2025

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT REPORT

Almacenera Pacífico S.A.C. – site Lurin Address: Carretera Antigua Panamericana Sur km 29.5, Lurin, Departamento Lima – PERÚ 2025

Submitted by:
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1. Operation General Information

Name of Production Facility:	Almacenera Pacífico S.A.C. Site Lurin - Peru
Name of Facility Owner:	Almacenera Pacífico S.A.C.
Name of Facility Operator:	Almacenera Pacífico S.A.C.
Dates of the audit:	13th and 14th August 2025
Name of Responsible Manager:	Giancarlo Mota Flores
Address:	Carretera Antigua Panamericana Sur km 29.5, Lurin, Lima, Peru
State / Province:	Lima
Country:	PERU
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2. Operation Location Detail and Description:

The International Cyanide Management Institute (hereinafter ICMI) Auditor´s Guidance for Use of the Cyanide Production Verification Protocol, published June 2021, was used as a reference in evaluating compliance measures for Production Practices.

Almacenera Pacifico, S.A.C., (hereinafter ALPA), was created in 2006, to provide logistics services to mining companies. It specializes in the storage of hazardous materials.

ALPA stores Mercantil's cyanide until a client puts in an order. Then, Mercantil hires an ICMI certified transporter to carry the Cyanide to the mining unit.

ALPA site Lurin, It is ALPA's own premises of 106,165.91 m2 Carretera Antigua Panamericana Sur km 29.5,Lurin, Lima, Peru.

Subsequently, as required by the market, ALPA expanded services to companies in various fields, which meant considerably increasing storage capacity.

The operations include the storage of solid sodium cyanide, the product is stored in their original package from the producer: in wooden boxes (IBC – Big Box) of 1 ton, 1.1 ton, and metal cylinders of 50 kg. ALPA stores Mercantil's cyanide until a client puts in an order. Then, Mercantil hires an ICMI certified transporter to carry the Cyanide to the mining unit.

ALPA stores cyanide in Lurin, in storage No 30, which cover an area of approximately 3,000 m2. The cyanide is presented in wooden boxes of 1 ton, 1.1 ton, and metal cylinders of 50 kg.

Additionally, ALPA carries out the transfer process in a warehouse with a surface area of approximately 700 m2.

The cyanide is transferred from the 1 ton or 1.1 ton wooden boxes to 20 ton – 22 ton ISO tanks.

ALPA is no longer engaged in direct aspects of the cyanide supply chain, only dry cyanide storage and transfer, in an indoor area at the Lurin facilities. For this reason, the scope of the recertification audit only considers the production protocol.

3. Auditor Information

Audit Company:	-e QUELLE E.I.R.L. and Mingroup Investments S.A.C.
Lead Auditor:	Álvaro Fuentes Huanqui
Technical Auditor:	Marcos Mera Escala
Email Lead Auditor:	alvaro.fuentes@e-quelle.net

Name and signature of the audit team.

Lead Auditor: Álvaro Fuentes Huanqui — Name — Signature

Technical Auditor: Marcos Mera Escala — Name — Signature

Dates of Audit: 13th and 14th August 2025.

4. Auditor´s Finding

This operation is

- ✓ in full compliance with the International Cyanide Management Code
- ☐ in substantial compliance *(see below)
- ☐ not in compliance

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

Dates of Audit: 13th and 14th August 2025.

5. 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 Production Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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Name of Facility	Signature of Lead Auditor	Date of submittal

Almacenera Pacífico S.A.C. Lurin		1st December 2025
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6. Principles and Standards of Practice

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 Standard of Practice 1.1
- ☐ in substantial compliance with Standard of Practice 1.1
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

The construction of the warehouse and the transfer area have plans reviewed and approved by the civil engineer. During the construction, Quality controls of the Structure were developed through the Construction Report Warehouse 25 Lurin II, by the company VCC Metalmecánica Construcción S.A.C., which includes the main specifications of the metal structure, roof and enclosures as well as accesses and gates. This report includes the certificate of Quality of Construction Materials, Mill test certificate, inspection certificates of the manufacturer of construction materials Hebei Yanshan Iron and Steel Group Co. Ltd., Quality certificates for Floor Resistance by the company ACO Concret and certificate of analysis of the epoxy base catalyst 3-1 (Epoxy anticorrosive base), DILEPOX IB (thinner for epoxy paint) and UNIPOX Primer 500 FOS (Used as a base coat in epoxy coating systems for industrial facilities) certificate of analysis.

The plans of the warehouse and the transfer area reviewed and approved by the civil engineer and the Quality controls of the Structure through the Construction Report Warehouse 25 Lurin II, by the company VCC Metalmecánica Construcción S.A.C., are stored in the offices of ALPA Lurin by the general management and head of Safety, Occupational Health, Environment and Quality (hereinafter HSEQ) of ALPA Lurin.

The construction and supervision of the works were carried out with qualified personnel designated by the contractor company VCC Metalmecánica Construcción S.A.C., from the civil engineer for the design of the area. And the Engineer, responsible for the supervision of works as Technical Supervisor who signs the Construction Report Warehouse 25 Lurin II.

The auditors reviewed the following evidence: Calculation Report – Structural Frame Analysis for the warehouse, signed by Civil Engineer, including: General Information, Material Data, Loads, Seismic Analysis, Element Design, and Conclusions.

Calculation Report – Structural Frame Analysis for the transfer area, Steel structure: Main structural members (beams and columns). Seismic analysis.

Carbon steel and structural steel are commonly used in industrial facilities and present no intrinsic chemical incompatibility with solid sodium cyanide, provided that dry operating conditions are maintained and moisture is controlled.

The reviewed reports demonstrate proper dimensioning of the main structural members , with seismic verification for Zone both the warehouse and the transfer area.

The clear height and spans are consistent with industrial storage facilities designed for safe operation of solid sodium cyanide.

Integrity and Protection Conditions: To ensure long-term compatibility, anti-corrosion protection (e.g., industrial coatings on steel) were implemented to prevent section loss due to corrosion.

Based on the reviewed calculation reports and the nature of the stored product in the warehouse and transfer area structures is deemed compatible, provided that dry operating conditions are maintained, contact with acids/oxidizers is avoided, and anti-corrosion protection and moisture control measures are implemented.

Floors were made concrete, it has a Quality Certificate for Resistance, it also has a epoxy base catalyst.

The floors were made with concrete, it has a Quality Certificate for epoxy base coating with its respective Quality Certificate and certificate of analysis of DILEPOX IB.

The warehouse building's floor and walls typically serve as sufficient secondary containment for stored containers of solid cyanide, such as IBCs and drums. In addition, the warehouse floor is higher than the external floor, the purpose of which is to prevent liquids from entering. Another measure taken is that the unloading or loading of solid sodium cyanide (IBCs or drums) are forbidden in case it is raining.

The solid cyanide is stored in a roofed and enclosed structure to prevent contact with precipitation. The enclosure of this structure is composed of metallic structure with a gabled roof and a metal structure.

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Anti-corrosion protection, applied by a specialized supplier, consisting of surface preparation by abrasive blasting with sand up to white metal grade (SSPC-SP5), guaranteeing the adhesion of the coating. Subsequently, an epoxy system formulated to resist highly corrosive environments was applied.

The installation was carried out with self-drilling screws, guaranteeing the required fastening and finishing.

The lateral sides have one part with Raschel mesh coverage for ventilation. The concrete structural elements serve mainly to give ductility and provide greater resistance to roof loads. In the upper part of the wall there is a metal structure with aluzinc coverage. The roof has, along its lateral ends, where the coverage ends, with rain gutters made of galvanized iron.

The warehouse an adequate ventilation. The lateral sides have one part with Raschel mesh coverage for ventilation. The clear height and spans are consistent with industrial storage facilities designed for safe operation of solid sodium cyanide.

According to the procedure Storage and dispatch of sodium cyanide PR-OP-08 includes in section 2.1 that the warehouse must have restricted access. Sign for authorized personnel only.

The 26 access doors to the warehouse are kept locked and keys are stored in the control booth. There is a key handling procedure PR-OP-17. If a third party (customer, auditor, ALPA employee) is going to visit the warehouse, they must send an email to the operations coordinator of ALPA to obtain an authorization. The operations coordinator is the person who authorizes access to the warehouse.

In the main entry to the warehouse and external walls of the warehouse, there are signs that say: "entry prohibited, restricted area".

ALPA has an exclusive space designated for solid sodium cyanide. In this warehouse, there are no materials of concern with respect to incompatibility with cyanide.

Production Practice 1.2

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

The operation is
- ✓ in full compliance with Standard of Practice 1.2
- ☐ in substantial compliance with Standard of Practice 1.2
- ☐ not in compliance with

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Finding/Deficiencies Identified:

ALPA has developed two specific procedures for the operation of cyanide: PR-OP-08 Storage and dispatch of sodium cyanide, and the Cyanide Transfer procedure PR-OP-10. The operations coordinator of ALPA and the operations assistant, were interviewed about the procedures for unloading, loading and handling containers of cyanide and for managing any contaminated materials or wash water. The interviewed personal demonstrated that they have knowledge of the procedures.

The Contingency Plan for sodium cyanide PL-OP-01, includes section 5.3 types of incidents: Incidents without injuries / continuous operation, mechanical problems / not continuous, container fall / packaging with spill, container fall / packaging without spillage, warehouse fire.

There is a change management procedure PR-SIG-23, includes changes to the operation that may have significant impacts. During the last year there have been changes in operations, infrastructure or scope of service, included in the change management plan register FO-SIG-40 for the new construction work of the storage and transfer warehouse, requested by the operation manager. The justification of the change is reducing the risk of contact of the product with the water due to the possible occurrence of a tsunami, additionally has the advantage that this product will be further away from the water table regarding to the place where it is located. Approved by the general management and the head of Safety, Occupational Health, Environment and Quality (hereinafter HSEQ), who were involved throughout the Project from start to finish in meetings with the operations manager and general management. According to the change management procedure, whenever changes occur that may affect the Occupational Health and Safety Management System, the following documents must be updated:

- *Hazard Identification, Risk Assessment, and Control Matrix.*
- *Annual Occupational Health and Safety Plan.*

There is an internal and supplier preventive maintenance program. There is evidence of preventive maintenance of the forklift by the contractor company Montacarga Uchuya EIRL for the period 2025. The forklifts have been designated for all ALPA operations, any of the units are destined for sodium cyanide operations.

In the case of the telehandler, there is a maintenance program based on the odometer, there is evidence of preventive maintenance report carried out by contractor Montacargas Agemaq EIRL. There is a maintenance plan prepared by Montacargas Agemaq EIRL that includes type 1 and type 4 preventive maintenance planned for 2025.

There is a maintenance report of Dust Collector (dust extractor).

Maintenance Program 2025 – PG-SIG-03 includes the following equipment:

- *Compressor for dust extractor (annual)*
- *Particle dust extractor (every 6 months)*
- *Transfer bin (every 6 months)*
- *Mobile lifeline (every 6 months)*
- *Dryer (annual)*
- *Transfer bin blade (every 6 months).*

There is a 2025 calibration program, which includes hydrogen cyanide gas detectors, there are certified (semi-annual calibration) hydrogen cyanide Detectors, BW Technologies brand, made by Safety and Maintenance company, there is a calibrator training certificate by the Honeywell in progress Gas detection Products Training Course Service Level II. In addition to being an Authorized service center of Honeywell/ Industry Safety for the DW technologies brand. It has a calibration certificate for Microdock MS-L3 test station.

The organization retain not only the calibration program , but also the calibration records for at least three years.

As established in the Contingency Plan PL-OP-01 Section 12, point 5.7, all liquid waste generated from site decontamination activities must be collected and stored in properly labeled containers by an authorized solid waste operating company, duly approved by the Peruvian Ministry of the Environment.

It is important to note that the facility exclusively handles solid sodium cyanide; therefore, transfer operations do not involve sodium cyanide solutions.

Any contaminated water collected is managed according with the mentioned Contingency Plan. This water is collected by an authorized specialized company in disposal of dangerous residues. This company is approved by the Peruvian Ministry of the Environment. This company disposes the dangerous residues according to the regulations of the Peruvian Government. There is no involvement of sodium cyanide solutions, this facility exclusively handles solid sodium cyanide, therefore there is only liquid waste generated from site decontamination activities, so it is not necessary to measure if the water contains cyanide, because this residual water will be disposed by a specialized company.

There is a solid waste management plan hazardous and non-hazardous PR-OP-32 rev03 of 12-Jul-2024. As established in the Contingency Plan PL-OP-01 (03- Jan- 2025), Section 12, point

5.7, all liquid waste generated from site decontamination activities must be collected and stored in properly labeled containers by an authorized solid waste operating company, duly approved by the Peruvian Ministry of the Environment.

ALPA disposes of cyanide-contaminated materials—such as contaminated boxes, bags, PPE, rags, etc.—in a sealed container clearly labeled as material contaminated with sodium cyanide. These contaminated wastes are collected and disposed of by an authorized company licensed to manage hazardous waste and registered and approved by the Ministry of Environment of Peru (MINAM). In addition, these companies are required to hold a special operating permit for the transport of hazardous materials and waste issued by the Ministry of Transportation and Communications (MTC), as well as the corresponding municipal operating licenses.

These contractors maintain a detailed waste management plan that complies with MINAM regulations and includes the prevention, reduction, recycling, and final disposal of the generated waste, including the ultimate destination of the disposed material.

ALPA has a designed document, PR-OP-03 Goods reception procedure, which includes Checklist: FO-OP-15. The operations coordinator or operations assistant of ALPA checks the solid sodium cyanide received in the warehouse according to the FO-OP-15 check list. The package and label are checked. The format includes general customer information, receipt date, registration date, vehicle information, load information, product code, United Nations Code.

There is the procedure for Storage and dispatch of sodium cyanide PR-OP-08, which includes in point 2.4 the statement that to dispatch a transportation unit with sodium cyanide, the following must be taken into account: The required documentation must be available prior to loading, as specified in Section 2.6.1 of Procedure PR-OP-07 "Transportation of Sodium Cyanide.".

As mentioned in point 2.6.1 of procedure PR-OP-07 "Transportation of Sodium Cyanide", the convoy leader reviews the condition of the containers that are suitable for travel without holes and with the identification labels of the cyanide of solid sodium.

The Verification of Procedures and Controls for ISO tanks Used in Cyanide Transfer are the following: 1. Transfer Procedure, 2. Pressurization Procedure, 3. Technical Specifications of ISO tanks, 4. Hydrostatic Test Consideration

Production Practice 1.3

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 1.3
- ☐ not in compliance with

Finding/Deficiencies Identified:

The operation inspects all loading, unloading, transfer and storage areas to identify releases of solid cyanide or situations that pose a risk of a cyanide release (e.g., cracking of impermeable surfaces), the good conditions of the packages (IBCs, and drums). There is periodic inspections according with Procedure PR-OP-03 – Goods Reception, which references Checklist FO-OP-15.

ALPA has established procedures and records to ensure routine inspections of packages and containers used for the transportation of solid sodium cyanide:

Reception of Goods

Documented in Procedure PR-OP-03 – Goods Reception, which references Checklist FO-OP-15.

Upon receipt, the Operations Coordinator or Operations Assistant inspects each shipment of solid sodium cyanide at the warehouse.

The inspection includes verification of the packaging integrity (Intermediate Bulk Containers and drums), the condition of labels, and compliance with requirements for general customer information, receipt and registration dates, vehicle and load details, product code, and United Nations code.

Storage and Dispatch

As per Procedure PR-OP-08 – Storage and Dispatch of Sodium Cyanide, Section 2.4, dispatch of a transportation unit requires all mandatory documentation to be available before loading, in accordance with Procedure PR-OP-07 – Transportation of Sodium Cyanide, Section 2.6.1.

The convoy leader verifies that all containers are in suitable condition for transport, ensuring they are free from holes, damage, or deformation, and that all hazard identification labels for sodium cyanide are correctly affixed and legible.

Inspection of ISO Tanks (when applicable to transfer operations)

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The Cyanide Transfer Procedure PR-OP-10, Rev. 08 (06-Jan-2025) requires inspection of ISO tanks using FO-OP-37 – ISO Tank Inspection Checklist.

Inspections confirm the condition of the ISO tank's frame, hatches, gaskets, and valves, ensuring no damage, corrosion, or leaks, and verify the presence of appropriate labeling for solid sodium cyanide.

In addition, Procedure PR-OP-31, Rev. 05 (06-Jan-2025) requires a pressure test before each transfer, recorded on FO-OP-54 – Pressure Test Data Sheet, Rev. 06.

Routine inspections are conducted at every stage of handling (reception, storage, dispatch, and transfer) to ensure that all packages and containers used for the transportation of solid sodium cyanide remain intact, properly labeled, and compliant with regulatory and safety requirements. This system provides assurance that only containers in suitable condition are dispatched for transport.

Before each transfer operation, a forklift check list is made, document FO-OP-10; pre-use check list of telehandler, document FO-OP-11, before the operation of the equipment and once a week.

The calibration of the hydrogen cyanide gas detectors is carried out every six months.

Warehouse Inspection Format FO-OP-25, include information like date of the inspection, the name of the inspector, and any observed deficiencies.

There is an internal and supplier preventive maintenance program. There is evidence of preventive maintenance of the forklift by the contractor company Montacarga Uchuya EIRL for the period 2025. 07 forklifts have been designated for all ALPA operations, any of the units are destined for sodium cyanide operations.

In the case of the telehandler, there is a maintenance program based on the odometer.

Warehouse Inspection Format FO-OP-25 include information like date of the inspection, the name of the inspector, and any observed deficiencies.

According to the recommendations provided by the suppliers at the end of the maintenance, ALPA carried out the follow-ups together with the Service Orders derived from the complementary works.

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 Standard of Practice 2.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

There is a procedure for Storage and dispatch of sodium cyanide PR-OP-08, which includes warehouse characteristics, preparation of operations, review of the emergency kit, loading and unloading of the product; Product storage communications and cyanide emergency response.

It has the Contingency Plan for sodium cyanide PL-OP-01, includes risk assessments, notifications and Communications, emergency procedures, which includes point 5.3 types of incidents, Incidents without injuries / continuous operation, mechanical problems / non-continuous, container fall / packaging with spill, container fall / Packaging without spillage, warehouse fire. In addition, there is a procedure for Storage and dispatch of sodium cyanide PR-OP-08 as well as the procedure for sodium cyanide Transfer PR-OP-10.

It includes preventive maintenance of the facilities, where staff must issue a work order through the "SSGG Works" app. Corrective maintenance in facilities is included. Maintenance can be carried out with ALPA's own personnel or external personnel if they consider it necessary. In the case of contractors, there is a Safety Management procedure for clients, contractors and visitors, PR-SIG-25 which includes visitants, contractor policies and processes where HSEQ requests documents from contractors including chemical safety sheets, supplementary risk insurance. In the case of work and supervision carried out by contractors, induction is carried out with an informative video of 20 minutes and final evaluation.

There is an annual occupational health and safety plan, PL-SIG-02, which includes the safety committee that is planned for the 2025 update, and there is also an Identification procedure of hazards and Risk Assessment PR-SIG-11, which includes interviews with personnel. The annual occupational health and safety plan, PL-SIG-02 applies to all locations and includes training, inspections, management of dangerous substances, investigation of accidents, incidents and

occupational diseases. The hazard and risk matrix is carried out at the workplace, in the case of the matrix of forklift and telehandler operator, warehouse assistant and operations coordinator MT-SIG-04.

There is a Training Program PG-SIG-05 – Annual Program 2025, which includes the following topics:

- *Safe handling of sodium cyanide*
- *Transportation of cyanide*
- *Storage and dispatch of cyanide*
- *Cyanide transfer operations*
- *Contingency plan for sodium cyanide*
- *Decontamination procedures*
- *Proper use of emergency showers and eyewash stations*

The staff participates in the preparation and review of documents through daily meetings, 5-minute talks at the beginning of work and through the safety supervisor who refers the needs of the staff to management.

In the PR-OP-08 cyanide storage and dispatch procedure, the preparation of operations is included and before unloading the packages of sodium cyanide from the maritime container, the personnel must turn on the cyanide gas detector and verify that it is at 0.0 ppm.

PR-OP-10 – Cyanide Transfer Procedure, states:

Personnel must activate the hydrogen cyanide (HCN) gas detector prior to operations and verify that the reading is 0.0 ppm in the area where activities will be carried out.

Note: This device will automatically stop functioning six months after its last calibration. When this occurs, personnel must notify the supervisor so that calibration can be scheduled. For this reason, it is impossible to operate with an uncalibrated device.

During operations, if the detector alarm is activated, the following steps must be followed:

At 4.7 ppm: Operations must be suspended immediately, and personnel must evacuate the area for 10 minutes. After this period, HCN concentration must be re-measured; if normal values are confirmed, operations may resume.

At 10 ppm: The same actions as above must be followed, and the area must be ventilated for a minimum of 25 to 30 minutes.

If the concentration does not decrease, additional ventilation cycles of 15 to 20 minutes must be applied until the level reaches 0.0 ppm.

Personnel must place all emergency equipment close to the work area.

Personnel must wear their Personal Protective Equipment (PPE), sealing openings with duct tape to prevent dust ingress, and must perform a mask fit test (positive or negative pressure check) to ensure proper sealing.

In the PR-OP-10 procedure for cyanide transfer, it includes the use of a portable hydrogen cyanide gas detector. The alarm is set on 4.7 ppm. Activities are described when alarm is activated. During the interview with the staff, knowledge of safety aspects and controls is confirmed.

There is a 2025 calibration program, which includes hydrogen cyanide gas detectors, there are 02 certified (semi-annual calibration) hydrogen cyanide Detectors, BW Technologies brand, , there is a calibrator training certificate by the Honeywell in progress Gas detection Products Training Course Service Level II. In addition to being an Authorized service center of Honeywell/ Industry Safety for the DW technologies brand..

The organization retain not only the calibration program , but also the calibration records for at least three years.

Note: These devices will automatically stop functioning six months after their last calibration. When this occurs, personnel must notify the supervisor so that calibration can be scheduled. For this reason, it is impossible to operate with an uncalibrated device.

In all operations with sodium cyanide, it is always required that at least 2 people be present. It is mentioned in point 2.2.1 of procedure PR-OP-08 Storage and dispatch of sodium cyanide. During the unloading or loading are present the following personnel: the warehouse assistant, Risk Prevention and the forklift operator.

In the sodium cyanide transfer operation, there are telehandler operator and 3 warehouse assistants, one of them helps to place the handles of the bags to the telehandler, another is located on top of the ISO tank to verify the correct filling of the tank and the third person supports any of the operators.

There is an Occupational Health Program in place that includes:

- *Pre-employment medical examinations for all new employees.*

- *Periodic medical examinations to monitor ongoing health conditions.*
- *A medical surveillance program aligned with occupational risks.*

The Occupational Health Management Procedure PR-SIG-17 defines the protocols for medical examinations. In addition, there is an official medical evaluation protocol that applies specifically to: Administrative personnel, workers in operational areas, workers performing confined space entry, workers conducting tasks at heights. The medical examinations include the ability to use a respirator, hearing and vision, and pulmonary function, according to the tasks to be done by the employee.

The results of medical examinations are confidentially delivered by the occupational physician directly to the employees.

An example of implementation is the Operations Coordinator Case Evaluation

Instructions for removing victim and operator suits, document with code IN-OP-06 aimed at correctly carrying out the removal of the suit used during the handling of chemical products. There is a waste management procedure that includes the final disposal of used suits. . During the operations in the Warehouse and the transfer facility, there is not allowed the presence of visitors and other external persons, the entry to the Warehouse and the transfer facility is restricted. However according to the emergency plan PL-SIG-01 rev.07 the plan applies to employees, visits and contractors.

The cyanide warehouse has legible signage in the main entry and inside the warehouse to ensure that all workers who may be exposed to cyanide are aware of the risks and take appropriate protective measures. The signs alert to the presence of cyanide and the need for appropriate personal protective equipment. Also, this signage is along the external perimeter wall. In addition, ALPA personnel receive training on sodium cyanide safety, which reinforces compliance with these restrictions.

At the main entrance to the warehouse and along the external perimeter wall, there are clearly visible signs prohibiting smoking, eating, drinking, and the use of open flames in all areas of the facility where cyanide is present. In addition, ALPA personnel receive training on sodium cyanide safety, which reinforces compliance with these restrictions.

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 Standard of Practice 2.2
- ☐ in substantial compliance with Standard of Practice 2.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

It has the Contingency Plan for Cyanide PL-OP-01, includes risk assessments, notifications and Communications, emergency procedures. Includes point 5.3 types of incidents, Incidents without injuries / continuous operation, mechanical problems / non-continuous, container fall / packaging with spill, container fall / packaging without spillage, warehouse fire. The contingency Plan detail the necessary responses to cyanide exposure through ingestion, inhalation, and absorption through the skin and eyes.

There is an annual safety program PG-SIG-01 that includes the inspection of fire extinguishers, safety cabinets, emergency lights, and other critical equipment. The following inspection formats are used:

- *FO-SIG-11 – Fire Extinguishers Inspection (monthly frequency).*
- *FO-SIG-15– Inspection of Emergency Showers and Eyewash Stations (monthly frequency).*
- *FO-SIG-16 – Emergency Response Kit Inspection.*

For example, the monthly inspection of eyewashes and emergency showers (FO-SIG-15) was reviewed for the case dated 05-Jul-2025, conducted by the HSEQ Supervisor and approved by a representative of the Safety Committee.

The warehouse is equipped with:

One safety shower (capacity: 440 liters) and one eyewash station (capacity: 30 liters), both located outside the storage area near the main warehouse entrance. During the audit, the safety shower pressure was tested and confirmed to be in good working condition with appropriate pressure, while the eyewash station was found to be operational with low water pressure.

At the sodium cyanide warehouse, there are five dry chemical powder extinguishers (50 kg each) and two dry chemical powder extinguishers (12 kg each).

The pressure testing and maintenance of the fire Extinguishers are performed by the supplier of these extinguishers, which is a specialized company to perform these tasks. The monthly

inspection of the fire extinguishers verifies the external conditions, the pressure and the next date of maintenance of the extinguishers.

They have one antidote for cyanide poisoning, the brand is Cyanokit (Hydroxocobalamin). The operation has one medical oxygen cylinder with a valved mouthpiece that can also be used as a resuscitator. The reliable means of emergency communication or notification is mobile telephone through WhatsApp group Hazardous materials brigade, evacuation brigade and/or firefighting brigade. There is FO-SIG-16 inspection of emergency equipment that includes antidote kit and oxygen cylinder.

There is FO-SIG-16 rev05 inspection of emergency equipment including antidote kit and oxygen cylinder, the antidote is stored in the warehouse number 5 under controlled temperature, with the temperature specified by its manufacturer They have one antidote for cyanide poisoning, the brand is Cyanokit (Hydroxocobalamin).

Safety Data Sheets (SDS) are available at the entrance to the warehouse in Spanish. Both printed copies and a QR code are provided to access the digital version..

Since the warehouse exclusively manage cyanide in solid form, the labeling requirements of this provision apply only to cyanide containers. The IBCs and drums of cyanide are clearly identified as such, they keep the original label from the producer in good conditions.

Instructions for decontamination of personnel and transfer equipment IN-OP-03, to ensure that all personnel working in operation know and execute physical and dry decontamination before leaving the area.

The personnel approach the compressed air point that is at the end of the transfer. Decontamination is carried out from head to toe, removing the particles found in the Tyvek suit, full face mask, gloves and boots. Equipment cleaning and decontamination is included. During the operations in the Warehouse and the transfer facility, there is not allowed the presence of visitors and other external persons, the entry to the Warehouse and the transfer facility is restricted. However according to the emergency plan PL-SIG-01 rev.07 the plan applies to employees, visits and contractors.

ALPA has the capacity to provide first aid and medical care in case of sodium cyanide emergencies. The occupational doctor visits the facility once a week and attends in case of emergencies and is available 24/7 by phone. A risk prevention officer is present on-site from

Monday to Sunday, from 7:00 a.m. to 7:00 p.m.; he is also a firefighter and trained to provide first aid.

The Contingency Plan (PL-OP-01) includes a list of seven medical centers in Lima, with the closest being the Villa El Salvador Emergency Hospital (20 minutes away) and the Santa Martha del Sur Clinic (25 minutes away). There is documented evidence of letters sent on 01-Aug-2025 to both medical centers, notifying them of their inclusion as support entities in case of spills, incidents, or emergencies involving sodium cyanide.

The Contingency Plan PL-OP-01 for sodium cyanide includes, in point 5.11.3, first aid procedures in case of poisoning. The antidote must be administered only by authorized medical personnel. The plan considers medical personnel as an external resource and includes updated contact numbers of the closest medical centers. In the event of a medical emergency, the transfer of the exposed worker is carried out using the available company vehicle located at the office.

Yes, there is a procedure named "Incidents and accidents" PR-SIG-09 rev10 of 30-Apr-2024, this document includes the flow of investigation of the fatal or dangerous accident, collection of information, analysis of cause and proposed actions and measurement of effectiveness to prevent the recurrence of the accident. There is a record of work accidents FO-SIG-18. At the time of the audit, there were no accidents or incidents related to the handling of cyanide.

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 Standard of Practice 3.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

There is only storage of solid cyanide in unopened containers and packaging, such as IBCs and drums. The potentially contaminated water, such as wash water and water used to decontaminate clothing and equipment, is not discharged to streams, rivers or other surface water. There is no access to surface waters in the warehouse. The contaminated water will be disposed of through a company specialized in hazardous waste.

For the transfer operations, no water is used, they are dry operations and in case of spills, the surface is cleaned and decontaminated with sodium hypochlorite. There are no water points or water surfaces near the facility.

The transfer of solid cyanide from box IBCs to ISO tanks is a dry process and does not directly generate waste process solution.

Since this is a warehouse operation that handles cyanide exclusively in closed packages or containers, such as Intermediate Bulk Containers (big boxes) and drums, and no reagents are used or processing takes place, the potential for releases to the environment is extremely limited. In addition, the transfer of solid cyanide from box IBCs to ISO tanks is a dry process and does not generate process solution or liquid waste.

The facility does not have any indirect discharge to surface water; therefore, environmental monitoring for such discharges is not necessary.

The facility does not have any indirect discharge to surface water or groundwater; therefore, environmental monitoring for such discharges is not necessary

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The facility does not have any indirect discharge to surface water; it has not been any seepage from the facility.

This warehouse operation exclusively handles cyanide in closed packages or containers, such as Intermediate Bulk Containers (IBCs) and drums, and no reagents are used nor processing takes place.

The transfer of solid cyanide from IBCs to ISO tanks is a dry process and does not directly generate process solution waste. This operation is equipped with a particle dust extractor to limit cyanide dust emissions. In addition, hydrogen cyanide gas is continuously monitored during this process using a portable gas detector.

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 oeration is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 4.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

There is an annual training plan that includes topics for handling and emergencies related to storage and operations with cyanide. There are courses such as Safe Handling of Cyanide dictated on 15-Apr-2025, Cyanide Transport Procedure dictated on 03-Jul.2025, Cyanide Storage and Dispatch Procedure dictated on 03-Jul2025.

The warehouse and transfer operation personnel of ALPA were interviewed , it was verified that they have the knowledge for safe handling of sodium cyanide and emergency response, they understand very well what cyanide is, its forms and dangers, routes of poisoning, proper storage practices, symptoms of mild and severe poisoning, measures for safe handling and storage of sodium cyanide.

Evidence of training on the proper use of PPE for cyanide transfer operations was verified. Jorge Almeyda (Risk Prevention Specialist) provided photographs of operators fully equipped with the required PPE before starting transfer activities.

In addition, training record FO-SIG-09, dated May 14, 2025, documents the session "Use of PPE in Sodium Cyanide Transfer Operations," conducted by Julinho Ramos, HSEQ Supervisor. Participants included all personnel involved in the operation: two forklift operators, one telehandler operator, the operations coordinator, and three warehouse assistants. This training is conducted on an annual basis.

Evidence of training provided to personnel to perform their work was verified:

FO-SIG-09 – Training on Sodium Cyanide Transfer Operations, conducted on 4-Jul-2025 (annual frequency), delivered by Julinho Ramos – HSEQ Supervisor, to all personnel involved in the transfer operation.

MIP Master Izajes Perú – Safe Forklift Operation Training, completed on 19-Feb-2025, valid until 19-Feb-2026. Certificates issued to Freddy Paredes and Juan Mamani.

MIP Master Izajes Perú – Safe Telehandler Operation Training, completed on 18-Nov-2022. Certificate issued to Freddy Paredes.

Ogreen – HAZMAT Level II, completed on April 22 and 29, 2023. Certificate issued to Freddy Paredes.

IFSEC Perú SAC – HAZMAT Level III, completed on April 17–20, 2023. Certificate issued to Luis Huamaní.

The procedure for sodium cyanide transfer PR-OP-10 establishes in section 2.1 "Considerations for the Process – Personnel Requirements" that:

- *Personnel must have read the Sodium Cyanide MSDS.*
- *Personnel must hold HAZMAT I, II, or III training.*
- *Personnel must pass an alcohol test, with a negative result.*
- *Personnel must have working at heights training.*
- *Personnel must be in good health, physical condition, and adequate emotional state.*
- *Personnel must be trained and authorized in the use of forklifts and telehandlers.*

The operation trains its employees on the written procedures prior to allowing them to work with cyanide.

All personnel are trained in cyanide transfer (04-Jul-2025), on an annual basis it is also formalized within the Cyanide Awareness Training program. PO-SIG-05 rev03. All courses within the program are held annually. At the beginning of the activities, new personnel are provided with a general safety induction in the workplace.

***T**he employees have been instructed on how to accomplish their assigned tasks safely. It was verified that he has knowledge of safe handling of sodium cyanide, unloading, storage and loading procedures, and use of PPE.*

The employees received the following trainings, the training materials were identified:

- Procedure of Transfer of solid sodium cyanide, dated 04-jul-2025.

- Procedure of storage and dispatch of sodium cyanide dated 03-Jul-2025

- Contingency Plan for sodium cyanide dated 04-Jul-2025.

***T**he internal safety trainings are dictated by the HSEQ supervisor, there is its training from 24-May-2019 by IFSEC Peru, It also has courses on Hazardous Material Technical Level by the Ibero-American School of Business and the Ibero-American School of Brigade and Firefighters from January 09 to 11, 2024. There is Level II hazardous materials training by Brezea S.A.C. Locally, there is no local regulation on the authorization of training companies or trainers in local government registries. Internally within ALPA, internal training is only required to be on an annual basis.*

Specialized trainings as a forklift operator and telehandler operator are conducted by recognized external organizations such as IFSEC Peru SAC, or Master Izajes Peru Enabling code by CO/M-2025-2309 issued on 19-Feb-2025 valid on 19-Feb-2026.

***E**ffectiveness is validated through the monitoring of indicators on accident rates and incidents, and they have not been recorded in the last 3 years. Another method of evaluation is carried out through the programmed drills.*

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 4.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

There is training in the safe handling of sodium cyanide dated 15-Apr-2025, training material was evidenced that it includes first aid, poisoning symptoms, medical care, antidote supply, fire cases, spills and photographic evidence for emergency response and rescue.

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The training on the Safe Handling of Sodium Cyanide includes information on the symptoms of poisoning, first aid, medical attention, administration of antidotes, actions in case of fire or spills, rescue procedures, and emergency response. There is evidence of this training dated 15-Apr-2025.

Additionally, personnel receive training on the Contingency Plan, there is evidence of this training dated 04-Jul-2025.

There is a record of the physical and virtual trainings, within the registration control procedure PR-SIG-02 rev11 includes the time of storage of records such as occupational diseases, safety records, etc.

The virtual records have a digital folder that includes the training materials and documents of the Management System within them, training certificates, talks, first aid certificates, among the other documents related to the Management System.

The training records have the name of trainer, place/address, date from training, time on training, attendance list and subject of the training. The effectiveness of the training is measured on the performance of the employee during the operations.

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 Standard of Practice 5.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

ALPA has developed the PL-OP-01 Contingency Plan for sodium cyanide, includes level 01 cyanide accident up to 20 TN dry and level 02 Accident with cyanide with water and more than 20 TN. Includes container fall, fire, dry spill, water spill, rain event.

ALPA has developed the PL-OP-01 Contingency Plan for Sodium Cyanide for the Lurin facility. The plan identifies as a high-probability event the possible fall of a container or package with product spillage. This scenario considers the potential consequence of a release of up to 20 metric tons of sodium cyanide and the possible generation of hydrogen cyanide gas. The plan establishes preventive measures, emergency response actions, communication protocols, and coordination with external medical and emergency support entities to mitigate risks to workers, the community, and the environment.

ALPA has developed the PL-OP-01 Contingency Plan for Sodium Cyanide, which includes in section 5.8 the procedures for managing dry spills, cleaning, and decontamination. Liquid cyanide is not applicable, as the operation only stores and handles sodium cyanide in dry containers. The transfer of solid cyanide from IBC boxes to ISO tanks is a dry process and does not directly generate liquid effluents or process solutions.

ALPA has developed the PL-OP-01 Contingency Plan for Sodium Cyanide, which specifically addresses fire scenarios in section 5.9 “Response to Fires”. The plan includes procedures for responding to incipient fires, as well as major fire events, and establishes the roles, responsibilities, and resources required to control and mitigate such emergencies.

ALPA has developed the PL-OP-01 Contingency Plan for Sodium Cyanide (Lurin), which establishes specific actions in case of a spill:

Personnel must use the required Personal Protective Equipment (PPE), including Level A/Level B protective suits, respiratory protection against dust and mist, impermeable gloves, eye protection, and impermeable boots.

The affected area must be isolated within a 100-meter radius.

The emergency kit for cyanide intoxication response must be deployed immediately.

Additionally, neighboring companies to the sodium cyanide warehouse include Energía Peruana SAC (power generator supplier) and Lavisa (warehousing services).

As documented in the Stakeholder Matrix MT-SIG-05, the surrounding community (local residents) has also been included as an interested party in the contingency planning.

ALPA has developed the PL-OP-01 Contingency Plan for Sodium Cyanide (Lurin), which includes specific first aid measures and the administration of antidotes in case of exposure:

Section 5.11.3 First Aid in case of inhalation:

Conscious affected person: Provide oxygen.

Unconscious affected person: Provide oxygen and administer the antidote immediately. Note that the antidote may only be administered by authorized medical personnel.

If the affected person is not breathing: Call a physician. Provide forced oxygen and/or artificial respiration. The antidote may only be administered by authorized medical personnel.

Section 5.11.7 Cyanokit Administration: The plan also establishes a procedure for the administration of Cyanokit as the specific antidote, which must be performed exclusively by qualified medical staff.

The transfer of solid cyanide from IBCs to ISO tanks is a dry process and does not directly generate process solution waste. This operation is equipped with a particle dust extractor to limit cyanide dust emissions. In addition, hydrogen cyanide gas is continuously monitored during this process using a portable gas detector.

The PL-OP-01 Contingency Plan for Sodium Cyanide includes specific procedures for different spill scenarios and accidents:

5.3.3: Container/packaging fall with spill.

5.7: Dry spill – cleaning and decontamination.

5.9: Water spill – cleaning and decontamination.

These sections outline the main actions to be taken in case of an accident, ensuring proper containment, assessment, response, and mitigation of potential risks.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

The operations procedures are communicated through the training including the contingency plan (04-Jul.2025), in addition within the Safety Committee it is communicated monthly with the safety requirements and accident rates, where in case of accidents they can review and update the emergency response plan.

During the audit, staff are interviewed and familiar with emergency response and work procedures related to cyanide handling.

***T**his question would not be applicable because the release scenarios identified by the operation do not pose risks to communities. The cyanide operations in the storage and transfer are controlled during the operation and do not represent a potential risk to the neighboring communities since the transfer operations are carried out once a week. The transfer of solid cyanide from IBCs to ISO tanks is a dry process and does not directly generate process solution waste. This operation is equipped with a particle dust extractor to limit cyanide dust emissions. In addition, hydrogen cyanide gas is continuously monitored during this process using a portable gas detector. In the environmental monitoring of the last 3 years no gas leaks into the atmosphere have been identified. However, ALPA has made potentially affected neighbors aware of the nature of their risks associated with the storage and transfer of solid sodium*

cyanide. There is evidence of letters sent to Lau Vidal SAC and Energía Peruana SAC, the letters are dated 01-aug-2025. The companies received the letters on 19-aug-2025.

The operation has identified external entities with emergency response roles and involved them in the cyanide emergency response planning process.

The PL-SIG-01 Emergency Response Plan includes coordination with the General Volunteer Fire Brigade of Peru, Medical Alert, and the Red Cross as part of the external support for first aid brigades. The fire brigade was formally notified through a letter dated 01-Aug-2025 regarding emergency response for the transport of hazardous materials.

A secondary response mechanism is in place through IFSEC Peru SAC, which is directly contracted by the client MERCANTIL S.A. Communication in case of an emergency is channeled via MERCANTIL S.A. The most recent ICMI audit report for Mercantil S.A. (Current certification dated 04-Apr-2025) includes reference to the commercial agreement between IFSEC and MERCANTIL S.A.

The PL-OP-01 Contingency Plan lists seven medical centers in Lima, with the nearest being the Villa El Salvador Emergency Hospital (20 minutes away) and the Santa Martha del Sur Clinic (25 minutes away). Both facilities were officially notified of their inclusion as support entities in case of spills, incidents, or cyanide-related emergencies via letters dated 01-Aug-2025, with receipt confirmed on 19-Aug-2025..

The MT-SIG-05 Stakeholder Matrix identifies support groups for emergency response, including firefighters and hospitals. The procedure refers to PR-SIG-18 Communications Procedure, as well as to the Contingency Plan for sodium cyanide. The Contingency Plan is reviewed annually, and formal notification letters are sent to stakeholders every two years. During each review, the contact details of stakeholders, including telephone numbers, are verified and updated.

Production Practice 5.3

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.3
- ☐ not in compliance with

Finding/Deficiencies Identified:

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PL-OP-01 Contingency Plan for sodium cyanide, includes that HSEQ Manager and Operation Manager are the Designate primary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Plan.

The PL-OP-01 Contingency Plan for sodium cyanide, Section 3.1, identifies the First Response Brigade and Emergency Brigades. The Evacuation Brigade is included in Annex D. A list of Hazardous Materials Brigades is also available on the induction bulletin board and in ALPA's General Emergency Plan PL-SIG-01 rev07 dated 03-Feb-2025.

Hazardous materials training is provided to brigade members, including preparation for chemical spill emergencies under PR-SIG-29 rev03. This training program covers personal safety, safe handling, storage, spill response, fire response, medical emergencies, and environmental emergencies. Training activities include courses, practical exercises, and simulated drills related to cyanide storage and transfer.
For sodium cyanide emergency response, brigade members must receive the following training:

- *Properties of cyanide.*
- *Personal safety.*
- *Safe handling of cyanide.*
- *Storage.*
- *Response to fires near sodium cyanide.*
- *Medical emergencies.*
- *Environmental emergencies.*

The Emergency Response Plan includes 24-hour emergency telephone numbers for hospitals, clinics, police, and fire stations under Section 3.2 (Contacts, positions, and telephone numbers). This information is also posted on bulletin boards in emergency information murals within the facility.

The Emergency Response Plan under the item 3. Indicates the communication flow chart and sequence with the updated phone numbers from all emergency brigades and also indicates the procedure of the report of the emergency.

The Emergency Plan PL-SIG-01 specifies the roles of the HSEQ Chief, HSEQ Supervisor, and Brigade Leaders, as well as support groups.

HSEQ Chief: assumes command during emergencies, calls for external assistance if required, informs the Safety Committee of actions taken, and directs brigades.

HSEQ Supervisor: assumes the Chief's duties in their absence and provides direction to brigades.

The Contingency Plan also details the responsibilities of the First Aid Brigade, Firefighting Brigade, and Hazardous Materials Brigade, as well as support personnel such as security agents, logistics, surveillance, and medical staff.

Annex I of the Emergency Plan PL-SIG-01 rev07 (03-Feb-2025) includes an inventory of first aid kits and Annex J includes an inventory of emergency response kit and the list of the elements of the Cyanokit emergency kit, including its components and supplies.

The Safety Inspection Procedure PR-SIG-08 rev11 includes monthly and daily inspection requirements, as appropriate, for fire extinguishers, first aid kits, emergency lights, eyewash stations, safety showers, and other emergency equipment to ensure readiness and availability.

The Emergency Plan PL-SIG-01 rev07 (03-Feb-2025) describes the functions of external support groups, including security agents, logistics, and surveillance.

Medical facilities: Letters dated 01-Aug-2025 were sent to the Villa El Salvador Emergency Hospital and Santa Martha del Sur Clinic, notifying them of their role in supporting cyanide-related emergencies. Both facilities confirmed receipt on 19-Aug-2025.

External responders: The General Volunteer Fire Brigade of Peru, Medical Alert, and the Red Cross are included as support entities. Additionally, IFSEC Peru SAC provides specialized emergency response services through a commercial agreement with MERCANTIL S.A.

Neighboring communities/companies: Letters were sent on 01-Aug-2025 to neighboring companies (Energía Peruana SAC and Lavisa) informing them of the risks associated with cyanide storage and the emergency response plan.

***T**he facility has confirmed that external entities included in the Emergency Response Plan are aware of their roles. Formal notification letters were sent on 01-Aug-2025 to the General Volunteer Fire Brigade of Peru, and to the designated medical centers (Villa El Salvador Emergency Hospital and Santa Martha del Sur Clinic), informing them of their participation in cyanide-related emergencies. Delivery receipts dated 19-Aug-2025 are on file. The IFSEC Peru S.A.C. is the secondary response emergency provider, there is an updated contract with the provider at the moment of the audit.*

The Contingency Plan PL-OP-01 and the General Emergency Plan PL-SIG-01 establish the participation of external responders during mock drills to ensure coordination with first aid brigades and other internal brigades. Records of joint exercises and communications are maintained as evidence of their involvement.

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Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.4
- ☐ not in compliance with

Finding/Deficiencies Identified:

The Contingency Plan PL-OP-01 establishes in section 3 "Notification and Communication System" that, at the scene, the warehouse manager must notify the HSEQ Head and Operations Manager. Section 4.1.2 specifies that all communications are to be coordinated with Company Management, including interaction with the Crisis Committee, the press, and national authorities.

The Emergency Plan PL-SIG-01 rev07 (03-Feb-2025), Annex A, provides a detailed communication flow: the initial witness informs the immediate supervisor, who in turn informs the brigade and prevention officer. The activated brigade, including HSEQ staff, is responsible for further notifications.

Additionally, PL-OP-01 (section 7 "Public Relations / Governmental Relations") defines the responsibilities of the liaison officer with government and communication entities. These responsibilities include:

- *Coordinating notification and reporting to applicable regulatory agencies.*
- *Serving as the main liaison with government bodies and external stakeholders.*
- *Establishing communication centers and issuing press releases.*
- *Authorizing and coordinating communication with the public, media, and government authorities.*
- *Ensuring external responders and authorities are promptly informed of any cyanide emergency.*

This structure ensures that all relevant parties—internal management, regulators, medical facilities, and external response providers—are notified promptly and appropriately during an emergency.

Emergency Response Plan PL-OP-01 rev06 from 03-Jan-2025, under the 7. Public Relations/Government Relations includes: Preparedness for response to an emergency/crisis, sequence of actions to be taken into account, which includes contact with the client and preparation of information for public communication, what to do in case of the accident, what not to do during the accident, what to say and what not to say, it also includes a communication

policy in the event of an emergency/crisis, which includes commitments to openness and information. reliable clarity of information, impartiality, proactivity, visibility, opportunity, cooperativism and prevention of disinformation.

ALPA has a written procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms.

There is a procedure for Incidents and accidents PR-SIG-09, which includes in the section of Significant Incident with cyanide the communication to the ICMI within 24 hours following its occurrence in accordance with the requirements of the ICMI.

During the last 3 years, there have been no emergencies or incidents with cyanide.

Production Practice 5.5

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.5
- ☐ not in compliance with

Finding/Deficiencies Identified:

The Contingency Plan PL-OP-01 rev06 (03-Jan-2025), under item 5.7 Dry Spill – Cleaning and Decontamination, specifies the procedure to be followed once cyanide collection is completed. Depending on the agreement with the authorities, the exposed area may be decontaminated by first applying lime, followed by a 5% hypochlorite solution to destroy residual cyanide. The area must then be rinsed with plenty of water.

The plan indicates that hypochlorite should ideally be applied using a garden-type sprinkler pump and must remain in contact with the affected area for at least 15 minutes. The procedure continues with pH measurement of the affected area to ensure it is above 11.

Additionally, the plan includes instructions for hazardous waste management, proper labeling, and disposal through a specialized company. It also requires that after each work session,

personnel remove disposable protective clothing and reinforce personal hygiene before leaving the site.

In the Emergency Response Plan PL-OP-01 rev06 from 03-Jan-2025, includes under the item 5.7 Dry Spill – cleaning and decontamination, and describes in detail the actions to be taken in the event of a dry spill in your cleanup and decontamination activities.

The Procedure for handling hazardous and non-hazardous solid waste PR-OP-32 is also considered in paragraph 2.6 management of waste contaminated with sodium cyanide.

All waste generated during sodium cyanide operations, such as boxes, bags, rags, strapping, and PPE, must be placed in containers separated from other types of waste.

This waste will remain in a designated area by the generator and will subsequently be removed by an Authorized Solid Waste Operator, which, upon completion of the service, must provide the corresponding hazardous waste manifest.

The Plan prohibit 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 reasonably be expected to enter surface water. Described under Contingency Plan PL-OP-01 under the 5.9 spill in water - cleaning and decontamination.

The warehouse operation exclusively handles cyanide in closed containers, such as Intermediate Bulk Containers (big boxes) and drums. No reagents are used, and no processing takes place; therefore, the risk of emissions is minimal relative to the quantities stored and the secure packaging used. The transfer of solid cyanide from IBC boxes to ISO tanks is a dry process and does not generate process solution waste.

The contingency plan includes the following procedure in the case of dry spill -cleaning and decontamination:
Put on your Personal Protective Equipment (PPE).
Isolate the affected area.
If the cyanide is loose, collect it with a shovel and place it inside a plastic bag or drum.
If there is a threat of rain, apply lime abundantly over the cyanide briquette spill to maintain a pH greater than 11.
If rain is imminent, cover the spilled cyanide with a tarp, plastic sheet, canvas, or any waterproof material.
Build earth dikes around the spill area to prevent rainwater from contacting the cyanide briquettes.
Wait until the rain stops and the ground dries before continuing with the collection work.

Once cyanide collection is completed, and based on a decision agreed upon with the authorities, the exposed area may be decontaminated with lime and then a 5% hypochlorite solution to destroy the residual cyanide. Rinse the area with plenty of water. An ideal way to apply the hypochlorite is with a sprinkler pump such as those used in gardens. Allow the hypochlorite to remain in contact with the affected area for at least 15 minutes.
The amount of lime and hypochlorite applied must be abundant (at least twice the stoichiometric balance).
Allow the area to dry before removing the barriers.
To ensure that the entire spill area has been detoxified, measure the pH to confirm it is above 11.

Production Practice 5.6

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.6
- ☐ not in compliance with

Finding/Deficiencies Identified:

The Document Control Procedure PR-SIG-01 rev. 15 (dated 06-Jan-2025), section 2.5.6, states that all management system documents must be reviewed at least once a year, or whenever significant changes occur in the processes described or controlled. If no changes have been made, the review date must still be updated (not applicable for formats).

In addition, the Contingency Plan for Sodium Cyanide (PL-OP-01), section 9 "Update," establishes that the Plan must be revised whenever there are substantive or formal modifications, such as changes in procedures, personnel, telephone numbers, equipment, methods, or any other element that may improve effectiveness and efficiency. The responsibility for proposing modifications lies with the involved parties, while the Company is responsible for updating and distributing the revised Plan to all relevant stakeholders..

The Contingency Plan includes drills under section 8.5, which establishes that two drills must be conducted annually (one theoretical and one practical) to evaluate the effectiveness of the Plan and correct any identified deficiencies.

As evidence, a sodium cyanide spill drill was conducted on 14-Jul-2025.

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Scenario: A spill occurred in the transfer area, where water was present near the cyanide, with the additional risk of light rain. An unconscious person was found lying on the floor (supine position), apparently contaminated with the chemical.

Participants: ALPA's hazardous materials brigade and first aid brigade.

Results: Strengths, weaknesses, and recommendations were documented for continuous improvement of the Plan.

The noted drill simulated the entire emergency response process from the initial emergency callout notification through to the close-out of the response process.

In the Contingency Plan for Sodium Cyanide (PL-OP-01) in point 9.0 includes Update. This Plan requires being updated at every opportunity that there are modifications of substance and form, in terms of procedures, people, telephone numbers, equipment, methods, or any other consideration that allows us more effectiveness and efficiency.

Those responsible for these modifications will be the parties involved and the person who must update and retransmit the Plan is The Company to all interested parties.

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