safety (H&S) meetings between both companies.

The consignor considers consultation on route details a sensitive issue because of the very real possibility of increasing the risk of robbery or vandalism.

The consignor along with Transportes Meridian , have implemented administrative controls for the route between the port and the warehouse due to safety (robbery) concerns. Before departing, each transporter communicates its departure to its base and to the cyanide consignor. Follow up of the cyanide shipment is closely made with Global Positioning System (GPS) and constant cellphone communications by both companies to its respective control centers.

Occasionally, the transport could be accompanied by guards depending on the security conditions of the area, this at the request of the client. By interview to management personnel, the auditor confirmed that cyanide transport operations are closely followed up since its departure from the port of Callao until its arrival to Contrans warehouse.

Transportes Meridian , the transport contractor, is an ICMI certified transporter, and as such was found in compliance on implementing all the procedures required in Transport Practice 1, during it last certification audit.

## Transport Practice 1.2

*Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.*

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| The operation is | ✓ | in full compliance with | Transport Practice 1.2 |
| | ☐ | in substantial compliance with | |
| | ☐ | not in compliance with | |

Contrans demonstrated that personnel operating its cyanide handling equipment, such as forklifts and reach stackers, have been properly trained and have a specific certification to operate this equipment. The auditor reviewed the documentation verifying that its operators are properly trained and certified to operate the equipment for handing cyanide.

Transportes Meridian , the contractor trucking company, is an ICMI certified transporter and was found in compliance with this requirement during its certification audit.

At Contrans, all personnel operating cyanide handling equipment has been trained to perform their assigned tasks in a safe and environmentally sound manner. Forklift and reach stacker operators have been trained on moving loads without rupturing or damaging cyanide containers. Such training was found acceptable as although not being cyanide-specific, it addresses safe management of hazardous materials during handling of these products, covering the appropriate issues.

The auditor verified training records to Contrans equipment operators in the procedure Storage and Dispatch of Loose Cargo - Hazardous Materials and Controlled Chemical Products, covering the recertification period. In addition to reviewing the training records, the auditor interviewed the equipment operators, verifying that they have received this training.

Transportes Meridian drivers operating transport equipment have been trained to perform their jobs to minimize the potential for cyanide releases and exposures, as the transporter was found in compliance with this requirement during its ICMI certification audit.

Contrans contracts Transportes Meridian to conduct the transport activities required in Transport Practice 1.2. Contrans conducts annual audits of its critical contractors as Transportes Meridian ; the audit includes evaluating the contractor’s driver’s competence. This is within the framework of its annual Health & Safety (H&S) program. In addition, national regulations and ISO 45000 require controlling their critical suppliers such as carriers, work crew contractors and property security. The auditor verified that the truck transporter is aware of its responsibilities as being certified in the Code. Also, Contrans provide the auditor with documentation as emails, notifying of their responsibilities with regard to compliance with the Code Transport Practices.

## Transport Practice 1.3

*Ensure that transport equipment is suitable for the cyanide shipment.*

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| The operation is | ✓ | in full compliance with | Transport Practice 1.3 |
| | ☐ | in substantial compliance with | |
| | ☐ | not in compliance with | |

Contrans has records documenting the load-bearing capacities of its cyanide handling equipment as forklifts and reach stackers and its maximum load weight available for the auditor review. Contrans has implemented specific maintenance activities to ensure its equipment retains a load-bearing capacity adequate for the anticipated load. This include periodic planned maintenance and inspections, as well as having in place appropriate specifications for equipment and parts that may be replaced during maintenance. The auditor reviewed maintenance records for these equipment and interviewed maintenance personnel verifying that Contrans procedures are followed.

Contrans also inspects the transporter trucks each time they arrive with shipments to the warehouse, before being authorized to enter to the facility to discharge its shipment. During Contrans annual audits of its critical contractors this aspect is also considered. The auditor review these inspection records and interviewed the facility employees verifying its compliance with this provision.

Contrans has in place appropriate specifications for its cyanide handling equipment forklifts and reach stackers. In addition to the manufacturer's rating of the loading capacity of its handling equipment is adequate, Contrans also verifies that the load bearing capacity of its equipment is adequate by inspecting and testing periodically its equipment to identify signs of stress or overloading. This is done as part of the transporter's routine preventive maintenance inspection program. Forklifts and reach stacker are maintained according to the frequency and responsibilities stablished in the monthly maintenance program. It is worker's responsibility to report daily the hour meter readings installed in every heavy equipment and to coordinate the preventive maintenance ahead of time. Additionally, forklifts and reach stacker are inspected at the start of the work shift. The inspection is recorded using a checklist. The auditor reviewed the inspection records and interviewed the maintenance personnel or equipment operators in evaluating compliance with this provision.

Contrans procedure Storage and Dispatch of Loose Cargo - Hazardous Materials and Controlled Chemical Products stablish the allowed weights for the forklifts and reach stackers to ensure that equipment is not loaded in excess of its design. The procedure describes unloading of 20 foot sea containers with reach stackers of 42 tons capacity. Forklifts are 3 tons capacity; the procedure indicates handling a single IBC with one ton of sodium cyanide at a time during the deconsolidation maneuvers of the boxes from the sea container for storage in the warehouse, in the same way for loading cyanide into the truck boxes at the warehouse. Contrans handles standard weights for cyanide shipments in 20 foot sea containers

being around 22 tons gross and IBC of one ton. Contrans retains records demonstrating that the procedure achieves this goal, the auditor also interviewed the verifying that the procedure is implemented.

Transportes Meridian , the trucking company contractor, has implemented all the activities required in Transport Practice 1.3 and was found in compliance during its ICMI certification audit.

### Transport Practice 1.4

*Develop and implement a safety program for transport of cyanide.*

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| The operation is | ✓ | in full compliance with | Transport Practice 1.4 |
| | ☐ | in substantial compliance with | |
| | ☐ | not in compliance with | |

Contrans procedure for storage and dispatch cargo addresses handling and inspection procedures to ensure that the integrity of cyanide packaging is maintained during the cyanide cargo loading and unloading. For the unloading of the container, after opening and ventilating the container, the personnel in charge and the forklift operator will carry out the unloading work; previously they verify the integrity and cleanliness of each IBC element to unload. In the same way, it proceeds for the loading and dispatch of the IBCs, the lashing of the cargo inside the truck or container is in charge of the transporter.

Contrans procedures include visual inspection of the transport units on arrival and departure from the facility, requiring checking the truck box or container door is locked. Checklists inspections require checking doors are closed and secured with padlocks and seals.

Checklists inspections and the procedure for storage and dispatch cargo include confirming the cargo is identified as cyanide. Prior to opening the container with sodium cyanide, it is verified that the SDS safety Data Sheet) in Spanish corresponds to the load through the UN Number 1689, Class 6 dangerous goods and Maritime Pollutant labeled on the external walls of the container and that each IBC has a label in Spanish identifying the product as sodium cyanide. The auditor inspected the placards and signages used to identify the presence of cyanide on the shipment verifying compliance with this provision.

Contrans only uses the services of Transportes Meridian trucking company in the supply chain and oversees it activities to ensure compliance with this Transport Practice. Transportes Meridian , as being certified with the Cyanide Code meets all applicable Code requirements. Transportes Meridian is aware of its responsibilities under this Transport Practice, has procedures to meet these responsibilities, and operates in compliance with the Code., which include vehicle inspections prior to each departure/shipment, a preventive maintenance program, limitations on operator or drivers' hours, procedures to prevent loads from shifting, procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered, a drug abuse prevention

program and retains records documenting that the above activities have been conducted.

Transportes Meridian, as being an ICMI certified transporter, has implemented procedures that complies the applicable Code requirements for Transport Practice 1.4.

### Transport Practice 1.5

*Follow international standards for transportation of cyanide by sea.*

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| The operation is | ✓ | in full compliance with | Transport Practice 1.5 |
| | ☐ | in substantial compliance with | |
| | ☐ | not in compliance with | |

Contrans cyanide supply chain operations only includes ground transportation and storage; there are no maritime transportation activities, this transportation practice does not apply to this supply chain.

### Transport Practice 1.6

*Track cyanide shipments to prevent losses during transport.*

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|---|---|---|---|
| The operation is | ✓ | in full compliance with | Transport Practice 1.6 |
| | ☐ | in substantial compliance with | |
| | ☐ | not in compliance with | |

Contrans, as the cyanide consignor, ensures by mean of periodic inspections, that Transportes Meridian can communicate with the consignor and with emergency responders, during transport. The auditor reviewed the procedures of the consignor verifying compliance with this provision. Transportes Meridian drivers, as being the transported certificated on the Code, are provided with cell phones to communicate with the transport company, the cyanide consignor warehouse and the emergency responders, as appropriate. According to their procedures for cyanide transportation, all trucks must have communication equipment. Drivers have pre-determined contact information with them during deliveries.

Contrans inspection to Transportes Meridian include ensuring that the transporter have a means of communication at all times and locations when transporting cyanide. The auditor reviewed the consignor´s inspection records and interview the employees to verify compliance with this provision. The drivers keep their cell phones operational and charged. All have GPS tracking system which is checked for properly function before each trip. The transporter also uses checklists to verify the communication equipment is functioning properly.

Due to the metropolitan route that cyanide shipments follow from the port of Callao to Contrans warehouse also in Callao, during the route evaluation, it was found that there are no communications blind spots.

Transportes Meridian has satellite-based GPS systems to track trucks during transport. They use GPS and software systems that visually tracks truck locations on computers and cell phones. Contrans has access to this systems to track the progress of cyanide shipments. The auditor observed the tracking maps on Contrans headquarters, verifying compliance.

Cyanide shipments are carried out directly from the Callo Port to Contrans warehouse in Callao without opening the sea containers, for which the seals are controlled on departure through pre-trip inspections and on arrival of the shipment to Contrans. Drivers, in accordance with the requirements, must always carry the dispatch guides indicating the amount of cyanide in transport, the shipping paperwork, including chain of custody requirements, to ensure that cyanide shipments arrive at their destination intact. Among others, a waybill accompanies the cyanide shipments which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, bill of lading, customs declarations and shipper guide.

The auditor reviewed this documentation completed during the course of several shipments and through interviews with Contrans supervisors. The supply chain has implemented inventory controls to prevent cyanide losses during shipment. Shipping paperwork was found to be conformant to the Code requirements.

Contrans showed completed shipping records indicating the amount of cyanide transported in each truck. Their procedures for cyanide transportation require this documentation must accompany every cyanide shipment. All shipments of cyanide are accompanied by shipping papers identifying the amount of cyanide in the load and by Safety Data Sheets describing the necessary precautions for handling of cyanide. The auditor reviewed the Consignor´s procedure confirming that this information accompany each cyanide shipment and verified its implementation by interviewing operators and reviewing this documentation from performed cyanide shipments.

Transportes Meridian, as being Certified in the Cyanide Code, comply with all requirements of Transport Practice 1.6.

## Principle 2 | INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

### Transport Practice 2.1

*Store cyanide in a manner that minimizes the potential for accidental releases.*

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 2.1

Interim storage activities in this cyanide supply chain, as defined by ICMI, does not take place. Cyanide shipments are sent directly from the warehouses to the mine sites. Within the scope of this supply chain audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. This Transport Practice does not apply to this transport operation.

## Principle 3 | EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

### Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 3.1

As stated in the ICMI Guidance for Use of the Cyanide Transportation Verification Protocol dated June 2021, the Transport Practices and questions under this principle apply to interim storage sites as well as cyanide in transport. Cyanide transport is performed by Transportes Meridian, an ICMI certified transport, has written plans for responding to emergencies that may occur during their cyanide transport activities and was found in compliance during its recertification audit.

Contrans as the cyanide consignor has a written plan to respond as necessary to any incidents that may occur while cyanide is handled in its facility; in the same plans stablish that cyanide related emergencies during transportation will be attended by the transported, keeping Contrans informed of ongoing response actions and alerted in case they need Contrans support.

During this recertification audit, Contrans has been evaluated under Principle 5 - Emergency Response of the ICMI Cyanide Production Verification Protocol dated June 2021 which is developed in detail following this Transport Verification Protocol.

# PRODUCTION VERIFICATION PROTOCOL

## Principle 1 | OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

### Production Practice 1.1

*Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.*

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 1.1

*Summarize the basis for this Finding/Deficiencies Identified:*

The auditor confirmed the facility has retained and updated its records of the review and approval of a facility's design and construction by regulatory agencies. During the previous certification audit the quality control and quality assurance programs were validated trough the Certificate of Technical Inspection of Safety in Multidisciplinary Buildings, issued by the National Institute of Civil Defense (INDECI due to its acronyms in Spanish) authority of the Provincial Municipality of Callao, certifying that Contrans complies with the regulations on the subject security in buildings in force.

Contrans showed its last inspection certificate from INDECI valid for the period from January 7, 2022 until January 7, 2024 issued in conformance in the document: Certificate of Technical Inspection of Safety in Buildings for Establishments Subject to Inspection Classified with High Risk Level or Very High Risk According to the Risk Matrix. INDECI has qualified personnel which perform biannual health and safety inspections to all commercial facilities.

During this certification period, the warehouse for the Hazmat deconsolidated products, including cyanide, was expanded providing all the warehouse with new metal structure (columns and beams) and the roof coverage of the warehouse was replaced. The coverage consists of a hermetic awning. The cyanide storage areas include roofing, floors and walls that provide impermeable barriers to potential releases and forklifts used to move and store cyanide packed in one ton Intermediate Bulk Containers (IBC). There are no tanks holding contaminated water.

The auditor reviewed the materials certificates and the report issued to the INDECI describing the new installation, verifying it has been professionally designed and constructed. This warehouse improvement passed the inspection of INDECI satisfactorily during its last inspection mentioned above, determining they are "fit for service" and can continue to be safely operated according to their existing

procedures.

The warehouse exclusively handle cyanide in closed packages such as Intermediate Bulk Containers, and sea containers, and no reagents are used or processing takes place.

Handling and storage of containerized and packaged solid cyanide at the warehouse operation is conducted on an asphalt impermeable surface, including the area for cyanide sea containers storage. Asphalt surfaces protect the ground throughout all the facility, which is adequate to minimize seepage to the subsurface.

Contaminated water, such as water used to decontaminate clothing and equipment, would be collected in the tray provided with the module for emergency shower - low pressure eyewash station, to be subsequently disposed of as hazardous waste. Contrans do not use water to wash the pavements; the area is only swept and dry collected.

During the site visit, the auditor inspected the operation confirming that the asphalt impermeable surfaces are intact and do not have cracks that compromise their ability to contain released cyanide.

The requirements of this provision do not apply to the warehouse operations managing solid cyanide in unopened IBCs packaging.

Contrans does not handle cyanide in liquid state, in vessels or tanks. Containers are stored over an asphalt pavement in good conditions.

Contrans stores solid cyanide in sea containers in an open yard and also stores cyanide as deconsolidated cargo in one ton IBCs within a warehouse with roofed and enclosed structures to prevent contact with precipitation.

The warehouse roof is made of hermetic fireproof canvas, conditioned with gutters for the discharge of water on rainy days. With a maximum height of five meters, has two sliding metal doors for the entry of lifting equipment (forklift), it also has padlocks to close the doors when the operations are finished. The area has a ventilated environment, with respective bins for the deposit of hazardous solid waste. The access control to the facilities is duly identified and registered to the authorized personnel for both entry and / or exit.

Cyanide is packed in closed wood boxes (IBC) packaged in polyethylene and polypropylene bags which protect the product from the air-environment moisture. IBCs are stored on asphalt floor in good conditions to prevent contact with water. No water systems for potable use is near this area; the safety shower station has its own contention tray; the cyanide storage area is designed such that leaks or other potential releases will not come in contact with cyanide containers. The surfaces adjacent to the warehouse are graded away from the warehouse to prevent ponding of water near the walls. Cyanide stored in sea containers is located in the upper area of the open yard - sea containers are suitable for outside storage.

Solid cyanide in wooden boxes is stored in the warehouse with adequate ventilation to prevent the build-up of hydrogen cyanide gas and cyanide dust. The warehouse perimeter has a concrete wall on

the back side with the other two side sides and the front protected by metal fences (trellis) with cyclonic mesh secured to each other. Adequacy of ventilation was confirmed through visual confirmation.

All operations to unload cyanide from sea containers are performed outdoors, so there is minimal potential for build-up of hydrogen cyanide gas. The opening of sea containers is subject to a procedure requiring time for ventilation.

The facilities are within a locked areas with restricted access. Security guards are present 24 hours a day, 7 days a week. Gates are kept locked. Visitors must sign in upon entry. Access to the unauthorized personnel is prohibited. Both the sea containers yard and the IBCs warehouse keep records of all site personnel and subcontractors that access to the area. Cyanide is stored separated of incompatible materials in all cases.

## Production Practice 1.2

*Develop and implement plans and procedures to operate cyanide production facilities in amanner that prevents accidental releases.*

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|---|---|---|
| The operation is | ✓ in full compliance with<br>☐ in substantial compliance with<br>☐ not in compliance with | Production Practice 1.2 |

*Summarize the basis for this Finding/Deficiencies Identified:*

Contrans warehouse has standard operational procedures describing the operations activities, safety measures and personal protective equipment required during routine activities. There are written procedures for unloading and loading cyanide in sea containers and IBC´s from /to sea containers, procedures for cyanide safe storage and for managing any contaminated materials. The procedures describe how cyanide containers and contaminated materials are managed in a safe and environmentally sound manner that prevents cyanide releases and exposures. Procedures reviewed are:

- DS-P-001 Entry, storage and clearance of loose cargo - Materials Hazards and chemical inputs and Controlled Goods v.12;
- SIG-PR-06-O_PETS Collection and transport of hazardous waste;
- Entry to the Warehouse and Container Dispatch
- EM-P-001 Heavy Machinery Maintenance v.01;
- SM-N-010 Cyanide Emergency Preparedness and Response Plan v.02;
- SM-P-005 Investigation of Accidents and Work Incidents v.02; and

- SG-P-010 Change management v.04

The auditor reviewed the facility written operating procedures, among other documents, confirming that they address the safe management of cyanide. Implementation of procedures for reception, handling and storage of cyanide was confirmed through observation of these activities during the auditor site visit. The auditor also had interviews with the personnel responsible for performing these tasks, and reviewed the available documentation, finding it in conformance.

The operations standard operation procedures include contingency instructions for non-standard operating situations that detail contingency measures to be implemented if there is an upset in any activity that may result in cyanide exposures or releases. These procedures include actions in case of cyanide as spills. Evacuation of the warehouse is also addressed. Spill kits and equipment are located near the entrance door of the warehouse. Contingency actions in the standard operating procedures include situations such as damage to a cyanide box on arrival inside a damage sea container or during handling cyanide boxes.

The warehouse has developed and implemented the procedure SG-P-010 Change management v.04 for managing of changes (MOC). These procedures require to evaluate any impact on the worker´s Health & Safety (H&S) and the environment before new projects or equipment be installed on site. Require conducting a risk analysis before changes in procedures or equipment is done. It states to identify changes to the facility or its operating practices that may increase the potential for cyanide releases and adverse impacts on worker health and safety before such changes are implemented so that they can be evaluated and addressed, as necessary. The procedure requires written notification to environmental and health and safety personnel and a sign-off before the change can be instituted. Verification was through review of the procedure as well as completed MOC forms, signed off by environmental and health and safety personnel.

Contrans has the procedure EM-P-001 Heavy Machinery Maintenance v.01, a preventive maintenance program and checklists for the forklifts and reach stackers receiving/delivering activities, which requires maintenance for forklifts and reach stackers every 250 hours of work. The frequency of the different preventive maintenance activities is scheduled in program. The type of maintenance corresponds to the equipment of the facilities. During the pre-use of the vehicle the operator of the equipment, the reading of the hour meter is signed, additionally they report at the end of the day any failure of the equipment to the maintenance workshop on any corrective that the equipment needed. The Area of Management of Equipment and Machinery, carries in an Excel worksheet the control of hours of hours worked by each team. Forklifts number 2 and 3 are used to handle the boxes with cyanide. When entering to maintenance inspection checklists area used to check each system of the equipment such as the hydraulic part and brakes, among others. Maintenance is performed internally, with the company's own personnel. Maintenance activities are recorded in an electronic log. There are 6 reach stackers at the warehouse, which initially have a supplier warranty of 2,000 hours of work or one year. After the warranty period, maintenance of this equipment is done in Contrans workshops, with personnel authorized for this purpose by the manufacturer.

The auditor reviewed work orders describing work performed, spare parts changed, and recommendations. The warehouse do not performs washing activities to equipment in its installations, there are no tanks, pumps and piping associated with managing wash water. Maintenance records were available for review and found acceptable. The auditor inspected the cyanide facility, reviewed maintenance records and interview employees verifying compliance with this provision.

There are no process equipment in use at these warehouse that require calibration.

The warehouse has asphalt floors and concrete based walls to provide secondary containment, although no cyanide solutions is stored. The facility has the written procedure SIG-PR-06-O_PETS Collection and transport of hazardous waste in place describing how any water collected in the building is handled, how the operation determines if the water contains cyanide, and how it treats and/or disposes of water contaminated with cyanide, to prevent unauthorized / unregulated discharge to the environment of any cyanide-contaminated water that is collected in a secondary containment area. The procedure also addresses management of water found in secondary containments for outside storage areas. In case of water produced from floors cleaning in the storage area, it would be collected through the rainwater gutter that unloads in plastic containers and will remain in it as is not connected to the public drainage network. Rain In the area is very scarce, Callao is in an arid area. Liquid collected in the area could include water from eye wash and emergency shower testing, storm water, cleaning water or any spill. The only potential cyanide solutions generated at the warehouses is the equipment decontamination water in case of a spill of solid cyanide.

The procedure for collection and transport of hazardous waste outlines how to proceed with cyanide waste and potentially contaminated solids with cyanide as used Tyvek suits, other used personal protective equipment (PPE) and any other material used to recover any spill of cyanide. The procedure also describes how equipment that may be contaminated with cyanide should be decontaminated prior to disposal. The cyanide contaminated waste and materials will be stored in the hazardous waste area within the warehouse while waiting shipping. Zolix, a firm specialized in transport of hazardous material and hazardous wastes, will transport all contaminated material to Innova Ambiental, also an authorized landfill for these kind of waste. On any cyanide spill, the emergency procedure SM-N-010 Cyanide Emergency Preparedness and Response Plan v.02 will be followed. Records of cyanide waste shipments and other than cyanide were available and found to be acceptable.

The procedure Entry to the Warehouse and Container Dispatch and the procedure DS-P-001 Entry, storage and clearance of loose cargo - Materials Hazards and chemical inputs and Controlled Goods v.12, include requirements to inspect that sea containers and individual IBCs of cyanide stored for shipment must meet the packaging requirements of the Peruvian jurisdictions through which the material will pass, including international standards. This includes requirements for the container itself as well as for signage on containers identifying the presence of cyanide and its risks to health and the environment. The procedures include checking sea containers arriving to the facility, to ensure these have been properly labeled and packaged by the operation that produced it.

## Production Practice 1.3

*Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.*

| | | |
|---|---|---|
| The operation is | ✓ in full compliance with<br>☐ in substantial compliance with<br>☐ not in compliance with | Production Practice 1.3 |

*Summarize the basis for this Finding/Deficiencies Identified:*

The warehouse is operated as dry facility, there are no tanks with cyanide solutions. The facility inspects all loading, unloading, and storage areas and secondary containments to identify releases of solid cyanide or situations that pose a risk of a cyanide release as cracking of impermeable surfaces. Documentation has been retained and was available for the auditor review demonstrating that inspections have been conducted, that they have been focused on the identification of releases and on the elements critical to the prevention of releases and exposures.

Checklist used for these inspections direct the inspector to evaluate specific items and provides sufficient detail regarding what to look for. During the site visit to the facility, the auditor confirmed that potentially hazardous conditions have been identified. The facility is regularly inspected, the workers were knowledgeable regarding the aspects that could present a treat and that they have to notify them to the site manager. Documentation is retained and was available for the auditor review demonstrating that inspections have been conducted.

The warehouse conducts daily inspections, enough to identify potential problems before they present a risk of cyanide release or exposure. Inspections include the cyanide warehouse, the facility perimeter for integrity, lighting, tv cameras. Emergency response equipment and materials are inspected weekly, firefighting extinguishers are subject to monthly inspections. There are also pre-operational inspections before operations involving cyanide handling, and inspections of the documentation, boxes and transportation equipment. The auditor reviewed examples of inspections records confirming frequencies are sufficient to assure that equipment and installations are functioning as desired.

The facility inspections and maintenance records are documented in checklists and include the date of the inspection, the name of the inspector and any observed deficiencies. The nature and date of corrective actions are documented in the inspection records. The auditor reviewed the inspection records SF-R-002 Facilities Inspection - Perimeter Barriers, Infrastructure, Lighting and Equipment v.02, verifying that this information is recorded. Records are retained in hard copy and were acceptable.

## Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

### Production Practice 2.1

*Develop and implement procedures to protect facility personnel from exposure to cyanide.*

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 2.1

*Summarize the basis for this Finding/Deficiencies Identified:*

The warehouse written procedures for unloading and loading sea containers and to deconsolidate/load cyanide IBC´s from / to sea, for cyanide safe storage and for managing any contaminated materials, addressing all aspects of the operation (reception, storing and dispatching of cyanide), that are necessary for protection of workers. These procedures include inspection programs for the cyanide warehouse and its preventive maintenance programs for the forklifts and reach stackers during normal operations. The procedures also address the required actions for non-routine and emergency operations, and maintenance activities. The procedures address the related safety issues as they describe safe practices. The level of detail in these procedures is adequate with the risks involved with the task. These documents include statements for use of personal protective equipment and for pre-work inspections, as appropriate and necessary for the warehouse operations. Pre-work inspections are required for cyanide reception and dispatch operations. Use of personal protective is addressed in the procedures, safety training programs and in signs posted in specific work areas where cyanide is present.

Pre-work inspections are focused on safety and operational issues and documented in inspection. The operation has also procedures in its emergency response plans, describing the specific steps necessary to decontaminate emergency response equipment which could have been in contact with cyanide. The auditor reviewed these procedures confirming they describe safe work practices and are implemented, through employee interviews and observation.

Workers at the facility have the opportunity to express their feedback in development and evaluation of health and safety procedures during diffusion of the updated procedures, safe talk at the beginning of the working day held Mondays, Wednesdays and Fridays, and during the daily work planning, in which various topics are discussed and work is planned.

The auditor reviewed the written procedures for unloading and loading and safe cyanide storage where are required such meetings, and by interviews with the warehouse's personnel. Employee participation

in the development and maintenance of safety practices was found to be acceptable.

The facility has identified the areas where hydrogen cyanide (HCN) gas is potentially harmful to humans with appropriate signaling those areas and activities that may expose its workers to harmful cyanide concentrations and require all personnel entering these areas to use the necessary personal protective equipment (PPE). The standard operations procedure DS-P-001 Entry, storage and clearance of loose cargo - Materials Hazards and chemical inputs and Controlled Goods v.12 require PPE and a gas monitor in the warehouse area as protection from exposure to levels of cyanide greater than 4.7 parts per million (ppm) and 10 ppm.

The auditor confirm by direct observation of the signaling warning workers, that the operation has determined these areas and activities where such exposures may occur and require appropriate personal protective equipment and has stablished administrative controls, as necessary. It is signposted in the sea containers area with cyanide and in the warehouse for storing sodium cyanide in IBCs. The auditor also interviewed the workers to confirm that these protective measures are being implemented.

The facility has two MSA Altair portable HCN monitoring devices when working in unloading and loading activities, to confirm that safe working conditions exist. The monitors alarms are set to 4.5 and 10 ppm.. The procedures address to stop the work and clear the area if the first alarm of 4.5 ppm HCN gas is trigged, and to evacuate the warehouse in case the second alarm set at 10 ppm is activated. Compliance with this provision was verified by observation of the monitoring equipment, calibration records and employee interviews.

The auditor found that the HCN gas monitors were calibrated annually by external contractor SIMCAL. This fact was observed since the manufacturer recommends doing it every six months. After the audit, Contrans modified the procedure by calibrating the detectors and establishing that it is every six months. The auditor reviewed the recent calibration records indicating that the equipment calibration was completed. No additional information was required to find this protocol Question in compliance with the Code.

It was verified that the forklift and reach stackers operators work under supervision. Contrans procedure DS-P-001 Entry, storage and clearance of loose cargo - Materials Hazards and chemical inputs and Controlled Goods v.12 require to handle sodium cyanide using a buddy system, plus senior supervision and that all personnel participating must have means of communications. The procedures states that all personnel working with cyanide must be accompanied during this job. The auditor confirmed compliance with this provision through review of the standard operating procedure, interviews and by a task observation of unloading cyanide boxes from a sea container.

It was verified that Contrans evaluates the health of employees to determine their ability to perform their specified tasks through the matrix of occupational medical examinations of their active personnel. Mepso, the medical services provider, sends Contrans monthly records with information about the status of the personnel medical exams and any observations about them (expired exam / observed exam / exam due / no exam). Information from previous months were also verified, which indicates

continuity in staff evaluations.

During the audit it was not clear Contrans clothing change procedures. The existing procedure Personal Protective Equipment and Work Uniforms, did not specify about the disposal of the Tyvec suits. It was not clear if they were going to be reused or discarded and if they were reused the auditor required that they specify where they were going to be kept and who would have access to them to avoid cyanide contamination.

After the audit Contrans included in the Emergency Response Plan and in the cyanide loading and unloading working procedure, statements for employees and contractors, related to clothing change procedures. All the warehouses' operators working with cyanide must wear Tyvek suits, this clothing is left on site in a safe place when they leave, out of access of unauthorized workers to the place, so that it can be reused, if the suits are still in good shape. The procedures address employees must change clothes upon leaving the operational area. They remove any clothing that has potentially been in contact with cyanide after cargo handling operations. No contractors are allowed to be in the area while handling cyanide. The auditor reviewed the procedures and observed the change room with lockers and the dedicated area to store the used Tyvec suits to verify compliance.

Warning signs advising workers that cyanide is present are  posted in the warehouse storage area and the containers yard, and that, if necessary, suitable PPE must be worn,. Warning signs are placed in the facility including entrances, cyanide warehouse and in the containers parking areas. The mandatory use of specific personal protective equipment is indicated for the sodium cyanide zone: mask, googles, helmet, safety footwear, dust mask, gloves and mandatory use of reflective vest.

Workers are alerted to the presence of cyanide and the need for appropriate personal protective equipment. The auditor verified compliance by observation of signage around the facilities, interviews with site personnel and review of the overall safety and training programs regarding to cyanide safety.

Warning signs are placed in the facility including entrances, cyanide warehouse and in the containers parking areas, warning that smoking, eating, drinking, and generating open flames is prohibited in areas where there is the potential for cyanide contamination. The facility prohibits smoking, eating, drinking and having open flames in all areas of the warehouse where cyanide is present. The prohibition is also communicated in the operation safety training, standard operations procedures and is re-enforced by signage in these areas. The auditor reviewed the training plans and records, interviewed the employees and observed on site signage throughout the facility, finding compliance with this provision. Employees showed awareness of the restrictions and of the potential dangers of not following the rules.

## Production Practice 2.2

*Develop and implement plans and procedures for rapid and effective response to cyanide exposure.*

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 2.2

*Summarize the basis for this Finding/Deficiencies Identified:*

Contrans Emergency Response Plan, M-N-010 Cyanide Emergency Preparedness and Response Plan v.02, describes specific emergency response procedures to respond to cyanide exposures. The Plan cover the processes to be followed in the event that cyanide is ingested, skin or eye contact made, and/or inhaled. The use of cyanide antidotes are also detailed. The document addresses transfer of exposed victims to medical centers. The Plan is suited for the facility.

Showers, low-pressure eye wash stations and non-acidic fire extinguishers are located at strategic locations throughout the facility. It was verified that are maintained and inspected on a regular basis. Near the cyanide warehouse is also a portable safety shower and low-pressure eye wash station with its own pressurized water supply. The eye wash and emergency showers are tested prior to every cyanide handling operation. The facility has several non-acid fire extinguishers located at strategic locations throughout the facility. Inspection / testing records were reviewed and were found to be complete.

It was verified that the facility has water, oxygen, antidote, a resuscitator and emergency communication means. The employees have radio and cellular phones for internal communication. The facility in addition, has a Control Center with complete communication systems from where any emergency notification would be managed.

The warehouse has water, oxygen, Air Mask Bag Unit (AMBU) as resuscitation equipment, Cyanokit (Hidroxicobalamine injectable) as cyanide antidote, and communication devices readily available. Communication is accomplished with cell phones. The auditor confirmed compliance with this provision through inspection of the facility and interviews with employees.

Contrans performs weekly inspections to its first aids and emergency response equipment. The auditor reviewed completed checklists forms covering the re-certification audit period. First-aid and emergency response equipment are stored and tested as directed by their manufacturer and replaced on a schedule that assures, they will be effective when used.

The Annual Program for Health and Safety at Work, shows the inspection plan to be carried out throughout the year, to emergency equipment, machinery and transport units: personal protective equipment (PPE), fire network, fire extinguishers, briefcases and first aid kits, anti-spill kit, emergency

showers and eyewash.

The auditor reviewed inspections records for eyewash and emergency showers carried out in the cyanide storage area, as well to anti-spill kits. The facility appropriately maintains emergency response equipment and the antidote to ensure their availability during an emergency. The emergency response equipment is stored locked in a room near the medical services, the cyanide first aids kit is stored in the facility's medical center. The inspection checklist includes expiration dates of the first aids items. The auditor confirmed the dates on the antidote is current and also stored at the temperature specified by the manufacturer to ensure it will be effective when used.

Copies of the sodium cyanide Safety Data Sheets are available to workers at the entrance to the operational areas of the warehouse in local language, Spanish. First aid procedures are available at the first aid kit. Also, as other information materials on cyanide safety, the facility has enough signing informing about the presence of cyanide and the precautions to consider.

The facility does not have cyanide solutions, storage tanks, process tanks, containers and piping containing cyanide. They exclusively manage cyanide in solid form in sea containers and IBC boxes. All containers with cyanide are clearly identified as such. The auditor determined compliance with this provision through inspection of cyanide containers stored at the operation.

The facility standard operation procedures have requirements implemented for hand washing and showering for its employees who have been in areas of the facility posing the potential for skin exposure to cyanide. The procedure Personal Protective Equipment and Work Uniforms, includes decontamination statements for employees, contractors and visitors leaving areas with the potential for skin exposure to chemicals and other hazardous materials. In addition, Contrans included in the Emergency Response Plan and in the cyanide working procedure, statements for employees and contractors, related to skin decontamination procedures The auditor reviewed the procedures for unloading and loading cyanide IBC´s from /to truck boxes, for cyanide safe storage and for managing any contaminated materials and confirmed its implementation through observation of and interviews with employees. The procedures cover all people entering and leaving the warehouse area and require that they wash their hands when leaving the warehouse. Employees demonstrated a good understanding of the decontamination procedure and the need for safety precautions.

Contrans has on-site personnel trained in cyanide first-aid to respond in the event of a cyanide exposure. Has its own medical center to provide first aids and medical assistance to workers exposed to cyanide. As previously noted, oxygen tank and antidote kit are available on site as well. The site has a part time doctor on site, personnel is trained to provide first aids, including oxygen administration. The auditor reviewed training records in the emergency response plan which includes cyanide fist aids, provided by an external contractor who is s experienced trainer in cyanide emergency, demonstrating that the individuals have received specific training in cyanide first aid, including use of oxygen. Antidotes would be administered at the medical center by authorized personnel.

The facility emergency response plan covers transfer of exposed victims to a medical center, allowing for warehouse staff to transport the exposed person to the hospital. It states Contrans will carry out

the transfer of the affected person by ambulance or in any of the units assigned to the risk prevention area accompanied by the social worker assistant. The emergency response plan requires immediate notification to the hospital and transport of the victim, along with the cyanide antidotes and bottle of oxygen, to the medical centre clinic *Bellavista AUNA* located at 10 minutes' drive from the warehouse or to clinic *San Gabriel,* at 20 minutes' drive*,* with greater capacity to respond to an event due to toxicological risk of sodium cyanide. The auditor reviewed the operation's response procedures confirming compliance with this provision.

Contrans has alerted and evaluated three local hospitals near the facility of the need to treat patients for cyanide exposure and to interact with a medical facility to ensure it has adequate, qualified staff, equipment and expertise to respond to cyanide exposures: clinic *Bellavista AUNA,* which is also Contrans contractor for medical services, and clinics *Providencia* and *San Gabriel,* for need to treat patients due to cyanide exposures. The auditor reviewed Contrans Occupational Nurse report dated January 2023, reporting the results of his visit to this clinics interviewing its medical personnel and assessment of installations , concluding the clinic San Gabriel has greater capacity to respond to an event due to toxicological risk of sodium cyanide.

Contrans has agreements with these medical centers to provide medical attention to exposed workers that could require attention beyond the site capabilities.

The facility has developed and implemented the procedure SM-P-005 Investigation of Accidents and Work Incidents v.02; for incidents report and investigation, including cyanide exposure cases. According to interviews, procedures and practices would be extensively reviewed in the event of an incident to determine the need for revision. There have not been any cyanide-related incidents, but records of other accidents and incidents were reviewed confirming that the general program for investigation of accidents and incidents is being implemented.

# Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

## Production Practice 3.1

*Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.*

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 3.1

*Summarize the basis for this Finding/Deficiencies Identified:*

The facility does not discharge directly or indirectly to surface water. For the possible case of floor washing, the cyanide warehouse has a water collection channel that does not connect to any drainage; it will be collected goes to a plastic tank for its proper final disposal later. Contrans monitors domestic effluents bi-annually as is required by local regulations, in all cases the results showed undetectable levels of cyanide in effluents.

Contrans cyanide warehouse is located in an Industrial area where the beneficial use of groundwater is not defined by the authority. As Contrans only operates with closed packages of solid sodium cyanide, is not required by local regulations to monitor ground water.

Contrans limits atmospheric emissions of HCN gas avoiding solid cyanide briquettes contact with water. Cyanide is stored with appropriated measures to avoid moisture. The storing area is on an asphalt carpet, the cyanide warehouse is in a roofed area. Cyanide is received in waterproof containers: sea containers and IBC bags. Due the nature of its operations, Contras is not required by local regulations to monitor levels of atmospheric emissions of hydrogen cyanide gas and cyanide dust. The facility exclusively handles unopened packages of solid cyanide..

Bi-annua domestic effluents monitoring is required by local regulations. The auditor considers it is adequate to characterize their effluents considering Contrans is a storage facility; their operations do not generate air emission or wastewater containing cyanide under normal conditions. Waste generated by an emergency would be handled as hazardous waste.

# Principle 4 | TRAINING

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

## Production Practice 4.1

*Train employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.*

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 4.1

*Summarize the basis for this Finding/Deficiencies Identified:*

Contrans has a formal training program that include cyanide awareness training, prior to the start of work and refresher training at least once per year for cyanide safe management. Interviews with site personnel confirmed they had completed hazard awareness training. The auditor reviewed the annual Occupational Health and Safety Training Program corresponding to the certification period as well as records of personnel training for this period, which included training in the use and emergency with sodium cyanide, transportation and storage, among others.

Training in sodium cyanide safety and emergency response and Hazmat (hazardous materials) was provided by a third-party contractor, Safety Management Resources, every year in December. In 2021 with 20 attendees, in 2022 with 16 participants, including in all cases the forklift operator, warehouse coordinator, operators and emergency responders. The auditor reviewed the participants' certificates of attendance and the learning material in covering the full range of training related to cyanide. Interviews with site personnel confirmed they had completed hazard awareness training. Records are retained throughout an individual's employment documenting the training they receive.

The facility trains its workers regarding the proper use of personal protective equipment and the specific personal protective equipment required for the tasks of handling cyanide in the warehouse and open yard for sea containers. Use of personal protective equipment is addressed in the operating procedures, safety policies, work regulations, safety training programs, and signs posted in specific work areas where cyanide is present. In addition to the HCN gas monitors, it is required the use of safety helmets, glasses, gloves, safety suits and footwear, and dust respiratory protection.

The Auditor reviewed the facility's documentation of this training, observed the use of personal protective equipment at the facility and interviewed employees regarding their training, confirming

compliance.

Contrans trains its workers in the tasks of cyanide storage, handling and transport to perform their normal production tasks to minimize risk to worker health and safety and in a manner that prevents unplanned cyanide releases. This training is given by the H&S area; records of training were reviewed during the audit. The H&S area keeps all training records registered and filed. SIMA, an external contractor has trained Contrans personnel in safe cyanide management and emergency response.

The Auditor reviewed examples of training assistance records and test of understanding. Through interviews, employees showed awareness of procedural requirements.

Contrans provides task training to all its employees before they are allowed to work with cyanide in an unsupervised manner. This requirement is specified in Peruvians local regulations and in Contrans's work regulation. All personnel is trained internally on cyanide awareness training prior to work in the facility and trained in the job procedures before working with cyanide. The auditor verified its compliance reviewing the training materials, assistance records and interviewing operational and supervisory personnel. Training effectiveness is evaluated through testing and through observation of on-the-job performance by the Operations Supervisor.

Contrans provides annually refresher training to its employees, on normal tasks involving handling cyanide to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. This training is specific to their assigned tasks and address cyanide safety. The register of personnel authorized to work with cyanide shows the date of its annual refresher training. Formal evaluations were verified by review of the evaluation records and interviews with employees.

The facility uses the work procedures as training materials. All necessary job requirements are included in the procedures, and therefore the training. The procedures identify the job-specific training needs. Training records were reviewed and were found to be complete. Records were reviewed and were found to be complete, finding this requirement in compliance.

Training on normal tasks to handle cyanide is provided by Contrans's Operations Supervisors and H&S Supervisors, who are experienced and qualified personnel with knowledge of the specific tasks to be accomplished and experience in effective communication techniques. Verification included interviews with the Supervisors, confirming their level of expertise in operating the facilities and in training is adequate.

Contrans evaluates the training effectiveness through testing and observation of on-the-job performance by the Operations Supervisors. The auditor reviewed records for formally documented evaluations, finding it in compliance.

## Production Practice 4.2

*Train employees to respond to cyanide exposures and releases.*

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|---|---|---|
| The operation is | ✓ in full compliance with<br>☐ in substantial compliance with<br>☐ not in compliance with | Production Practice 4.2 |

*Summarize the basis for this Finding/Deficiencies Identified:*

Contrans trains its employees working in activities related to cyanide handling and in areas where cyanide is present are trained in what to do in the event they observe a cyanide release and/or exposure. According to the facility emergency response plan, employees are trained to provide first response in case of cyanide spills with the assistance of Contrans´s Emergency Response Team and first aids with assistance of the medical center nurse.

The auditor reviewed the operation's safety program, the emergency response plan, records of response training, and through interviews with facility personnel confirming that appropriate training is provided to site personnel by external contractor Safety Management Resources. Verification of the implementation of this provision was reviewing of the response plan.

Contrans employees related to cyanide activities are trained by contractor Safety Management Resources to carry out cyanide exposure and release response actions, as required in the emergency response plan. Training includes decontamination and the use of the oxygen and control of releases. The training program includes requirements for employee training. The auditor reviewed records of the training that these employees receive, which were documented and complete.

The training records include the names of the employee and the trainer, the date, topics covered, and tests demonstrating understanding. Records are retained throughout an individual's employment documenting the training they receive, and in the Supervisors records.

# Principle 5 | EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

## Production Practice 5.1

*Prepare detailed emergency response plans for potential cyanide releases.*

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 5.1

*Summarize the basis for this Finding/Deficiencies Identified:*

Contrans maintains the emergency response plan SM-N-010 Cyanide Emergency Preparedness and Response Plan v.02 to address potential releases of cyanide that may occur on site, describing specific emergency response procedures to respond to cyanide releases and exposures.

Contrans's emergency response plan (ERP or Plan) do not considers a scenario of catastrophic release of hydrogen cyanide gas (HCN) due to the nature of the operation, which consists of receiving and storing sea containers with solid sodium cyanide and also deconsolidating it, storing and dispatching IBC boxes with cyanide, in the event of a cyanide spill during handling, it would be over dry floor given the aridity of the location, manipulation is carried out on an impermeable surface and no water courses are in the vicinities.

The Plan do consider the potential failure scenario of solid cyanide releases to asphalt dry and wet surfaces, during loading and unloading operations. No packing operations are performed at the facility, cyanide IBC boxes are not opened. First respond will be in charge of Contrans and in case of a major spill, the external contractor Grupo Management Resources will attend the cyanide spill.

Releases during fires are considered in the Plan, due to short circuits, hot work and combustion equipment, and ignition due to incompatibility or poor handling of hazardous materials. In all cases, the Plan indicates that if possible, to fight the fire with dry chemical powder extinguishers that are not acidic or that contain water. If the fire cannot be controlled, it is preferable to let the product. For larger fires, consider calling the local firefighter's company. Explosion scenarios are not considered possible in the Plan as the facility do not stores substances or materials that could result into explosions.

The Plan do not consider emergency scenarios due cyanide piping, valves or tanks rupture, the facility do to manages cyanide solutions requiring this cyanide installations.

Power outages scenarios is not considered as a cyanide emergency scenario in the Plan , due to the nature of the cyanide handling operation. The Plan do consider electrical blackouts, for which the

facility has an electrical power generator for power outages, to maintain internal communications, and lighting among other equipment. Contrans has also installed automatic emergency lighting with battery power in case of lack or untimely cut of electrical power. These are reflector type headlights, located in strategic areas maintaining the reflection angles oriented predominantly to the evacuation routes and escape or exit doors for good lighting and orientation guidance in case of mass evacuation.

Waste treatment facilities are considered in the Plan. Bags with cyanide contaminated waste will be arranged in a red container of hazardous waste, waiting to be collected by the external contractor Zolix, authorized to manage hazardous waste, who will take it to its final disposal to be encapsulated and disposed of in the safety landfill of Innova Ambiental. As a security measure that the final disposal has been carried out, the hazardous waste manifest signed by the company in charge of the disposal Zolix was available.

The auditor verified that the Plan address those release scenarios that may reasonably be expected to occur and result in significant impacts to its workers, community and environment, as applicable to the site-specific features of the operation and its environmental setting.

The Plan describes step- by-step response actions for solid cyanide spills, fire, injured workers and site evacuation. There is also a community telephone directory for contacting the neighboring industrial facilities should a broader evacuation be needed.

The Plan also describes procedures for responding to cyanide exposures due HCN gas inhalation, skin contact, and ingestion for both conscious and unconscious victims. The warehouse staff would administer oxygen. As cyanide antidote, trained medical staff from Contrans medical center would administrate hydroxocobalamin injection (vitamin B12 a) in 5 grams dose from the Cyanokit located at the medical center. The Plan states the use of this antidote is necessarily subject to the presence and supervision of medical personnel or nurses trained in the use of these elements, as well as in the recognition of the symptoms of cyanide poisoning and symptoms of adverse reaction to the use of the medicinal elements that make up the antidote kit.

Emergency scenarios for solid cyanide spills on dry and wet soil in the Plan contemplate controlling the spill at its source, which in this case the source would be the IBC box.

On returning to normal operating conditions, the Plan describes containment, assessment, mitigation, and prevention measures, including a detailed investigation in accordance with the separate incident investigation procedure.

The auditor evaluated the Emergency Response Plan confirming its level of detail is appropriate.

## Production Practice 5.2

*Involve site personnel and stakeholders in the planning process.*

| | | |
|---|---|---|
| The operation is | ✓ in full compliance with<br>☐ in substantial compliance with<br>☐ not in compliance with | Production Practice 5.2 |

*Summarize the basis for this Finding/Deficiencies Identified:*

Contrans is part of the Maritime Committee holding monthly meetings where they discuss security issues and incidents. Previously, the meetings were held in person at each facility, then with the COVID-19 pandemic they continued by teleconferences. Currently will resume face-to-face meetings.

They are also part of the Oquendo Committee where they participate in monthly meetings with companies in the area and representatives of the National Police, the Fire Department, the National Port Authority (for tsunamis issue) and the Civil Defense Institute (Indeci). It is currently done by teleconferences via WhatsApp.

Workers have been involved in emergency response planning via the training sessions and mock drills. Workers have also been trained in safe cyanide management and first aids in case of cyanide exposure. Stakeholders were involved in the initial process to obtain functioning licenses for the warehouse. Adjacent facilities have been informed of the site's operations.

The facility is located within an industrial park, there are no residential and public areas near. The Government of Callao authorities, the Ministry of Transport and Communications, and the local Safety Committee of Oquendo, among others, were communicated about the hazardous substances in the warehouse and what communications and response actions are appropriate.

The site has informed adjacent facilities and civil protection authorities regarding its operations and coordination in case evacuation is required. The site provided a copy of its emergency response procedures to the civil protection authorities. Contrans was able to demonstrate through interviews and through communication records, that they are in regular contact with local authorities..

Contrans sent proof of having communicated the emergency response plan to local firefighters and police, sending them letters that were listed with the charge received in accordance. The medical facility, Auna, is involved with Contrans emergency response plan as provides medical services to the facility. The roles of these external emergency responders' entities is clearly identified in the emergency response plan and involved those entities in the cyanide emergency response planning process.

The facility engaged in monthly meetings with the Maritime Committee and the Safety Committee of Oquendo stakeholders where participates the police commissioned, the local firefighter's commander,

the surrounding industrial and chemical companies representants, the Government of Callao to assure that the Plan addresses current conditions and risks.

## Production Practice 5.3

*Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

| | | |
|---|---|---|
| The operation is | ✓ in full compliance with | Production Practice 5.3 |
| | ☐ in substantial compliance with | |
| | ☐ not in compliance with | |

*Summarize the basis for this Finding/Deficiencies Identified:*

Contrans workers and the management personnel are members of the site emergency response brigade. Their roles are described in the Plan. The Site Manager is the brigade coordinator. In general, the senior-most manager present at the site is granted the authority to provide all necessary resources. Additionally, the Plan shows contact number of alternate emergency response coordinators. Their responsibility, authority, and duties for managing an emergency situation are clearly described.

The emergency response team (ERT) is identified in the Plan. All involve participation of Contrans personnel. The Plan includes a list of the emergency brigades' teams for hazardous materials, evacuation, and first aids.

The ERT is trained according to the annual training program. Training is provided by Contrans own specialist personnel and specialized external contractor Safety Management Resources, who provided the ERT with annual training, in Security Management and Emergency Response with Sodium Cyanide: Operations, Emergency Response, Incident Command and Crisis Committee (8 hours), with an average of twenty participants.

The Plan include internal and external call-out procedures and 24-hour contact information with Contrans Control Center for the coordinators and response team members. Responsibility, authority, and duties for managing an emergency situation are clearly described in the Plan. The ERT is made up of a General Chief Brigadier, a Brigade Chief and the Brigadists.

When the emergency alarm is activated, the General Chief and the Brigade Chief who are in the facilities will go to the pre-established meeting points, from where they will direct the Brigadists for the maneuvers until all the personnel have been evacuated.

The Plan lists the emergency response equipment that should be available and includes PPEs, first aids kits, containment and neutralization materials and collection equipment for waste generated during the emergency.

The emergency response equipment is inspected monthly using checklists. First aids kits are inspected weekly. Its availability and operability was confirmed during the audit. Filled checklists were reviewed and interviews during the audit confirmed this practice.

The roles of the police, firefighters and medical services are described in the Plan.

Contrans confirmed that outside entities with roles in emergency response as the contractor Grupo Management Resources for cyanide spills recovery, the police, firefighters, and medical services are aware of their involvement and have been provided with a copy of the emergency response plan.

The auditor reviewed records of meetings, confirmation that these entities were sent copies of the Plan. The monthly meetings with the Maritime Committee and Oquendo Committee has the participation of the police and firefighters representants.

## Production Practice 5.4

*Develop procedures for internal and external emergency notification and reporting.*

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|---|---|---|
| The operation is | ✓ in full compliance with<br>☐ in substantial compliance with<br>☐ not in compliance with | Production Practice 5.4 |

*Summarize the basis for this Finding/Deficiencies Identified:*

The Plan includes a communication protocol including internal communication roles as well as notification to the authorities and external responders. The Plan includes a directory emergency telephone numbers of internal and external contacts. The Plan establish who is responsible of calling the external responders and authorities. The Plan includes procedures for evaluating emergencies and as appropriate, notifying management, agencies, responders, medical facilities, and others. The auditor reviewed the Plan verifying that this information is available and up to date.

The Plan includes instructions for communication with the authorities, external responders, the Government of Callao and the Safety Committee of Oquendo which represent the surrounding stakeholders. The Plan do not include procedures for communication with the media but includes procedures to communicate the incident to the authorities.

The Plan includes a requirement and details to notify ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such communications have been done as there was no significant incident in the operation.

## Production Practice 5.5

*Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.*

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|---|---|---|
| The operation is | ✓ in full compliance with | Production Practice 5.5 |
| | ☐ in substantial compliance with | |
| | ☐ not in compliance with | |

*Summarize the basis for this Finding/Deficiencies Identified:*

The Plan address recovery cyanide briquettes, decontamination of contaminated media, and management and disposal of spill clean-up debris. Briquettes would be recovered using brooms, shovels, bags, and pails. Recovered materials would be returned to the boxes or disposed as with other hazardous wastes. There are no cyanide process solutions at the warehouses, but in the unlikely event of a liquid cleanup, the Plan indicates that absorbent materials or sand would be used, followed by recovery as with solid cyanide. Other than wash down with water, if needed, neutralization or treatment of soils is not anticipated as cyanide is handled on an asphalt pavement.

The Plan requires to call the specialized contractor Zolix, authorized to manage hazardous waste, to take it to its final disposal to be encapsulated and disposed of in the safety landfill of Innova Ambiental.

Provision of an alternate drinking water supply is not considered as the operation only manages solid cyanide over impermeable surfaces. A release of solid cyanide is not considered can adversely impact a drinking water supply. The warehouse is supplied with drinking water from the public network, the personnel drinks bottled water.

The Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water or that could be expected to enter surface water, although all activities are performed inside the site property and there are no surface water bodies near of the site.

The Plan addresses that environmental monitoring will be necessary when a cyanide spill has had direct contact with the soil (with vegetation or without vegetation) or has contact with surface water exceeding local regulations limits, taking soil or water samples to corroborate the effect of the spill and take the appropriate measures. The Plan states that environmental monitoring will be commissioned to contractors Cultura QHSE or GEHSIMA S.A.C. who should proceed according to national regulations regarding allowed sampling methodologies, parameters and possible locations.

## Production Practice 5.6

*Periodically evaluate response procedures and capabilities and revise them as needed.*

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| The operation is | ✓ in full compliance with<br>☐ in substantial compliance with<br>☐ not in compliance with | Production Practice 5.6 |

*Summarize the basis for this Finding/Deficiencies Identified:*

The Plan requires to be updated when conditions change or at least annually. Contrans has updated the Plan during this recertification period as required.

Contrans conducted annually emergency mock drills during recertification period. On December 29, 2022 performed a mock drill related to cyanide spill and exposition, with multiple opportunities for improvement as described in the drill report. On December 16, 2021 they performed another mock drill simulating a cyanide spill during deconsolidation of IBC boxes from a sea container. On August 19. 2020 was the other mock drill simulating a cyanide spill with 16 participants.

All drills were evaluated during meetings after the drill, by the facility supervisors and workers. The auditor reviewed the mock drill reports, where the response times were considered, the training, the material handling suitability and the personal involvement. The reports include evaluation of the drills, the ERPs compliance, and established the necessary corrective action. Corrective actions were done and closed.

The Plan includes provisions to evaluate it and revise as necessary after any emergency that required its implementation. No such reviews have been conducted as there were no cyanide incidents requiring to activate the Plan.