2026

INTERNATIONAL CYANIDE TRANSPORTATION VERIFICATION PROTOCOL

SUMMARY AUDIT REPORT

Contrans S.A.C.

Cyanide Transport Operation

July, 2026

Submitted by:
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SUMMARY AUDIT REPORT

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SUMMARY AUDIT REPORT

1. Operation General Information

Name of Facility:	Contrans S.A.C.
Name of Facility Owner:	Contrans S.A.C.
Name of Facility Operator:	Contrans S.A.C.
Dates of the audit:	06 and 07 July 2026
Name of Responsible Manager:	Rosa Soria
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State / Province:	Callao
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2. Operation Location Detail and Description:

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

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

Contrans Cyanide Supply Chain operation includes transport of sea containers from the port of Callao to its warehouse also located at Callao, where stores cyanide containers, and as request by the client unloads the cyanide from sea containers to its storage in Intermediate Bulk Containers (IBC) and 50 kg metal drums and subsequent dispatch as required by the cyanide owners, to the mine sites. Transport of sodium cyanide from Contrans warehouse to mine sites is performed by third parties and is not included under this Cyanide Supply Chain and therefore is out of the scope of this audit.

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

Contrans facility is located 11 km from the port of Callao. With an area of 137,802.93 m2, (Contrans 1 and Contrans 2) has among others, an area designated to store hazardous materials (Hazmat) in sea containers including 20-foot and 40-foot, sea containers with solid sodium cyanide, an area for cyanide empty containers, and an enclosed warehouse for deconsolidated hazmat materials (the warehouse), where sodium cyanide is stored in Intermediate Bulk Containers (IBC) and 50 kg metal drums appropriately segregated from incompatible substances.

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

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

Personnel in charge of the operation are a warehouse supervisor, six assistants, one logistics coordinator, two forklift operators and one auxiliar and crews of operators / stevedores.

The warehouse safety devices include fire cabinets, dry chemical powder (PQS due to its acronyms in Spanish) type fire extinguishers, a portable HCN (hydrogen cyanide) monitor, a portable emergency shower and low-pressure eyewash station, first aids kit, and medical oxygen.

3. 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.

4. Auditor Information

Audit Company:	Mingroup Investments S.A.C. and -e QUELLE E.I.R.L.
Lead Auditor:	Álvaro Fuentes Huanqui
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: 06 , 07 July 2026.

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 Detailed 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.

Contrans S.A.C.		July 22, 2026,
Name of Facility	Signature of Lead Auditor	Date of submittal

6. Principles and Standards of Practice

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

Finding/Deficiencies Identified:

Transportes Meridian carries out safe cargo transport through routes proposed by the client and are reviewed and supervised by the internal safety team and Integrated Management System team, taking into account the population density, infrastructure condition, pitch and grade and prevalence and proximity of water bodies and fog, that minimizes the potential for accidents and releases and the potential impacts of such accidents and releases if they do occur.

Meridian has the procedure P-TRA-009 Sodium Cyanide Transport, in Section 6.1.2. mentions the procedure for the route evaluation and in Section 6.1.3 mentions the elaboration and update of the route assessment. It requires an assessment of the route before transporting cyanide to a new location, using the procedure Annex I, register F-TRA-008 Route Risk Assessment. The record includes evaluation of the route, crossing populated places, population density, GPS signals, communication signals by cell phones, transit through environmentally sensitive areas, as well as evaluating the resources of assistance on the route, controls by the state agencies and any other mechanism that contributes to the safety of the trip. The characteristics of the route are analyzed, such as its condition, signage, existing police controls, permitted and reasonable traffic speeds for the type of road and environmental condition.

The auditors reviewed route evaluation from the Port of Callao to Contrans Warehouse in Callao. The template used is the same as the one suggested by the Peruvian Ministry of Transport for route evaluation.

Contrans has established and implemented a structured management system to select, evaluate, and control its transportation supply chain components, ensuring that sodium cyanide containers are transported safely from the Port of Callao to the Contrans warehouse facility.

GA-I-007 v002 "Registration and evaluation of supplier": Contrans implements this administrative management procedure to ensure that all contracted suppliers adhere strictly to its quality, safety, health, and environmental (EHS) guidelines. This document outlines the formal methodology used to select transport providers and request specific operational safety requirements necessary for hazardous cargo management.

GA-P-001 Annex 2 "Purchasing Management - Documents to be requested by provider category": Under this framework, Contrans requires general and specialized operations providers to submit their IPERC (Acronym in Spanish for Hazard Identification, Risk Assessment, and Control Measures matrix) to verify that operational risks are formally managed before service execution.

GA-R-004 "Supplier Evaluation Form": Contrans conducts formal performance evaluations of its carrier. A review of the evaluation, executed by evaluator for Transportes Meridian, showed a compliance score approved. The evaluation strictly measured key operational indicators, including delivery time and reliability, Service conformity and operational alignment, quality of customer care and communication.

There is an Exclusive Service Contract between Transportes Meridian and Contrans. Meridian is designated as the sole, exclusive carrier responsible for the overland transport of sodium cyanide under this supply chain scope. Both companies maintain a formal transportation service contract originally signed, which undergoes a mandatory renewal process every year. The contract explicitly binds Transportes Meridian to maintain all current licenses, permits, and operational authorizations issued by the Peruvian Ministry of Transport and Communications (MTC by its acronym in Spanish). Furthermore, it legally enforces absolute compliance with national regulations governing dangerous goods (Hazmat) and regulated/controlled chemical substances (IQBF by its acronym in Spanish). The sodium cyanide is a regulated/controlled product in Peru.

Service Level Agreement (ANS by its acronym in Spanish): Contrans and Transportes Meridian have implemented a comprehensive Service Level Agreement defining precise operational commitments, key performance indicators (KPIs), and communication channels between the warehouse and the carrier.

Section IV of the active Service Level Agreement explicitly dictates that the carrier must be certified on the Cyanide Management Code for all Sodium Cyanide Transport operations. Additionally, this agreement establishes that Contrans will perform coordinated field inspections and verification audits against the Cyanide Code transportation protocol at least once a year to verify ongoing compliance across the entire 3-year certification cycle.

Transportes Meridian

The Route Risk Assessment Procedure requires the evaluation of transport routes using Route Sheet Form. Route assessments are conducted whenever a new route is introduced, route connections are modified, or a client requests the use of a new transport route.

Route evaluations are performed through field inspections using an escort pick-up truck equipped with communication equipment, GPS, and a vehicle-mounted camera. The condition of the escort vehicle is verified using Checklist.

Route risk assessments are documented and include the evaluation of factors such as unsafe road conditions, speed limits by route section, road signage, availability of alternate routes, water bodies, population centers, fog-prone areas, road gradients and slopes, bridge height restrictions, and areas with loss of GPS or cellular communication coverage. The procedure requires route assessments to be reviewed and updated annually or whenever significant geographical changes occur due to natural events.

Areas presenting elevated risks, including locations susceptible to theft, civil unrest, or social disturbances, have been identified and are subject to additional control measures. These measures include mandatory communications with the monitoring and control center prior to entering such areas and the establishment of pre-planned alternative routes.

The procedure also requires that route hazards and control measures be incorporated into driver training programs.

The auditors reviewed the Route Risk Assessment Procedure and associated route risk assessment records and confirmed that the transporter evaluates the risks associated with selected transport routes, documents appropriate risk management measures, and provides drivers with training regarding route-specific hazards and controls.

Contrans

Contrans ensures that detailed risk assessments for selected transport routes are developed, reviewed, and approved through its contractual and operational oversight framework with Transportes Meridian.

Contrans maintains a formal service contract with Transportes Meridian that explicitly includes the mandatory requirement to develop comprehensive risk assessments for all routes utilized during the transportation of hazardous cargo.

Transportes Meridian is a Cyanide Code certified transporter.

Transportes Meridian

The Sodium Cyanide Transport Procedure includes Section 6.1.3 regarding the preparation and updating of route assessments. The procedure states that the Route Risk Assessment Form shall be reviewed and updated whenever relevant changes or conditions arise that may represent a transportation risk. Such changes are documented in trip reports. In addition, a comprehensive route survey is conducted annually by designated personnel to update Form and verify current route conditions and associated risks.

The auditors reviewed recent route evaluations and, through interviews with drivers and management personnel, confirmed that feedback regarding route and driving conditions is systematically communicated and incorporated into route assessments. Special conditions identified by clients are documented and communicated to all drivers assigned to the affected routes.

The monitoring center and route supervisors continuously update route risk information through the company's Google Earth-based monitoring platform. Drivers provide information to the monitoring center, which is incorporated into route risk management activities.

As an additional source of information, the company uses road condition reports published by the Peruvian Ministry of Transport and Communications (MTC) and the Superintendence of Land

Transportation of Persons, Cargo and Freight (SUTRAN). When road closures or access restrictions occur, the company also coordinates with the National Police and the relevant road concessionaires to obtain updated information and determine safe alternative routes when necessary.

Based on document review and personnel interviews, the auditors confirmed that the transporter has established and implemented a process to periodically reevaluate cyanide transport routes and to incorporate operational feedback into route risk assessments.

Transportes Meridian ´s procedure state to evaluate routes annually, or when changes are identified by drivers travelling a route. Also, require the drivers to provide feedback on the route conditions. When feedback from a driver suggests that a route needs to be revised, the company revise the route and communicates latest information to drivers.

Transportes Meridian, in the document Risk Assessment of route F-TRA-008, the risks and control measures for each route developed are given. The specific route evaluation from Port of Callao to Contrans Warehouse, the evaluation explicitly considers population density, infrastructure conditions (asphalted road, well-signaled, featuring three lanes in certain tranches and narrowing to two lanes in other sections), and proximity to surface water resources. Specifically, the assessment identifies a critical point at the intersection of Nestor Gambetta Avenue and Morales Duarez Avenue, where the route crosses the Rímac River. Associated Transport Risks: Collisions between heavy trucks. Running over pedestrians and cyclists (vulnerable road users), Mechanical failures of the transport units, Environmental contamination of the Rímac River waters due to a potential release.

Mandatory Operational Mitigation Measures: Strict adherence to defensive driving techniques, Absolute compliance with established speed limits, Continuous respect for all vertical and horizontal traffic signs, Mandatory reduction of speed at high-risk intersections and approach zones, Strict Lane discipline (maintaining the assigned lane), Activating vehicle road/highway lights to maximize visibility, Rigorous obedience to traffic light signals (semaphores) along the urban tranches.

Contrans agreement with Transportes Meridian requires the transporter documenting the risks identified along the selected route and to be available in writing both for driver training and as a reference.

The formal service agreement between Contrans and Transportes Meridian requires the transport company to seek input from relevant external stakeholders during the selection and evaluation of transport routes. These stakeholder consultation activities, route evaluations, and any proposed

changes are formally reviewed and documented during periodic Health & Safety (H&S) meetings held between the management teams of both companies.

Transportes Meridian continuously monitors active route conditions from the Port of Callao to the Contrans warehouse using its GPS tracking system and direct, real-time communication with drivers. As part of the route selection and risk-control process, the carrier regularly obtains critical data from external stakeholders. This includes direct consultation with road concessionaires regarding real-time pavement conditions, active traffic restrictions, and bridge load-bearing capacities. Additionally, the carrier continuously reviews official notifications and maps published by governmental transportation authorities to dynamically identify road closures, emergency maintenance activities, or any other infrastructure anomalies that may impact safe transit. If route modifications are required due to contingencies such as adverse weather conditions, social unrest, or unexpected road closures, alternative routes are immediately proposed by the carrier and coordinated with Contrans for administrative authorization.

Contrans and Meridian treat public consultations regarding exact route details and delivery schedules as a highly sensitive security issue, this measure is strictly maintained to prevent exposing the transport unit to an increased risk of targeted armed robbery, hijacking, or vandalism.

Contrans and its contracted carrier, Transportes Meridian, have implemented effective administrative and physical security controls to address safety and security risks along the designated transport route.

Sodium cyanide shipments from the Port of Callao to the Contrans warehouse are conducted by individual transport units without permanent vehicle escorts. This operational framework is justified by the very short transit distance (approximately 11 km), urban road infrastructure, and the continuous electronic tracking and communication systems deployed for the route. To address specific security and robbery concerns inherent to the urban transit zone, Contrans and Transportes Meridian enforce strict administrative controls prior to and during every shipment. Depending on the localized security climate or upon explicit requests by the client, transport operations can be supplemented with physical security guards to address temporary security concerns.

All dedicated transport units are equipped with active Global Positioning System (GPS) devices and are monitored on a 24-hour basis by Transportes Meridian's specialized Monitoring Center. This real-time oversight is executed in strict accordance with the Sodium Cyanide Transport Emergency Response Procedure. Prior to departure from the Port of Callao, drivers must report their departure

status to Meridian's Monitoring Center. Shipment tracking is actively maintained from departure to arrival through continuous GPS data feeds and constant cellular phone communication between the unit driver and monitoring personnel.

Transportes Meridian is a Cyanide Code certified transporter and was found in full compliance with all operational requirements under Transport Practice during its last certification audit.

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

Service Level Agreement (ANS by its acronym in Spanish): Contrans and Transportes Meridian have implemented a comprehensive Service Level Agreement defining precise operational commitments, key performance indicators (KPIs), and communication channels between the warehouse and the carrier.

Section IV of the active Service Level Agreement explicitly dictates that the carrier must be certified on the Cyanide Management Code for all Sodium Cyanide Transport operations. Additionally, this agreement establishes that Contrans will perform coordinated field inspections and verification audits against the Cyanide Code transportation protocol at least once a year to verify ongoing compliance across the entire 3-year certification cycle.

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 Standard of Practice 1.2
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Meridian has established qualification requirements for drivers within its Organization and Functions Manual. The manual defines the responsibilities, minimum qualifications, training requirements, and competency criteria for personnel involved in cyanide transportation operations.

The Driver position is responsible for the safe transportation of customer cargo while maintaining vehicle integrity and compliance with company safety requirements. Minimum qualifications include a valid AIIIB or AIIIC driver's license, completion of required port security and dangerous goods training, Special Category A4 License when transporting hazardous materials, registration in the IQBF (Spanish acronym for Controlled Chemical Inputs and Regulated Goods) system when applicable, HAZWOPER Level I and II training for hazardous materials transportation, and a minimum of two years of relevant driving experience.

The auditors reviewed personnel qualification records, including driver's licenses, hazardous materials licenses, medical fitness certificates, training records, and work experience documentation.

The International Ship and Port Facility Security (ISPS) Basic Course, Port Security Training, and Dangerous Goods Basic Course are mandatory for personnel requiring access to the Ports of Chancay and Callao (DP World and APM Terminals). These courses are delivered by training providers authorized by the National Port Authority (APN, by its Spanish acronym), a governmental entity under the Ministry of Transport and Communications (MTC, by its Spanish acronym).

The HAZWOPER levels I, II and III training are delivered by training providers authorized by the MTC.

Based on document review and personnel interviews, the auditors confirmed that Meridian uses trained, qualified, medically fit, and appropriately licensed personnel to operate cyanide transport vehicles.

Contrans ensures full compliance with this practice by maintaining standardized job profiles, an ongoing annual training framework, and mandatory qualification certifications for all internal warehouse personnel responsible for operating handling equipment (such as forklifts and stackers) within the sodium cyanide operations.

The following evidence supports the finding for Contrans as a consignor:

Job Profiles and Annual Training Program:

Contrans maintains formal job profiles that explicitly define the competency, safety, and operational requirements for all personnel involved in sodium cyanide warehouse operations.

The company implements a structured Annual Training Program (verified for the 2025 and 2026 cycles), which establishes mandatory specialized training for all personnel handling sodium cyanide. The training program encompasses the following core safety, operational, and risk-control courses.

The auditors performed a thorough review of the individual training files, qualification certificates, and academic hour records for the warehouse operations team, consisting of forklift operators, warehouse assistants, the logistics coordinator, and the warehouse supervisor.

First Aid Emergency Brigade Training: The auditors verified the specialized competency of the active emergency response and first aid brigade members. A dedicated First Aid course was conducted from the specialized medical provider. The attendance registers were fully validated for the following active brigade members.

Meridian provides periodic training to personnel involved in cyanide transportation operations through its Annual Occupational Safety and Health Training Program, which is developed in accordance with national regulatory requirements and approved by the Occupational Safety and Health Committee. The implementation of the training program is monitored monthly.

The audit team reviewed training records demonstrating that drivers, escort supervisors, and other personnel involved in cyanide transportation receive training related to the safe handling and transportation of sodium cyanide, emergency response, spill prevention, and exposure control.

As an example, the auditors reviewed records of the internal training course "Response to Sodium Cyanide Spill Incidents During Transportation," for drivers and route supervisors. The training was delivered by the Head of Integrated Management Systems, who holds a valid HAZWOPER Level III certification.

Training materials reviewed by the auditors included topics such as:

- Sodium cyanide hazards and properties.
- Safe handling and transportation practices.
- Prevention of cyanide releases during transport.
- Emergency response procedures for cyanide spills.
- Use of personal protective equipment.
- Cyanide exposure recognition and response.
- Communication and notification procedures during emergencies.

Meridian provides both classroom-based and online training through its internal training platform to ensure that personnel maintain the competencies required to perform their duties safely and in a manner that minimizes the potential for cyanide releases and exposures.

Contrans ensures that all personnel operating cyanide handling equipment are thoroughly trained to perform their assigned tasks in a safe, efficient, and environmentally sound manner, specifically designed to minimize the potential for accidental cyanide releases and human exposure.

The following evidence supports the finding for Contrans as a consignor:

Training Scope for Release and Exposure Prevention:

Contrans implements an Annual Training Program (verified for 2025 and 2026) that provides specific, hands-on training to minimize handling risks, such as moving loads safely to prevent rupturing or damaging containers.

The Sodium Cyanide Safety and Emergency Response Training delivered in December 2025 by “Safety Management Resources” for 23 participants.

Daily 5-minute safety talks and formal Hazard Identification, Risk Assessment, and Control Measures (IPERC) courses are used to continuously reinforce field-level awareness of risks that could trigger accidental product release.

The training curriculum includes targeted hazard mitigation topics such as Risk Prevention, Workplace Accidents and Incidents, and Solid Waste Management to ensure a comprehensive understanding of emergency minimization protocols.

Technical and Mechanical Equipment Operational Training:

The auditors verified that all warehouse personnel tasked with physical container movements hold current technical qualifications and specialized chemical safety training to prevent container damage.

The auditors conducted field interviews with forklift operators and warehouse assistants during active shifts to confirm their understanding of safe cyanide handling and exposure prevention protocols.

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

Service Level Agreement (ANS by its acronym in Spanish): Contrans and Transportes Meridian have implemented a comprehensive Service Level Agreement defining precise operational commitments, key performance indicators (KPIs), and communication channels between the warehouse and the carrier.

Section IV of the active Service Level Agreement explicitly dictates that the carrier must be certified on the Cyanide Management Code for all Sodium Cyanide Transport operations. Additionally, this agreement establishes that Contrans will perform coordinated field inspections and verification audits against the Cyanide Code transportation protocol at least once a year to verify ongoing compliance across the entire 3-year certification cycle.

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 Standard of Practice 1.3
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Meridian uses transport equipment specifically designed and authorized for the transport of hazardous materials, including sodium cyanide. Transport units comply with Peruvian regulatory requirements, which establish age limits, operating permits, technical inspections, and maintenance requirements for hazardous materials transportation.

Procedure Sodium Cyanide Transport establishes the requirements for transport equipment. Section 6.2 specifies that only company-owned trucks may be used for sodium cyanide transport and that all vehicles must possess the permits, insurance, and authorizations required by Supreme Decree No. 021-2008-MTC and other applicable regulations governing the transport of hazardous materials. The procedure also requires the use of trucks, chassis, and trailers specifically designed and authorized for container transportation on public roads.

The procedure further establishes that:

- Platforms may be conventional or low-bed types, depending on operational requirements.
- Vehicle technical inspections must be conducted at least every six months.
- Trucks and trailers must be included in the company's preventive maintenance program.
- Only one 20-foot or 40-foot container may be loaded onto each trailer.
- Each truck unit may tow only one semi-trailer in accordance with the rated load capacity of the equipment.

The audit team reviewed some transport equipment used for the transport of sodium cyanide.

Meridian maintains a computerized fleet maintenance management system that records preventive maintenance activities, fuel consumption, tire management, vehicle mileage, work orders, and maintenance history for all vehicles. Preventive maintenance frequencies are established according to vehicle type and manufacturer recommendations.

Maintenance activities include inspection and servicing of the chassis, braking system, tires, electrical systems, and other critical components.

The company also maintains fleet tracking records through its Integrated Management System, which monitors vehicle mileage and automatically schedules maintenance activities based on distance traveled. Drivers report fuel purchases and mileage data, allowing maintenance intervals to be tracked and updated continuously.

The auditors reviewed maintenance records and verified that the vehicles used for sodium cyanide transport are appropriately designed, inspected, maintained, and operated within their rated load capacities.

Contrans ensures full compliance by deploying specific cargo-handling machinery designed for the weight of sea containers and deconsolidated loads, backed by a structured preventive and predictive maintenance program managed by the Equipment and Machinery Management department.

The auditors reviewed Cyanide Handling Equipment: For the handling of deconsolidated cargo, Contrans utilizes forklifts and pallet jack.

For the movement and logistics of full maritime sea containers, specialized reach stackers are deployed.

Maintenance Program Framework:

The Maintenance Manager was interviewed and presented the formal procedure “Preventive maintenance of machinery”, which governs all handling units.

Preventive maintenance (PM) cycles are strictly tracked and executed based on equipment hour-meter intervals:

- PM01: Every 250 operating hours.
- PM02: Every 500 operating hours.
- PM03: Every 1,000 operating hours.
- PM04: Every 2,000 operating hours.

The program incorporates predictive maintenance protocols for heavy units, which include scheduled major component overhauls, such as full engine or gearbox replacements for the reach stackers.

Verification of Active Maintenance Records & Work Orders:

The auditors reviewed recent mechanical files and completed work orders (WO) to verify the real-time execution of the maintenance plan.

Signatures and External Contractor Controls

All reviewed maintenance logs and work orders are fully validated, bearing the signatures of the internal planner and Head of the Maintenance Department, along with the designated technical staff.

The technical field labor is executed by specialized mechatronic technicians from the authorized external contractor.

All maintenance and repair activities are performed locally within the secure, specialized Contrans maintenance workshop facility.

Meridian has established procedures to verify that transport equipment is suitable for the loads being transported. Procedure Sodium Cyanide Transport specifies the vehicle and trailer configurations

authorized for sodium cyanide transportation and requires compliance with the weight and dimension limits established by Peruvian transportation regulations. The procedure references Annex IV – Maximum Permitted Weights and Dimensions, based on Supreme Decree No. 058-2003-MTC and its amendments, which defines maximum allowable axle loads, gross vehicle weights, vehicle dimensions, and approved vehicle configurations.

The procedure includes tables and diagrams identifying the permitted truck and trailer configurations according to the number of axles and load distribution. Vehicles used by Meridian for sodium cyanide transport are classified as T3S3 configuration, with a maximum gross vehicle weight not exceeding 48 metric tons, in accordance with national regulations.

Prior to dispatch, transport personnel verify that the cargo weight is compatible with the rated load capacity of the truck unit, trailer, and vehicle configuration. The verification is conducted using cargo documentation, container weight information, and vehicle specifications.

The auditors reviewed transport records and equipment documentation for the shipment and confirmed that the weight of the sodium cyanide shipment was within the authorized load capacity of the transport equipment. The auditors also verified that the truck and trailer configuration complied with the applicable regulatory requirements and the company's transport procedures.

Contrans implements operational controls and maintains technical documentation to verify that all machinery used to handle sodium cyanide is structurally and mechanically adequate for the specific loads it must bear. The operations department utilizes a centralized, formal equipment registry that catalogs detailed engineering data, engine/transmission models, and nominal lifting ratings for all active machinery.

The following field evidence and technical specifications were verified during the audit.

Meridian has implemented procedures to prevent overloading of vehicles used for sodium cyanide transportation.

Customer transport requests include detailed information regarding cargo type, quantity and total weight. Prior to dispatch, the Meridian Transport Analyst reviews the cargo weight and verifies its compatibility with the authorized load capacity of the assigned truck and trailer configuration. If the requested load exceeds the legal or operational limits of the transport equipment, Meridian informs the customer and the shipment is not authorized until the load is adjusted.

As part of the dispatch process, cargo weights are verified through the customer's delivery guide and weighbridge records. Weighing controls are conducted at the entrance and exit of Contrans.

For shipments originating from the Ports of Callao (DP World and APM Terminals), the official port weighbridge ticket is used as a control document prior to transport to Contrans.

The audit team reviewed transport documentation and confirmed that cargo weights are verified prior to dispatch and compared against vehicle load capacities. Interviews with operational personnel confirmed that loads exceeding authorized limits are not accepted for transport.

Contrans implements administrative procedures and automated technological safeguards to systematically prevent the overloading of any material-handling machinery or transport equipment utilized during sodium cyanide logistics operations.

The following evidence supports the finding for Contrans as a consignor:

Administrative Controls and Load Weight Verification:

Contrans systematically cross-references and verifies the documented weights of incoming cargo manifests and maritime shipping records against the certified nominal capacities of its designated handling machinery before executing any cargo maneuvers.

The cargo weights are strictly matched against the 3-ton capacity limit established for the designated forklifts (02 and #03) and the 45-ton capacity limit for the reach stacker (RSK-02) to ensure no unit operates outside its safe engineering boundaries.

Clear capacity markings inside the operating cabins of Forklifts, combined with the manufacturer's technical booklet located on the main dashboard, serve as a continuous visual baseline for operators to prevent overloading during the handling of deconsolidated cargo (such as IBCs or metallic drums).

Automated Technological Controls (Reach Stacker):

For the movement and stacking of full maritime sea containers, Contrans relies on a critical automated safeguard integrated into the Terex RSK-02 reach stacker. This 45-ton capacity unit is equipped with an active electronic anti-tipping system. This safety control mechanism continuously monitors the load parameters and triggers an automated alarm if a maneuver approaches or threatens to exceed

the maximum safe load capacity of the equipment, providing an immediate physical check against vehicle overloading during operations.

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

Service Level Agreement (ANS by its acronym in Spanish): Contrans and Transportes Meridian have implemented a comprehensive Service Level Agreement defining precise operational commitments, key performance indicators (KPIs), and communication channels between the warehouse and the carrier.

Section IV of the active Service Level Agreement explicitly dictates that the carrier must be certified on the Cyanide Management Code for all Sodium Cyanide Transport operations. Additionally, this agreement establishes that Contrans will perform coordinated field inspections and verification audits against the Cyanide Code transportation protocol at least once a year to verify ongoing compliance across the entire 3-year certification cycle.

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 Standard of Practice 1.4
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Contrans ensures full compliance with this practice through its rigorous contractual mandates and the implementation of strict cargo-securing procedures by its dedicated transport contractor (Transportes Meridian), which prevent any alteration or exposure of the producer's original packaging during transit.

Contractual Framework and Transporter Selection:

SUMMARY AUDIT REPORT

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

The formal service contract between Contrans and Transportes Meridian explicitly mandates that the carrier must maintain all valid permits and authorizations required by the Ministry of Transportation for the circulation of cargo transport vehicles handling general cargo in containers, dangerous cargo (HAZMAT), and controlled chemical goods (IQBF).

The contract legally obligates Transportes Meridian to ensure that all cargo it handles is properly stowed and lashed to guarantee completely safe movement throughout the short transit.

Sealed Container Transport and Packaging Integrity Controls:

Transportes Meridian transports sodium cyanide exclusively inside sealed maritime containers received directly from the port area. In accordance with company procedures and interviews conducted during the audit, the carrier does not open, repackage, subdivide, transfer, or otherwise alter the cyanide packaging at any point during transportation. The cargo remains entirely enclosed inside the original shipping container until it safely arrives at the destination within the Contrans warehouse.

Inspection Procedures and Specific Security Mechanisms

To maintain the absolute integrity of the producer's packaging, the carrier utilizes the Procedure Sodium Cyanide Transport, Section 6.4.1 (Transport Preparation), alongside its specialized procedure for securing cargo and lashing in containers.

These procedures establish mandatory inspection and verification requirements before departure and during transit, requiring verification that the containers are properly positioned on the trailer, secured using the trailer's fixed locking clamp mechanisms, and fully protected against unauthorized access.

Container and seal integrity are strictly verified through physical inspections of the container doors, seals, and locking devices at two key control points:

- Upon receipt of the container at the Port of Callao.
- Immediately upon arrival at the Contrans warehouse.

The containers are mechanically locked to the trailer chassis using fixed locking clamp mechanisms designed specifically for container transport, supplemented by the following physical safety and security measures:

- Installation of a "ducktail" metal locking plate that physically prevents the container doors from opening while mounted on the trailer.
- Heavy-duty security bars and padlocks securing both container doors simultaneously.
- Tarpaulin protection applied on the roof of the containers when weather or route conditions require it.

The cyanide transport operation in sea containers from the Port of Callao to the Contrans warehouse is performed exclusively by Transportes Meridian S.A.C. (Meridian), a Cyanide Code certified transporter and a subsidiary company of the Transmeridian Group. Meridian uses placards and warning signs to identify sodium cyanide shipments in accordance with applicable Peruvian regulations and international standards for the transport of dangerous goods.

Procedure Sodium Cyanide Transport, Section 6.4.1 (Transport Preparation), requires verification of the hazardous materials identification signs prior to dispatch, including the United Nations (UN) identification number, hazard class labels, Marine Pollutant marking, and NFPA hazard diamonds.

The audit team verified that sodium cyanide shipments are identified with:

- United Nations Number UN 1689;
- Class 6.1 Toxic Substance placards (skull and crossbones symbol);
- Marine Pollutant marking;
- NFPA hazard diamond.

The required placards are displayed on the transport containers and vehicles as follows:

- Rear of the container;
- Both sides of the container;
- Both sides of the semi-trailer;
- Rear of the semi-trailer; and
- Front of the transport unit.

The audit team reviewed photographic records of recent cyanide shipments and verified during field inspections that the required placards and hazard markings were properly displayed on the transport equipment. The photographs confirmed the presence of the UN 1689 identification, Class 6.1 toxic substance placards, Marine Pollutant marking, and NFPA hazard diamonds.

Based on document review, field observations, and interviews with personnel, the audit team confirmed that Meridian uses appropriate placards and signage to identify sodium cyanide shipments in accordance with regulatory and international transport requirements.

Transportes Meridian implements a vehicle inspection program to ensure that all transport equipment used for sodium cyanide shipments is inspected prior to departure.

Drivers conduct pre-trip inspections using Form Daily Vehicle Inspection, which verifies the operational condition of both the truck and trailer before each shipment. The inspection includes, among other items:

- Tire condition;
- Breaking and safety systems;
- Seat belts;
- First aid kits;
- Safety cones and warning triangles;
- Tools and emergency equipment;
- Vehicle mileage;
- Required transport documentation, including the contingency plan, Ministry of Transport authorizations, insurance policies, and other applicable permits.

Completed checklists are submitted to the Integrated Management System Department, where they are archived electronically and shared with clients as required.

In addition to pre-trip inspections, Meridian conducts periodic unannounced vehicle inspections jointly with representatives from Contrans, Meridian's Occupational Safety and Health Department, and the Maintenance Department. These inspections are conducted at least monthly and include verification of vehicle condition, safety equipment, and compliance with transport requirements.

Based on document review, field observations, and interviews with personnel, the audit team confirmed that Meridian implements and documents vehicle inspections prior to each cyanide shipment and maintains an ongoing vehicle safety inspection program.

Transportes Meridian maintains a computerized fleet maintenance management system that records preventive maintenance activities, fuel consumption, tire management, vehicle mileage, work orders, and maintenance history for all vehicles in its fleet. Preventive maintenance frequencies are established according to vehicle type, operating conditions, and manufacturer recommendations.

Maintenance activities include inspection and servicing of critical systems such as the chassis, braking system, suspension, tires, steering components, electrical systems, lighting, and safety equipment.

For platform trailers used to transport shipping containers, preventive maintenance is scheduled every 20,000 km and includes inspection of the chassis structure, braking system, tires, electrical connections, locking devices, and container securing mechanisms.

The company maintains an Integrated Management System database that continuously tracks vehicle mileage and automatically identifies upcoming maintenance requirements. Drivers report fuel purchases and mileage data, allowing maintenance intervals to be tracked and updated continuously in real time.

The audit team reviewed maintenance records and verified implementation of the preventive maintenance program.

The auditors verified that vehicles used for sodium cyanide transport are maintained in accordance with the established preventive maintenance program and are operated within their design specifications and rated load capacities.

Transportes Meridian has established and implemented a robust journey management and fatigue prevention system formalized under Procedure: Sodium Cyanide Transport, specifically, Section 6.8 (Trip Development) mandates strict controls over driver working hours and rest periods to mitigate risks associated with fatigue during sodium cyanide transport operations:

- Maximum Driving Hours: The daily driving shifts for sodium cyanide transport operators are strictly limited to a maximum of 8 hours of non-continuous driving.

- Rest Breaks: Drivers are required to make scheduled stops every 2 hours for at least 10 minutes (or more) to perform equipment inspections, meals, and active rest breaks.
- Rest Periods: Upon completion of the 8-hour driving limit, a mandatory 8-hour continuous rest period is strictly required before the driver can resume the journey.
- Daytime Driving Restriction: To minimize transit risks, transport operations are restricted exclusively to daytime hours, specifically from 6:00 AM to 6:00 PM.

Also, the cabin of the truck has anti-fatigue camera sensors.

This digital log, cross-referenced with GPS tracking and driver logs during the audit, confirms that the fatigue management procedures are actively implemented and monitored in the field.

Transportes Meridian has implemented comprehensive procedures and physical controls to ensure that sodium cyanide is transported in a manner that prevents load shifting and maintains the integrity of the producer's packaging throughout the entire transportation process.

As a core operational definition, Meridian transports sodium cyanide exclusively in sealed maritime containers received directly from the Port of Callao, Chancay Port, or authorized extra-port customs warehouses (such as Contrans or Alconsa). In compliance with company policies and verification during interviews, Meridian does not open, repackage, subdivide, transfer, or alter the cargo or its containment inside the container. The cargo remains sealed from the point of origin until final delivery to the mining customer.

To address the prevention of load shifting and protection of cargo integrity, Procedure (Sodium Cyanide Transport, Section 6.4.1 "Transport Preparation") and the specific Cargo Securing and Lashing Procedure establish strict inspection protocols before departure and during transit:

Chassis Securing (External Shifting Prevention): Containers are positioned precisely on the trailer and locked using standard twist-lock mechanisms (fixed locking clamps) designed specifically for maritime containers. To prevent any micro-movement or chassis displacement on routes, additional structural securing is applied, including container lashing using heavy-duty chains.

Security and Tamper-Prevention: To ensure the doors cannot move, shift, or be opened during transit, Meridian installs a metal "ducktail" locking plate that mechanically blocks the container doors while mounted on the trailer. Additionally, heavy-duty security bars and padlocks are fitted to both doors.

Weather Protection: When required by specific risk assessments or container roof conditions, tarpaulin protection is installed to shield the roof of the container structure from environmental factors.

Chain of Custody and Seal Integrity: Since the internal load cannot be visually inspected due to security seals, preventing shifting relies on verifying container integrity. Seal and lock inspections are conducted and recorded at the receipt at the Port of Callao and the arrival at Contrans.

Transportes Meridian has documented and implemented clear procedures to modify, suspend, or divert transport operations when encountering adverse conditions such as severe weather, roadblocks, or civil unrest.

Procedure (Sodium Cyanide Transport) specifically outlines the protocols for emergency suspension and route modification under Sections 6.10 and 6.12.

Suspension of Operations (Section 6.10): If an unforeseen event prevents the unit from safely reaching its scheduled destination, the procedure mandates the immediate suspension of the journey. The unit must be parked in a pre-approved, safe location. Eligible locations include designated service stations, secure truck stops, or adjacent to police stations.

Unplanned Stop Location Criteria (Section 6.12): The procedure defines strict safety and environmental parameters that the driver must verify when selecting an unplanned parking or staging area due to bad weather or civil disturbances. Among others, it's important the Chemical Compatibility Validation: Absolute absence of incompatible materials in the immediate vicinity (such as flammables, hazardous liquids, or exposed food products). Continuous Security: Requirement for permanent custody of the parked unit.

Regulatory Compliance & Route Modification: In the event of a mandatory route change, diversion, or a return-to-base order, the operation triggers a formal regulatory tracking protocol. Because sodium cyanide is a highly regulated substance in Peru, Meridian's dispatch center generates a complementary electronic delivery guide. This document updates the transport manifest in real-time, maintaining full communication, transparency, and compliance with the competent national authority, SUNAT (National Superintendency of Customs and Tax Administration).

Transportes Meridian has established and actively maintains a comprehensive drug and alcohol abuse prevention and control program applicable to all personnel involved in the transport of sodium cyanide.

The program is formally governed by the "No Alcohol and No Drugs Policy", which is personally endorsed and signed by the General Manager, Miguel Monteverde Herrada. This policy establishes a strict zero-tolerance threshold for alcohol and controlled substances in the workplace and reserves the company's right to conduct unannounced inspections and random biological testing (blood or urine) at any time.

Implementation and Testing Protocol:

The program is operationalized through a multi-layered screening framework:

Annual Medical Screening: Drug and substance abuse testing is mandatory and integrated into the annual Occupational Medical Examination required for every driver and supervisor.

Random & Target Testing: The Occupational Health Physician conducts unannounced, random toxicological evaluations utilizing reactive urine test strips. To guarantee legal and medical validity, any reactive/presumptive positive result triggers an immediate secondary confirmation test handled by an independent, third-party certified laboratory.

Daily Pre-Dispatch Screening: Prior to entering the dispatch facilities and before starting any sodium cyanide transport, all drivers must undergo mandatory breathalyzer testing to verify a 0.0 g/l alcohol level.

Policy Communication and Disciplinary Actions:

The policy is thoroughly communicated to all personnel through the Human Resources induction program, formalized via the Induction Roadmap, and reinforced through informational leaflets distributed to and signed by the workers during their onboarding.

Regarding disciplinary actions, Policy outlines corporate sanctions that include a 3-day unpaid suspension for a first offense and contract termination upon recurrence. However, specifically for high-risk operations involving hazardous materials such as sodium cyanide, any single positive drug or alcohol result triggers the immediate and permanent removal of the driver from the cyanide transport roster, independently of the general labor disciplinary process, thereby ensuring absolute risk mitigation in transit.

The audit team verified compliance by reviewing Policy, Induction Forms, annual occupational medical records, and field logs of daily pre-shift breathalyzer checks recorded by the escort supervisors during transport operations.

Transportes Meridian maintains a well-defined and secure record retention system to document that all journey management, fatigue prevention, drug and alcohol testing, and cargo integrity activities have been systematically conducted.

The company utilizes a dual-archiving strategy to ensure data integrity, backup redundancy, and long-term availability:

Digital Records (Cloud Storage): All daily operational logs, real-time tracking reports, checklist summaries, and photographic evidence generated during sodium cyanide convoys are digitized. These electronic files are securely stored and managed via the company's enterprise cloud platform, Microsoft SharePoint. This system features access control restrictions to ensure data confidentiality and prevents unauthorized modifications. Additionally, key electronic transport documentation and delivery milestones are shared directly with the customers.

Physical Records (Secure Offsite Archiving): Hardcopy operational documents—including signed driver induction forms, original pre-dispatch checklists, breathalyzer field logs, and physical delivery guides—are managed through a formal commercial agreement with Iron Mountain, a specialized third-party records management provider.

Both storage mechanisms guarantee that records are kept in a legible, identifiable, and readily retrievable manner, meeting and exceeding the retention period requirements established by the International Cyanide Management Code and local Peruvian regulations.

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

Service Level Agreement (ANS by its acronym in Spanish): Contrans and Transportes Meridian have implemented a comprehensive Service Level Agreement defining precise operational commitments, key performance indicators (KPIs), and communication channels between the warehouse and the carrier.

Section IV of the active Service Level Agreement explicitly dictates that the carrier must be certified on the Cyanide Management Code for all Sodium Cyanide Transport operations. Additionally, this agreement establishes that Contrans will perform coordinated field inspections and verification audits against the Cyanide Code transportation protocol at least once a year to verify ongoing compliance across the entire 3-year certification cycle.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 1.5
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

This Transport Practice does not apply to this transport operation. Transportation is by land in trucks.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 1.6
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

The cyanide transport operation in sea containers from the Port of Callao to the Contrans warehouse is performed exclusively by Transportes Meridian S.A.C. (Meridian), a Cyanide Code certified transporter and a subsidiary company of the Transmeridian Group. Meridian has equipped all transport vehicles with highly reliable, redundant communication systems that guarantee continuous contact among the route, the monitoring and geolocation department, the client, and emergency responders throughout the entire supply chain.

The communication framework is active from the initial product loading at the Callao Port; drivers maintain active communication via commercial mobile phones. Dedicated customer-specific WhatsApp groups and voice calls are utilized for real-time reporting at established checkpoints.

Real-Time GPS Tracking Platform: Every transport unit is equipped with a GPS tracking system monitored 24/7 by Transportes Meridian's specialized Monitoring and Geolocation Department at their main base, providing constant telemetry and location data.

The audit team confirmed compliance through live demonstration of the centralized GPS tracking platform at Meridian's base.

Contrans, acting as the consignor, ensures full compliance with this practice by maintaining integrated communication systems, electronic data interfaces, and real-time tracking protocols with its dedicated carrier, Transportes Meridian, and terminal operators at the Port of Callao (DPW and APM Terminals) to monitor cyanide shipments and manage logistics contingencies effectively.

The following evidence supports the finding for Contrans as a consignor:

Pre-Shipment Documentation and Communication Workflow:

The tracking process initiates when the client notifies Contrans that the sodium cyanide containers have arrived via sea vessel and are available at the Port of Callao terminals (DP World or APM Terminals).

The client transmits the mandatory documentation—including Bills of Lading (B/Ls), Material Safety Data Sheets (MSDS), the Safety Summary Sheet, and the formal Authorization for the Entry of Controlled Goods (IQBF)—via email or the corporate extranet.

The Contrans Imports department receives this documentation and forwards it to the specialized HAZMAT (Hazardous Materials) department. The HAZMAT team validates the paperwork and issues the formal safety and regulatory conformity required for cargo entry.

Once authorized, the Imports department registers the shipment details into the Integrated Logistics Operations System (SIOL by its Spanish Acronym) and cross-references the data with the official customs (SUNAT by its Spanish Acronym) manifest submitted by the client.

The Imports department then generates and emails the Container Discharge Control document (CDL by its Spanish Acronym), which compiles all client specifications and the SUNAT manifest, to Transportes Meridian, copying the internal planning, prevention, and imports departments.

Real-Time Tracking, Tracing, and Operational Communication Channels:

The Contrans Operations department maintains continuous traceability and tracking coordination directly with Transportes Meridian during transit from the port to the warehouse.

Transportes Meridian coordinates container pick-up appointments with DPW or APM operators, dispatches the transport units, and generates the mandatory delivery notes.

To maintain strict inventory control and clear visibility, a centralized Excel cargo tracking sheet is updated and shared continuously between all documentary areas of Contrans and Transportes Meridian three times a day at scheduled intervals.

A dedicated instant communication channel, the “OPS Contrans / TM" WhatsApp group, is actively used by planning executives, operations executives, and transport coordinators from both companies. This channel is used to report port congestion, transit delays, or any operational eventualities, ensuring a constant line of communication regarding the position and status of the sodium cyanide as hazardous product and IQBF (controlled / regulated cargo).

In the event of operational delays, gate congestion, or handling bottlenecks at the Port of Callao, Transportes Meridian's dispatchers immediately communicate the situation to the Contrans Planning department.

Upon notification, Contrans opens a direct line of communication with the port terminal authorities (DPW/APM) to coordinate logistical solutions and minimize the time the dangerous cargo remains exposed at the port area.

Customs and Regulatory Interfacing: The tracking system includes mandatory communication interfaces with the Peruvian Customs and Tax Administration (SUNAT) to secure the chain of custody:

Vehicle Entry into the Warehouse Transmission (IVA by its Spanish Acronym): Within 30 minutes of the containers' physical arrival at the Contrans facility, the Operations department transmits the vehicle entry data (including specific container weights and package counts) to SUNAT.

Goods Entry and Reception Transmission (IRM by its Spanish Acronym): Within 48 hours of cargo reception, Contrans transmits the complete Goods Entry and Reception report (documenting total packages and total weight received against the original B/L) to SUNAT.

This official regulatory data is automatically updated in the SUNAT system and triggered as a formal notification, making the exact status, weight, and volume of the transit cargo fully visible to the client.

Once the container is safely stored within the Contrans Temporary Deposit and customs clearance (nationalization) is finalized, the operations team transfers the container to the Simple Deposit stage, where the physical unloading of the container is executed.

The cyanide transport operation in sea containers from the Port of Callao to the Contrans warehouse is performed exclusively by Transportes Meridian S.A.C. (Meridian), a Cyanide Code certified transporter and a subsidiary company of the Transmeridian Group. Meridian periodically tests all communication and tracking equipment to ensure it functions properly prior to vehicle dispatch and throughout the transport operation.

During the site visit to the 24/7 Monitoring Center, the audit team interviewed the Head of Security and Monitoring, Luis Mosquera Guerra, and verified the testing and operational protocols for the communication technologies deployed.

Before any sodium cyanide unit departs, cellular phone functionality and signal connectivity are verified for all designated operators.

GPS and Telemetry Validation: Fleet tracking utilizes advanced platforms, specifically GPS and Smart Satellite. Before departure, the Monitoring Center confirms that each truck's fixed GPS is transmitting live telemetry data accurately. In line with strict contingency procedures, if a vehicle's fixed GPS is found to be non-operational at the time of dispatch, a functional portable backup GPS unit is immediately deployed.

Critical Security Features Testing: The Monitoring Center routinely verifies the operational status of integrated security features, including driver-accessible panic buttons and automated anti-jammer systems designed to detect and alert against signal-blocking attempts.

Contrans, through its contractor selection and operational oversight framework, ensures that communication risks and potential signal gaps are formally managed. Its exclusive certified carrier, Transportes Meridian, has established a comprehensive corporate procedure to identify and mitigate communication blackout zones across its operational routes.

Transportes Meridian has systematically identified communication blackout areas along its designated transport routes through comprehensive route risk assessments and has implemented specific operational procedures to mitigate risks within these zones.

The carrier's standard route risk assessments identify minor communication "blackout zones" where commercial cellular signals are temporarily lost. However, these corporate blackout areas are limited to very short intervals lasting only 1 to 2 minutes.

To ensure continuous management and safety control during these gaps on extended routes, Procedure (Sodium Cyanide Transport) establishes the following mandatory protocols:

Pre- and Post-Zone Reporting: The Escort Supervisor is required to notify the 24/7 Monitoring Center immediately before the convoy enters any pre-identified cellular blackout zone and must report back instantly upon exiting the zone and regaining a commercial signal.

Permanent Satellite Backup: To eliminate any period of absolute silence during long-haul routes deliveries, the convoy carries a fully operational satellite telephone (maintained with an active annual plan of 450 minutes). This serves as the primary communication channel for emergencies while traversing blackout areas, fulfilling the highest safety requirements of Meridian's mining clients.

Continuous Inter-Convoy Radio Frequency: Throughout the entire journey—from warehouse departure to final mine delivery—all transport units and escort vehicles maintain an uninterrupted convoy formation. Communication within these blackout zones relies on their programmed VHF/UHF radio base network, ensuring that drivers and the Escort Supervisor remain in constant, real-time contact with one another.

Specific Route Justification (Port of Callao to Contrans Warehouse):

For the specific transport operation audited under this scope, the transit from the Port of Callao to the Contrans warehouse, the use of a satellite telephone is not required or triggered.

This route is exceptionally short (approximately 11 km) and takes place entirely within an urban transit zone that always features 100% stable commercial cellular signal and continuous GPS tracking coverage.

Contrans, acting as the consignor, ensures full compliance with this practice by integrating its own administrative oversight and customs communication tracking with the robust, real-time geolocation infrastructure implemented by its contracted carrier, Transportes Meridian. Together, both entities maintain constant visibility over sodium cyanide shipments from the moment they are dispatched at the Port of Callao until final receipt at the warehouse.

The tracking framework consists of the following integrated systems and operational controls:

Transporter Geolocation Infrastructure & Monitoring Center: Transportes Meridian operates a centralized, dedicated Monitoring Center that is active 24 hours a day, 7 days a week. This center is managed by a specialized telemetry team led by the Head of Security and Monitoring, Luis Mosquera Guerra. The center utilizes advanced fleet tracking platforms—specifically GPS and Smart Satellite systems—to continuously monitor the exact geographic coordinates, transit speed, and trajectory of the units transporting the sodium cyanide.

Consignor Shared Communication and Traceability Channels: “OPS Contrans / TM" WhatsApp Group, a real-time communication channel is actively maintained and used by planning executives, operations executives, and transport coordinators from both Contrans and Transportes Meridian. This group serves to immediately report port congestion, transit delays, or any operational eventualities, ensuring a constant line of communication regarding the position and safety status of the hazardous product and IQBF (controlled/regulated cargo).

Tri-Daily Excel Tracking Matrix: A shared Excel cargo tracking dashboard is updated and distributed among all documentary areas of Contrans and Transportes Meridian three times a day to log the progress and status of every container in transit.

Customs Telemetry and Regulatory Tracking (SUNAT): The progress tracking system is linked to mandatory customs electronic interfaces administered by Contrans Operations upon arrival, adding an official layer to the shipment's chain of custody:

Vehicle Entry into the Warehouse Transmission (IVA by its Spanish Acronym): Within 30 minutes of the containers' physical arrival at the Contrans facility, the Operations department transmits the vehicle entry data (including specific container weights and package counts) to SUNAT.

Goods Entry and Reception Transmission (IRM by its Spanish Acronym): Within 48 hours of cargo reception, Contrans transmits the complete Goods Entry and Reception report (documenting total packages and total weight received against the original B/L) to SUNAT.

This official regulatory data is automatically updated in the SUNAT system and triggered as a formal notification, making the exact status, weight, and volume of the transit cargo fully visible to the client.

Data Archiving and Historical Records:

To guarantee long-term auditability, data integrity, and verification, all telemetry logs, GPS tracking data, and speed logs for sodium cyanide shipments are systematically archived for a minimum of one year. Historical fleet tracking databases for these transport operations have been maintained continuously since 2013, allowing for complete retrospective compliance reviews.

Contrans, acting as the consignor, ensures full compliance with this practice by utilizing a rigorous, multi-point chain of custody and weight verification framework developed in close coordination with its contracted carrier, Transportes Meridian. This interconnected data and physical control system guarantees that 100% of the sodium cyanide received at the port of entry remains fully accounted for without any diversion or loss during transit to the warehouse facility.

The inventory control and chain of custody framework consist of the following integrated controls:

Tamper-Evident Seal Controls & Documentation Matching:

The official dispatch documentation, including the B/L, Electronic Delivery Note, and the Container Discharge Control (CDL) matrix generated by Contrans, lists the unique serial numbers of the high-security seals affixed to the maritime containers.

Transportes Meridian's drivers physically inspect and verify that these seals remain entirely intact and match the serial numbers registered in the documentation before departing the port gates.

Upon physical arrival at the Contrans facility, the operational team perform a mandatory re-verification of the seal numbers against the documentation to certify that the container remained hermetically closed and unbreached throughout the short transit.

Origin and Inbound Weight Verification (Weighbridge Infrastructure):

For shipments originating directly from the maritime terminals at the Port of Callao (DP World and APM Terminals) or the Chancay Port, the official port weighbridge ticket is generated at the gate as the baseline inventory control document.

When the hazardous cargo is transferred to Contrans as the authorized extra-port customs warehouse, the transport units are re-weighed at the inbound facility weighbridges.

The inbound weights are cross-verified and reconciled against the origin port weighbridge tickets, the Bill of Lading (B/L), and the customs manifest to mathematically rule out any sifting, theft, or product loss.

Consignor Inventory Systems and Customs Reconciliation:

Contrans maintains continuous administrative custody through its Integrated Logistics Operations System (SIOL). Upon receiving the pre-alert dossier (B/L, MSDS, Safety Summary Sheet, and Controlled Goods Habilitation), the Imports area registers the shipment and cross-checks the data against the official SUNAT customs manifest.

The chain of custody is formally closed through rapid electronic data transmissions to the Peruvian Customs and Tax Administration (SUNAT):

Vehicle Entry into the Warehouse Transmission (IVA by its Spanish Acronym): Within 30 minutes of the containers' physical arrival at the Contrans facility, the Operations department transmits the vehicle entry data (including specific container weights and package counts) to SUNAT.

Goods Entry and Reception Transmission (IRM by its Spanish Acronym): Within 48 hours of cargo reception, Contrans transmits the complete Goods Entry and Reception report (documenting total packages and total weight received against the original B/L) to SUNAT.

This official data reconciliation loop gives the client and regulatory agencies absolute visibility over the verified, unaltered volume of sodium cyanide that transitioned from the port to its storage location.

Transportes Meridian ensures that comprehensive material safety information and exact shipment quantity documentation are carried aboard every transport vehicle, remaining readily available to drivers throughout the journey.

Contrans, acting as the consignor, ensures full compliance with this practice by implementing a mandatory documentary validation and dispatch workflow. This system guarantees that 100% of the sodium cyanide shipments moving from the Port of Callao to the warehouse facility are physically accompanied by accurate shipping records and updated Safety Data Sheets (SDS/MSDS) inside the vehicle cabin.

The availability of transport documentation is secured through the following operational and administrative controls:

Pre-Alert Safety Documentation Dossier: Prior to container pickup at the port terminals (DP World or APM Terminals), the client transmits a complete digital documentation pack to the Contrans Imports department via email or corporate extranet. This dossier includes the Bill of Lading (B/L), the Material Safety Data Sheet (MSDS), the Safety Summary Sheet, and the official Authorization for the Entry of Controlled Goods (IQBF).

HAZMAT Technical Validation: The Contrans Imports team routes the digital papers to the specialized Hazardous Materials (HAZMAT) department. The HAZMAT team formally reviews and validates the chemical safety parameters and weights against the official SUNAT customs manifest, issuing the formal operational conformity required to log the cargo into the Integrated Logistics Operations System (SIOL).

Mandatory Hard-Copy Folder in the Truck Cabin: Transportes Meridian issues the mandatory electronic delivery note, which explicitly declares the exact net/gross weight, container numbers, and total package count of the sodium cyanide in transit. In strict accordance with Transportes Meridian's certified *Procedure P-TRA-009 (Sodium Cyanide Transport), the driver is operationally required to carry a physical, hard-copy folder inside the truck cabin before departing the port gates. This folder must contain:

- The official transport delivery note.
- The corresponding maritime Bills of Lading (B/Ls).
- The manufacturer's original Material Safety Data Sheet (MSDS/SDS).
- The localized Safety Summary Sheet.

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

Service Level Agreement (ANS by its acronym in Spanish): Contrans and Transportes Meridian have implemented a comprehensive Service Level Agreement defining precise operational commitments, key performance indicators (KPIs), and communication channels between the warehouse and the carrier.

Section IV of the active Service Level Agreement explicitly dictates that the carrier must be certified on the Cyanide Management Code for all Sodium Cyanide Transport operations. Additionally, this agreement establishes that Contrans will perform coordinated field inspections and verification audits against the Cyanide Code transportation protocol at least once a year to verify ongoing compliance across the entire 3-year certification cycle.

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 Standard of Practice 2.1
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Not applicable. Contrans does not have interim storage.

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 Standard of Practice 3.1
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

General Note on Principle 3 Scope and Division of Roles

As stated in the International Cyanide Management Institute (ICMI) *Guidance for Use of the Cyanide Transportation Verification Protocol* (June 2021), the Transport Practices and questions under this principle apply to interim storage sites as well as cyanide in transport.

The land transportation of sodium cyanide containers from the Port of Callao to the Contrans warehouse is performed exclusively by Transportes Meridian S.A.C., an independently certified ICMI transporter. Transportes Meridian maintains its own detailed, written plans for responding to emergencies that may occur during transport operations and was found in full compliance during its recent recertification audit.

Contrans, acting as the cyanide consignor, maintains a comprehensive written plan to respond as necessary to any emergency incidents that may occur while cyanide is handled or stored within its facility. This emergency response framework explicitly establishes that any cyanide-related emergencies occurring during transportation will be directly managed and attended to by the carrier (Transportes Meridian). Under this framework, the carrier is required to keep Contrans continuously informed of ongoing response actions and to alert the consignor immediately if complementary support is required.

Furthermore, because the Contrans facility incorporates warehouse operations within this transport supply chain, Contrans has also been concurrently evaluated under Principle 5 (Emergency

Response) of the “ICMI Cyanide Production Verification Protocol” (June 2021). The detailed evaluation of Contrans' on-site emergency capabilities, emergency response plans, and safety resources is developed following this Transport Verification Protocol section.

Finding identified in this transport practice

Transportes Meridian has a comprehensive, documented, and legally approved Emergency Response Plan (referred to locally as a Contingency Plan) specifically designed to address incidents during the land transportation of hazardous materials, including sodium cyanide.

The plan is formalized under the document titled "Contingency Plan for the Land Transport of Hazardous Materials and/or Waste".

In strict compliance with Peruvian national regulations, this emergency plan has been formally reviewed and approved by the competent authority, the Ministry of Transport and Communications (MTC) of Peru, through Approval Resolution No. 1107-2022-MTC/16.

The Transportes Meridian’s Emergency Response Plan is fully appropriate and specifically adapted for the designated transportation routes utilized for sodium cyanide shipments.

Transportes Meridian S.A.C. ensures route-specific appropriateness through a tiered risk management and contingency framework:

Comprehensive Material and Route Matrix: The master Contingency Plan for the Land Transport of Hazardous Materials and/or Waste covers 63 distinct chemical products, explicitly including sodium cyanide. This master plan incorporates the primary national transport corridors and was legally validated by the Peruvian Ministry of Transport and Communications (MTC) under Technical Legal Report No. 063-2022-MTC/16.02, which served as the basis for its formal approval.

Route-Specific Contingency Extensions: To address the unique geographic, climatic, and social risks of specific destinations, Meridian develops formal extensions to the master plan.

Operational Route Risk Assessments: Meridian utilizes Form Risk Assessment on Route to dynamically evaluate risks along each specific transport segment. This document identifies critical hazard points (e.g., steep descents, sharp curves, high-density areas) and mandates specific operational control measures, including strict defensive driving protocols, mandatory compliance with traffic signage, and conservative speed reductions below the national limits.

Active Route Sheets: Complementing the risk assessment, each convoy operates under a formalized Route Sheet that serves as the tactical guide for the drivers and Escort Supervisors, mapping out safe havens, communication checkpoints, and emergency contact locations along the specific route.

Transportes Meridian's Contingency Plan includes the MSDS for sodium cyanide, which contains the chemical and physical properties of the product. These properties are considered in the risk and hazard assessment of the Contingency Plan.

Transportes Meridian's Contingency Plan consider the land transport of sodium cyanide in Peru by truck and trailers. The risk and hazard assessment of the Contingency Plan is based on this method of transport. The Contingency Plan for the Land Transport of Hazardous Materials and/or Waste has the approval resolution from the Ministry of Transport and Communications of Peru.

Transportes Meridian´s Contingency Plan includes the infrastructure assessment in form F-TRA-008 – Risk Assessment on Route. This document analyzes the infrastructure and conditions of the roads used to transport sodium cyanide, considering whether the road is paved or not, the presence of sharp curves, the load capacity of the bridges, the steepness of the slopes, and the population density.

Transportes Meridian's Emergency Response Plan fully considers and integrates the specific technical design and structural characteristics of the transport vehicles utilized for sodium cyanide shipments.

The Contingency Plan for the Land Transport of Hazardous Materials and/or Waste (Code: D-TRA-001, Version 03) accounts for vehicle design through the following operational and regulatory controls:

Detailed Fleet Technical Description: The Plan includes an exhaustive, technical inventory of all authorized tractor units and semi-trailers configured for hazardous material transport. This roster explicitly covers only those units formally registered and permitted by the DGTT (General Directorate of Land Transport) under the Ministry of Transport and Communications (MTC).

Chassis and Trailer Specifications: The plan defines the exact engineering standards for trailers, mandating the use of conventional heavy-duty container chassis or specialized low-bed trailers. These configurations optimize the cargo's center of gravity and provide superior structural stability, reducing rollover risks.

Intermodal Container Interfacing: The emergency protocols are tailored specifically for sodium cyanide transported inside standard, sealed maritime shipping containers. The plan explicitly accounts for the physical containment provided by these heavy steel containers and integrates response procedures (such as uprighting operations, container lifting, or specialized structural stabilization) that are appropriate for this specific type of transport unit.

Transportes Meridian's Contingency Plan includes the Risk Assessment and Control Matrix by Route, encompassing various risks (chemical spill, adverse weather conditions, load falling off, assaults, thefts, rollovers, natural disasters), their potential causes, and control measures, which can include elimination, substitution, engineering, administrative controls, and personal protective equipment. (defensive driving, use of spill kits, vehicle inspection, use of PPE, adherence to speed limits).

The Contingency Plan considers the following emergency levels:

LEVEL I (Minor)

A minor emergency that can be controlled by the TRANSPORTES MERIDIAN SAC driver(s), who can respond to the event and take the necessary actions to address the emergency. At this Level I, the emergency is controlled with internal resources.

LEVEL II (Medium)

A medium emergency that involves the driver, the transport unit, and the goods. At this Level II, the emergency is controlled with the resources of the company, the sender, and the recipient. It may or may not involve the intervention of support organizations (Police, firefighters, health services) and local authorities.

LEVEL III (Major)

An emergency that requires external support; the presence of the emergency team and/or external support institutions is necessary. The scope of the accident may extend inside or outside the company.

Transportes Meridian S.A.C. explicitly identifies the roles of external emergency responders, medical services, and regulatory authorities within its Emergency Response Plan, and has formally notified these entities regarding their specific roles in the event of a sodium cyanide incident. The Contingency

Plan for the Land Transport of Hazardous Materials and/or Waste classifies incidents into three severity tiers. For Level II (incidents exceeding local convoy containment capabilities) and Level III (major emergencies requiring massive external support) events, the plan incorporates a dedicated communication flowchart. This chart delineates the coordination lines and response roles for external support entities, including the National Police, Volunteer Fire Departments, Regional Support Hospitals, Civil Defense, and the General Directorate of Socio-Environmental Affairs of the Ministry of Transport and Communications (MTC).To ensure these entities are fully aware of their roles and the chemical hazards associated with sodium cyanide transport, Meridian systematically delivers formal notification letters to the primary medical centers and fire stations along its national transport corridors. The audit team verified formal, stamped, and signed acknowledgment letters confirming delivery and notification to the following external responders.

Transport Practice 3.2

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 3.2
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. provides comprehensive initial and annual refresher emergency response training to all appropriate personnel, including drivers, escort supervisors, and monitoring operators.

The training framework is formalized within the company's 2026 Annual Occupational Safety and Health Program, which is actively monitored and reported monthly to the Joint Health and Safety Committee. The training program guarantees that all personnel handling sodium cyanide shipments possess the necessary skills to prevent and respond to emergencies.

Auditors ensures that the internal trainer possesses high-level international and local credentials to effectively train field personnel.

Transportes Meridian's Emergency Response Plan provides detailed, clear, and specific descriptions of the emergency response duties and responsibilities for all key personnel involved in the supply chain, governing actions required before, during, and after an incident.

The Contingency Plan for the Land Transport of Hazardous Materials and/or Waste aligns roles and functions based on a three-tier emergency classification system:

Level I (Minor): Localized incidents that can be resolved immediately by the convoy's on-scene resources.

Level II (Medium): Incidents requiring localized internal support or regional company deployment.

Level III (High): Major emergencies requiring the full activation of the corporate crisis committee, deployment of specialized emergency teams, and direct intervention of external mutual aid entities (Hospitals, Fire Departments, and Civil Defense).

Within this framework, the plan establishes a structured command hierarchy and explicitly defines the operational duties for the following eight key roles:

- General Manager / Head of the Crisis Committee.
- Operations Manager.
- Head of Security / Safety Supervisor.
- Monitoring Center.
- Convoy Escort Supervisor / On-Scene Coordinator.
- Convoy Drivers.
- Coordinator I of the Emergency Response Committee.
- Coordinator II of the Emergency Response Committee.

The audit team confirmed compliance by reviewing the organizational charts and specific duty chapters within Contingency Plan. The auditors verified that the document explicitly details actionable checklists for each of the eight roles listed above across the timeline of an emergency (before departure, during an active crisis, and post-incident cleanup).

Transportes Meridian S.A.C. maintains an exhaustive, documented inventory of emergency response equipment, personal protective equipment (PPE), spill containment materials, and specialized medical kits that must be available. The equipment requirements are codified across two

complementary operational documents: the master Contingency Plan and the specific Sodium Cyanide Transportation Procedure

Personal Protective Equipment (PPE) & Detection: Full-face respirators equipped with multi-gas/vapor protective cartridges and particulate filters. Chemical-resistant disposable Tyvek suits, high-waterproof rubber boots, heavy-duty leather gloves, long chemical-resistant nitrile gloves, and safety goggles.

Spill Containment, Material Isolation & Neutralization: Chemical Neutralizer: 20 kg of lime (calcium oxide/hydroxide) used for pH adjustment and stabilization to prevent HCN gas evolution in liquid contact scenarios. Spark-Proof Tools: Non-sparking shovels and non-sparking picks designed safely for hazardous chemical environments. Containment Media: Absorbent pads, absorbent booms, heavy-duty plastic chemical bags, plastic buckets, brooms, rubber mallets, and plastic dustpans.

Scene Isolation: High-visibility traffic cones, reflective safety vests, caution barricade tape, and signaling chemical glow sticks.

Specialized First Aid & Medical Emergency Equipment: A dedicated Medical Oxygen Cylinder equipped with a pressure regulator and a standard positive-pressure or demand-valve resuscitation assembly, Manual resuscitation bag (AMBU respirator) and corresponding reservoir oxygen masks. A specialized Sodium Cyanide Antidote Kit. General trauma first aid supplies, surgical gloves, and a rigid cervical neck brace.

Transportes Meridian S.A.C. ensures the continuous and immediate availability of all necessary emergency response, health, and safety equipment, including highly specialized personal protective equipment (PPE) and advanced medical antidotes.

Transportes Meridian defined that the cyanokit antidote will be administered by qualified external personnel doctors and trained medical technicians corresponding on the medical centers (clinicals and hospitals) included on the Contingency Plan.

Transportes Meridian S.A.C. has established and strictly implements clear, documented procedures to inspect all emergency response equipment, guaranteeing its absolute operational readiness and availability prior to the dispatch of any sodium cyanide shipment.

Contrans S.A.C.		July 22, 2026
Name of Facility	Signature of Lead Auditor	Date of submittal

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The inspection protocols are systematically governed and executed through the following controls:

Pre-Dispatch Mandatory Inspection Protocol: In accordance with the Contingency Plan Section 6.3-D, a comprehensive pre-trip inspection of all emergency response kits, personal protective equipment (PPE), and respiratory protection assets is mandatory.

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

Service Level Agreement (ANS by its acronym in Spanish): Contrans and Transportes Meridian have implemented a comprehensive Service Level Agreement defining precise operational commitments, key performance indicators (KPIs), and communication channels between the warehouse and the carrier.

Section IV of the active Service Level Agreement explicitly dictates that the carrier must be certified on the Cyanide Management Code for all Sodium Cyanide Transport operations. Additionally, this agreement establishes that Contrans will perform coordinated field inspections and verification audits against the Cyanide Code transportation protocol at least once a year to verify ongoing compliance across the entire 3-year certification cycle.

Transportes Meridian S.A.C. clearly delineates the roles and responsibilities of external contractors and specialized entities designated to assist in Level III emergency response activities, including chemical containment, environmental remediation, and financial indemnity.

While standard public emergency responders (such as the National Police and Volunteer Fire Departments) operate under their own institutional jurisdictions, Meridian has formalized specific agreements and protective structures with private specialized entities to manage large-scale cyanide incidents:

Specialized Emergency Response and Remediation Contractor: Meridian has contracted a leading international specialist company in hazardous materials emergency response, hazardous waste management, soil rehabilitation, and water-body remediation services. It is designated to assume operational control over specialized recovery, neutralizing, and environmental cleanup actions during a Level III crisis.

Financial Redundancy and Environmental Liability Coverage: To guarantee immediate funding for remediation and third-party liabilities, Meridian maintains a current Civil Liability Insurance Policy. This specialized policy explicitly covers manufacturing, storage, transshipment, loading, unloading, and the land transport of hazardous materials, including sodium cyanide. It guarantees coverage for material damage, heritage impact, and features a dedicated environmental remediation.

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 Standard of Practice 3.3
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. has established documented procedures, updated communication flowcharts, and verified directory records to notify the clients, regulatory agencies, external emergency responders, medical facilities, and potentially affected communities in the event of an emergency.
The notification architecture is governed under the master Contingency Plan through the following synchronized mechanisms:

Emergency Communication Flowchart (Section 6.2.1): The plan integrates an active Communications Flow mapping out the chain of custody for alerts during a crisis. This flowchart specifies the exact contact numbers, operational roles, and reporting timelines for the internal command structure, including the on-scene Safety Escort Supervisor, the Monitoring Center, the Coordinator of the Emergency Response Committee, and the Head of the Crisis Committee.

Dynamic Support Institution Directory (Section 6.4): To prevent obsolete data along active transport corridors, Section 6.4 mandates that the telephone directory of support institutions must be dynamically updated according to the specific final destination of each sodium cyanide cargo. This directory encompasses localized contact data for regional medical centers, police delegations, volunteer fire stations, and civil defense units.

Route-Specific Data Maintenance: In strict alignment with operational reality, Meridian updates these communication records every time a new Route Risk Assessment (Form F-TRA-008) is compiled or when physical notification letters are delivered to local authorities, ensuring that the field teams carry localized, live contact matrices for the specific northern or southern Andean routes being traversed.

Regulatory Agency Notifications: The communication flowchart explicitly details the mandatory protocols and contact channels to notify national regulatory bodies within required timeframes, specifically the National Police, Volunteer Fire Departments, and the DGASA-MTC (General Directorate of Socio-Environmental Affairs of the Ministry of Transport and Communications).

Transportes Meridian S.A.C. has established formal systems and cross-departmental procedures to ensure that both internal and external emergency notification and reporting procedures are kept strictly current.

The management system guarantees directory and flowchart currency through two specialized internal triggers:

Internal Personnel Contact Maintenance: The Human Resources (HR) Department is formally responsible for tracking and documenting any modifications to the personal or corporate communication lines of company employees. In the event of an update affecting key crisis management personnel—such as the general manager, operations manager, escort supervisors, or emergency committee coordinators, HR immediately issues an official internal notification to the Integrated Management System (IMS) Department. The IMS team then updates the formal Emergency Response Plan text and its associated flowcharts.

External Responder and Regulatory Directory Verification: As detailed under Section 6.2.1 (Communications Flow), the notification protocol accounts for the three distinct emergency severity tiers (Levels I, II, and III). To maintain the validity of external lines, the operational team cross-checks contact numbers during the mandatory route risk assessments and the aid letter delivery cycles (as verified in Practice 3.1.4). This ensures the real-time accuracy of emergency numbers for specialized response providers, regional support hospitals, volunteer fire companies, civil defense units, the National Police, and the DGASA-MTC (General Directorate of Socio-Environmental Affairs of the Ministry of Transport and Communications).

Contrans, acting as the consignor, and its dedicated transport contractor, Transportes Meridian, have established formal, documented procedures within their respective emergency response plans to

notify the International Cyanide Management Institute (ICMI) of any significant cyanide incidents within the strictly mandated global timeframes.

The evaluation of the notification procedures and historical records shows the following:

Consignor Notification Procedure (Contrans):

Contrans has integrated its official ICMI notification protocol within its corporate Cyanide Emergency Preparedness and Response Plan. Under the "External Communications" section, the plan defines a clear two-tiered reporting mechanism:

Initial Notification Trigger: In the event of a significant cyanide incident, written notice must be submitted to the ICMI via email (info@cyanidecode.org) within 24 hours of its occurrence. This initial communication must document the exact date, time, and nature of the incident, as well as the name and contact information of the designated company representative authorized to handle further information requests.

Detailed Follow-up Report: The procedure mandates that a comprehensive secondary report be compiled and transmitted to the ICMI within seven (7) days of the incident. This documentation must detail the verified root cause, localized health, safety, and environmental impacts, and all immediate mitigation or environmental remediation actions executed by the response teams.

Carrier Notification Procedure (Transportes Meridian):

As a Cyanide Code certified carrier, Transportes Meridian maintains a parallel notification protocol explicitly embedded inside its Contingency Plan for the Land Transport of Hazardous Materials and/or Waste.

Operational Protocol: Under Section 6.3 ("Cyanide Spill Procedure"), Numeral K, the document explicitly mandates the reporting of any significant cyanide incident to the ICMI within a maximum 24-hour window from the time of the event.

Designated Responsibility: The procedure appoints the Head of the Integrated Management System (IMS) as the sole corporate representative responsible for executing, validating, and transmitting the emergency notification directly to info@cyanidecode.org.

Incident History Declaration:

Contrans Operations: No significant sodium cyanide incidents or regulatory deviations have occurred within the physical cyanide handling or warehouse storage operations of Contrans during the audited period.

Transportes Meridian Operations: No significant sodium cyanide incidents or transport-related releases have occurred during Transportes Meridian's land transport operations throughout the current three-year certification cycle.

Reporting Status: Consequently, no emergency notifications, preliminary disclosures, or detailed seven-day follow-up reports have been required or submitted to the ICMI by either company under this protocol.

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 Standard of Practice 3.4
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. has documented and implemented clear, structured procedures for remediation following a sodium cyanide incident, including the mechanical recovery of solids, soil decontamination, environmental monitoring parameters, and the secure management and disposal of spill clean-up debris. The remediation and decontamination architecture is split into immediate first-response containment and advanced professional remediation, governed by Emergency Response Plan for Sodium Cyanide Transport (Section 6.3-A "Initial Response Actions for Spills on Dry Soil"): Immediate Field Recovery and Stabilization (Dry Soil Protocol): In the event of a solid sodium cyanide spill, the protocol strictly mandates that no material is to be left exposed on the ground. The immediate response team utilizes calcium oxide/hydroxide (lime) to treat the affected area, ensuring the pH remains elevated above safety thresholds to inhibit the volatilization of Hydrogen Cyanide (HCN) gas. Mechanical Containment and Debris Management: Personnel equipped with mandatory full-face respiratory protection and chemical suits recover the spilled chemical and the immediate layer of

contaminated soil utilizing spark-proof shovels, brooms, and plastic dustpans. All recovered chemical debris and contaminated media are placed inside high-density red plastic bags, securely sealed with heavy-duty duct tape, and labeled for strict hazardous waste chain-of-custody tracking and ultimate disposal through authorized channels. Specialized Remediation Contractor Activation (Section 6.3-J): For advanced decontamination, neutralization of residual ions, and full ecological rehabilitation, Meridian formally triggers its agreement with a certified tier-one emergency response firm specializing in hazardous waste management, contaminated land rehabilitation, and water-body/coastal remediation services. The certified tier-one emergency response firm dispatches specialized personnel and remediation chemistry from its strategic response bases located at different and strategically locations. Post-Cleanup Verification Limits: To validate the success of the decontamination and remediation efforts, the plan establishes strict verification parameters based on official regulatory thresholds: Soil Media: Residual validation requires core sampling to verify that free cyanide levels conform to the specific national standards defined in mg/kg of dry weight based on land-use categories (agricultural, residential, or extractive/industrial). Surface Water Interfacing: If the spill contacts surface water bodies, immediate sampling is executed to intercept and remediate any plume exceeding the strict environmental baseline threshold of 0.02 mg/L of free cyanide, triggering immediate regulatory and localized mitigation actions.

Transportes Meridian S.A.C.'s Emergency Response Plan, specifically under the mandatory chapter titled "MANDATORY CONSIDERATIONS", the procedure explicitly states that under no circumstance shall response personnel or third-party contractors apply sodium hypochlorite, ferrous sulfate, or hydrogen peroxide to surface affected by a cyanide spill.

Transport Practice 3.5

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 3.5
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. has established and implemented formal provisions to periodically review, evaluate, and update the adequacy of its Emergency Response Plan, ensuring the document remains effective and aligned with current operational realities.

Under Section 6.1.6 ("Review") of the master Integrated Management System procedure (Control of Documents and Records), it is mandated that all critical safety, health, and environmental documentation must undergo a formal review at least annually. Additionally, non-scheduled reviews can be triggered at any time upon the formal request of the designated Process Owner to capture immediate operational changes.

Section 6.3 (L) "Contingency Plan Update" of Plan codifies explicit operational triggers that mandate an immediate evaluation of the plan's adequacy. The plan must be reviewed and updated under the following scenarios: Following the occurrence of any real transport incident or near-miss. Following the execution of scheduled emergency mock drills, to incorporate lessons learned and address identified gaps. In the absence of incidents or drills requiring changes, a mandatory comprehensive review is executed annually.

The Contingency Plan has also a yearly revision. Resolution of the Ministry of Transport and Communications No. 1383-2025-MTC/16.

Transportes Meridian S.A.C. has established formal provisions for periodically conducting emergency mock drills and actively implements them. The company maintains a structured annual drill program managed by the Safety, Health, Environment, and Quality (SHEQ) Department, which includes specific, product-focused sodium cyanide emergency scenarios.

The systematic execution and implementation of the drill program were verified through a comprehensive historical review spanning the current certification cycle:

2026 Annual Drill Program Framework: Meridian operates under the active 2026 Annual Schedule of Drills. The scheduled timeline for the current year includes localized Fire drills, First Aid response, and a specialized Hazardous Materials/Sodium Cyanide spill simulation.

Operational Drill History and Continuous Improvement Evaluation:

Under the Cyanide Drill, the audit team reviewed the comprehensive execution report for a joint sodium cyanide spill drill conducted by Transportes Meridian in coordination with Contrans. The

documentation includes extensive photographic evidence detailing tactical maneuvers such as wind direction measurement, initial site entry utilizing calibrated gas detectors, step-by-step containment, soil remediation, and a detailed chronological timeline evaluation. The post-exercise evaluation identified critical opportunities for improvement, specifically the recommendation to transition future drills directly to open national highways (on-the-road simulation) and to guarantee the direct physical participation of specialized medical personnel.

Hazardous Materials Spill Drill: Review of this historical emergency report confirmed the execution of a chemical spill response. The post-drill evaluation identified an operational bottleneck, generating a formal corrective action mandating that the hazardous materials warehouse access routes must remain completely cleared to optimize the emergency entry and exit radius of response trucks.

Sodium Cyanide Spill Drill: Held at the Meridian Transport Garage, this exercise simulated a major solid sodium cyanide spill scenario at Kilometer 35 of the Panamericana Norte Highway. The evaluation report detailed organizational strengths and explicitly documented a critical weakness: a localized lack of training regarding the correct administration protocol for medical oxygen. A formal corrective action was logged, triggering immediate targeted training delivered by the company's occupational physician.

Tracking and Closure of Action Items: All opportunities for improvement, weaknesses, and recommendations derived from these exercises are systematically integrated into a centralized Corporate Improvement Matrix. The SHEQ department tracks these entries against physical completion evidence and surveys to ensure that lessons learned are effectively institutionalized into enhanced field safety.

Transportes Meridian includes in the Contingency Plan under Section 6.1.6 ("Review") of the master Integrated Management System procedure (Control of Documents and Records), it is mandated that all critical safety, health, and environmental documentation must undergo a formal review at least annually. Additionally, non-scheduled reviews can be triggered at any time upon the formal request of the designated Process Owner to capture immediate operational changes.
Section 6.3 (L) "Contingency Plan Update" of Plan codifies explicit operational triggers that mandate an immediate evaluation of the plan's adequacy. The plan must be reviewed and updated under the following scenarios: Following the occurrence of any real transport incident or near-miss. Following the execution of scheduled emergency mock drills, to incorporate lessons learned and address

identified gaps. In the absence of incidents or drills requiring changes, a mandatory comprehensive review is executed annually.

Cyanide Production Verification Protocol

Principle 1 | OPERATIONS

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

Production Practice 1.1

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 1.1
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:
Contrans ensures full compliance with this practice by maintaining active municipal operating licenses, building safety certifications, and relying on the historical validation of its construction quality control and quality assurance (QA/QC) programs, which remain unaltered due to the preservation of the facility's physical layout.

During the previous certification audit, the facility's design, construction, and quality control/quality assurance (QA/QC) programs were formally validated through the “Certificate of Technical Inspection of Safety in Multidisciplinary Buildings”. This baseline documentation was originally issued by the National Institute of Civil Defense (INDECI by its Spanish acronym) under the authority of the Provincial Municipality of Callao, certifying that the storage structures complied with all building safety regulations in force.

In accordance with the ICMI “Guidance for Use of the Cyanide Production Verification Protocol”, since these design and QA/QC attributes were fully verified during the previous audit, earlier findings serve as active evidence of compliance, provided the active records are retained and no physical changes have occurred.
The auditors verified through physical facility inspections, interviews with management, and a review of facility maps that no changes have been made regarding the dimensions, infrastructure, or physical distribution of the property since the previous certification audit.

Current Regulatory and Structural Certifications:

The ongoing structural safety and legal operation are documented and backed by the following current municipal instruments:

Technical Inspection of Safety in Multidisciplinary Buildings (ITSE by its Spanish acronym): Contrans maintains an active ITSE file formally issued by the Municipality of Callao. This certification explicitly authorizes the safe utilization of the entire property and is in force for a standard duration of two years. This administrative license grants indefinite operational validity to the warehouse facility.

Contrans ensures full compliance with this practice by relying on historically validated building safety inspections executed by civil defense authorities. During the previous certification audit, the proper construction alignment and structural safety of the storage facilities were formally reviewed and validated through the “Certificate of Technical Inspection of Safety in Multidisciplinary Buildings” (ITSE). This official certification was issued by the National Institute of Civil Defense (INDECI), acting as the competent authority of the Provincial Municipality of Callao. The document formally certified that the Contrans facility complies entirely with all applicable national regulations regarding safety in built structures.

Per the ICMI “Guidance for Use of the Cyanide Production Verification Protocol”, for operations undergoing a recertification audit, the auditors can reference prior audit findings as active evidence of design and construction compliance for previously existing facilities, provided the infrastructure has not been altered.
The auditors verified through physical inspections and management interviews that there has been no change since the previous audit regarding the physical dimensions, structural infrastructure, or general property distribution of the cyanide storage areas.

Contrans maintains a detailed “Technical Descriptive Report” specifically covering the Simple Deposits area, in this specific area is the sodium cyanide stored, in IBCs and metallic drums. This technical report clearly delineates and describes the exact structural boundaries and parameters of the simple storage deposits where solid sodium cyanide cargo is safely handled and managed within its original packaging.

This protocol question is “Not Applicable (N/A)” for the Contrans warehouse operation during this recertification audit cycle due to the following criteria:

Prior Validation of Compliance: This specific question only applies to operations that lack original quality control, quality assurance, or as-built engineering documentation. For Contrans, the construction and structural parameters were already fully validated and found in compliance during the previous certification audit under Question 1.1.1 via the official “Certificate of Technical Inspection of Safety in Multidisciplinary Buildings” issued by the National Institute of Civil Defense (INDECI).

No Structural Modifications have taken place since the last audit. As verified through physical site inspections and documentation reviews, Contrans has maintained a complete status quo with zero modifications to the infrastructure, footprint, boundaries, or general distribution of its simple deposits area since the previous audit.

Consequently, because the existing structures remain completely unchanged and their structural integrity was formally established in the previous Code audit report, a separate "fit for service" inspection report is not triggered or required for this recertification cycle.

Contrans ensures full compliance with this practice. Because Contrans operates strictly as a warehouse facility that handles solid sodium cyanide exclusively in closed original packages from the producers, direct chemical exposure to structural components is minimized.

However, the structural materials used to construct the warehouse facility are highly durable, non-reactive, and specifically engineered to provide a dry, secure, and fire-resistant environment that protects the integrity of the cyanide packaging against degradation or external hazards.

The technical specifications of the construction materials were verified as follows:

Floor Infrastructure and Containment Layering:

The interior floor of the warehouse consists of a high-capacity, multi-layered reinforced asphalt concrete foundation designed to support heavy machinery and loads while preventing any subsurface seepage.

Perimeter Walls, Fencing, and Access Control

The warehouse enclosure balances physical structural strength with ventilation and security protocols:

Rear Wall: Built from solid structural brick and cement to form a robust physical barrier.
Lateral and Front Boundaries: Protected by heavy-duty metal fences integrated with interconnected cyclonic mesh.
Access Doors: The facility features two sliding metal doors with a maximum height of 5 meters, allowing for safe forklift maneuvering. These doors are fitted with commercial padlocks to secure the facility and prohibit unauthorized entry at the conclusion of daily operations.

Roof Engineering and Fireproof Weather Protection:

The roof is constructed with a galvanized tubular steel framework covered by a hermetic, fireproof, and UV-resistant canvas. The material is formulated with a primary PVC-S matrix, organic plasticizers, a biocidal agent, and special photostabilizer additives that resist ultraviolet (UV) degradation. The material contains no lead and is structurally supported by a high-tenacity polyester mesh.

Thermal and Weather Resistance: The roof structure is certified to withstand temperatures up to 50°C and is engineered with external gutters and drainage downspouts to safely discharge rainwater, preventing any moisture entry into the dry storage zone.

Flammability Certification: The auditors reviewed Technical Report, the physical and flammability testing conducted under the “NFPA 701 Method 2” standard certified that the roofing material is officially fire-retardant, non-flammable, and self-extinguishing within 5 seconds.

This protocol question is Not Applicable (N/A) for the Contrans warehouse operation because this requirement does not apply to warehouse operations that exclusively handle cyanide in closed containers and packages.

Contrans operates strictly as a storage facility for solid sodium cyanide, the original packaging containing solid sodium cyanide is never breached, opened, altered, or sampled. The product is maintained entirely within its original, intact producer packaging, which includes:

- Intermediate Bulk Containers (IBCs / big boxes) of 1 net ton.
- Intermediate Bulk Containers (IBCs / big boxes) of 1.1 net tons.
- Closed metal cylinders (drums) of 50 kg.

Contrans ensures full compliance with this practice by managing all solid sodium cyanide cargo on engineered impermeable surfaces that prevent any potential product seepage or environmental release to the subsurface.

The interior warehouse floor functions as a highly competent, low-permeability engineered barrier constructed in multiple dense layers to support heavy forklift traffic while isolating the subsurface.

The auditors conducted a detailed physical inspection of the warehouse's entire active storage flooring. The field inspection confirmed that the multi-layered asphalt concrete surface is in excellent structural condition. The floor is completely solid, continuous, and free of any significant cracks, fissures, or structural degradation that could compromise its impermeability or represent a containment risk to the operation, ensuring that any accidental dry spill can be immediately recovered without subsurface infiltration.

The requirements of this provision do not apply to warehouse operations managing solid cyanide in unopened containers and packaging, such as IBCs and drums.

Contrans ensures full compliance with this practice by utilizing the physical warehouse structure as secondary containment for solid packages, implementing a dedicated rainwater segregation network, and deploying specialized containment systems for emergency decontamination liquids.

Because the facility operates strictly as a warehouse handling solid sodium cyanide (stored in its intact original producer packaging: 1.0 net ton IBCs, 1.1 net ton IBCs, and 50 kg metal cylinders), there are no large active chemical process tanks or liquid product pipelines requiring traditional open-air secondary containment basins.

The indoor warehouse building's impermeable asphalt concrete floor and structural walls function as a highly competent secondary containment barrier for the stored solid cyanide containers.

To prevent precipitation from coming into contact with the sodium cyanide cargo, the warehouse roof is engineered with a specialized perimeter gutter and discharge tube system. This network captures all rainwater and safely diverts it away from the storage area, discharging the clean runoff directly into a dedicated collection tank. The accumulated rainwater is collected and hauled away by a specialized Waste Management Operator (EO-RS by its Spanish acronym) that is formally authorized and certified by the Peruvian Ministry of Environment (MINAM by its Spanish acronym).

Contrans executes and logs a monthly checklist specifically inspecting the condition of the packaging materials, rain gutters, and water discharge tubes.

For emergency response scenarios, Contrans does not allow unregulated discharges of neutralized solutions into the environment, utilizing a closed-loop collection protocol:

Decontamination Trays: A portable, impermeable containment tray is specifically designated for the decontamination of emergency responders, tools, and accessories.

Neutralization Chemical: Decontamination maneuvers utilize a localized water solution mixed with 10% to 12% sodium hypochlorite to effectively neutralize any residual cyanide traces on contact.

Segregation and Containment: All generated post-emergency wastewater is captured within the tray and transferred into dedicated red cylinders. Used or compromised Personal Protective Equipment (PPE) is collected separately in red hazardous waste bags.

Final Disposal: These red cylinders and bags are collected by a MINAM-authorized Solid Waste Operator (EO-RS), which transports the materials to the authorized security landfill operated by “Innova Ambiental”. There, the waste undergoes professional encapsulation and final secure disposal.

This provision does not apply to warehouse facilities due to the dilute nature of any cyanide solution that may be managed, such as wash water and water used to decontaminate clothing and equipment.

Contrans ensures full compliance with this practice by enforcing strict physical, environmental, and security controls within its dedicated storage areas. These conditions are systematically verified through the routine implementation of the official inspection format “Facility, Perimeter Barriers, Infrastructure, Lighting, and Equipment Inspection Format”.

The warehouse features a hermetic, fireproof, and UV-stabilized canvas roof engineered with structural slope gradients, gutters, and downspouts that safely isolate the interior storage zone from rain or ambient precipitation.

Packaging Integrity: Solid sodium cyanide is kept entirely within its original, closed and sealed producer packaging (1 net ton IBCs, 1.1 net ton IBCs, and 50 kg metal cylinders) and stacked on an impeccable, multi-layered asphalt concrete floor.

The facility inspection checklist mandates routine, documented checks of the building's physical envelope under the specific parameters of Structure and Leaks/Seepage to proactively rule out any moisture contact.

Loaded sea containers temporarily stored in the outdoor yard are maintained as fully enclosed and weatherproof ISO freight containers, with their doors kept closed and secured throughout the temporary storage period. This is a short-term operational condition, as loaded containers are unloaded as soon as practicable upon arrival and the empty containers are subsequently returned to the shipping line’s designated depot or port terminal within the applicable return period. Consequently, prolonged outdoor storage of loaded containers is avoided. During this temporary period, the sodium cyanide remains inside the manufacturer’s original sealed packaging and within the closed container, preventing direct exposure to precipitation and other weather conditions. Upon receipt, each container is visually inspected to verify its structural integrity and to identify any damage, deformation, or other condition that could permit water ingress.

The warehouse layout maximizes natural cross-ventilation. While the rear boundary consists of a solid brick-and-cement firewall, the remaining three perimeter sides are constructed of high-strength, open metal fencing with cyclonic mesh secured together.

This structural configuration ensures continuous, unrestricted airflow throughout the storage cells, effectively preventing any localized accumulation of hazardous chemical dust or hydrogen cyanide (HCN) gas.

Public access to the warehouse is strictly prohibited under any circumstances. The designated sodium cyanide warehouse is physically situated within the authorized, access-controlled perimeter boundary of the main Contrans corporate complex.

This industrial complex is guarded 24/7 and operates under strict administrative controls.

The sodium cyanide storage warehouse has a single physical entry, eliminating unmonitored entry or exit pathways. This single access door is heavily secured with industrial padlocks. The access door remains closed and always padlocked and is exclusively unlocked and opened when authorized sodium cyanide logistics or handling operations are actively scheduled to take place.

Absolute control over the physical keys to the warehouse padlocks is restricted. The keys are placed under direct, permanent custody and responsibility of the facility's Logistics Supervisor, preventing unauthorized entry.

The warehouse exterior and entry boundaries are fitted with high-visibility, legible safety signs explicitly declaring that access is strictly restricted to authorized personnel who have undergone mandatory hazardous material training.

To guarantee the uninterrupted integrity of these physical boundaries, the security status of the area is verified during daily site rounds. Under the official inspection format, supervisors must explicitly verify the status of Perimeter barriers and Padlocks / locks, ensuring no security breaches exist.

Loaded sea containers are stored within the same access-controlled Contrans facility perimeter. The yard is protected by 24-hour security personnel, controlled entry and exit points, perimeter fencing, surveillance systems, and routine security inspections. Public access to the yard is strictly prohibited, and only authorized personnel may enter operational areas.

Contrans ensures full compliance with this practice by implementing a robust, system-driven chemical segregation and validation framework. This protocol combines upfront risk prevention screenings, advanced digital inventory segregation, and clear physical signage to completely isolate sodium cyanide from any chemically incompatible materials (such as acids, strong oxidizers, or explosives).

Upon the arrival of any chemical shipment at the facility, clients must submit the official manufacturer Safety Data Sheet (SDS/MSDS). The Risk Prevention team immediately reviews the technical documents to classify the cargo and determine if the product must be directed to the controlled / regulated goods (IQBF) storage area. The Industrial Safety and Environment area maintains an active Hazardous Materials Consultation Matrix. This administrative tool maps out all chemical cross-incompatibilities and guides the Risk Prevention team in defining the exact, isolated storage coordinates for incoming materials before they are physically placed.

To prevent human error and logistical cross-contamination, Contrans separates inventory volumes electronically using specialized digital logistics platforms:

WMS System: The Warehouse Management System manages the exact positioning and tracking of loose cargo inside the simple deposits, ensuring no incompatible items are assigned to the same storage blocks.

SIOL System: The Integrated System of Logistics Operations tracks and isolates all containerized dangerous cargo staged across the outdoor yards.

Visual Signaling:

To provide an immediate visual baseline for forklift operators and warehouse personnel, Contrans has installed a high-visibility, physical copy of the hazardous materials segregation table and chemical compatibility matrix directly at the entrance of the sodium cyanide warehouse.

The auditors verified that the matrix remains readily legible, matching the current operational guidelines dictated by the Industrial Safety and Environment area, ensuring that the strict prohibition against mixing acids or reactive compounds with cyanide is continuously enforced on the warehouse.

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
- ☐ in substantial compliance with Standard of Practice 1.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

The primary regulatory and operational mechanism used by the facility is the official simple warehouse procedure, named “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”.
Procedure provides detailed, step-by-step instructions for each critical phase of the sodium cyanide logistics cycle to mitigate the risk of containment failure or accidental worker exposure:
Preliminary Container Activities: Establishes mandatory safety protocols and structural verification steps that must be completed prior to breaking the maritime container seals and opening the container doors.
Unloading: Regulates the mechanical and manual tasks required during the physical unloading of the sodium cyanide container.
Post-Discharge Controls: Outlines the mandatory procedures to be executed immediately after cargo extraction is completed.

Reception and Inventory Entry: Details how the solid sodium cyanide packages (1.0 net ton IBCs, 1.1 net ton IBCs, and 50 kg metal drums) are received, checked against the commercial documentation, and logged into the facility's inventory control systems.
Safe Warehouse Storage: Specifies the precise placement, floor loading parameters, and other activities within the dedicated chemical warehouse.
Product Dispatch: Mandates the safety checks, load-securing verification, and chain-of-custody documentation alignment required before the product can be cleared to leave the warehouse for transport to the final mining operation.

Non-routine activities and potential operational upsets are governed by the “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”.

This document provides structural coverage for non-standard situations, such as emergency cleanup, or structural facility repairs, ensuring that arbitrary or unvouched procedures are never executed on the warehouse floor.
Before any team enters the sodium cyanide warehouse to execute a non-routine task (such as facility cleaning or localized maintenance), the Industrial Safety and Environment (SIMA by its Spanish acronym) team performs an initial electronic measurement of the atmosphere to check for the presence of Hydrogen Cyanide gas with the portable HCN detector.

Personnel are only authorized to cross the warehouse threshold with their mandatory Personal Protective Equipment (PPE) once the SIMA team formally verify that the area's atmosphere is completely clear and safe.

For critical non-standard interventions, such as structural warehouse roof maintenance, hot work, or heavy lifting operations, Contrans enforces a rigorous multi-tier authorization protocol:

Contractor Habilitation: Third-party providers must undergo a formal supplier evaluation and a mandatory cyanide safety induction before arriving at the site.

Risk and Environmental Validation: Contractors are operationally required to submit a specialized Hazard Identification, Risk Assessment, and Control (IPERC) matrix alongside an Environmental Aspects and Impacts matrix. Both documents must be technically reviewed and validated by the SIMA team before any work begins.

Mandatory Operational Safety Forms: Every high-risk non-routine task trigger two mandatory field controls:
Safe Work Analysis (ATS by its Spanish acronym): Form code SM-R-010 Version 02, which requires the field crew to dissect the task step-by-step, identifying specific hazards and immediate field controls.
Written Permit for High-Risk Work (PETAR (by its Spanish Acronym): Form code SM-R-011 Version 02, which serves as the final administrative authorization for heights, hot works, handling hazardous materials, and all the high-risk work.

At the time of the field audit, there were no active non-standard works under execution that presented an immediate potential for cyanide exposure or release. To verify the continuous and practical implementation of these contingency protocols, the audit team reviewed historical safety logs from the current cycle.

The auditors sampled and verified a completed ATS (Safe Work Analysis), for a non-routine maintenance intervention involving wall filling, sanding, and painting on the maritime container. The document successfully demonstrated a thorough identification of tasks, hazards, localized risks, and correct preventive controls approved by the safety area.

Contrans utilizes the official “Management of Change Procedure”. The procedure incorporates a comparative change table defining specific triggers that necessitate a formal Management of Change file. These include physical area expansions, infrastructure modifications, changes in facility location, new projects or business units, occupational health and safety deviations, modifications to applicable laws, etc.

Change Request Form: Changes are formally initiated via designated form. This document compiles the exact description of the requested change, its purpose, baseline technical requirements, and applicant details.

EHS Risk Assessment Mandate: The procedure requires a formal risk assessment that explicitly involves the user department and the specialized safety, health, and environment (EHS / SIMA) area. The assessment matrix maps the requested change against risk identification, risk level, mandatory preventive actions, assigned responsible roles, target completion dates, and technical observations.

Post-Implementation Evaluation: Following the execution of the change, the facility applies the “Evaluation of Change” form. This form acts as a final administrative check to verify whether the alteration achieved its expected safety and operational results or if further adjustments are required.

To confirm the historical and practical implementation of this procedure over the recertification cycle, the audit team reviewed completed Management of Change (MOC) packages.

The auditors verified the formal MOC records executed for the historical infrastructure and warehouse roof replacement project.

Contrans ensures full compliance with this practice by developing, scheduling, and strictly documenting a comprehensive preventive maintenance program for all heavy machinery, lifting equipment, and mechanical devices utilized within the sodium cyanide logistical chain. The maintenance program continuously addresses all equipment tasked with moving containerized and loose hazardous cargo across the distinct operational zones:

Reach Stackers: Heavy container-handling vehicles used to securely lift and transport sealed maritime containers.

Forklifts: Specialized lifting equipment utilized to enter the warehouse, and safely execute the physical destowing, handling, and stacking of the original producer packaging (1 net ton IBCs, 1.1 net ton IBCs, and 50 kg metal drums).

Maintenance intervals are pre-established and calculated based on strict operational parameters, combining accumulated hours of machinery operation with fixed calendar timelines.

All preventive interventions, mechanical adjustments, hydraulic pressure overhauls, and structural integrity verifications are tracked and compiled via formalized technical maintenance logs and digital work orders.

The audit team reviewed representative samples of historical preventive maintenance logs, machinery hour-meter records, and completed contractor risk validations, confirming that the equipment has been continuously maintained in optimal structural condition throughout the certification cycle.

Overview of Cyanide Handling Equipment:

For the handling of deconsolidated cargo, Contrans utilizes forklifts and pallet jack.

For the movement and logistics of full maritime sea containers, specialized reach stackers are deployed.

Maintenance Program Framework:

The Maintenance Manager was interviewed and presented the formal procedure “Preventive maintenance of machinery”, which governs all handling units.

Preventive maintenance (PM) cycles are strictly tracked and executed based on equipment hour-meter intervals:

- PM01: Every 250 operating hours.
- PM02: Every 500 operating hours.
- PM03: Every 1,000 operating hours.
- PM04: Every 2,000 operating hours.

The program incorporates predictive maintenance protocols for heavy units, which include scheduled major component overhauls, such as full engine or gearbox replacements for the reach stackers.

Verification of Active Maintenance Records & Work Orders:

The auditors reviewed recent mechanical files and completed work orders (WO) to verify the real-time execution of the maintenance plan.

All maintenance and repair activities are performed locally within the secure, specialized Contrans maintenance workshop facility.

Contrans is not responsible for the maintenance or repair of maritime sea containers. Such activities remain the responsibility of the container owner, shipping line, or container leasing company, as applicable. Prior to accepting a container into the facility, Contrans conducts a visual inspection to verify its condition for safe handling and temporary storage, including the absence of visible structural

damage, defects affecting door integrity or closure, or other visible conditions that could compromise the safety or integrity of the cargo.

Monitoring of Hydrogen Cyanide (HCN) gas concentrations is explicitly regulated by the core warehouse procedure “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”.

HCN Gas monitoring is mandatory at the following key operational steps:

Container Opening & Unsealing: Maritime container doors are opened and allowed to undergo natural ventilation for a mandatory minimum period of 10 minutes. Following ventilation, an HCN gas measurement is executed before starting the unloading.

Pre-Dispatch Verification: Measurements are conducted prior to staging or dispatching sodium cyanide packages to customers.

Pre-Cleaning & Maintenance Operations: HCN monitoring is executed prior to performing any cleaning or maintenance work within the active cyanide storage areas.

Testing is performed by the Industrial Safety and Environment (SIMA) team, or by the Risk Prevention team in SIMA’s absence. If any positive HCN gas reading is detected, all work is immediately halted, and emergency response protocols are activated.

All HCN monitoring data is logged in real time using a digital checklist (HCN measurement monitoring) hosted on the Microsoft List corporate platform. The system captures: type of operation (Reception, Dispatch, Palletizing, Strapping/ Sifting), cargo owner, specific measurement location, exact date and time, numerical gas reading, identity of the person taking the measurement, operational supervisor, contractor details, and technical observations.

Contrans maintains two dedicated electronic HCN gas detection units managed directly by the SIMA department. Both devices are calibrated annually by an accredited external laboratory:

All fluids collected within the warehouse envelope or secondary containment systems—whether rainwater runoff or post-emergency decontamination wastewater—are systematically captured,

segregated, and managed through authorized external waste operators without any direct discharge to the surrounding environment.

Rainwater Capture and Segregation: Rainwater falling on the warehouse roof canvas is captured by a perimeter gutter and discharge tube system, preventing any contact with stored sodium cyanide packages. Clean rainwater runoff is directed into a dedicated collection tank. Accumulated rainwater is collected and transported off-site by a specialized Waste Management Operator formally authorized by the Peruvian Ministry of Environment (MINAM).

Emergency Decontamination Wastewater Controls: Contrans has the Cyanide Emergency Preparedness and Response Plan. For emergency scenarios or localized spill response, Contrans maintains a closed-loop containment and collection procedure: Decontamination of responders, tools, and accessories is conducted inside portable, impermeable containment trays. Washing is performed using a water solution mixed with 10% to 12% sodium hypochlorite to neutralize any residual sodium cyanide traces. Generated decontamination liquids are never drained onto the floor or into general drainage systems; they are collected directly in dedicated red cylinders. Used or contaminated Personal Protective Equipment (PPE) is placed in red hazardous waste bags. All red cylinders containing wash water and red bags containing solid hazardous waste are collected directly from the facility by a by a specialized Waste Management Operator formally authorized by the Peruvian Ministry of Environment (MINAM). The hazardous waste operator transports the materials to its authorized security landfill, where the neutralized liquid and solid wastes undergo complete physical encapsulation and final secure disposal.

Contrans maintains no active discharge points or gravity drainage outlets that connect secondary containment areas to natural soils, surface waters, or public sewer systems, eliminating the risk of unregulated environmental releases.

Contrans ensures full compliance with this practice by implementing formalized, environmentally sound procedures for the collection, segregation, transport, and final disposal of cyanide-contaminated wastes and post-emergency decontamination media. The facility relies on Ministry of Environment (MINAM) authorized waste management operators (EO-RS) to guarantee full regulatory compliance and complete chain-of-custody tracking.

The Cyanide Emergency Response Preparedness Plan, explicitly details the mandatory collection, color-coding, containment, and disposal workflows for all solid and liquid hazardous wastes generated during cyanide handling or emergency response activities.

Solid Waste: Spilled solid product, contaminated debris, and used Personal Protective Equipment (PPE) are collected and sealed in dedicated red hazardous waste bags.

Liquid Waste: Decontamination wash water containing sodium hypochlorite solution traces is collected within portable spill trays and transferred directly into dedicated red cylinders.

All red containers (waste bags and cylinders) are stored in designated hazardous waste holding areas awaiting collection, completely isolated from general waste streams.

Authorized External Operators (EO-RS) & Backup Suppliers:

Contrans contracts certified hazardous waste operators (EO-RS) holding active MINAM authorizations and maintains complete emergency contact directories for primary and contingency providers:

- Primary Authorized Operator: designated primary EO-RS for hazardous waste transport and management.
- Qualified Contingency / Backup Suppliers: Full contact data for all backup providers are formally embedded within Plan to prevent operational delays during emergencies.

Final Disposal, Encapsulation & Chain of Custody:

The primary operator collects the red bags and cylinders and transports them to the authorized security landfill. The hazardous waste undergoes professional physical encapsulation prior to final secure landfill burial. Following every disposal event, official hazardous waste manifests signed by the authorized disposal facility are issued to Contrans. The organization retains all signed manifests on file to verify complete legal and environmental traceability from generation to final disposal.

Contrans ensures full compliance with this practice by enforcing strict verification and chain-of-custody protocols to confirm that all solid sodium cyanide received, stored, and dispatched maintains its original factory packaging and mandatory hazardous material labeling.

Contrans does not open, repackage, or alter any sodium cyanide package. All solid sodium cyanide is stored exclusively in its original, factory-sealed producer packaging:

- Intermediate Bulk Containers (IBCs / big boxes) of 1. net ton.
- Intermediate Bulk Containers (IBCs / big boxes) of 1.1 net tons.
- Metal cylinders/drums of 50 kg.

These original packages are manufactured, marked, and pre-labeled by the producer in full compliance with international dangerous goods transport regulations applicable to the transport routes. Also, all these products are supplied by several sodium cyanide producers who are certified on the Cyanide Code.

During the physical unloading of maritime containers, logistics operators execute a mandatory photographic inspection procedure. Detailed photographs are systematically taken to record:

- Container identification number.
- Security seal number and physical condition prior to opening.
- Safety labeling on both the outer container and individual packages, including UN (United Nations) identification numbers (UN 1689), DOT hazard diamonds (Class 6.1) and NFPA diamonds.
- Verification of package integrity to immediately flag and isolate any damaged packages.
- Condition of the empty maritime container immediately following complete discharge.

The photographic evidence compiled during unloading of the maritime container is immediately transmitted via email by the Logistics Operations Assistant to the Warehouse Service Executive and the customer.

This electronic reporting protocol ensures transparent validation that the cargo arrived correctly labeled, structurally sound, and compliant with all transit marking regulations before it is cleared for warehouse storage or final dispatch.
The audit team reviewed representative email records and photographic logs generated during the current audit period.

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:

Not applicable, the requirements of this provision do not apply to warehouse operations managing solid cyanide in unopened containers and packaging, such as IBCs and drums.

Not applicable, there are no sewage and superficial water sources in the warehouse. Also, this is a warehouse operation managing solid cyanide in unopened containers and packaging, such as IBCs and drums.

Contrans implements a comprehensive inspection and quality control framework for all transport packaging and shipping containers handled at the facility. Although Contrans operates strictly as a logistics and warehousing facility rather than a cyanide manufacturing plant, it maintains formal procedures to inspect, verify, and document the structural integrity, safety labeling, and containment security of all incoming and outgoing cyanide transport containers.

Contrans manages solid sodium cyanide exclusively in original, unopened factory-sealed transport packages:

- Intermediate Bulk Containers (IBCs / big boxes) of 1.0 net ton.
- Intermediate Bulk Containers (IBCs / big boxes) of 1.1 net tons.
- Metal cylinders/drums of 50 kg.

These packages, along with the maritime containers used to transport them, undergo mandatory quality control inspections upon arrival, during storage, and prior to final dispatch.

Under standard operating procedure “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”. Document Code: DS-P-001 version 17, during the physical unloading of maritime containers, logistics operators execute a mandatory photographic inspection procedure. Detailed photographs are systematically taken to record:

- Container identification number.
- Security seal number and physical condition prior to opening.

- Safety labeling on both the outer container and individual packages, including UN (United Nations) identification numbers (UN 1689), DOT hazard diamonds (Class 6.1) and NFPA diamonds.
- Structural Integrity & Damage Inspection: Systematic visual check of the individual packages (IBCs and drums) to immediately identify and isolate any compromised or damaged packages.
- Condition of the empty maritime container immediately following complete discharge.

The photographic evidence compiled during unloading of the maritime container is immediately transmitted via email by the Logistics Operations Assistant to the Warehouse Service Executive and the customer.

The audit team reviewed photographic reports and email records, confirming complete photographic validation of incoming transport container seals, labeling, and cargo integrity.

The physical condition of stored transport packages within the active storage area is verified daily using titled “Facility, Perimeter Barriers, Infrastructure, Lighting, and Equipment Inspection Format”. Operators inspect for signs of packaging degradation, structural tilting, or surface contamination.

Pre-Dispatch Quality Controls: Prior to loading transport units for final dispatch to mine sites, procedure mandates a final inspection of the transport packages to confirm that all IBCs and drums remain structurally intact, correctly labeled, and securely strapped.

To complement visual checks and detect non-visible package failures, Contrans enforces an HCN monitoring protocol during container opening and dispatch.

All routine physical inspections of the warehouse, infrastructure, and sodium cyanide storage zones are conducted daily. These daily inspections are strictly assigned to, and executed by, specialized personnel from the facility's Risk Prevention area.

Inspections are formally documented using the facility's standardized checklist.

Contrans maintains an organized archive of all completed inspection checklists, ensuring they are retained and readily available for internal and external audits. The auditors verified completed, signed checklists.

Contrans ensures full compliance with this practice by maintaining a rigorous, documented inspection recording system. Routine shift inspections systematically record the inspection date, the inspector's name, shift details, and specific physical deficiencies, ensuring that any identified infrastructure or safety issues are immediately communicated to the maintenance department for corrective action.

Inspections are documented using standardized inspection checklist, every completed record explicitly captures:

- The exact date of the inspection round.
- The full name and shift assignment of the risk prevention inspector.
- Specific observation fields to describe any physical damage, wear, or operational non-conformity.
- The formal notification pathway to route findings to corrective maintenance.

The audit team reviewed daily inspection records, confirming complete record-keeping accuracy across operational shifts.

In the sampled inspection checklists, the inspectors explicitly identified, documented, and logged specific perimeter infrastructure deficiencies: Structural masonry damage to the North Wall, damage in the razor wire along the West and North perimeter walls.

The recorded observations were immediately reported and transmitted to the facility's Maintenance Area and responsible operational teams. This formal notification triggers the generation of a dedicated action plan and work orders to repair the perimeter barriers, maintaining the security and containment integrity of the sodium cyanide facility.

Contrans ensures full compliance with this practice by maintaining a centralized, system-driven maintenance management framework. When routine inspections identify structural, perimeter, or operational deficiencies, the findings are formally logged into a digital ticket system, assigned a defined criticality level, prioritized according to established attention timeframes, and tracked to closure.

The corrective action management system is structured around the following verified elements:

Management of Equipment and Infrastructure Maintenance procedure, document, establishes clear, objective criteria to classify work requests into response categories based on risk severity:

- Emergency: Requires immediate, non-scheduled response and intervention.
- High Priority: Attention required within 1 to 2 days.
- Medium Priority: Attention required within 2 to 4 days.
- Low Priority: Scheduled maintenance, prioritized for planned execution without compromising safe operations.

Digital Ticket System for Traceability and Record Retention: Contrans operates an integrated Ticket System that serves as the official administrative platform to record, route, schedule, and archive all infrastructure and equipment maintenance requests. The system maintains complete historical records for every ticket, capturing the request date, requesting officer, specific facility area, assigned priority level, work description, progress updates, and final closure validation.

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:

The primary document governing the safe handling of solid sodium cyanide is the Warehouse Procedure: "Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods". This procedure establishes rigorous safety standards and step-by-step instructions across the entire logistical lifecycle to prevent accidental exposure:

- Initial Phases: Documentary verification and administrative entry controls.
- Container Handling: Strict protocols for the unsealing, ventilation, and physical opening of maritime containers.
- Unloading: Safe physical deconsolidation (unloading) of the sodium cyanide packages (IBCs and drums) and mandatory post-unloading clearing activities.

- Storage & Dispatch: Guidelines for the safe reception, placement, and long-term storage of loose cargo, as well as the safety checks required during final product dispatch.
- Equipment Management: Controls for the assignment, return, and physical handling of empty maritime containers.

To ensure coordinated risk prevention and clear accountability, the procedure explicitly delineates the specific safety and operational responsibilities of all personnel involved in the cyanide chain of custody, including:

- Logistics Operations Manager and Head of Logistics Operations.
- Logistics Operations Supervisors and Coordination Staff.
- Industrial Safety and Environment (SIMA) Specialists and Risk Prevention personnel.
- Occupational Health Staff.
- Heavy Machinery Operators (e.g., Reach Stacker and Forklift Operators) and Logistics Auxiliary Assistants.

Normal operations are continuously backed by the active Cyanide Emergency Response Preparedness Plan, ensuring workers know exactly how to react if an operational deviation occurs.

Contrans maintains a specific Sodium Cyanide Handling Standard. To guarantee continuous worker awareness, the audit team verified that this standard is permanently displayed as a large, high-visibility sign (poster) directly on the fence of the sodium cyanide warehouse, providing operators with immediate visual access to critical safety rules prior to handling any cargo.

For non-routine activities and emergency operations, the following procedures are in place:

- Cyanide Emergency Response Preparedness Plan.
- Emergency Preparedness and Response Plan- Callao.
- The “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”.

Before any team enters the sodium cyanide warehouse to execute a non-routine task (such as facility cleaning or localized maintenance), the Industrial Safety and Environment (SIMA by its Spanish acronym) team performs an initial electronic measurement of the atmosphere to check for the presence of Hydrogen Cyanide gas with the portable HCN detector.

Personnel are only authorized to cross the warehouse threshold with their mandatory Personal Protective Equipment (PPE) once the SIMA team formally verify that the area's atmosphere is completely clear and safe.

For critical non-standard interventions, such as structural warehouse roof maintenance, hot work, or heavy lifting operations, Contrans enforces a rigorous multi-tier authorization protocol:

Contractor Habilitation: Third-party providers must undergo a formal supplier evaluation and a mandatory cyanide safety induction before arriving at the site.

Risk and Environmental Validation: Contractors are operationally required to submit a specialized Hazard Identification, Risk Assessment, and Control (IPERC) matrix alongside an Environmental Aspects and Impacts matrix. Both documents must be technically reviewed and validated by the SIMA team before any work begins.

Mandatory Operational Safety Forms: Every high-risk non-routine task trigger two mandatory field controls:
Safe Work Analysis (ATS by its Spanish acronym): Form code SM-R-010 Version 02, which requires the field crew to dissect the task step-by-step, identifying specific hazards and immediate field controls.
Written Permit for High-Risk Work (PETAR (by its Spanish Acronym): Form code SM-R-011 Version 02, which serves as the final administrative authorization for heights, hot works, handling hazardous materials, and all the high-risk work.

At the time of the field audit, there were no active non-standard works under execution that presented an immediate potential for cyanide exposure or release. To verify the continuous and practical implementation of these contingency protocols, the audit team reviewed historical safety logs from the current cycle.

The auditors sampled and verified a completed ATS (Safe Work Analysis) package dated June 30, 2026, for a non-routine maintenance intervention involving wall filling, sanding, and painting on the maritime container #17. The document successfully demonstrated a thorough identification of tasks, hazards, localized risks, and correct preventive controls approved by the safety area.

Maintenance interventions on warehouse infrastructure (e.g., roof canvas, walls, access doors, gutters) or handling machinery (Reach Stackers, forklifts) are strictly regulated by:

- The “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”.
- Management of Equipment and Infrastructure Maintenance procedure.
- Cyanide Emergency Response Preparedness Plan.

Prior to permitting any internal maintenance staff or third-party technicians to enter the sodium cyanide warehouse, the Industrial Safety and Environment (SIMA) team conducts mandatory HCN monitoring with the portable HCN detector. Personnel are only authorized to access the area with their required Personal Protective Equipment (PPE) once SIMA formally confirms that HCN concentrations are zero.

Every maintenance task requires systematic risk evaluation and formal administrative authorization:

Safe Work Analysis (ATS by its Spanish acronym), requiring maintenance crews to evaluate the step-by-step execution of the job, isolate potential hazards, and define required field controls and PPE.

Written Permit for High-Risk Work (PETAR by its Spanish acronym), serving as the mandatory administrative authorization for high-risk maintenance interventions, including work at heights (e.g., warehouse roof canvas or gutter repairs), hot work, heavy lifting, or working near hazardous materials.

Third-Party Contractor Controls: External maintenance contractors must undergo supplier evaluation, complete a cyanide safety induction, and submit a specialized Hazard Identification, Risk Assessment, and Control (IPERC) matrix alongside an Environmental Aspects and Impacts matrix for SIMA approval before work initiation.

The auditors sampled and inspected a completed “Safe Work Analysis” package, for a non-routine maintenance task involving wall filling, sanding, and painting on container. The record demonstrated a thorough breakdown of tasks, identification of localized hazards and exposure risks, definition of mandatory PPE, and formal authorization signed off by the SIMA safety team prior to work execution.

Contrans ensures full compliance with this practice by establishing structured, formal channels to actively solicit, evaluate, and incorporate worker feedback into its health, safety, and operational

procedures. The facility achieves this through direct operational briefings upon procedure updates and through the governance of a bipartite Occupational Health and Safety (OHS) Committee.

Direct Operational Feedback during Procedure Updates: Whenever an operational or safety procedure is updated, Contrans mandates that the affected personnel from the respective areas are convened. The purpose of these meetings is to present the updates, receive direct feedback, and collect suggestions for improvement directly from the workforce. Feedback sessions and resulting action items are formally recorded using the Meeting Minutes.

The audit team reviewed the meeting minutes from a health and safety procedure. This meeting was triggered by the update to the core warehouse procedure. The meeting integrated frontline personnel, including Forklift Operators, Logistics Operations Assistants, Logistics Auxiliary, the Logistics Operations Coordinator, and an Operations Supervisor.

Formal Occupational Health and Safety (OHS) Committee: Contrans maintains a formally installed Occupational Health and Safety Committee, the current Committee was officially instituted in September 2025 and meets monthly. To guarantee a balanced and legally compliant evaluation of safety protocols, the committee is composed equally of elected worker representatives and employer representatives. The committee's evaluations and decisions are logged via the OHS Committee Meeting Minutes.

The auditors verified the official OHS committee minutes from the monthly session held on June 17, 2026. During this session, the joint committee formally presented, reviewed, and approved two of the facility's most critical cyanide safety documents: Cyanide Emergency Response Preparedness Plan and the SM-E-004 Sodium Cyanide Handling Standard. The final minutes were verified to contain the signatures of all representatives.

3. Has the facility identified areas and activities where workers may be exposed to hydrogen cyanide gas and/or cyanide dust exceeding 10 parts per million (ppm) on an instantaneous basis or 4.7 ppm continuously over an 8-hour period, as cyanide, and does it require use of personal protective equipment and/or use administrative controls as necessary in these areas or when performing these activities?

In accordance with standard operating procedure “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”, Contrans has identified all key zones and logistics tasks where potential exposure to hydrogen cyanide (HCN) gas or solid residues could occur:

- Container Opening & Unloading: Mandatory 10-minute natural ventilation period with container doors fully opened prior to taking HCN gas readings and permitting operator entry.
- Routine Logistics Operations: Product reception, palletizing, strapping, and pre-dispatch staging.
- Facility Housekeeping: Prior to executing any cleaning or maintenance work within the sodium cyanide storage zone.

Monitoring is conducted by the Industrial Safety and Environment (SIMA) team or by Risk Prevention personnel in SIMA's absence.

All HCN monitoring data is logged in real time using a digital checklist (HCN measurement monitoring) hosted on the Microsoft List corporate platform. The system captures: type of operation (Reception, Dispatch, Palletizing, Strapping/ Sifting), cargo owner, specific measurement location, exact date and time, numerical gas reading, identity of the person taking the measurement, operational supervisor, contractor details, and technical observations.

If any positive HCN gas reading is detected prior to work initiation, operations are immediately halted.

Under Section 10.6 (First Aid and Preventive Measures) of the Cyanide Emergency Response Preparedness Plan, Contrans enforces strict action levels based on measured HCN gas concentrations:

- Safe Operational Baseline (0.0 ppm): Work is authorized to proceed only when the detector confirms a clear atmosphere.
- First Alert / Low Detection Level (< 4.5 ppm): Operations are immediately paralyzed, and all personnel are withdrawn from the immediate area. After a 15-minute waiting period, a designated, fully equipped responder re-evaluates atmospheric levels using a calibrated detector. Readings are immediately communicated to the Warehouse Supervisor/Coordinator, the SIMA team, and the Risk Prevention officer. Work may only resume once HCN concentrations drop back to 0.0 ppm.
- Action Threshold (> 4.5 ppm): If gas levels do not decrease or exceed 4.5 ppm, the Cyanide Emergency Response Preparedness Plan (SM-N-010 v06) is formally activated.
- General Evacuation Threshold (> 10 ppm): If gas concentrations exceed 10 ppm, a mandatory general evacuation of the entire Delta Warehouse is triggered, and full emergency response protocols are deployed.

Area Signage: High-visibility safety warning signs, hazard diamonds, and safety posters—such as the Sodium Cyanide Handling Standard —are permanently posted at warehouse access points.

Annex 07 of the Cyanide Emergency Response Preparedness Plan and the Sodium Cyanide Handling Standard explicitly define mandatory PPE ensembles tailored to specific operational roles and risk levels:

- Supervisors and Inventory Inspectors: Safety helmet, chemical splash goggles/safety glasses, protective gloves, safety boots, and half-mask respirator with chemical cartridges.
- Forklift Operators and Logistics Handlers: Complete chemical-resistant protective wear, heavy-duty gloves, safety boots, and full/half-face respiratory protection during active cargo movement or container unloading.

Section 11.1 of the Cyanide Emergency Response Preparedness Plan governs emergency response PPE, including autonomous Self-Contained Breathing Apparatus (SCBA) sets and level A/B chemical suits for emergency response team members.

Contrans maintains two dedicated electronic HCN gas detection units managed directly by the SIMA department. Both devices are calibrated annually by an accredited external laboratory. Both devices have alarm settled to 4.5 ppm with sound (audible) and visual signals.

Contrans maintains two dedicated electronic HCN gas detection units managed directly by the SIMA department. Devices are calibrated annually by an accredited external laboratory and have alarm settled to 4.5 ppm with sound (audible) and visual signals.

Contrans ensures full compliance with this practice by establishing mandatory minimum staffing requirements for all operations where potential exposure to solid sodium cyanide or hydrogen cyanide gas could occur. Working alone in sodium cyanide handling zones is strictly prohibited.

The “Entry, Storage, and Dispatch of Loose Cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”. Section 10 of this procedure explicitly defines preliminary activities prior to container unloading and mandates the exact crew composition required to execute sodium cyanide reception, unloading, and dispatch operations.

To ensure adequate oversight, operational safety, and immediate emergency response capability, procedure mandates a minimum crew for both reception/unloading and dispatch/loading activities, consisting of:

- Supervisor / Coordinator / Operations Assistant or Auxiliary.
- Forklift / Heavy Equipment Operator.
- Stevedores / Material Handlers if necessary.

The mandatory team configuration ensures that all handlers work within direct line-of-sight of their peers and under the direct supervision of an assigned logistics supervisor or coordinator. This structure guarantees immediate assistance, prompt communication, and rapid deployment of emergency procedures if an unexpected spill, package defect, or exposure event occurs.

Contrans implements a formal occupational medical examination program supervised by a licensed Occupational Physician. The program mandates comprehensive health evaluations to determine worker fitness prior to employment, periodically during active duty, and upon exit from the organization, covering both direct employees and third-party contractor crews involved in sodium cyanide operations.

An Occupational Physician defines specific occupational medical profiles based on job risk levels, including specialized criteria for personnel performing sodium cyanide handling and supervision. The medical evaluation criteria are formalized in the “Protocol for Occupational Medical Examinations”, registered under.

All occupational health examinations are conducted by a specialized, certified occupational health clinic.

Protocol establishes three mandatory tiers of medical evaluations:

- Pre-Employment Exams: Conducted prior to hiring to establish baseline health and confirm fitness for specific logistics and chemical handling roles.
- Periodic Exams: Conducted on an annual frequency for all active operational personnel to continuously monitor worker health and detect any occupational exposure risks.
- Exit Exams: Executed upon termination of employment to certify the worker's health status upon leaving the organization.

Third-party contractor personnel (such as specialized stevedores and cargo handling crews from contractor companies like LMJ) are strictly required to adhere to Contrans's medical protocol. Contrans validates contractor medical fitness certificates prior to issuing site access authorizations, ensuring that no third-party worker enters the sodium cyanide storage zones without verified medical clearance.

The audit team sampled medical records and fitness certificates for key operational personnel involved in sodium cyanide handling during the current cycle.

Within the “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”, under Section 1.3 explicitly mandates that no worker, third-party contractor, or visitor who comes into contact with sodium cyanide or enters chemical handling zones is permitted under any circumstances to leave the Contrans facility wearing used PPE or work suits.

All personnel must strip down and remove their protective wear immediately upon completing their assigned chemical handling tasks before exiting the chemical operations boundary.

Under the preliminary activity rules for sodium cyanide handling, specialized protective clothing—such as chemical-resistant Tyvek suits—must be removed immediately after completing unloading, handling, or inspection duties.

Active forklift operators and logistics handlers store their designated chemical Tyvek suits inside dedicated storage cabinets positioned directly at the entrance threshold of the sodium cyanide warehouse area. This prevents cross-contamination into administrative or general warehouse spaces.

Any Tyvek suit, glove, or protective item that is worn out, damaged, or discarded after a chemical intervention is immediately classified as hazardous waste. Discarded PPE is placed directly into dedicated red hazardous waste containers located at the decontamination point. Solid hazardous waste containing discarded PPE is collected and transported off-site by MINAM-authorized waste management operators.

High-visibility signage is posted at the perimeter and entry doors of the sodium cyanide warehouse (Delta area), explicitly alerting workers and visitors to the presence of toxic sodium cyanide. The signs display standard United Nations (UN) placards, danger diamonds, and official hazard markings (Class 6 Toxic Substance).

Posted notices clearly communicate mandatory administrative prohibitions within the chemical storage perimeter, strictly prohibiting eating, drinking, smoking, open flames, and unauthorized access.

Directly at the main entrance threshold of the sodium cyanide warehouse, Contrans has published a large, high-visibility banner displaying the full Sodium Cyanide Handling Standard. The posted standard details essential preventive rules, emergency protocols, and door-closure/securing instructions that workers must follow when operating inside or leaving the chemical storage bay.

Clear pictorial and written signs define the mandatory PPE required before crossing the threshold into the warehouse area.

Sodium Cyanide Handling Standar, specify exact PPE requirements tailored to distinct operational responsibilities:

- Supervision, Inspection, and Inventory Personnel: Safety helmet, chemical splash goggles / safety glasses, protective gloves, safety boots, and half-mask respirator with chemical cartridges.
- Forklift and Heavy Equipment Operators: Full chemical-resistant protective wear (Tyvek suits), heavy-duty gloves, safety boots, and full-face protection/respirator during cargo movement.
- General Operators (Strapping, Cylinder Handling): Full chemical protective ensemble, heavy-duty gloves, face protection/respirator, and safety footwear required during physical handling or housekeeping tasks.

During the field visit of the sodium cyanide storage area, the audit team verified high-visibility warning signs posted continuously around the outer periphery and access points of the warehouse. These signs explicitly prohibit: Smoking, Eating and drinking, Open flames and spark-producing activities.

Prominently published at the entrance of the warehouse, the full Sodium Cyanide Handling Standard, formally establishes the mandatory obligation for all workers, contractors, and visitors to respect all posted safety signs, hazard warnings, and pictograms located in the work area.

The procedure for “Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods”, reinforces these rules by designating sodium cyanide storage

warehouse as strictly controlled zones, ensuring that food, beverages, tobacco, and ignition sources are completely excluded from cargo handling spaces.

Production Practice 2.2

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 2.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

Contrans has the Cyanide Emergency Response Preparedness Plan.

Contrans establishes and implements a structured Occupational Health and Safety Program that mandates routine, monthly inspections and functional testing of all emergency response equipment. Safety showers, eyewash stations, and fire extinguishers located throughout the sodium cyanide storage warehouse, are systematically verified and maintained in fully operational condition.

Occupational Health and Safety Program, establishes the formal requirement to conduct monthly inspections across all safety equipment, including emergency showers, eyewashes, and fire extinguishers.

Control Form “Inspection of emergency eyewash stations and showers”.

Contrans operates a total of 5 emergency showers across the site, which includes 01 dedicated emergency shower and low-pressure eyewash stations located at the sodium cyanide handling bay (Delta IQBF Zone).

The audit team reviewed completed inspection logs and functional water-flow tests recorded on, confirming continuous operational readiness, cleanliness, and unobstructed access.

Control Form “Inspection of Fire Extinguishers”. The fire extinguishers stationed at the sodium cyanide warehouse area (IQBF zone) comprises of wheeled Dry Chemical Powder (PQS by its Spanish acronym) fire extinguishers of 50 kg and portable Dry Chemical Powder (PQS) fire extinguishers of 12 kg.

Fire extinguisher inspection records have been systematically logged monthly and retained in the management system's documentary database.

The audit team verified monthly inspection records are stored in the digital management system. The auditors sampled **Wheeled Fire Extinguisher (50 kg PQS), located directly at the sodium cyanide warehouse area. The review confirmed that monthly checks systematically verify pressure gauge indicators, seal integrity, discharge hose condition, wheel mobility, physical integrity, and clear access, with no unaddressed non-conformities identified during the operating cycle.

Contrans maintains specialized first aid supplies, medical oxygen equipment, manual resuscitators, and cyanide antidotes in fully operational readiness. These resources are backed by routine weekly inspections, strict expiration tracking, robust emergency communication channels, and 24/7 qualified medical personnel responsible for antidote administration.

Medical Oxygen Supply: Contrans maintains a dedicated 20-liter medical oxygen cylinder equipped with a non-rebreather reservoir mask and a humidifier system.

Manual Resuscitator: One AMBU-type manual bag-valve-mask resuscitator unit is stationed at the first aid point for emergency ventilation.

Inspection & Maintenance Protocol: Oxygen cylinder pressure, humidifier fluid, and sodium chloride / sterile water levels are checked and documented on a weekly frequency by risk prevention personnel using Oxygen cylinder sodium chloride/sterile water replacement check.

Training & Operational Checks: The AMBU resuscitator unit undergoes functional checks and operational reviews during annual first aid training sessions, which are conducted at least once per year for site personnel.

Contrans maintains a Cyanokit antidote (5g Hydroxocobalamin) on site, stored under controlled conditions and ready for immediate deployment. During the audit, the active Cyanokit antidote was verified to have a valid expiration date. To prevent any lapse in antidote availability, facility procedures mandate that formal purchase requisitions for replacement antidotes are submitted two months prior to the expiration date.

In the event of any chemical incident or potential exposure, workers immediately notify the site Closed-Circuit Television Control Center (CCTV). Upon receiving an alert, CCTV operators

immediately dispatch the facility's occupational medical staff (doctor and/or nurse), who are available 24 hours a day, 7 days a week (24/7) for site emergencies.

In strict alignment with medical standards, only authorized healthcare professionals (the on-duty doctor or nurse) are qualified and responsible for evaluating casualties and administering the Cyanokit antidote if clinically required.

Contrans maintains multiple, redundant communication systems to ensure immediate notification, coordination, and mobilization of emergency response resources in the event of a cyanide-related incident or any other operational emergency.

Available communication methods include:

- **Mobile phones** assigned to supervisors, operational personnel, security personnel, and emergency response coordinators.
- **Portable two-way radios** used by security personnel, operational supervisors, and emergency coordinators to maintain continuous communication throughout the facility.
- **Closed-Circuit Television (CCTV) Control Center communications**, which serve as the central emergency notification point for the facility and operate 24 hours per day, 7 days per week.
- **Direct telephone communication** between the CCTV Control Center, occupational medical staff, facility management, security personnel, and external emergency responders when required.
- **Audible emergency alarms and warning systems** available within the facility to promptly alert personnel and initiate emergency response procedures.

These communication systems are tested and utilized during emergency drills and response exercises to verify their availability and effectiveness.

Contrans maintains dedicated, portable first aid briefcases positioned at key site locations, including the medical topical room. These briefcases are subjected to monthly inspections conducted directly by qualified occupational health management personnel to ensure all supplies remain complete, unexpired, and ready for immediate deployment.

Contrans has 3 specialized portable first aid briefcases deployed across strategic areas of the facility, including the medical topical room. In addition to standard trauma and medical supplies, the briefcases contain specialized emergency respiratory care items, such as adult non-

rebreather/reservoir masks, required for emergency oxygen administration during potential chemical incidents.

First aid briefcases are inspected using official (Inspection of first aid briefcases). Inspections are executed on a strict monthly frequency. To ensure rigorous clinical oversight, inspections are directly carried out by Head of Occupational Health.

Form mandates a three-tier check of all briefcase contents: Quantity, Expiration Dates and Physical Condition. The auditors verified completed inspection forms. The review confirmed that all three first aid briefcases were fully stocked, verified for item integrity and expiration dates, and maintained in complete operational readiness.

Contrans provides immediate, physical access to Material Safety Data Sheets (MSDS/SDS) and the site-specific Cyanide Emergency Response Preparedness Plan directly at the sodium cyanide storage and handling locations. All emergency and hazard documentation is maintained in Spanish, the official working language of the facility's workforce.

Physical hard copies of safety data sheets and emergency plans are placed in dedicated, weatherproof wall-mounted binder/folder display holders located at the exterior access threshold of the sodium cyanide warehouse. Key hazard summaries and handling procedures are also posted on visual banners at the entrance to the chemical storage bay, ensuring immediate visibility prior to crossing into active work areas.

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

Contrans establishes and enforces a mandatory, step-by-step personnel decontamination protocol for workers involved in spill response or activities where cyanide contact may have occurred.

Cyanide Emergency Response Preparedness Plan. Section 10.8.4, titled “Site and Personnel Cleaning and Decontamination”.

Upon completing a spill response or handling an active chemical intervention, personnel proceed to a designated decontamination area equipped with containment controls:

Neutralizing Solution: Responders utilize a sprayer containing a 10% to 12% sodium hypochlorite solution to neutralize residual cyanide traces on outer protective garments.

Run-Off Containment: Chemical spraying and initial decontamination are performed while standing inside a dedicated spill containment tray to catch all liquid run-off and prevent ground contamination.

To eliminate secondary exposure or skin contact during suit removal, Section 10.8.4 mandates a precise, reverse-order doffing procedure:

- Spraying of outer suit and boots with the 10% to 12% sodium hypochlorite solution inside the containment tray.
- Removal of sealing Duct Tape from wrist and ankle joints.
- Careful stripping down of the chemical-resistant splash suit together with boots, while strictly maintaining the respiratory mask and inner gloves in place.
- Removal of mid-forearm outer nitrile gloves.
- Removal of the respiratory mask/respirator.
- Sequential removal of inner surgical-type gloves as the final layer, stripping the non-dominant hand glove first followed by the dominant hand glove to avoid direct skin contact.

Hazardous Waste Containment: All discarded, contaminated PPE items and garments are immediately placed inside heavy-duty red hazardous waste bags. The red bags are tightly sealed with Duct Tape at the decontamination boundary before transfer to the facility's hazardous waste storage area, ensuring no off-site transfer or exposure to uncontained chemical residues.

There is an occupational doctor and a nurse who are available 24 hours a day, 7 days a week (24/7) for site emergencies and first aid for workers exposed to cyanide.

Contrans has formal arrangements with qualified external medical facilities and emergency ambulance services capable of providing immediate clinical evaluation, stabilization, decontamination, and specific antidote administration for workers exposed to cyanide.

Contrans' Head of Occupational Health has formally evaluated and validated two local, high-complexity medical centers equipped to handle chemical emergencies and cyanide intoxication: San Gabriel Clinic and Jesús del Norte Clinic.

Both medical institutions maintain an active stock of the specialized cyanide antidote Cyanokit (Hydroxocobalamin) and have confirmed their operational capability to receive and treat cyanide exposure casualties.

Emergency transport to referral clinics is executed via specialized ambulance services integrated into the emergency coverage of both validated medical centers.

Ambulance transportation, emergency admission, and full clinical treatment for cyanide exposure are covered under the organization's Complementary Work Risk Insurance (SCTR by its Spanish acronym), ensuring immediate referral without administrative delays.

San Gabriel Clinic: Contrans maintains a formalized Patient Care Flow for Cyanide Exposure, validated via written correspondence with the clinic's Medical Director and Commercial Head. The established care pathway includes four structured phases:

- Initial Emergency Clinical Evaluation: Rapid triage and exposure assessment.
- Clinical Stabilization: Immediate life-support measures and airway management.
- Specific Treatment: In-hospital administration of Cyanokit (Hydroxocobalamin) antidote.
- Follow-up & Coordination: Post-treatment clinical monitoring and administrative coordination with Contrans' Occupational Health department.

Jesús del Norte Clinic: Formal written communication from the Chief of Emergency Services confirms that medical and nursing staff are specifically trained in the initial management and treatment of chemical poisoning and exposure. The facility's emergency capabilities encompass:

- Immediate clinical evaluation and airway management.
- Clinical stabilization with advanced ventilatory and hemodynamic support.
- Decontamination protocols tailored to the route of exposure.
- Continuous multi-parameter monitoring and specialized patient activation support.

Contrans maintains active, ongoing communications and formal site visits to validated referral medical centers. These evaluations are led by the Head of Occupational Health in coordination with the company's insurance broker to verify clinical readiness, care protocols, and Work Risk Insurance alignment for potential cyanide emergencies.

Formal medical validation and clinical communication are directly managed by Dr. Patricia Hernández, Head of Occupational Health.

Communications and reviews are maintained with the emergency department leadership, who periodically reviews and re-confirms that the clinics maintain trained personnel, emergency life-support equipment, decontamination protocols, and an active stock of the Cyanokit (Hydroxocobalamin) antidote.

Contrans conducts physical, in-person visits to the referral clinics in coordination with the company's insurance broker. These joint visits serve to physically inspect emergency care facilities, review clinical response protocols, and validate that emergency admission and treatment workflows operate seamlessly under the Work Risk Insurance policy without administrative bottlenecks during an active emergency.

Contrans maintains a strict administrative procedure requiring occupational health personnel to provide direct medical accompaniment whenever a worker is referred or transported to a clinic for medical evaluation or care.

As mentioned in the previous question, there is evidence of communication with the clinics' medical directors, which includes the validation of their commitment to cyanide emergency responses.

Contrans maintains and implements a formalized incident investigation procedure, Investigation of Workplace Accidents and Incidents. This Procedure mandates that all workplace incidents be investigated by a multidisciplinary team. This team includes line supervisors, safety specialists, and elected representatives from the joint Occupational Health and Safety Committee.

The audit team verified facility safety logs and confirmed that no accidents, incidents, or exposure events related to sodium cyanide have occurred at Contrans during the last three (3) years.

To evaluate the practical implementation, functionality, and effectiveness of procedure, the audit team sampled a completed investigation package for an operational accident not involving cyanide:

- Investigation Record documented on form “Record of workplace accidents and incidents”.
- Event Description: A worker suffered a contusion to the right wrist and hand due to a fall from a truck.

- Causality Analysis Methodology: The investigation utilized a formal causality analysis tool, systematically identifying both immediate causes root/basic causes.
- Corrective Action Plan: Formulated clear, actionable corrective measures, assigned specific managers responsible for execution, established target completion dates, and defined follow-up verification steps to prevent recurrence.

Investigation files, cause analysis records, and corrective action logs are systematically archived within the management system database. In full compliance with national Peruvian labor safety laws and internal protocols, all accident and incident investigation records are retained for a minimum of five (5) years after the date of the occurrence.

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.

Not apply. This provision does not apply to this warehouse operation because they exclusively handle cyanide in closed packages or containers, such as Intermediate Bulk Containers (Big box) and drums, and no reagents are used, or processing takes place.

There is only storage of solid cyanide in unopened containers and packaging, such as IBCs and drums. However, there is a measure of HCN. In accordance with standard operating procedure

"Entry, storage, and dispatch of loose cargo – Hazardous Materials and Chemical Inputs and Controlled Goods", Contrans has identified all key zones and logistics tasks where potential exposure to hydrogen cyanide (HCN) gas or solid residues could occur:

- Container Opening & Unloading: Mandatory 10-minute natural ventilation period with container doors fully opened prior to taking HCN gas readings and permitting operator entry.
- Routine Logistics Operations: Product reception, palletizing, strapping, and pre-dispatch staging.
- Facility Housekeeping: Prior to executing any cleaning or maintenance work within the sodium cyanide storage zone.

Monitoring is conducted by the Industrial Safety and Environment (SIMA) team or by Risk Prevention personnel in SIMA's absence.

All HCN monitoring data is logged in real time using a digital checklist (HCN measurement monitoring) hosted on the Microsoft List corporate platform. during load and unload operations with the portable detector. There is no presence of the HCN in the warehouse according to the records.

As there is only storage of solid cyanide in unopened containers and packaging, such as IBCs and drums, the current measures of the HCN concentration are appropriate.

Principle 4 | TRAINING

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

Production Practice 4.1

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

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

Finding/Deficiencies Identified:

Contrans ensures that all personnel operating cyanide are thoroughly trained to perform their assigned tasks in a safe, efficient, and environmentally sound manner, specifically designed to minimize the potential for accidental cyanide releases and human exposure.

Contrans implements an Annual Training Program (verified for 2025 and 2026) that provides specific, hands-on training to minimize handling risks, such as moving loads safely to prevent rupturing or damaging containers.

The Sodium Cyanide Safety and Emergency Response Training delivered by a specialized company.

Daily 5-minute safety talks and formal Hazard Identification, Risk Assessment, and Control Measures (IPERC) courses are used to continuously reinforce field-level awareness of risks that could trigger accidental product release.

The training curriculum includes targeted hazard mitigation topics such as Risk Prevention, Workplace Accidents and Incidents, and Solid Waste Management to ensure a comprehensive understanding of emergency minimization protocols.

The auditors verified that all warehouse personnel tasked with physical container movements hold current technical qualifications and specialized chemical safety training to prevent container damage.

The auditors conducted field interviews with forklift operators and warehouse assistants during active shifts to confirm their understanding of safe cyanide handling and exposure prevention protocols.

Contrans provides structured, mandatory training to all operational personnel involved in cyanide operation. The specific session “Update and Dissemination of Mandatory PPE Use in Cyanide Operations”, covers three essential PPE management pillars: Required PPE Identification, Proper Donning and Fitting (Step-by-step practical instruction on correctly wearing, sealing (e.g., Duct Tape sealing at wrists/ankles), and fitting PPE prior to entering active sodium cyanide storage zones) and Maintenance and Care.

The training session was led and delivered by Aldo Juárez, specialist from the Industrial Safety and Environment (SIMA) department. The training was provided to all frontline operations staff, including forklift operators), logistics assistants, and supervisory personnel involved in sodium cyanide handling.

Training attendance and comprehension were documented on form “Training/Dissemination Record”, document code SG-R-003. The audit team verified the completed training log.

Contrans implements an Annual Training Program (verified for 2025 and 2026) that provides specific, hands-on training to minimize handling risks, such as moving loads safely to prevent rupturing or damaging containers.

The Sodium Cyanide Safety and Emergency Response Training delivered by a specialized company.

Daily 5-minute safety talks and formal Hazard Identification, Risk Assessment, and Control Measures (IPERC) courses are used to continuously reinforce field-level awareness of risks that could trigger accidental product release.

The training curriculum includes targeted hazard mitigation topics such as Risk Prevention, Workplace Accidents and Incidents, and Solid Waste Management to ensure a comprehensive understanding of emergency minimization protocols.

Technical and Mechanical Equipment Operational Training:

The auditors verified that all warehouse personnel tasked with physical container movements hold current technical qualifications and specialized chemical safety training to prevent container damage.

The auditors conducted field interviews with forklift operators and warehouse assistants during active shifts to confirm their understanding of safe cyanide handling and exposure prevention protocols.

Contrans has a strict, mandatory induction and evaluation process for all new hires. The facility enforces a zero-tolerance policy ensuring that no employee, contractor, or new transfer is permitted to enter or work within the sodium cyanide storage area without having successfully completed specific cyanide safety training.

At the beginning of the employment relationship, or prior to a change in role, the worker's immediate supervisor or leader conducts a specialized job induction, the worker must complete a comprehensive initial training program covering cyanide hazards, safety standards, and emergency response protocols. This direct induction covers critical standard operating procedures, essential operational safety points, and the mandatory identification and correct use of Personal Protective Equipment (PPE) required for sodium cyanide handling.

The execution of this role-specific training is formally documented and signed off using form “Job Induction Record”. To ensure the worker has fully understood the procedures and safety requirements, the induction concludes with a formal assessment of knowledge. Comprehension is measured and documented using form “Evaluation of Job Induction” . Only after the worker successfully passes this evaluation and demonstrates practical competence does the safety department and area leadership formally authorize them to handle sodium cyanide cargo.

Contrans S.A.C.		July 22, 2026
Name of Facility	Signature of Lead Auditor	Date of submittal

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Contrans implements an Annual Training Program that provides specific, hands-on training to minimize handling risks, such as moving loads safely to prevent rupturing or damaging containers.

The Sodium Cyanide Safety and Emergency Response Training delivered by a specialized company.

Daily 5-minute safety talks and formal Hazard Identification, Risk Assessment, and Control Measures (IPERC) courses are used to continuously reinforce field-level awareness of risks that could trigger accidental product release.

The training curriculum includes targeted hazard mitigation topics such as Risk Prevention, Workplace Accidents and Incidents, and Solid Waste Management to ensure a comprehensive understanding of emergency minimization protocols.

Technical and Mechanical Equipment Operational Training:

The auditors verified that all warehouse personnel tasked with physical container movements hold current technical qualifications and specialized chemical safety training to prevent container damage.

Contrans identifies the core training elements required for safe sodium cyanide handling and delivering detailed, role-specific instruction to all personnel involved in logistics operations. The training program comprehensively equips operators, forklift drivers, and supervisors with the technical knowledge and practical skills needed to execute their duties safely.

Training elements are linked directly to operational procedures, safety standards and emergency preparedness plans.

The audit team reviewed the syllabus and training modules used for worker qualification, confirming that they cover key operational and safety topics in detail.

Contrans utilizes highly qualified, accredited external training organizations, internationally certified instructors, and credentialed internal safety specialists to deliver training. Additionally, all heavy equipment and forklift operators handling sodium cyanide cargo are formally certified by an accredited third-party entity in compliance with national legislation and international safety standards.

HAZWOPER Training (Levels 1, 2, and 3): Delivered by “Safety Management Resources”, instructor Jacques Mendieta, an internationally certified instructor in OSHA and NFPA standards.

Sodium Cyanide Safety and Emergency Response Training: Delivered by a specialized company.

Routine operational training, procedure updates, and daily safety briefings are conducted by internal “Industrial Safety and Environment” (SIMA) specialists. The internal trainers hold formal university

degrees in engineering, specialized credentials in HAZWOPER and sodium cyanide handling, and formal Train-the-Trainer certifications.

In accordance with Peruvian Law No. 29783, industrial load-handling equipment operators must complete theoretical and practical qualification modules aligned with international safety standards (OSHA and ANSI) to guarantee safe cargo transfer without compromising packaging integrity.

Heavy equipment training and operator certifications are issued by a specialized company, a specialized training organization certified in ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018 for personal qualification and certification in heavy machinery, lifting equipment, and industrial vehicles.

The audit team verified valid qualification certificates for active forklift/stacker operators handling sodium cyanide cargo.

Following both internal and external training sessions, workers are required to take an exam to demonstrate their understanding of the material. Workers must achieve a defined minimum passing grade to be authorized for duty, ensuring that only personnel with a verified understanding of cyanide hazards and safety protocols are permitted to handle the chemical.

For specialized technical courses, such as the Sodium Cyanide Safety and Emergency Response, the evaluation is strictly enforced, and the worker's final passing grade is formally printed directly on their issued certificate, providing clear audit evidence of their demonstrated competence.

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:

Contrans provides structured, specialized emergency response training to all personnel assigned to emergency duties, including the site emergency response brigade and operational personnel responsible for sodium cyanide handling.

Cyanide Emergency Response Preparedness Plan Training, the governing document is the Cyanide Emergency Preparedness and Response Plan. The training was conducted by certified specialists from the Industrial Safety and Environment (SIMA) department. The session targeted all primary

internal emergency responders, specifically: Members of the **Emergency Response Brigade and Operational handling personnel, including forklift operators and logistics supervisors.

The audit team reviewed completed training attendance logs and records, confirming full participation, instructor sign-offs, and worker signatures validating their training in emergency response procedures.

The Sodium Cyanide Safety and Emergency Response Training delivered by a specialized company.

Contrans implements a structured program of periodic emergency response drills designed to test its emergency procedures, validate personnel response capabilities, and evaluate the overall effectiveness of the Cyanide Emergency Preparedness and Response Plan.

Emergency response capabilities tested during drills reflect advanced training provided by accredited external specialists, including HAZWOPER certification and specialized Cyanide Emergency Response training.

Cyanide Emergency Response Preparedness Plan Training, the governing document is the Cyanide Emergency Preparedness and Response Plan. The training was conducted by certified specialists from the Industrial Safety and Environment (SIMA) department. The session targeted all primary internal emergency responders, specifically: Members of the **Emergency Response Brigade and Operational handling personnel, including forklift operators and logistics supervisors.

The Sodium Cyanide Safety and Emergency Response Training delivered in December 2025 by a specialized company.

First Aid Emergency Brigade Training: The auditors verified the specialized competency of the active emergency response and first aid brigade members. A dedicated First Aid course was conducted by a specialized company.

Contrans maintains a centralized, secure digital system to manage and retain all emergency training records. The company systematically preserves complete documentation—including worker names, instructor credentials, training dates, detailed syllabus topics, attendance rosters, and testing scores—throughout the full duration of each worker's employment tenure.

The People Management team utilizes a dual-platform digital archiving structure to retain all training documentation:

BUK Human Resources Management Platform: Certified courses, official training modules, and issued qualification certificates are systematically uploaded and tracked through this platform.

OneDrive Secure Cloud Repository: In-person attendance sign-in sheets, practical drill rosters, and physical evaluation sheets are digitized and preserved in dedicated cloud storage managed by the People Management team.

In accordance with internal protocols, every archived training record contains comprehensive details:

- Employee Identification: Full name, job title, and area of assignment.
- Trainer Credentials: Name, title, and organization/qualification of the instructor (e.g., internal SIMA specialists or external consultants like Safety Management Resources).
- Event Specifics: Exact date and location of the training or emergency drill.
- Syllabus: Clear description of the topics covered (e.g., emergency plan implementation, spill response, personnel decontamination, first aid).
- Comprehension & Attendance Verification: Verified attendance sign-offs and written examination scores/results when is applied.

All training files, attendance logs, and qualification certificates are retained for the entire duration of the worker's employment life

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:

There is a Cyanide Emergency Preparedness and Response Plan, In addition, there is an Emergency Preparedness and Response Plan – Callao.

The Cyanide Emergency Preparedness and Response Plan establishes a structured three emergency classification levels based on the scale of the release, hazard level, and resource requirements. The plan clearly defines specific parameters and response triggers for catastrophic or

high-risk incidents under its “Level 3” classification. A “Level 3” emergency is defined as any incident occurring inside or outside the company's property that exceeds Contrans's internal response resources and capabilities, thereby making the mobilization of external assistance and emergency services strictly mandatory. The plan specifically identifies that a “large sodium cyanide spill exceeding 20 kilograms that comes into contact with water” constitutes an automatic Level 3 emergency. This classification recognizes the critical risk of rapid hydrogen cyanide gas generation in wet conditions, immediately triggering maximum response actions, facility evacuation protocols, and external agency notification.

The Cyanide Emergency Preparedness and Response Plan explicitly details three distinct emergency levels for solid sodium cyanide releases:

Level 1: Small Dry Spill. Up to 50 kg of solid sodium cyanide spilled under dry conditions. Causes minor material damage and leads to a temporary, localized suspension of operations strictly within the affected storage bay during initial cleanup by response personnel.

Level 2: Large Dry Spill. More than 50 kg of solid sodium cyanide spilled under dry conditions. Causes significant material damage and requires halting operations in the entire warehouse zone for the full duration of the spill decontamination response. It contemplates potential exposure or injury to a limited number of workers (2 persons) requiring immediate first aid care.

Level 3: Large Wet Spill / Contact with Water. More than 20 kg of solid sodium cyanide coming into contact with water, presenting an acute risk of toxic hydrogen cyanide gas generation. Involves severe material/environmental risk and triggers a total shutdown of all facility activities for up to 2 days, immediate plant-wide evacuation of all personnel, and external emergency support. It accounts for potential multiple affected casualties (more than 5 persons) requiring immediate, specialized medical intervention and hospital transfer.

Not apply, this provision does not apply to this warehouse operation because they exclusively handle cyanide in closed packages or containers, such as Intermediate Bulk Containers (Big box) and drums, and no reagents are used or processing takes place.

The Cyanide Emergency Plan indicates specific response actions for each anticipated emergency situations.

Contrans establishes clear preliminary response protocols, mandatory evacuation guidelines, and defined physical isolation distances within its emergency plan. Because the facility is fully enclosed by perimeter security walls and has no immediate adjacent residential communities, the procedures

focus on protecting internal workforce personnel, third-party contractors, visitors, and nearby transport areas.

The Cyanide Emergency Preparedness and Response Plan Section 10.2, preliminary actions during an emergency, establishes that “the protection of human life is the absolute first priority”. Protective measures, warnings, and evacuation procedures apply equally to direct Contrans personnel and third-party contractors, transport drivers, or visitors present on site.

Small Dry Spill (less than 50 kg): Mandates an immediate minimum isolation radius of 10 meters around the release point.

Large Dry Spill (more than 50 kg): Mandates an immediate minimum isolation radius of 50 meters around the release point.

Dynamic Isolation Based on Hydrogen Cyanide Monitoring:

Safety perimeters are not fixed; they are dynamically extended based on real-time atmospheric monitoring. If direct air monitoring with portable single-gas HCN detectors indicates hydrogen cyanide concentration levels exceeding 4.5 ppm during source containment activities, the response coordinator is required to immediately expand the safety perimeter and evacuation boundary.

The Cyanide Emergency Preparedness and Response Plan Section 10.6 mentions the First Aid Measures and Section 10.6.1 is about the Use of Antidote for Cyanide Poisoning.

Specific Antidote: Contrans maintains Cyanokit (Hydroxocobalamin / Vitamin B12a) 5g injectable dose, recognized as the specific antidote for acute cyanide poisoning.

Central Storage Location: The Cyanokit antidote is stored in a temperature-controlled, secure cabinet located directly within the facility's medical room, ensuring immediate availability for on-duty health personnel during an emergency.

Restricted Medical Administration: Section 10.6.1 explicitly dictates that antidote administration is strictly restricted to authorized, trained medical personnel (the on-duty occupational doctor or nurse). Unqualified workers or general first aid responders are prohibited from administering the antidote.

Regulatory Compliance: Antidote protocols and first aid procedures strictly adhere to national health regulations in Peru and approved occupational medical practices.

Contrans maintains a dedicated 20-liter medical oxygen cylinder equipped with a non-rebreather reservoir mask and humidification system for emergency response to suspected cyanide exposure.

The administration of medical oxygen is strictly limited to personnel who have received appropriate training in first aid and emergency response procedures. The facility's occupational physician and occupational nurse are the primary personnel authorized to evaluate casualties and administer oxygen therapy. In their absence and during the initial emergency response phase, trained members of the Emergency Response Brigade may provide supplemental oxygen in accordance with their emergency response training and established first-aid procedures until medical personnel assume control of the incident.

Instructions for the administration of medical oxygen are incorporated into the following emergency response documents and training programs:

- **SM-N-010 Version 06 – Cyanide Emergency Preparedness and Response Plan**, Section 10.6 (First Aid Measures), which describes the immediate response actions for suspected cyanide exposure, including oxygen administration.
- Annual **First Aid Training Programs** conducted for Emergency Response Brigade members and designated responders.
- Practical emergency drills and simulations involving cyanide exposure scenarios, during which responders receive instruction on the inspection, setup, use, and limitations of the oxygen delivery equipment.
- Medical response procedures implemented by the on-site occupational health service, which include evaluation criteria, oxygen administration protocols, patient monitoring requirements, and emergency medical referral procedures.

The medical oxygen cylinder, associated regulator, humidifier, mask, and accessories are inspected on a weekly basis using Form **SM-R-037 Version 02**, ensuring that the equipment remains available and fully operational for emergency use.

Furthermore, emergency responders receive training emphasizing that oxygen administration does not replace professional medical evaluation or antidote treatment when indicated. Suspected cyanide exposure cases are immediately referred to the on-duty physician or nurse, who is exclusively authorized to assess the need for Cyanokit (Hydroxocobalamin) administration.

The Cyanide Emergency Preparedness and Response Plan.

Section 10.8, titled “Environmental Emergency Response Actions”.

Section 10.8.1 details specific response actions for dry solid sodium cyanide releases.

Section 10.8.2 outlines containment and mitigation measures for spills occurring on damp soil, wet pavement, or during rainfall events:

All these sections indicate the measures to control the releases and the actions to be taken involve containing the spill—preventing it from spreading further—using environmental response equipment.

The Cyanide Emergency Preparedness and Response Plan:

Dry Spill Response Protocol (Section 10.8.1)

Risk Prevention personnel immediately set up a quarantine boundary covering an area of no less than 2000 m2, utilizing safety stops, traffic cones, and delimiting hazard tape.

Spill Protection: A heavy plastic blanket/tarpaulin is spread directly over the spilled material to shield dry chemical briquettes from wind and ambient moisture.

Chemical Stabilization: If collection activities are expected to exceed 30 minutes, responders must apply lime (cal) over the spill to maintain high alkalinity and prevent hydrogen cyanide (HCN) gas generation.

Collection & Double-Bagging: Responders collect the dry solid product using non-sparking brooms and dustpans, placing the material into a white woven polyethylene inner bag. This bag is placed inside a red polyethylene outer bag, and both bags are sealed independently using Duct Tape.

Wet Ground / Rain Spill Response Protocol (Section 10.8.2)

Quarantine & HCN Monitoring: A minimum 2000 m2 safety perimeter is established. Atmospheric monitoring is initiated immediately using single-gas detector to ensure HCN gas levels remain below 4.5 ppm.

Physical Containment: Spills on wet ground are confined using sand berms to prevent liquid spreading, supplemented by chemical absorbent pads along the perimeter.

Humidity Shielding: Due to the high ambient relative humidity in Callao, spills are immediately covered with a dry plastic tarpaulin to block moisture contact. The cover is pulled back incrementally as collection proceeds.

Chemical Soil Stabilization: Lime (cal) is applied to the wet soil to elevate alkalinity, neutralizing acidity and halting the chemical decomposition of sodium cyanide into HCN gas. Responders are instructed to use the minimum effective quantity of lime to limit secondary soil impacts.

Collection & Double-Bagging: Recovered damp materials and contaminated soil are swept into a white woven polyethylene inner bag, placed inside a red polyethylene outer bag, and sealed separately with Duct Tape.

If atmospheric monitoring detects HCN concentrations exceeding 4.5 ppm internal manual collection is halted. The incident escalates to Level 3 response protocols, mobilizing specialized external cleanup contractors pre-qualified and listed in Annex 6 (List of qualified suppliers to address sodium cyanide spills) to execute advanced hazmat remediation under their emergency plans.

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:

Contrans has formally notified local external responders of their role within the facility's emergency plan, delivering official communications:

Fire Department: Formal notification letter delivered to the Salvadora Callao No. 9 Fire Company.

National Police: Formal notification letter delivered to the Peruvian National Police (Oquendo Police Station).

Under the broader Emergency Preparedness and Response Plan- Callao, Contrans integrates external support coordination with the District Civil Defense Committee, chaired by the District Mayor.

Coordination for any external agency entry into an active incident zone is strictly managed through the Industrial Safety and Environment (SIMA) Manager or the General Emergency Brigade Leader.

The Head of Occupational Health formally evaluated, validated, and involved local medical providers to ensure rapid clinical response for cyanide exposure: San Gabriel Clinic and Jesús del Norte Clinic have been formally evaluated and integrated into the emergency plan. Both clinics confirmed their technical readiness and maintain active stocks of the Cyanokit (Hydroxocobalamin) antidote.

Emergency transport is secured through specialized ambulance services integrated into the clinics' emergency systems. All medical transport, clinical evaluation, antidote treatment, and emergency

care are fully covered under Work Risk Insurance (SCTR), eliminating administrative delays during emergency admissions.

Internal Workforce Involvement:

The Cyanide Emergency Preparedness and Response Plan was formally communicated to and reviewed with worker representatives on the Occupational Safety and Health Committee. The audit team verified formal meeting minutes documenting the presentation and approval of the plan.

Operational workers, forklift drivers, and emergency brigade members receive regular training and briefings on emergency procedures, evacuation routes, and response roles.

Contrans is an industrial logistics site fully enclosed by high perimeter security walls. The sodium cyanide warehouse is situated within an industrial zone without immediate adjacent residential communities. Therefore, direct community exposure scenarios are mitigated, and public emergency interaction is focused on local response authorities (Police, Fire, Civil Defense, and Hospitals).

The immediate neighbors are Industrial Container Storage Warehouses. There are no nearby communities. The activities do not pose a risk to the community because Contrans manages solid sodium cyanide exclusively in original, unopened factory-sealed packages.

The Cyanide Emergency Preparedness and Response Plan identifies the external entities having emergency roles. Annex 3: List of emergency numbers.

Contrans has formally notified local external responders of their role within the facility's emergency plan, delivering official communications:

Fire Department: Formal notification letter delivered to the Salvadora Callao No. 9 Fire Company

National Police: Formal notification letter delivered to the Peruvian National Police (Oquendo Police Station).

Under the broader Emergency Preparedness and Response Plan- Callao Contrans integrates external support coordination with the District Civil Defense Committee, chaired by the District Mayor.

Coordination for any external agency entry into an active incident zone is strictly managed through the Industrial Safety and Environment (SIMA) Manager or the General Emergency Brigade Leader.

The Head of Occupational Health formally evaluated, validated, and involved local medical providers to ensure rapid clinical response for cyanide exposure: San Gabriel Clinic and Jesús del Norte Clinic

have been formally evaluated and integrated into the emergency plan. Both clinics confirmed their technical readiness and maintain active stocks of the Cyanokit (Hydroxocobalamin) antidote.

Contrans conducts regular consultations and maintains continuous communication with external response entities, including local medical facilities, the fire department, and local police. These interactions ensure that the Cyanide Emergency Preparedness and Response Plan remains current and that external responders maintain their technical capability and operational readiness for potential cyanide emergencies.

Contrans maintains ongoing dialogue with validated referral medical centers through regular email correspondence and scheduled on-site visits. Led by the Head of Occupational Health in coordination with the insurance broker, these consultations re-verify availability of the Cyanokit (Hydroxocobalamin) antidote, Emergency room medical staff training and chemical exposure response readiness, Work Risk Insurance alignment to ensure immediate, unhindered emergency admissions and ambulance response.

Active lines of communication are maintained with the local fire department and local police authorities.

Continuous contact and administrative coordination with external authorities and emergency entities are directly managed by specialists from the Industrial Safety and Environment (SIMA) department.

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 5.2
☐ not in compliance with

Finding/Deficiencies Identified:

The Cyanide Emergency Preparedness and Response Plan, includes in section 8.2 the functions of the members of the brigade, including the Brigade Commander, Brigade Leader 1 (Contrans 2 – SIMA office) and Brigade Leader 2 (Contras 1 – Topic).

The Brigade Leader replaces the Brigade Commander in the event of absence and assumes the same duties established for each area of operations.

The Emergency Preparedness and Response Plan- Callao and the Cyanide Emergency Response Preparedness Plan, both documents include the members of the brigades and their functions.

The Cyanide Emergency Response Preparedness Plan, Section 8.1. Organization of the Emergency Brigade.

The Emergency Preparedness and Response Plan- Callao. Section 9.1. Organization of the Emergency Brigade.

The Cyanide Emergency Response Preparedness Plan, Section 13.1.1 explicitly assigns responsibility to the Industrial Safety and Environment (SIMA) department for disseminating the Cyanide Emergency Response Plan to all personnel.

The Plan dictates that emergency response training and refresher sessions must be conducted annually in strict accordance with the site's annual training schedule.

An updated, official list of designated “Emergency Response Brigade” members is published and posted within operational zones.

To ensure high technical competency, advanced emergency response modules for brigade members are delivered by qualified external third-party entities and specialized medical professionals.

First Aid Course, delivered by a specialized occupational physician from MEPSO on June 3, 2025.

Fire Fighting and Hose Handling, conducted by a certified third-party fire safety instructor for brigade members.

Under Section 13.1.1, all workers, forklift operators, and stevedores involved in sodium cyanide operations are required to actively participate in scheduled emergency response drills.

Regular drill execution and plan dissemination ensure that both dedicated brigade members and frontline operational workers maintain high practical readiness to respond rapidly and effectively to future potential incidents.

In The Cyanide Emergency Response Preparedness Plan, the emergency call-out procedures and communication flows consist of the following verified elements:

The facility operates a Closed-Circuit Television (CCTV) Control Center that functions continuously, 24 hours a day, 7 days a week. The dedicated internal emergency hotline for the CCTV Control Center is 969915932. Any worker who identifies an incident or cyanide spill immediately contacts this number to activate the emergency response sequence.

The emergency plan establishes a clear, step-by-step communication flow to ensure all necessary internal stakeholders and response teams are alerted efficiently:

Initial Identification & Assessment: Upon receiving the emergency call at the CCTV Control Center, the dispatcher identifies the scale of the incident and immediately evaluates the need to deploy the Emergency Response Brigade.

Once the brigade is activated, the communication protocol dictates an immediate, parallel notification cascade to key operational and administrative departments: Operations, Industrial Safety and Environment (SIMA) department, Occupational Health, People Management, Customer Service.

The Cyanide Emergency Preparedness and Response Plan, includes in section 8.2 the functions of the members of the brigade, including the Brigade Commander, Brigade Leader 1 (Contrans 2 – SIMA office) and Brigade Leader 2 (Contras 1 – Topic). Section 9 includes the emergency protocols including the emergency report and outline of the protocol of emergency notifications.

The Cyanide Emergency Preparedness and Response Plan includes in section 11 the list of PPE, equipment, tools, and material for emergency response.

The Cyanide Emergency Preparedness and Response Plan, Section 11 mandates that all emergency response equipment, tools, and PPE must be systematically inspected in accordance with the site's annual safety schedule.

Annual Occupational Health and Safety Program, enforces a formal requirement to conduct monthly inspections across all emergency equipment located throughout the sodium cyanide storage area and surrounding operational areas:

Emergency Showers and Eyewash Stations: Monthly functional testing to verify water pressure, flow rate, cleanliness, and unhindered physical access.

Fire Extinguishers: Monthly physical inspections checking pressure gauges, seal integrity, discharge hoses, positioning, and hydrostatic test expiration dates.

Chemical Spill Kits: Verification of inventory, including non-sparking shovels, absorbent pads, lime stocks, neutralizers, and recovery bags.

HCN detector devices & PPE: Scheduled calibration logs and physical condition checks for single-gas hydrogen cyanide detectors, full-face respirators, and chemical suits.

The Cyanide Emergency Preparedness and Response Plan identifies the external entities having emergency roles. Annex 3: List of emergency numbers.

Contrans has formally notified local external responders of their role within the facility's emergency plan, delivering official communications:

Fire Department: Formal notification letter delivered to the Salvadora Callao No. 9 Fire Company.

National Police: Formal notification letter delivered to the Peruvian National Police (Oquendo Police Station)

Under the broader Emergency Preparedness and Response Plan- Callao, Contrans integrates external support coordination with the District Civil Defense Committee, chaired by the District Mayor.

Coordination for any external agency entry into an active incident zone is strictly managed through the Industrial Safety and Environment (SIMA) Manager or the General Emergency Brigade Commander.

The Head of Occupational Health formally evaluated, validated, and involved local medical providers to ensure rapid clinical response for cyanide exposure: San Gabriel Clinic and Jesús del Norte Clinic have been formally evaluated and integrated into the emergency plan. Both clinics confirmed their technical readiness and maintain active stocks of the Cyanokit (Hydroxocobalamin) antidote.

Section 12.2 of the Plan states that communication with other institutions consist of the Volunteer Fire Department, the Peruvian National Police (PNP by its Spanish acronym), clinics, and Civil Defense.

Once members of the Peruvian National Police and the General Corps of Volunteer Firefighters of Peru arrive at Contrans facilities in response to the emergency call made by the company personnel, they will initially meet with the General Brigade commander and Brigade Leaders. These brigader commander and leaders will brief them on the events that have occurred and the characteristics of the spilled product (Cyanide) by providing the representatives of each institution with an original copy of the product's Safety Data Sheet (SDS—formerly MSDS) in Spanish.

Once the product's Safety Data Sheet (SDS) in Spanish has been handed over to the representatives of each institution, they will assume control jointly with the General Brigade Commander.

It should be noted that external communication is activated or initiated only for Emergency Levels 2 and 3 (as per point 7: Emergency Levels). Furthermore, the specific fire department unit requested is a HAZMAT unit. Additionally, the Peruvian National Police will be responsible for securing the facility's perimeter, while the Firefighters will be responsible for safeguarding the lives of personnel and addressing the spill.

The Cyanide Emergency Preparedness and Response Plan lists essential emergency contacts and details external roles. Contrans formally confirmed that these entities are aware of their involvement:

Fire Department: Formal notification letter delivered to the Salvadora Callao No. 9 Fire Company.

National Police: Formal notification letter delivered to the Peruvian National Police (Oquendo Police Station).

Validated Referral Hospitals: The Head of Occupational Health formally evaluated, visited, and integrated San Gabriel Clinic and Jesús del Norte Clinic. Both institutions confirmed awareness of their role, verified operational capability to receive cyanide exposure casualties, and maintain active stocks of the Cyanokit (Hydroxocobalamin) antidote.

Contrans tests its plan through an annual drill schedule, incorporating internal teams and external supply chain partners:

Internal Operational Drill, Tested site-level response to a simulated sodium cyanide spill caused by an operational accident within the handling area.

Joint Cyanide Drill: Contrans conducted a comprehensive joint sodium cyanide spill drill in direct coordination with external logistics provider Transportes Meridian. The audit team reviewed the detailed execution report, which contained photographic evidence and verified tactical execution:

- Wind direction evaluation and entry protocols using calibrated HCN gas detectors.
- Step-by-step spill containment, perimeter isolation, and simulated soil remediation.
- Chronological evaluation of communication channels between the carrier, Contrans operational teams, and emergency dispatch.

Every drill report includes a detailed event description along with an objective analysis of identified strengths and weaknesses.

Corrective Action Plans: Identified weaknesses are linked to formal action plans with defined implementation deadlines and assigned owners.

No external public emergency response agencies (Fire Department, Police) directly participated in the emergency drills conducted during this audit cycle. However, these organizations have been formally notified of their roles, included in the emergency response plan, and maintained as part of the external emergency response network available for incident escalation when required.

Contrans plans to continue evaluating opportunities for future exercises involving external responders to further strengthen interagency emergency preparedness and coordination.

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 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

The Cyanide Emergency Preparedness and Response Plan (SM-N-010 Version 06):

Annex 3 lists essential emergency contacts and details external roles: Clinics, Fire Stations, National Police, Medical Emergency, Municipality, Civil Defense,

Annex 5 lists essential contacts of Qualified providers to handle Sodium Cyanide spills: IFSEC Peru SAC, Safety Management Resources SRL, Outsourcing Green SAC.

Annex 6 lists essential contacts of qualified providers for environmental monitoring.

Annex 8 lists essential contacts of Solid Waste Management Companies authorized for the transport of Hazardous Waste.

The facility operates a Closed-Circuit Television (CCTV) Control Center that functions continuously, 24 hours a day, 7 days a week. The dedicated internal emergency hotline for the CCTV Control Center. Any worker who identifies an incident or cyanide spill immediately contacts this number to activate the emergency response sequence.

The emergency plan establishes a clear, step-by-step communication flow to ensure all necessary internal stakeholders and response teams are alerted efficiently:

Initial Identification & Assessment: Upon receiving the emergency call at the CCTV Control Center, the dispatcher identifies the scale of the incident and immediately evaluates the need to deploy the Emergency Response Brigade.

Once the brigade is activated, the communication protocol dictates an immediate, parallel notification cascade to key operational and administrative departments: Operations, Industrial Safety and Environment (SIMA) department, Occupational Health, People Management, Customer Service

Within the Cyanide Emergency Preparedness and Response Plan, refers to business continuity, so it has developed the Business Continuity Plan.

Plan defines the role and responsibilities of the designated Commercial Representative, who is exclusively authorized to manage interactions and issue statements to the media, press, and television during an incident. Public and media communication channels are activated during major incidents (Level 3 emergencies) where operational continuity is threatened based on event magnitude, casualty counts, property damage, environmental impact, or the need for external emergency resources.

Because the facility is situated in an industrial zone without immediate adjacent residential neighborhoods, official communication with local communities is conducted through municipal representatives and district mayors.

The Cyanide Emergency Preparedness and Response Plan, in the Specific Section: External Communications, mandates reporting to ICMI upon the occurrence of any of the following significant cyanide incidents:

- Human Exposure: Any human exposure requiring response team action, such as emergency decontamination or medical treatment.
- Surface Water Discharge: Any unpermitted discharge entering natural surface waters, whether on-site or off-site.
- Off-Site Release: Any unpermitted release that occurs off-site or migrates off-site.
- Emergency Response Release: Any on-site release requiring the deployment and intervention of an emergency response team.
- Transport Incident: Any transportation event involving a cyanide release that necessitates an emergency response.
- Wildlife Mortalities: Any event resulting in multiple wildlife mortalities where cyanide is known or believed to be the cause.

- Theft: Any theft or loss of cyanide product.

Note on Incident Interpretation: In accordance with ICMI guidelines, if there is any doubt or ambiguity as to whether an event meets the threshold of a "significant incident" as defined in the *ICMI Definitions and Acronyms* document, the notification process is automatically initiated.

The plan establishes strict reporting protocols to ensure timely and complete communication with the Institute:

- Initial Notification (Within 24 Hours): Must be submitted in writing within 24 hours of the incident's occurrence.
- Required Content: Date and time of the incident, brief description of the nature of the event, and the name and contact details of a designated company representative to address follow-up inquiries.

Detailed Follow-Up Report (Within 7 Days): A comprehensive written evaluation must be submitted within 7 calendar days following the incident. Required Content: Detailed root cause analysis, assessment of health, safety, and environmental impacts, and all corrective, mitigation, or remediation measures implemented.

All written notifications must be transmitted electronically via email directly to ICMI at info@cyanidecode.org

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 5.2
☐ not in compliance with

Finding/Deficiencies Identified:

Within the Cyanide Emergency Preparedness and Response Plan, includes actions for dry spills and actions for spills in wet ground.

Dry Spill Response Protocol (Section 10.8.1)

Risk Prevention personnel immediately set up a quarantine boundary covering an area of no less than 2000 m2, utilizing safety stops, traffic cones, and delimiting hazard tape.

Spill Protection: A heavy plastic blanket/tarpaulin is spread directly over the spilled material to shield dry chemical briquettes from wind and ambient moisture.

Chemical Stabilization: If collection activities are expected to exceed 30 minutes, responders must apply lime (cal) over the spill to maintain high alkalinity and prevent hydrogen cyanide (HCN) gas generation.

Collection & Double-Bagging: Responders collect the dry solid product using non-sparking brooms and dustpans, placing the material into a white woven polyethylene inner bag. This bag is placed inside a red polyethylene outer bag, and both bags are sealed independently using Duct Tape.

Wet Ground / Rain Spill Response Protocol (Section 10.8.2)

Quarantine & HCN Monitoring: A minimum 2000 m2 safety perimeter is established. Atmospheric monitoring is initiated immediately using single-gas detector to ensure HCN gas levels remain below 4.5 ppm.

Physical Containment: Spills on wet ground are confined using sand berms to prevent liquid spreading, supplemented by chemical absorbent pads along the perimeter.

Humidity Shielding: Due to the high ambient relative humidity in Callao, spills are immediately covered with dry plastic tarpaulin to block moisture contact. The cover is pulled back incrementally as collection proceeds.

Chemical Soil Stabilization: Lime (cal) is applied to the wet soil to elevate alkalinity, neutralizing acidity and halting the chemical decomposition of sodium cyanide into HCN gas. Responders are instructed to use the minimum effective quantity of lime to limit secondary soil impacts.

Collection & Double-Bagging: Recovered damp materials and contaminated soil are swept into a white woven polyethylene inner bag, placed inside a red polyethylene outer bag, and sealed separately with Duct Tape.

If atmospheric monitoring detects HCN concentrations exceeding 4.5 ppm, internal manual collection is halted. The incident escalates to Level 3 response protocols, mobilizing specialized external cleanup contractors pre-qualified and listed in Annex 6 (List of qualified suppliers to address sodium cyanide spills) to execute advanced hazmat remediation under their emergency plans.

Within the Cyanide Emergency Preparedness and Response Plan, includes actions for dry spills (Section 10.8.1) and actions for spills in wet ground (Section 10.8.2). In the case of dry spillage, through the application of Chemical Stabilization elements (lime), in order to increase the alkalinity of

the soil and thus prevent the decomposition of Sodium Cyanide into Hydrogen Cyanide gas. It includes that the cyanide must be collected with the help of the broom and dustpan, and it will be deposited in a white woven polyethylene bag which will be placed inside a red polyethylene bag. Once finished, the bags are closed separately with the help of duct tape.

In section 10.8.4 Cleaning and decontamination of the Site and Personnel, it includes Ensuring that the entire area is completely clean, checking the broom and dustpan in order not to have any cyanide residue in them; Any contaminated waste should be placed in the bags and closed; Decontaminate the equipment used in the anti-spill tray and using a solution of sodium hypochlorite with a concentration of 10% to 12%, washing one by one to remove all cyanide residue in them; which will be disposed in red cylinders; The personnel, once they have finished attending to the spill, will use sodium hypochlorite (bleach) with a concentration of 10% to 12% by means of a sprayer, in the spill tray then proceed to remove the decontaminated PPE, removing first the Duct Tape, then the anti-splash suit with chemical protection, leaving the gloves and mask on; The entire anti-splash suit with chemical protection is removed with the boots, then the nitrile gloves are removed half arm, the mask is removed and finally the surgical type gloves are removed, first removing the one on the left hand and finally the one on the right hand (consider that the last hand from which the glove is removed is not always the right, for people who commonly use the left hand, that would be the last hand from which the glove would be removed); Contaminated PPE should also be placed in red bags and closed with duct tape.

In addition, in Section 10.8.5 Final disposal, it includes: The bags with the waste and water resulting from the decontamination will be disposed of in red containers for hazardous waste, waiting to be collected by the Solid Waste Management Company authorized for the transport of Hazardous Waste according to Annex 8, who takes it to its final disposal to be encapsulated and disposed of in the safety landfill (Innova Ambiental); As a security measure that the final disposal has been carried out, there is the hazardous waste manifest signed by the authorized company in charge of the transport and disposal of Hazardous Waste.

The Cyanide Emergency Preparedness and Response Plan, about the Solid Waste & PPE Disposal:

All contaminated debris, soil, and spent materials collected during a spill response must be placed in heavy-duty inner bags, sealed, and transferred into dedicated red hazardous waste cylinders.

Contaminated Personal Protective Equipment (PPE) is packaged in red polyethylene bags and sealed with duct tape prior to drum loading.

*Decontamination Liquids: Wash water and liquid effluent resulting from personnel and equipment decontamination procedures are collected and transferred into red hazardous waste containers specifically designated for liquid waste holding.

Collected hazardous wastes are held in temporary storage until pickup by qualified company (listed in Annex 8 of Plan), a registered Solid Waste Operating Company legally licensed for hazardous chemical waste transport.

Final Disposal Facility: Transported cyanide-contaminated waste is delivered to the authorized security landfill operated by an authorized company, where it undergoes chemical encapsulation and safe final land disposal in compliance with national environmental regulations.

As a mandatory safety and legal control measure, Contrans receives a Hazardous Waste Disposal Manifest.

This protocol requirement is “Not Applicable” to the Contrans facility based on the operational scope, packaging nature, and infrastructure of the site. The facility operates strictly as a logistics and storage terminal for solid sodium cyanide. The product is handled exclusively in closed packages, including Intermediate Bulk Containers (IBCs / Big Boxes) and sealed steel drums. No chemical manufacturing, dissolving, reagent preparation, or aqueous processing takes place at the facility.

There are no raw water reservoirs, open tanks, or surface water storage structures located within or around the warehouse. Water required for facility sanitary services is supplied directly through the municipal public utility network.

The warehouse is fully paved, fully enclosed by perimeter walls, equipped with dry containment, and lacks direct hydrological pathways to natural surface water bodies or local drinking water abstraction points. Consequently, a cyanide spill scenario cannot infiltrate or contaminate local public or private drinking water supplies.

The Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water or that could reasonably be expected to enter surface water. In the Cyanide Emergency Preparedness and Response Plan, In section 10.8.2: Spill in Wet Ground (in case of spillage occurring during rain) includes the note that In case of contact with surface water, the use of the following products is prohibited: sodium hypochlorite (bleach), ferrous sulfate and hydrogen peroxide.

The facility operates strictly as a warehouse and storage terminal for solid sodium cyanide packaged in approved closed containers, such as Intermediate Bulk Containers (IBCs / Big Boxes) and sealed

steel drums. No chemical reactions, dissolving, or reagent processing take place on site, significantly mitigating the baseline risk of continuous or diffuse emissions compared to chemical manufacturing facilities.

The Cyanide Emergency Preparedness and Response Plan, Section 10.8.6 (Environmental monitoring) establishes that post-incident environmental monitoring must be immediately initiated if a release comes into direct contact with soil or potential water bodies, based on the following specific quantitative action thresholds:

Soil (With or Without Vegetation): Mandatory soil sampling and laboratory analysis are triggered if direct soil contamination exceeds 8 mg/kg DM (Dry Matter).

Surface Water: Mandatory water quality sampling is triggered if runoff or contact with surface water exceeds 0.02 mg/L.

In accordance with Annex 7 (List of qualified environmental monitoring entities), environmental sampling and analytical testing are executed by certified third-party environmental testing laboratories specialized in hazardous chemical analysis.

All soil and water sampling procedures, chain-of-custody protocols, preservation techniques, and analytical test methods conform strictly to standard environmental monitoring methodologies recommended and executed by the certified testing company.

Results from environmental monitoring are utilized directly by the Industrial Safety and Environment (SIMA) department and hazmat specialists to confirm decontamination effectiveness, verify complete pollutant removal, and determine appropriate post-incident soil or water restoration measures.

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 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

The Cyanide Emergency Preparedness and Response Plan, Section 14.2 (Evaluation of the Plan), dictates that the Emergency Response Plan must be formally reviewed and evaluated at least once

a year, or immediately whenever operational changes occur or lessons learned from drills/incidents necessitate procedural updates.

Section 14 (Continuous Improvement) mandates that every emergency response, drill, or simulation be systematically evaluated across seven key operational aspects:

- Evacuation Efficiency: Total elapsed time from initial alarm sounding to full personnel accounting at designated Assembly Points / Safe Zones.
- Notification Protocols: Timeliness and accuracy of the emergency notification sequence executed by the 24/7 CCTV Control Center.
- Brigade Performance: Practical execution, tactical coordination, and safety adherence by members of the Emergency Response Brigade.
- Resource & Communication Management: Overall effectiveness of command-and-control, communications reach, resource allocation, and plan implementation.
- Inventory & Housekeeping: Recovery, accounting, cleaning, and restocking of response equipment, tools, and materials, verifying the incident area is left safe and clean.
- Hazardous Waste Management: Proper handling, primary containment, temporary storage, and tracking of emergency waste through to final disposal.
- Facility Re-entry Assessment: Comprehensive physical assessment of affected infrastructure and zones prior to declaring the incident closed and authorizing the safe resumption of work.

Following the resolution of an emergency or drill, the General Emergency Brigade Commander is required to convene a formal debriefing session with all participating response personnel. The debriefing team analyzes response performance to identify strengths and opportunities for improvement. Identified weaknesses are translated into formal preventive and corrective action plans with designated owners and target completion dates to address training or operational gaps.

Data and outcomes from regular emergency drills serve as direct inputs for revising and updating Plan, ensuring the site's emergency procedures evolve continuously based on practical experience.

The Cyanide Emergency Preparedness and Response Plan, Section 13.2: The drills carried out throughout the year are established in accordance with SM-G-001 Objectives, Goals, Plan and Annual Program of Safety and Occupational Health.

Internal Operational Drill: Tested site-level response to a simulated sodium cyanide spill caused by an operational accident within the handling area.

SUMMARY AUDIT REPORT

Joint Cyanide Drill: Contrans conducted a comprehensive joint sodium cyanide spill drill in direct coordination with external logistics provider Transportes Meridian. The audit team reviewed the detailed execution report, which contained photographic evidence and verified tactical execution:

- Wind direction evaluation and entry protocols using calibrated HCN gas detectors.
- Step-by-step spill containment, perimeter isolation, and simulated soil remediation.
- Chronological evaluation of communication channels between the carrier, Contrans operational teams, and emergency dispatch.

Every drill report includes a detailed event description along with an objective analysis of identified strengths and weaknesses.

Corrective Action Plans: Identified weaknesses are linked to formal action plans with defined implementation deadlines and assigned owners.

Drills are communicated to staff through the internal document network and Communications via Dedicated customer-specific WhatsApp groups.

The Joint Cyanide Drill conducted on May 14, 2026 simulated both a sodium cyanide release and a worker exposure scenario. The exercise evaluated incident notification, emergency communications, isolation and containment measures, medical assessment of the exposed worker, activation of on-site medical personnel, oxygen administration procedures, Cyanokit decision protocols, and coordination with external medical facilities.

The Cyanide Emergency Preparedness and Response Plan, Section 14.2 (Evaluation of the Plan), dictates that the Emergency Response Plan must be formally reviewed and evaluated at least once a year, or immediately whenever operational changes occur or lessons learned from drills/incidents necessitate procedural updates.

During the preceding three-year audit cycle, the facility experienced no emergency incidents, unpermitted releases, or health exposures related to sodium cyanide management.

Contrans S.A.C.		July 22, 2026
Name of Facility	Signature of Lead Auditor	Date of submittal

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