

***Beagle Shipping S.A.***  
***Summary Audit Report***  
***for the***  
***International Cyanide***  
***Management Institute***  
  
***January 2024***

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## Operation General Information

Name of Transport Operation: Beagle Shipping S.A..  
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Name of Facility Operator: Beagle Shipping S.A.  
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## Operation Location Detail and Description

Beagle Shipping S.A. (Beagle) is a company based in Lima, Peru, which provides transportation services with a fleet of 150 units for heavy cargo and oversized cargo controlled under GPS system (Global Positioning System) and 24/7 monitoring control. The Beagle cargo tracking system offers access to queries on the status of its shipments through its Beagle Net platform, including incidents reported by drivers in real time. The Company provides general door-to-door logistics services, from the collection of merchandise to its delivery at the destination indicated by the client.

In addition to transport at the national level, Beagle has ATIT (Agreement on International Land Transport) – Mercosur (Southern Common Market) authorization; it also has authorization for IMO (International Maritime Organization) dangerous cargoes, IQBF cargo (Chemical Inputs and Controlled Goods), sodium cyanide, ethanol and methanol.

Beagle was first certified in the International Cyanide Management Code (Cyanide Code) en 2017 and recertified in 2020. The scope of this recertification audit is the solid sodium cyanide transport operation between Callao Port to warehouses and to mining clients

Beagle is also certified in the International Organization for Standardization (ISO) 45001 standard - Occupational Health and Safety Management System, ISO 14001 - Environmental Management System, ISO 9001 - Quality Management System, ISO 37001 - Anti-Bribery Management System,

ISO 28000 - Supply Chain Security Management System, BASC - Safety Management System and Operations Control, and the national certification AEO - Authorized Economic Operator.

Beagle transported sodium cyanide between Port of Callao and Lurín district, located 25 km to the south, in Lima’s metropolitan area. Cyanide is transported by truck in 20-foot maritime containers. Around 20 tons (t) of sodium cyanide is placed in the container in 1-ton Intermediate Bulk Containers (IBC) placed in a way to prevent lateral movement within the container. Containers are received and delivered locked and tagged. No container is opened.

### Auditor’s Finding

This operation is

- |                  |   |   |
|------------------|---|---|
| The operation is | <input checked="" type="checkbox"/> in full compliance with<br><input type="checkbox"/> in substantial compliance with<br><input type="checkbox"/> not in compliance with | with the International Cyanide Management Code. |
|------------------|---|---|

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

### Auditor Information

Audit Company:	BP Cyanide Auditors S.A.C.
Lead Auditor and Transport	Bruno Pizzorni <a href="mailto:bpizzorni@cyanideauditor.com">bpizzorni@cyanideauditor.com</a>
Technical Auditor:	
Dates of Audit:	September 12 and 13, 2023

### Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management



Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

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



## Transport Verification Protocol

### Principle 1 | Transport

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

#### Transport Practice 1.1

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

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

Beagle has developed and implemented the procedure PR TRP 10 Road Risk Management V05 updated to August 2023, which covers all the cyanide transport process from route assessment cyanide loading and download and verification of effectiveness of security controls. The routes assessment is performed on an annual basis.

The auditor reviewed route evaluations made from the Port of Callao and Contrans warehouse to Almacenera Pacífico, in Lurín, Lima, a two hours' drive. The assessments include allowed hours for transport, police controls, check points, bridges, proximity to water bodies, road slopes and condition, population density and foggy areas, among others. In many cases, the routes evaluated and selected are limited by the availability of alternatives, jurisdictional designations and required routes for transport of dangerous goods. The auditor took these restrictions into account, determining the transporter's process effectively addresses this Transport Practice requirement.

In the route assessment process, Beagle uses a risk matrix to establish control measures based on each identified risk. The auditor reviewed examples of the measures taken, through the annotations made in the risk matrices for the route from Callao to Lurín, covering this recertification period.

The transporter procedure P-TRP 14 Sodium Cyanide Transport v4 requires an evaluation of the selected route to determine if extra precautions are necessary at points along the route. By mean of the route risks evaluation format, they collect field information, interview people, measure the width of the roads, including risks and control measures. Areas posing increased risks including areas prone to theft and social disturbances have been identified and are subject to additional control measures, such as communications with the monitoring and controlling personnel at the company

headquarters, before entering these areas, establishing preplanned alternative routes. Safety measures are documented for driver training.

The auditor reviewed the transporter procedure confirming that the risks of selected routes are evaluated, necessary extra precautions are documented, and drivers receive appropriate training.

Beagle carries out annual evaluations for its routes, in addition to having constant feedback on the route through the drivers and transport operation supervisors WhatsApp group.

Beagle's head of transport plans the activities to identify hazards on transport routes, through roadmaps which is the evidence of the follow-up during the trip. The auditor reviewed monitoring operations from these certification period verifying that a convoy comprised of 6 trucks was monitored leaving Contrans warehouse at Callao towards Almacenera El Pacifico (ALPA) in Lurín. Safe work observations such as traffic, estimated departure time and actual arrival time are noted in the document. Call points of the operation were made on four occasions leaving Contrans warehouse: at the road avoidance toll, the Panamericana Sur toll, the client's parking lot arrival and at the warehouse entrance.

The auditor reviewed recent route reevaluations and by interview with drivers and management personnel confirmed that feedback about driving conditions is communicated. Special conditions noted by customers are noted and communicated to all drivers assigned to the route.

The transporter documents the measures taken to address risks identified with the selected routes in the roadmaps reviewed, in the route risk matrix, company policies, Standard Operation Procedures (SOP) and Emergency Response Plan (ERP). These documents are available in writing both for driver training and as a reference. Features such as sharp turns, safety issues and high population density are addressed with special precautions. These control measures have been assigned to specific sectors of the road identified by kilometer markings. These controls include speed reduction, experienced drivers only, escorts, specialized training, among others.

For example, in the risk matrix it is indicated to decrease speed to 4 km / h before bridges, training on defensive driving, fatigue, drowsiness, and policy on cell phone use are described as a control. Among the company policies is that it is strictly forbidden to use cellular or radio devices without the hands-free system or send Short Message/Messaging Service (SMS) text messaging while driving. To answer a call, it is recommended to stop the vehicle in a safe place. Similarly, in the Contingency Plan for supply chain activities, there is a list of risks identified during transport, including situations during loading and unloading and indicating the necessary control measures.

Precautions are taken along the road although being a short section of transfer in these cases.

The auditor reviewed the transporter documentation addressing management of risks along the selected routes.

In Beagle's actual cyanide transport routes it is coordinated with the customer, there are no restrictions for dangerous loads on the route. The carrier evaluates the route to be taken, which has been previously reviewed with the customer and according to local regulations. During this recertification period Beagle transported sodium cyanide between Port of Callao and Lurín district, located 25 km to the south, in Lima's metropolitan area. In case Beagle has to transport cyanide to a mine site, they will communicate with communities in the influence area of the mine operation site to seek input, in coordination with the mine operation.

Beagle use convoys with a pickup truck escort to transport cyanide for security concerns. Beagle's procedure Sodium Cyanide Transport, states the convoy modality will be at one escort van for every five transport units or fraction for domestic travel. The convoy may include one or more vehicles as an escort at the request of the transport the client. The convoy is accompanied by a pickup truck with an escort supervisor equipped for first aids, equipment and material to contain and collect cyanide spills.

In addition, the transporter has GPS on each vehicle, and a 24/7 monitoring center all year round. Beagle has implemented administrative controls for the route due to safety (robbery) concerns. Before departing, the convoy leader communicates its departure to Beagle's headquarters and to the client. Follow up of the cyanide shipment is closely made with GPS and constant cellphone communications by both companies to its respective control centers.

By interview to management personnel, the auditor confirmed that cyanide transport operations are closely followed up since its departure from Callao until its arrival to ALPA warehouse in Lurín.

Beagle performs all the cyanide transport operations with its own trucks and drivers. The company do not subcontract any of the cyanide handling or transport.





## 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.*

The operation is

- in full compliance with
- in substantial compliance with
- not in compliance with

Transport Practice 1.2

Beagle only use trained, qualified and livened drivers to operate its transport vehicles. Beagle do not manipulate the cyanide sea containers as they are loaded and unloaded by thirds. There is a driver's job profile requiring A3B or A3C License + A4 special driving license for the transport of dangerous goods. In an Excel worksheet, the operations area keeps track of the validity of these documents, as well as Human Resources controls contracts and training. The Head of Maintenance is a driving instructor and examines the drivers' driving. Volvo trucks brand also trains the drivers with the new vehicles.

Beagle demonstrated that personnel operating its cyanide transport vehicles have been properly trained and have a specific license to operate with hazardous materials and the trucks with platforms for containers. The auditor reviewed the transporter's documentation verifying that its drivers are properly trained and licensed.

The Operations Supervisor directly trains all personnel in the procedure of transporting sodium cyanide including procedures for loading and off-loading their trucks – although the operation does not manipulate the maritime shipping containers – and in cyanide-specific training, among others as defensive driving. The auditor reviewed the trainings conducted during the three-year period corresponding to this certification audit, where around 40 drivers are periodically trained in the cyanide transportation procedure and the Emergency Response Plan (ERP). In addition, it is mandatory by the local jurisdiction that drivers have to receive refresher training to maintain the validity of their professional driving license for hazardous materials.

The auditor reviewed the records of attendance at the trainings and comprehension test at the end of each training. Training records are kept by the Human resources area in each driver's file. The auditor interviewed the drivers verifying that they have received the specified training.



Beagle performs all cyanide transport operations with its own trucks and drivers. The company does not subcontract any of the cyanide handling or transport.

### Transport Practice 1.3

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

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

Beagle uses Volvo FH 6X4, 400 to 540 horse power transport vehicles with towing capacity up to 80 tons, which is enough to tow the shipping container with 20 tons of cyanide plus the trailer. The trailer platforms are manufactured in Caisa, Sermet, Fameli, Random, all recognized manufacturers which grant quality certificates for their trailers. The auditor reviewed the technical specifications of the trailer manufacturers, as well as that of the tractors. In addition, reviewed examples of vehicle ownership cards where the load capacity is indicated, reviewed the circulation card and the mandatory technical review update.

Beagle has developed and implemented a preventive maintenance program for all his transport vehicles which is tracked through an Excel spreadsheet, which provide information about next maintenance date based on the kilometers traveled or the time established for each maintenance. Vehicles are inspected by the driver prior to departure. Any concerns are addressed prior to the vehicle being permitted to depart. Records of these inspections are documented on pre-use check lists. Records were available for the past three years and showed completion of a vehicle inspection checklist and sign-off by the driver.

Fleet specification files were available for review during the audit. The tractors and trailers were found to be capable of carrying the loads for which they were being used. Tractor and loaded trailer weights are carefully monitored to ensure that trucks are not overweight. The transporter has formal preventive maintenance program to ensure that its tractors and trailers are safe for transport.



Beagle performs a pre-use vehicle check list, there is preventive maintenance that is carried out in the supplier's workshops. All vehicles undergo a technical inspection every 6 months for hazardous loads.

The procedure for cyanide transport includes procedures to verify the adequacy of the equipment for the load it must bear. On reception of the service requirement, the transporter review among others, the type of merchandise, load and quantity of containers to ensure the vehicle adequacy. With this information assigns the transport unit and the driver that would comply with the service requirement.

Beagle manages standard amounts of cyanide in 20 feet ocean containers with known weights that load into its transporter's trailers. The cyanide transport procedure includes load instructions, loading diagrams and inspection forms to ensure the load is correctly transported. The transporter trains its operators to inspect the trailers prior to loading.

The procedure for sodium cyanide transportation establishes the safety measures to prevent overloading of the transport vehicle. Beagle has established that each platform will load only one cyanide container and that each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklist and was confirmed during the interviews.

The load made by the port operator is weighed to confirm the weight of the shipment. The loads being hauled are standard loads that do not vary in weight. Records of cyanide shipments were checked against weight capacities and weight limit regulatory information. The equipment used was capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported.

#### Transport Practice 1.4

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

The operation is  in full compliance with  
 in substantial compliance with  
 not in compliance with

Transport Practice 1.4

Beagle's procedure for sodium cyanide transportation states that on receipt of the cargo, to perform

verification of seal numbers in the container doors, to perform visual verification of integrity and conservation status of containers, verification of correct attachment point fastening on semi-trailer platform, to visual verification of security labeling of maritime container, truck and semi-trailer.

Beagle receives cyanide as solid briquettes transported in polypropylene supersacks enclosed in polyethylene lined 1,000 kg plywood Intermediate Bulk Containers (IBCs) packed in sealed 20-foot shipping containers. For security purposes and to maintain integrity of the packaging the shipping containers remain sealed. The seals are checked at the following designated points during transportation: on cargo receipt, at the start of transport and on arrival.

During transport the containers are secured to the trailer bed using locking clamp mechanisms that are part of the trailer. The clamps are located at fixed positions on the trailer so that the container is balanced during transport.

Beagle performs pre-trip inspections to ensure that trailers are locked and secured and that placards are on all four sides of the trailers. Normal safe driving procedures and unloading procedures ensure that the truck and the trailer are not damaged during transit. Per the interviewed personnel, the load is not removed from the container during the transport operation.

Beagle performs pre-trip inspections to ensure, among others, that those placards identifying the shipment as cyanide are on all four sides of the containers as required by the Peruvian jurisdiction through which it will pass. Each cyanide container is labelled to meet International Maritime Dangerous Goods (IMDG) Code labelling requirements. This labelling is posted on each side of the container and includes identification of solid sodium cyanide by United Nations (UN) number (1689) and the skull and crossbones marker used for Class 6.1 toxic substances, along with the Marine Pollutant marker.

Drivers conduct pre-trip vehicle safety checks prior to departure of the truck. These checks include confirmation that the cyanide placarding is displayed on all four sides of the vehicle. The auditor inspected the placards and signages used to identify the presence of cyanide on the shipment verifying compliance with this provision.

Beagle has implemented a safety program for cyanide transport that includes:

- a) Prior to truck departure, an inspection sheet is completed and signed by the driver prior to the vehicle leaving its base. Prior to departure of a convoy, the driver and the convoy leader conduct a pre-trip inspection of the vehicle and both sign that the truck is in good operating

condition. Any issues that could affect safety or the operation of the vehicle are resolved prior to departure.

- b) Beagle has developed and implemented a preventive maintenance program for all his transport vehicles. This maintenance program is tracked through an Excel spreadsheet, which provide information about next maintenance date based on the kilometers traveled or the time established for each maintenance, whichever comes first, according to the truck manufacturer specifications. The system is fed by the vehicle pre-use inspections, where vehicle mileage is recorded and any needed corrective action is registered, including drivers' feedback. Preventive maintenance is performed at the authorized brand workshop.

In the daily pre-use checklist of the vehicle, the mileage traveled is recorded and every 10 days the information is collected and the time needed for the next maintenance is calculated at 15,000 km and or 6 months. Beagle coordinates with the truck vendor Volvo for maintenance and to have the units available. The Head of Maintenance authorizes the use of the vehicle, there are units on standby to replace the vehicles in maintenance, if necessary. The fleet of trucks registered for the transport of hazardous materials is made up of about 40 trucks.

The auditor reviewed the maintenance plan which also includes the trailers. The detail of the work to be done appears in the respective work order.

- c) The procedure for cyanide transportation states that drivers are contractually limited to an "on-duty" workday to 12 hours, as also required by the local jurisdiction. The procedure address that the Transport Chief will assign the drivers for cyanide transport according to the hours of rest of the drivers. The entrance of the drivers to service and their exit is controlled manually, by means of their signatures in the guardhouse of the Beagle headquarters. In occasion of the audit, cyanide transportation was being performed in local routes, demanding around 2 hours to move the cargo between origin and destiny.
- d) Beagle procedures calls for the securing of the containers to the trailer bed using the clamping mechanisms that are part of the trailer itself and also with chains, for sodium cyanide transport operation. The integrity of the clamping mechanism and the attachment point on the container is checked during a pre-trip inspection prior to the departure of the truck or the cyanide convoy to destination. Correct clamping between semitrailer and sea container is checked by the driver once at the truck scale. Once out of the dispatch location



and before departure, containers are lashed with chains 3/8 "thick by 6 meters long. Interviews with drivers confirmed this procedure.

- e) Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are established in the cyanide transport procedure. Beagle Safety Coordinator and convoy leaders are responsible for evaluating weather and road conditions and determining what actions should be taken. Convoy Leaders are senior personnel, experienced with weather and road conditions, and adept at making decisions regarding the need to suspend a shipment or to modify any convoy plans. In addition to weather forecasts, regular reports are received from the Monitoring Central, including cases of civil unrest.
- f) Before each trip, Beagle drivers must undergo alcohol testing and periodically disclose evidence of drug use and a daily report of the tests carried out is generated for the managers. Violation of this policy will result in the separation of the worker from the organization. Beagle maintains drug and alcohol abuse prevention policies, which were reviewed during the audit, as well of examples of daily alcohol tests. In addition, the transporter has a preventive program on alcohol and drug abuse managed by an external entity, where specialists in the field give talks to drivers regularly. Interviews with Beagles driver and guards confirmed the realization of daily alcohol tests to all personnel.
- g) Records documenting all the above are maintained in hard copy and in electronic versions at the transporter's office.

### Transport Practice 1.5

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

The operation is

<input checked="" type="checkbox"/>	in full compliance with	
<input type="checkbox"/>	in substantial compliance with	Transport Practice 1.5
<input type="checkbox"/>	not in compliance with	

Beagle does not ship cyanide by sea or by air. This section of the International Cyanide Management Code (ICMC) Transport Verification Protocol does not apply to the operation.

### Transport Practice 1.6

#### *Track cyanide shipments to prevent losses during transport.*

The operation is  in full compliance with Transport Practice 1.6  
 in substantial compliance with  
 not in compliance with

All truck drivers and personnel involved in the cyanide transport operation are provided with cell phones with data for internet access, a WhatsApp distribution list and an Emergency Contact List to communicate between them, with the transport company, the cyanide consignor, distributor and with emergency responders. The communication group via WhatsApp application aloud to inform them any novelty or alert in the transport operation.

All trucks are equipped with GPS that allows Beagle to track their units at all times at the port during loading operations, on route and on arrival to the warehouse or any other final destination of the cargo. When a cyanide cargo is on road, the client receives periodically emails about the cargo location. The auditor reviewed the trucks for communications equipment and interviewed the drivers, confirming this information.

Beagle’s GPS are maintained by Comsatel, the GPS service provider, in coordination with the Transport Area for trucks availability. Before departure, it is required the driver to test the correct operation of the GPS’s panic button. Beagle’s operators from the vehicles tracking center, called the Control Tower, will report any difficulties to Comsatel. The auditor reviewed email communications between the Control Tower and Comsatel, copying communications Beagle’s to Maintenance and Transport areas, as well as an Excel spreadsheet where they track the GPS operation state.

Beagle’s communication system is part of the vehicle pre-use inspection and is maintained along with the formal preventive maintenance program. The system is used each day and correct operation of the system is confirmed at that time.

Communication blackout areas along the transport routes have been checked during routs risk



assessments performed by Beagle convoy leaders. During this recertification period, sodium cyanide transport operation was performed in areas all covered by communications.

Beagle trucks are continuously monitored along the route in real time, by means of the system called Beaglenet, and any delay will be immediately noticed at the Control Tower. Communications with the base are performed upon dispatch, upon arrival at the customer sites, and after unloading is complete. The Control Tower operator, responsible for tracking cyanide shipment status in Beagle, was interviewed, the GPS system was demonstrated, and logs showing that shipment status, other than cyanide, was being recorded were reviewed and were found to be complete. Beagle procedure for tracking of shipment status was reviewed during the audit and found to follow current practices.

Beagle implements inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. A waybill accompanies the cargo for transportation which includes chain of custody data such as container numbers, the amount of cyanide delivered, waybill number, shipping documentation, Safety Data Sheets (SDS), packing list, bill of lading, customs declarations and producer invoice, among others. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The amount of cyanide delivered is carefully monitored by the driver and remotely through Beagle's office.

The auditor reviewed the documentation completed during the course of several shipments and through interviews with Beagle's supervisors. Shipping paperwork was found to be conformant to the Code requirements.

All shipments of cyanide are accompanied by shipping papers identifying the amount of cyanide in the load and by Safety Data Sheets describing the necessary precautions for handling of cyanide. The transporter's procedures for cyanide transportation require that this information be available during transport. The auditor reviewed the transporter's procedure requiring that this information accompany each cyanide shipment and verified the implementation by interviewing operators and observing this documentation. The bills of lading and shipping papers reviewed clearly indicate the number of packages and amount of cyanide transported.



### Principle 2 | Interim Storage

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

#### Transport Practice 2.1

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

- The operation is
- in full compliance with
  - in substantial compliance with
  - not in compliance with
- Transport Practice 2.1

Beagle does not operate cyanide trans-shipping depots or interim storage sites in its transport operation. If a delivery is interrupted, loaded cyanide trucks would be stored in a secure location. This Transport Practice does not apply to the operation.

### Principle 3 | Emergency Response

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

#### Transport Practice 3.1

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

- The operation is
- in full compliance with
  - in substantial compliance with
  - not in compliance with
- Transport Practice 3.1

Beagle has a written plan for responding to emergencies that may occur during its cyanide transport activities. The Emergency Response Plan (ERP) PL MCS 09 Sodium Cyanide Contingency Plan dated August 2023. The Plan includes responsibilities, communication procedures, and notification

numbers for emergency responders and actions to take against cyanide emergency scenarios, among others.

The ERP involves Beagle's convoy personnel in using its capabilities, training, equipment and resources to manage first response to accidents involving release of sodium cyanide briquettes and first aids in case of cyanide exposure to persons. The ERP includes contact information to notify local authorities, outside emergency response providers, and company operations and safety management.

Beagle's Emergency Response Plan is appropriate as:

- a) The ERP reflects the issues presented by the particular transport route, the method of transport, the transport facilities and equipment. The Plan states what actions are to be taken in the event of a cyanide incident during transit. The document was found to be appropriate for the sodium cyanide transport operations. Emergency scenarios have been identified as result of the route assessment evaluation and emergency response actions have been addressed.
- b) The ERP considers the physical and chemical form of the sodium cyanide, with detailed explanation of its characteristics and toxicity based on the safety data sheet (SDS). Emergency response procedures address actions to be taken in response to this type of sodium cyanide spills. The SDS for solid sodium cyanide is readily available in the convoy to ensure that chemical-specific information is readily available at all times. The emergency scenarios consider the solid state of cyanide.
- c) Beagle's ERP considers the trucking transport to the final destination. The emergency response actions in the emergency plan are appropriate for this type of product and method of transportation. The document provides information regarding the packaging and transportation characteristics of the product, the container, trailer and truck tractor. All emergency scenarios developed are related to ground transportation.
- d) Beagle's ERP considers the different transport road infrastructure including conditions of the roads in highway, urban area and secondary roads. The ERP considers port, existing water courses and bridges conditions among others applicable to its transport routes. It addresses the emergency response to events that could occur in relation to these risks and hazards.



- e) Beagle's ERP considers the trucks and trailers design, including a detailed description of the vehicle. The document defines the appropriate trucks and chassis to use to transport cyanide. It states that must follow local regulation and that trailers must be of conventional type or of the low bed type. The procedure indicates cyanide will be transported in sea containers. The ERP is appropriate for this type of transport vehicle.

The auditor requested to review the ERP in order to describe in detail first aids response to cyanide intoxication, to insufflate oxygen with an AMBU (Airway Mask Bag Unit) if the victim is not breathing, not to apply mouth-to-mouth breathing. It was requested to state the cyanide antidote hydroxocobalamin, should only be administered by personnel licensed to apply injectables. Also asked to state that before approaching the victim they should secure the area by monitoring the level of HCN gas (hydrogen cyanide gas). To state what they will do when the alarms on the HCN portable gas monitor are triggered at 4.7 ppm (parts per million) and 10 ppm. Indicate that they should act with the wind at their backs in the event of a cyanide spill and how they will confine/contain the spill to prevent it from coming into contact with water. Specify the use of personal protective equipment.

It was also requested that they review their emergency response procedure in the event of a spill of sodium cyanide in water and that they also consider cases of spillage of solid cyanide on wet soil as an emergency scenario. It was requested that they include in the list of emergency contacts the telephone number of Mercantil, the operator of ALPA warehouse.

After the audit, Beagle sent a revised version of its emergency response plan, describing the appropriate first aid actions for cases of cyanide exposition. They included the use of the AMBU and prohibition to provide mouth-to-mouth resuscitation. Also clarified that the cyanide antidote will only be applied by licensed personnel regarding applying injectables. They including the actions to be carried out when the gas monitor alarm is triggered at 4.7 ppm that must evacuate, such as required by Peruvian regulations; at 10 ppm, also to evacuate. It was also established that they would act with the wind at their back and specified the necessary personal protective equipment required depending on the emergency response actions and the level of the emergency.

They also reviewed the emergency response actions for case of cyanide spills in water, indicating that they should move away from the area, notifying the authorities to make aware downstream communities to not drink or consume the water and to let the external emergency responder Ecomarine Solution Perú S.A.C. (Ecomarine) for emergency response, remediation, monitoring

and final disposal of waste. They also included in the ERP emergency scenarios of solid cyanide spills on wet soil. And finally, they included the telephone number of Mercantil warehouse within their list of emergency telephone numbers. No additional information was required to find this Protocol Question in Full Compliance with the Code.

The ERP describes the nature of the response actions to be taken for the types of emergency situations identified. The level of detail is adequate to the nature of the potential emergencies identified in the document. The ERP also establishes the logical line of actions that the leader and convoy drivers must take when irregularities arise during transport of sodium cyanide, including civil commotion and adverse conditions.

Beagle’s ERP describes the role of the external responders involved in the plan. The ERP states the following roles of outside responders in emergency response procedures:

Police will control and keep bystanders and / or other traffic units away from the accident range and / or spill or accident zone. The Firefighters will provide first aid to people injured in the warm area. And transfer the victims to the hospital. Ecomarine, the external responder (Level II and Level III accidents) will be responsible to recover, neutralize, remediate, monitoring and final disposing of any significant cyanide spill and contaminated material. Lima metropolitan hospitals will care for the injured person and / or affected person after the accident.

The Plan do not consider the communities participation to take their own actions in response to cyanide releases as the transporters current route is through Lima metropolitan area. The auditor reviewed documentation in emails informing these external entities about their functions assigned in the ERP.

**Transport Practice 3.2**

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

The operation is  in full compliance with Transport Practice 3.2  
 in substantial compliance with  
 not in compliance with

Beagle has provided emergency response training to all his personnel involved in the cyanide

transport operation as drivers, convoy leaders, managers, convoy mechanics, maintenance shop logistics and dispatch personnel, among others. They receive an appropriate level of training to fulfill their role in emergency response, which includes use of personal protective equipment, first aid for cyanide exposure incidents, and periodic refresher training. Evidence of the Staff Training and Education Program was verified which includes: first aids, road safety, firefighting basic notions in emergency situations and training in cyanide management (by external trainer).

The ERP states the specific emergency response duties and responsibilities of Beagle's management personnel, the Transport Chief, the Transport Coordinator/Convoy Leader and the drivers. Responsibilities and duties are described in the ERP before the event, during and after the emergency. Drivers would participate in the first response by recovering a cyanide spill in route. The specific duties and responsibilities of the convoy personnel and emergency response are clearly identified in the ERP, the auditor reviewed the transporter's Plan verifying that this information was included.

The transporter has a list of the emergency response equipment that must accompany the cyanide load along the transport route. A complete emergency response equipment list in the ERP, the Convoy Leader must inspect the medical and emergency kits prior to the departure of the convoy. The list includes cyanide gas detector, medical oxygen in a 1 m<sup>3</sup> cylinder with mask and reservoir bag and Cyanokit antidote. Also includes Tyvek suits, leather and impermeable gloves, rubber boots, safety goggles, full face masks, disposable respirators, isolating tape rolls, shovels, sweeps, polyethylene bags, empty containers and plastic blankets.

Beagle has the necessary emergency response and health and safety equipment available, including personal protective equipment during transportation. A checklist is used to verify that the emergency equipment it is available, and it is documented in the convoy report. The amount of oxygen in the oxygen cylinders is verified during the inspection of the emergency response equipment. The ERP establish this equipment must be inspected prior to every loading operation. The availability of this equipment was confirmed during the audit; all the equipment was available.

The auditor reviewed the emergency equipment checklists, inspected the emergency equipment including personal protective equipment that is available during transport and interviewed Beagle's personnel verifying compliance with this provision.

The ERP requires the Convoy Leader to perform the inspection of the safety and medical emergency equipment. In addition to inspections before each shipment, the operation maintains a

monthly inspection program to maintain emergency response equipment in optimal conditions. The auditor reviewed completed inspection records. The emergency response equipment identified in the transporter's ERP is being inspected and tested regularly so that it will be available in good working order when needed for use.

The operation has an agreement with Ecomarine an external emergency responder to assist them for cases of Level II (accident that cannot be controlled with the resources of Beagle, requiring the intervention of external help such as specialized entities) and Level III emergencies (It is an emergency that causes serious injuries and exceeds the resources of Beagle requires external help (firefighters, civil defense, governments, third party companies). The operation's Emergency Response Plan clearly delineates the roles and responsibilities of the operation and those of Ecomarine during Level II and Level III emergencies.

### Transport Practice 3.3

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

The operation is  in full compliance with  in substantial compliance with  not in compliance with Transport Practice 3.3

Beagle's ERP includes procedures and current contact information for necessary internal notification and external notifications in the event of a cyanide emergency during transport. It lists current emergency numbers for notifying the cyanide producer, the customer and regulatory agencies of an emergency, local hospitals, ambulance, firefighters, police and environmental responders. The auditor reviewed the transporter notification and contact information verifying compliance with this provision.

The transporter ERP states this document, including the emergency contact numbers, must be updated on an annual basis or when there are changes in the background and form, in terms of procedures, persons, telephone numbers, routes, equipment, methods, or any other consideration that allows more efficiency and effectiveness. The auditor verified its implementation reviewing previous versions of the ERP during this certification period.

The ERP includes a requirement and details to notify the International Cyanide Management

Institute (ICMI) of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. The ERP states that Beagle as a Code signatory company, must notify ICMI of the occurrence of any significant incident involving sodium cyanide, must describe the nature and extent of such incidents, as well as the response of the operation and the measures that have been taken to prevent its recurrence. The operation has not experienced any cyanide incidents during the past three-year audit cycle, so no such incidents were reported to the ICMI.

### Transport Practice 3.4

*Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.*

The operation is  in full compliance with  in substantial compliance with  not in compliance with Transport Practice 3.4

Beagle's ERP describes the first response procedure for recovery and neutralization of cyanide solids and disposal of spill clean-up debris, specifying that all the convoy personnel will participate on the spill recovery detailing how this will be done and that the contaminated material will be temporarily stored at ALPA warehouse.

For emergencies requiring response of the external contractor, remediation, recovery and neutralization of solutions or solids and decontamination of soils or other contaminated media, management and disposal of spill clean-up debris will be carried out by Ecomarine, an external contractor registered as Companies Providing Solid Waste Services (EPS-RS), authorized and registered by DIGESA (General Directorate of Environmental Health) for transport, treatment and final disposal in accordance with current national legislation.

Environmental monitoring will be in charge of the external contractor Ecomarine specialized to carry out the monitoring when the spill has had contact with the ground or water.

The auditor also reviewed Ecomarine's procedures to provide for safe and environmentally sound



remediation and management and disposal of cyanide waste materials. The acceptable values for free cyanide content in soil and water to consider the environment decontaminated as required by local regulations. National Environmental Quality Standards (ECA) for Soil establish 0.9 mg/kg (milligrams per kilogram) in dry weight of free cyanide for agriculture and residential soil and for commercial industrial/extractive land areas, 8 mg/kg free cyanide. For water the acceptable value for free cyanide is 0.02 mg/l.

Beagles ERP specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide for the treatment of cyanide spilled into surface waters. The contractor's response procedures also include this same prohibition.

### Transport Practice 3.5

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

The operation is  in full compliance with Transport Practice 3.5  
 in substantial compliance with  
 not in compliance with

Beagle's ERP states to be updated on an annual basis or when there are changes in the background and form, in terms of procedures, persons, telephone numbers, routes, equipment, methods, or any other consideration that allows more efficiency and effectiveness. The auditor verified its implementation through interviews with the Health and Safety Supervisor and review of the different versions of the Plan corresponding to the previous years. The ERP reviewed was maintained as latest versions and under formal document control. Records were available to show that this is done.

The ERP states to perform annually mock emergency drills that simulate transport-related cyanide exposures and releases so they are better prepared in the event that actual exposures and releases occur.

The auditor reviewed Beagle's emergency mock drills reports for cyanide spills, finding them to be effective. In all cases scenarios simulated human exposure with the testing of the decontamination procedures. The auditors reviewed the annual cyanide mock drill reports covering the recertification period related to spills with exposure to cyanide, requiring first aids response and recovery of cyanide, finding them in compliance.





On August 26, 2023, a Level III emergency mock drill (emergency requiring external responders). It was simulated a cyanide spill with personnel exposure. About 50 people participated, with the participation of the firefighters and Ecomarine, the external emergency responder.

In 2022 they simulated a Level III cyanide spill with Ecomarine, with the participation of 34 people. In 2021, they carried out an emergency drill for cyanide spills.

The auditor reviewed the reports of these emergency response exercises, verifying that they detected opportunities for improvement, assigned responsible persons and dates to comply with the established actions, demonstrating that they had completed them

The operation has provisions to evaluate and revise, as necessary, its ERP following incidents that trigger their implementation. Although the plan was periodically updated during this certification period, no evaluations were conducted due to incidents or emergencies during this audit cycle as these events did not occur during the period, as reported by Beagle's managers.

