

ICMI Cyanide Code Summary Audit Report

Action Resources, Inc.

2025 Recertification Audit



Submitted to:

The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

www.mss-team.com



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Operation General Information

Name and location of Operation:	Action Resources, Inc. 5001 Underwood Rd. Pasadena, TX 77507
Contact information for this facility:	Roger Howard Safety Director Roger.Howard@actn.com

Operation Description

The Action Resources (AR) Pasadena, Texas Terminal was audited and was found to be in FULL COMPLIANCE with the ICMI Cyanide Code. Action Resources is the transportation services arm of the larger Action Enterprises company. Action Resources has been providing specialized chemical and waste transportation services throughout North America since 1995.

Action Resources has been continuously certified since 2015 and transports solid sodium cyanide briquettes loaded into ISO tanks and intermediate bulk containers (IBCs) packed into intermodal (sea) containers by Cyanco in Alvin, Texas, USA. Cyanide is transported from the Alvin cyanide production facility to the Port of Houston, local rail heads, and to an interim storage location in Houston that is contracted by Cyanco and is included in the Cyanco Cyanide Code certified North America Rail and Road Supply Chain.

AR is responsible for route determination, shipment tracking, truck inspections, preventive maintenance, training, safety program management, and emergency response planning. AR has also been a Responsible Care Partner company since 2019 with a formally audited EHS management system every three years by a third-party auditing firm.

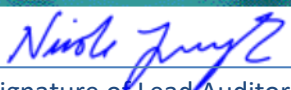
Audit Implementation and Conclusions

This recertification audit was conducted through on-site observations, reviews of records and procedures, and interviews with senior management, operations management, drivers, and dispatchers. The auditor used the ICMI *Cyanide Transportation Verification Protocol* (2021 Revision) to confirm International Cyanide Management Code (Cyanide Code) compliance.

Procedures, equipment condition and records were evaluated during this audit. The assessment was based on random samples of information and therefore deficiencies may exist which have not been identified. The depth to which records and data were sampled was typical of an environmental, health and safety (EH&S) management system audit. Legal compliance with federal, regional, and local regulations was not part of

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the scope of this evaluation.

The audit was performed by an independent third-party auditor who fulfills all ICMI Cyanide Code Lead Auditor and Technical Auditor requirements for cyanide transportation audits.

All aspects of the cyanide transportation were included in this Cyanide Code Recertification Audit. The operation was found to be in FULL COMPLIANCE with Cyanide Code Cyanide Transportation requirements.

Auditor's Finding

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

The Action Resources cyanide safety performance for the recertification period was excellent, there were no cyanide-related safety incidents, accidents, spills, or exposures.

The cyanide management practices for the Action Resources transportation operations were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol*. Action Resources internal standards, policies, practices, and procedures regarding the management of the cyanide operations were reviewed.

The auditor found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was excellent. Management systems upon which the operation is based are mature, and requested records were readily available for review. Action Resources Leadership was fully engaged throughout the recertification audit process.

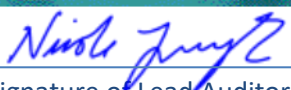
The results of this recertification audit demonstrate that the Action Resources cyanide-related transportation activities are in FULL COMPLIANCE with International Cyanide Management Code requirements.

Compliance Statement

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

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Auditor Information

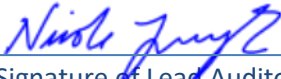
Audit Company:	MSS Code Certification Service, a division of: Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Dates of Audit:	May 13-14, 2025

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 Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the recertification audit. I further attest that the recertification 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.

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Principles and Standards of Practice - Cyanide Transportation 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.

Action Resources uses its documented procedure AR-EHSS-305 *Cyanide Transportation Procedure* to determine routes. The procedure calls for routes to be developed using mapping software, the National Hazardous Materials Route Registry, and through input from the Producers Risk Management and Logistics Managers. Routes are established on roadways that are not Hazmat restricted and that facilitate the shortest travel distance between pickup point and the destination. According to interviews, computer-recommended routes are evaluated to determine if comparable routes would be available that would reduce the risks associated with proximity to high population densities, poor road infrastructure (sharp turns), pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather and poor driving conditions. Routing considerations were found to continue to be consistent with those required by the Code.

Route evaluation records and approvals were available for all routes driven. All routes to mines, Cyanco facilities, ports, and the Cyanco interim storage were re-evaluated and re-approved in 2025. Information is printed out for drivers at the time of dispatch to ensure that route-specific considerations are available during transport. The electronic system in the trucks can also be used to communicate certain route-specific information to drivers. Routes are reviewed for risk initially and then at least every three years by the Action Resources Field Safety Leader. The routes are approved by the Director of Transportation.

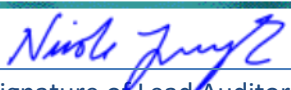
Changes to routes are made when increased risks are identified by route evaluations or driver feedback. The Cyanide Transportation Procedure includes a driver feedback process to communicate concerns with route conditions. Interviews with a sample of Action Resources Cyanide route drivers indicated that driver feedback is typically given verbally after deliveries, as necessary, and that drivers are aware of the verbal and written feedback processes.

A formal and documented Journey Management process is maintained. Approved routes were reviewed, and each route is documented including hazards and risk mitigation measures. No special safety or security concerns were identified. The Cyanide Transportation Procedure states that additional risk mitigation measures such as escort services, convoy movement or route reassignment will be considered should they arise.

Risk mitigation measures focus primarily on the avoidance of high traffic times of day. Details regarding cities that have specific hazardous material routes and exits that need to be used are included in the route assessments. This information is made available to the driver in the shipping instructions for each delivery.

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Drivers are authorized to stop driving if conditions are deemed to be unacceptable or dangerous. Dispatchers are notified immediately in such circumstances.

Community input regarding the transport of cyanide is incorporated into the route planning process using routing software that indicates whether communities have restricted use of specific roadways for the transportation of hazardous materials. Additionally, objective evidence was available that Action Resources, a Responsible Care Partner Company, actively engages with the Local Emergency Planning Committee (LEPC) in the Houston area. Community concerns and emergency planning information is shared between local stakeholders at meetings that are held periodically each year.

Action Resources (AR) does not subcontract any portion of their cyanide transportation operations. This requirement does not pertain to the organization. Action Resources does utilize Owner Operators, but these drivers transport under the Action Resources Department of Transportation (DOT) number. Owner Operators are required to have the same qualifications and training as AR drivers. Owner Operator trucks are also held to the same equipment maintenance and operational requirements as AR equipment. Owner Operators and their equipment were included in this onsite recertification audit.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.1
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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.

Action Resources uses only trained, qualified and licensed drivers. All drivers have a U.S. DOT Class A Commercial Driver's License (CDL) with a Hazardous Materials (HazMat) endorsement. The records for multiple drivers were reviewed. All licenses and HazMat endorsements were current and valid.

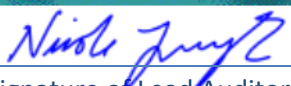
All drivers must complete training and testing prior to being allowed to move cyanide. Action Resources gives training initially and refreshes cyanide, general safety, compliance, and emergency response training annually to ensure that all personnel operating cyanide transportation equipment execute their duties in a manner that minimizes the potential for cyanide releases and exposures.

Training is provided by means of computer-based training modules, Safety Meetings, and individual training sessions when necessary. The annual training topics include Hazard Communication, hazard identification, health hazards, sign and symptoms of cyanide exposure, personal protective measures, general safety precautions, emergency actions, security concerns, recordkeeping and reporting, and other topics relevant to safe handling and transportation of sodium cyanide.

Internal training records for Action Resources personnel were reviewed and found to be acceptable. Recent improvements were made in 2025 to use a Learning Management System (LMS) to manage the

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training topics and records.

The Action Resources dispatch system blocks drivers from being assigned to loads for which they are not qualified or properly trained. A truck can also only be dispatched by the computer system if the DOT inspection is current.

Drivers were interviewed and were found to have an appropriate level of knowledge and safety awareness.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.2
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

Transportation equipment is designed by US manufacturers to meet U.S. DOT weight rating standards. Gross Vehicle Weight Rating (GVWR) is certified by the manufacturer and documented on each vehicle with a label. Equipment labels were reviewed during the audit and were found to be acceptable.

Truck inspections and preventive maintenance actions are performed regularly (120-day frequency) on Action Resources and Owner Operator equipment to ensure the adequacy of equipment to carry the specified loads. Inspections are scheduled, tracked and documented. Preventive Maintenance is tracked using a fleet maintenance system and the information uploads every night to the dispatch system. Each piece of company owned/leased equipment and owner-operator equipment is entered into a database and maintenance is scheduled according to factory recommendations or accepted industry standards. The database records the make, model, year, equipment number, date, mileage, services provided, repairs made, parts replaced, etc. The database provides daily advisory updates to the Shop Foremen regarding preventative maintenance schedules and required services including annual inspection renewals. Records show that maintenance activities are being performed as planned.

The chassis and ISO tanks are owned/leased and maintained by the shipper. Intermodal containers (sea containers) are maintained by ocean carriers and inspected prior to loading to ensure that the container is suitable for transportation. Cyanco uses a third-party, ISOChem, to maintain its transportation equipment. ISOChem is audited as part of the Cyanco North America Rail and Road Supply Chain. ISOChem and Cyanco provide Action Resources with records to demonstrate that the equipment is properly maintained.

Action Resources is responsible for verifying that the chassis is road legal prior to hauling a load. Tractors, ISO tanks, and chassis were physically evaluated during the audit and were found to be in good condition with complete DOT annual inspection records (trucks and chassis), and 120-day preventive maintenance records (for the trucks), and ISO tank inspection information and data plates for the recertification period.

Weight tolerances were confirmed through the review of records and placards on trailers and tractors.

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Loads are standard weights and do not vary significantly. Truck scale tickets are maintained and were available for review. A review of shipping records confirmed that loads have not exceeded the truck/chassis capacity ratings.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.3
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.

Cyanide containers are loaded and sealed by the Shipper. This is documented in the Cyanide Transportation Procedure and was confirmed through interviews with Action Resources personnel. The Shipper uses a checklist to confirm that the blocking and bracing has been done properly. Action Resources drivers confirm that the locking mechanisms securing the container to the trailer are properly engaged. ISO tank cyanide loads that were available for inspection were noted as being properly secured to the chassis with no deficiencies noted. Action Resources tractors are electronically governed to a speed of 68 mph to reduce the risk of shifting loads due to excessive speed.

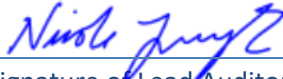
Appropriate placards are applied by the Shipper and are displayed on all four sides of the transport vehicles. Drivers visually inspect containers prior to each movement. Equipment was observed during the audit as having the proper placarding on all sides of the cargo and interviews with drivers confirmed their understanding of the process and compliance requirements.

The pre-trip inspection process is described in the company's Cyanide Transportation Procedure, Section VI. If there are any deficiencies found during the inspection, they are to be repaired prior to departure. Driver interviews confirmed this process, and they reported that pre-trip inspections are done prior to every departure/shipment. The pre-trip inspections include checking for maintenance needs and potential safety issues related to the truck (tractor, ISO tank, and/or intermodal container, and chassis. The pre-trip inspection is recorded on the electronic logging system. Records from the recertification period were sampled and were found to be complete. The pre-trip inspection process was found to be suitable and effective for identifying and resolving potential problems with the tractor, trailer, chassis, ISO tanks, and intermodal containers.

Truck inspections and preventive maintenance actions are performed regularly (at least at a 120-day frequency) to ensure the adequacy of equipment to carry the specified loads. Inspections are scheduled, tracked and documented. Each piece of company owned/leased equipment is entered into a database and maintenance is scheduled according to factory recommendations or accepted industry standards. The database records the make, model, year, equipment number, date, mileage, services provided, repairs made, parts replaced, etc. The system provides regular advisory updates to the Shop Foremen regarding preventive maintenance schedules and required services including annual inspection renewals. Preventive

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Maintenance is tracked using fleet maintenance software and the information is uploaded every night to the cloud-based dispatch system. Only equipment with up-to-date inspections and maintenance can be dispatched. Records from trucks and chassis used during the recertification period were sampled. Records were complete and showed that maintenance activities are being performed as planned for AR and owner-operator equipment.

Action Resources enforces limitations on drivers' hours in accordance with U.S. Federal Motor Carrier Safety Regulations (FMCSR). Current limits: 11-hour driving rule, 14-on duty, 70 hours combined driving and on duty per 8 days. 30 minutes after 8 hours of driving. Drivers are informed of legal requirements and are encouraged to stop driving if they become too tired (empowerment). Electronic on-board recorders are used on each trip and drivers are monitored on a continuous basis to ensure compliance with regulations. Dispatchers and Safety personnel monitor this information daily. This was confirmed through interviews and a demonstration of capability during the audit.

Cyanide containers are loaded and sealed by the Shipper. The Shipper uses a checklist to confirm that the blocking and bracing has been done properly. Action Resources drivers confirm that the locking mechanisms securing the container to the trailer are properly engaged. Action Resources tractors are electronically governed to a speed of 68 mph to reduce the risk of shifting loads due to excessive speed.

The Cyanide Transportation Procedure details how transportation routes can be modified or suspended when weather or other conditions make it unsafe to continue a trip. Onboard communication systems in all tractors provide a mechanism for alerting drivers and communication of alteration of pre-planned activities. Additionally, drivers are empowered and directed to pull over whenever weather, fatigue or other conditions make it unsafe to continue the trip. In such instances the driver is to contact the dispatcher. This process was confirmed through interviews with Action Resources personnel.

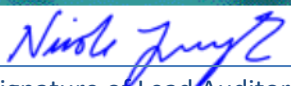
A drug and alcohol abuse prevention program is in place and is managed by a third-party provider. In accordance with United States (U.S.) Department of Transportation (DOT) regulations, Action Resources maintains a Drug and Alcohol Abuse prevention program. The program includes pre-employment, post-accident, post-incident, reasonable suspicion, and random testing elements applicable to the driver pool as well as office and administrative personnel. The policy is documented, and all employees are subject to termination if the zero-tolerance policy is not upheld.

Records were available and were reviewed to confirm that all Cyanide Code safety program requirements were fulfilled during the recertification period and that the safety program continues to be effective.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.4
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.

Action Resources does not transport sodium cyanide by sea; however, cyanide is delivered to the Port of Houston that is intended for ocean transport. Appropriate placards applied by the Shipper are displayed on all four sides of the transport vehicles. Drivers visually inspect containers prior to each movement. Equipment was observed during the audit as having the proper placarding on all sides of the trailers and interviews with drivers confirmed their understanding and actions. The Shipper is responsible for ocean transport. This is audited during the Ocean Supply chain audit of the Shipper (Cyanco).

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.5
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.

Tracking and security company processes and requirements are detailed in Section VII of the Actions Resources Cyanide Transportation Procedure. Dispatchers maintain contact with drivers and are kept updated as to the location of the trucks. Each truck is equipped with GPS tracking, satellite communications, and an Electronic Logging Device (ELD). The drivers also have cell phones. Action Resources uses GPS, satellite systems, and cell phones to ensure that trucks are continuously tracked. Interviews with drivers, dispatchers, and management personnel confirmed these practices.

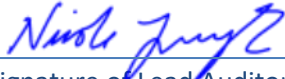
Equipment used by the drivers includes cell phones and satellite system units. Communications equipment is part of the precheck inspection process. The equipment is in constant use each day. Problems with the equipment would become readily apparent. If a communication unit fails, electronic error messages are automatically sent to the computer monitors of dispatch and operations personnel and sets are repaired as soon as they are returned to the terminal. Drivers are responsible for equipment checks and reporting issues. Interviews confirmed drivers understand this process.

Interviews were used to confirm that there are no blackout areas along the selected routes.

Transport containers are loaded with solid Sodium Cyanide and sealed by the Shipper and are not opened by Action Resources. The seal numbers and weight of the shipment are noted in shipping documents and confirmed at the point of transfer of custody. Shipping records are scanned and retained by Action Resources. Shipping paperwork from the recertification period was sampled and confirmation was made that Code requirements were consistently met, including chain of custody requirements. Mine customers sign the Bills of Lading upon delivery and in-gate tickets from port and rail deliveries are retained and scanned into the final record package for each delivery. Records from multiple shipments were sampled

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and were found to be complete.

Drivers have shipping documentation (including the Bill of Lading) with them throughout transport. Bills of Lading were reviewed. Information regarding the type of material transported the type of container, the number of packages, and the weight of the shipment were found to have been entered consistently onto the Bill of Lading by the Shipper. Drivers also have the sodium cyanide Safety Data Sheet (SDS) and Emergency Response Guidebook with them during transport. Each driver is issued a Cyanide Driver Book that is controlled and updated by the safety team in the main office. The books contain the approved delivery routes, cyanide procedures, emergency response information, and SDSs. The SDSs are for Cyanco Sodium Cyanide, Bricks and Sodium Cyanide Solution. These were confirmed to be the current revisions of the Cyanco SDSs. The Sodium Solution (UN 3414) SDS is necessary for when the ISO tanks are returned with a heel of solution after the product has been consumed at the mine. This practice was confirmed through driver interviews and a review of the information kept in the trucks utilized by the drivers.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.6
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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.

Action Resources does not provide interim storage for sodium cyanide. This requirement does not apply to the organization

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 2.1
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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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.

Action Resources continues to maintain a documented Cyanide Contingency Plan AR-EHSS-101 for transportation accidents. The Plan last underwent a full review in April 2025 and was updated again in June 2025 following this audit and another emergency response drill. Action Resources drivers are to move to a safe location (300 feet upwind of any spilled cyanide), secure the scene, and make notifications.

Action Resources only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging. Solid sodium cyanide (the only physical form transported as full loads), “empty” ISO tanks that have only a small heel of product left in them, roadway infrastructure differences, the type of transport container (ISO tank or intermodal container), and the roles of the different emergency responders are discussed in the planning information.

The plan was found to be appropriate for the company and the type of cyanide shipments made by Action Resources. Drivers are not trained in spill cleanup and do not have the personal protective equipment (PPE) for this type of activity. Action Resources maintains an account with an emergency response company for any cleanup and/or emergency response activities.

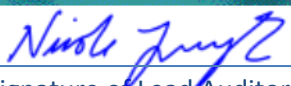
The AR Contingency Plan details the response actions for each person involved in managing a transportation emergency. The driver secures the scene, and notifies 911, Chemtrec, and the Action Resources Terminal Manager. The Manager who receives the call assumes ownership of the incident on behalf of Action Resources and makes any notifications that have not yet been made (e.g., shipper, emergency responders, authorities, etc.). The list of required notifications include those required by U.S. regulations and ICMI. The emergency responder is activated to clean up any spilled material and remediate the area in collaboration with Cyanco cyanide experts and the authorities.

The Action Resources Contingency Plan and Cyanide Transportation Procedure detail the roles of external responders (fire, police, ambulance), remediation responders, and hospitals.

The plan defines the roles of the emergency response company, authorities, and the Shipper. Records were available to show that Action Resources has been communicating with its emergency responder regarding its role in emergency response. The emergency response contractor also participated in the emergency response drill with AR in April 2025. AR participates actively with the Local Emergency Planning Committee (LEPC) in the Houston / Pasadena area. Medical response personnel from area hospitals also participate in the LEPC. Additionally, interviews were used to confirm that the Shipper has contacted medical facilities in the area and confirmed capability to treat patients for cyanide exposure in the event of an incident.

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The operation is:

- ☒ In full compliance with
☐ In substantial compliance with
☐ Not in compliance with

Standard of Practice 3.1

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

Training on the Cyanide Contingency Plan, including implementation of the plan, was given to drivers, dispatchers, and other relevant office personnel initially and then at least annually thereafter. Records from a Safety Stand Down meeting were available and found to be acceptable. Action Resources personnel were interviewed, and awareness of emergency procedures and documentation was confirmed. There are quarterly safety meetings, and the general topics include emergency response. Attendance is mandatory. Records were available to demonstrate that this practice has been maintained throughout the recertification period.

Action Resources drivers are to secure the scene and make notifications. Detailed emergency responsibilities of AR office and managerial staff and of Ambibar (emergency responder) are included in the Contingency Plan. The information found in the Cyanide Contingency Plan, last revised in 2025, was reviewed and found to be acceptable.

Section VI of the Cyanide Contingency Plan has the list of emergency equipment that is to be maintained on the truck and inspected during the pre-trip inspection process. The equipment includes gloves, safety glasses, hard-hats, protective clothing, respirators, absorbent pads or booms, DOT Emergency Response Guidebook, ABC fire extinguisher, and emergency reflective triangles. Drivers were interviewed and confirmation was made that a check of the emergency response equipment is part of the pre-trip inspection process. This is done to ensure availability of the equipment if there is an emergency. The emergency response equipment was checked during the audit and was found to be complete.

Action Resources subcontracts emergency response to an emergency response and remediation contractor. Correspondence with the AR corporate group and with the contractor confirmed the service provider's readiness to assist and the contractual relationship AR has with its service provider. The role of the contractor is clearly defined in the AR Cyanide Contingency Plan. The Plan was communicated to emergency response personnel and the emergency contractor participated in the April 2025 emergency response drill.

The operation is:

- ☒ In full compliance with
☐ In substantial compliance with
☐ Not in compliance with

Standard of Practice 3.2

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Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

The AR emergency procedures include telephone numbers for contacting the cyanide producer (Cyanco), regulatory agencies, Ambibar (external response provider), 911, Chemtrec, and medical facilities in regional areas along the designated routes in the United States and in Canada. The telephone information for the customer is on the shipping paperwork and is available, as necessary. Potentially affected communities would be notified through the robust 911 emergency services network and reverse calling systems that exist in the extensive chemical industrial area in the Pasadena / Houston region where these shipments occur. Telephone numbers reviewed during the audit were found to be up-to-date and recently reviewed.

The external emergency notification and reporting procedures, including telephone numbers, are reviewed at least annually, and as necessary. Information, including external emergency notification numbers, was up-to-date and complete. The AR Manager who is notified of an incident is the "Emergency Coordinator" and is responsible for making all necessary emergency notifications. This is detailed in the Responsibilities Section of the Cyanide Contingency Plan, last updated in 2025.

Section XI of the AR Cyanide Transportation Procedure details a procedure for notifying ICMI if there is a Significant Cyanide Incident, as per ICMI definitions. In the event of a significant cyanide incident, the Senior Director of Safety will notify ICMI within 24 hours of the incident. There were no significant cyanide incidents (spills or exposures) during the recertification period.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 3.3
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

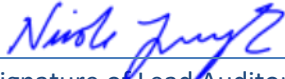
Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

Action Resources has contracted hazardous materials experts to remediate a spill and to dispose of contaminated solids. Requirements for contacting and coordinating cleanup with the contracted company are documented in the Action Resources Cyanide Contingency Plan. The auditor confirmed that the hazardous materials cleanup contractor is contracted for spill response through December 2026. This was found to be acceptable by the auditor. An Action Resources Emergency Coordinator is notified of any emergency via a dedicated phone line and is responsible for coordinating response efforts, maintaining communications with the driver, responders, and the Shipper until the incident has been mitigated.

Action Resources procedures detail the company's role in an emergency. Section IV of the Action Resources Cyanide Contingency Plan contains a prohibition against the use of sodium hypochlorite, ferrous

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sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. Interviews with Action Resources personnel confirmed awareness of the hazards of using de-contamination chemicals in surface waters. Records from correspondence with the emergency response / remediation contractor confirmed their awareness and understanding of this requirement.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 3.4
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

The emergency procedures are reviewed at least annually and after emergency response drills. The plan was last fully reviewed in 2025. Information was found to be up-to-date and complete during the audit.

Action Resources conducts mock emergency drills each year when there is not an actual deployment of the emergency plans to confirm that response procedures continue to be adequate, equipment appropriate, and personnel properly trained. A cross-organizational emergency drill was conducted in April 2025. Drill participants included personnel from Action Resources, Cyanco (Shipper), and the emergency response contractor. The drill together with emergency response personnel was especially useful to ensure that the external responder was trained on the AR Contingency Plan and that all parties are aligned. Another drill with all drivers was performed following the audit (June 2025) to ensure that each driver had the opportunity to practice emergency response actions.

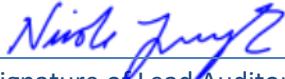
Both drills tested the emergency response plan with a focus on realistic environmental release scenarios. Action resources transports solid sodium cyanide in intermodal containers and in ISO tanks to ports, rail heads, and interim storage. The drills of the driver and office staff responsibilities (keep people away from the accident scene, cooperate with local authorities from a safe distance, and make notifications) did not include the unlikely scenario that a driver would need to be decontaminated. The auditor accepted the scenarios as appropriate for the operation.

After Action Reports from minor non-cyanide incidents in 2022, 2023, and 2024 were available for review. The events were also used to review the adequacy of the emergency response plans. Records showed that the emergency plans were carefully reviewed and updated, as necessary following actual deployment of the Contingency Plan. Although these incidents were not "planned drills" they were accepted by the auditor in lieu of drills because the events and resulting emergency actions were appropriately investigated and reviewed. Moving forward, the Safety Director will be scheduling annual emergency response drills in addition to performing After Action reviews following any incidents.

The last full review of the plan was conducted in 2025. Revisions to the plan were most recently made following the recertification audit in June 2025. No changes to the plan were necessary following the last

Action Resources, Inc.

Name of Operation


Signature of Lead Auditor

September 26, 2025

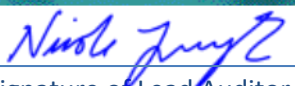
Date

emergency drill.

The records from the recertification period were reviewed and found to be acceptable by the auditor.

The operation is:	<input checked="" type="checkbox"/>	In full compliance with	Standard of Practice 3.5
	<input type="checkbox"/>	In substantial compliance with	
	<input type="checkbox"/>	Not in compliance with	

Action Resources, Inc.
Name of Operation


Signature of Lead Auditor

September 26, 2025
Date