SUMMARY AUDIT REPORT

FOR THE

INTERNATIONAL CYANIDE MANAGEMENT CODE

TRANSLOADING TERMINAL AND WAREHOUSE AT CIUDAD OBREGON

January 2026

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Operation General Information

Name of Production Facility:	CyPlus Idesa S.A.P.I. de C.V. - Transloading Terminal and Warehouse at Ciudad Obregon
Name of Facility Owner:	CyPlus Idesa S.A.P.I. de C.V.
Name of Facility Operator:	CyPlus Idesa S.A.P.I. de C.V.
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Operation Location Detail and Description

CyPlus Idesa S.A.P.I. de C.V. (CyPlus Idesa) was established in 2013 as a joint venture between Germany's Evonik and Mexico's Grupo IDESA. Since commencing production in Mexico in 2016, the company has been supplying sodium cyanide to the mining industry, leveraging the expertise of CyPlus GmbH, which boasts over six decades of cyanide production experience in Europe.

In August 2019, CyPlus GmbH became part of Röhm Group, a wholly owned subsidiary of Advent International. Established in 1984, Advent International is recognized as one of the world's leading private equity investors.

CyPlus Idesa operates Mexico's sole sodium cyanide facility, located in Coatzacoalcos, Veracruz. Its strategic positioning plays a vital role in ensuring a reliable and continuous supply of cyanide to mining operations throughout the country.

The company utilizes hydrocyanic acid and cyanide-based technologies while adhering strictly to safety and environmental standards, ensuring that the production and transportation of sodium cyanide align with the International Cyanide Management Code (ICMC).

CyPlus Idesa manufactures solid sodium cyanide in briquette form, which is packaged using two distinct methods. These briquettes are stored in UN-certified big bags enclosed in wooden boxes, available as either single-use or returnable boxes, each with a capacity of 1 ton. The UN marking

system, established by the United Nations, sets global standards for the classification, packaging, labelling, and marking of hazardous materials. This ensures that during transportation, the packaging provides safety across all modes of transit. CyPlus Idesa prioritizes high-quality packaging to guarantee the secure storage and transport of cyanide.

The sodium cyanide produced is exclusively tailored for mining customers and is crafted to meet specific industry requirements. Its benefits include local production and direct delivery to customers without intermediaries, a certified supply chain under the ICMC, and a highly responsive, customizable, and flexible service that stands out in Mexico's market.

Additionally, CyPlus Idesa has developed a comprehensive safety program designed specifically for mining clientele, ensuring robust safety measures and environmental protection. The company also maintains a strong infrastructure capable of supporting an effective emergency response plan should any unexpected situations arise.

CyPlus Idesa operates the Transloading Terminal and Warehouse located in the Industrial Park of Ciudad Obregón, Sonora, Mexico, commonly referred to as the Obregón Distribution Center (CDO by its Spanish acronym). The facilities at CDO support a range of key activities, including:

- Receiving and storing solid sodium cyanide in briquettes packed into one-ton Intermediate Bulk Containers (IBCs).
- Transloading operations, where sodium cyanide is transferred from IBCs to isotankers.
- Dispatching sodium cyanide in maritime containers via trucking companies, as well as in isotankers.

The warehouse accommodates incoming trucks transporting maritime containers from the CyPlus Idesa production plant, which contain solid sodium cyanide stored in IBCs. Upon arrival, the containers are deconsolidated using forklifts at the warehouse's entrance ramp. These forklifts then place the IBCs in the designated covered reception area within the warehouse.

For outbound dispatch, the process involves forklifts retrieving IBCs from the cyanide storage area. The forklifts either load the IBCs into maritime containers for transportation by truck or deliver them to the transloading facility within the warehouse. This facility, known as the Solid-to-Liquid System (SLS), facilitates the transfer of solid sodium cyanide into isotankers for further distribution.

The facility offers adequate vehicular access to accommodate the movement and maneuvering of cyanide delivery trucks. The warehouse is bordered by a facility for fertilizers, another for grains, and an adjacent property used as a trailer parking lot.

There are no streams or rivers on-site, and the property possesses features that mitigate potential impacts from extreme rainfall events. Both the northern and eastern access points to the warehouse are equipped with paved surfaces and storm drainage systems, as part of the Industrial Park

infrastructure in Ciudad Obregón. Additionally, the finished floor elevation of the facilities is higher than the surrounding natural terrain, as are the trailer platforms, minimizing flood risks to these structures.

A flooding event affecting the property would only occur if a rainwater flow exceeds the capacity of existing drainage systems. However, this is highly unlikely due to the substantial hydraulic capacity of the infrastructure in place. The Industrial Park utilizes artificial runoff interception and channeling systems robust enough to handle seasonal rainfall typically experienced in this sector.

The Distribution Center comprises two interconnected warehouses linked by a spacious corridor. Both facilities feature expansive interiors with high ceilings and include essential safety measures such as fire extinguishers, ventilation systems, video surveillance cameras, smoke detectors, a temporary storage area for hazardous waste, and a dedicated transfer zone for materials.

The warehouse is specifically configured for the reception, storage, and transfer of sodium cyanide (SLS). Deliveries are received at the front of the building via trailers, which are arranged in an orderly fashion for unloading. Products are subsequently stored in predefined secure areas within the facility.

Cyanide storage area:

The material is delivered in Intermediate Bulk Containers (IBCs) equipped with hermetically sealed polypropylene super sacks, each featuring four handling loops. Inside these sacks is an additional polyethylene super sack, also sealed for added security. Each bag has a capacity of 1,000 kg and contains sodium cyanide in briquette form. These super sacks are placed within wooden boxes, which are securely strapped and accompanied by proper documentation for transport. The product is stored indoors in the warehouse, with a maximum stacking limit of four boxes.

Product Unloading and Loading Area:

This area is situated near the base of the sodium cyanide storage facility, where trucks are unloaded using forklifts. Similarly, forklifts are used for loading as well, moving 1-ton wooden boxes over a short distance from the storage site to the truck designated for delivering the product.

Maneuver Yard:

It features access control and ample space to accommodate the movement of automotive loading units, ensuring that each maneuver handles just one loading or unloading process at a time.

Administrative Services Area:

The facility features a dedicated area for administrative services, encompassing essential office operations, archiving, electronic devices, digital boards, and sanitary provisions for both administrative staff and visitors. All aspects are fully aligned with municipal regulations.

Transfer Area to Isotankers (Solid-to-Liquid System known as the SLS):

Cyplus Idesa also supplies the product through Isotankers. To achieve this, the contents of the boxes are passed to these transports by means of the SLS.

After securing the super sack, the forklift transports it to the SLS unit. Once positioned, the cord at the lower neck of the bag is untied, allowing the briquettes to flow into a hopper. From there, they move along a conveyor chain and are directed into the designated entry point of the isotanker as per the established transfer protocol.

Once the briquettes have been completely transferred, the used super sack and its wooden packaging are classified as hazardous waste. Disposal procedures mandate that these materials be stored in the hazardous waste collection area, which is located in the second warehouse at the site.

The facility was first ICMI certified in 2013, then recertified in 2016, 2019 and underwent its last ICMI certification in November 2022. As part of the ICMI process, which requires all ICMI-certified operations to complete a third-party re-certification audit every three years, a re-certification onsite audit of the warehouse and transloading operations was conducted in August 18 and 19, 2025 using the ICMI Cyanide Production Verification Protocol.

The audit revealed that the facility maintained a satisfactory level of preparedness and understanding of the ICMI Cyanide Code requirements. Management systems were properly implemented, personnel showcased operational discipline, and the site was both well-maintained and organized. Additionally, records were thorough and readily accessible for review.

Auditor's Finding

This operation is

- ✓ **in full compliance**
- ☐ in substantial compliance
- ☐ not in compliance

with the International Cyanide Management Code.

This facility was determined to be in FULL COMPLIANCE with the International Cyanide Management Code.

This facility has not experienced any compliance issues or significant cyanide incidents since during this certification period.

Auditor Information

Audit Company:	BP Cyanide Auditors S.A.C.
Lead and Technical Auditor:	Bruno A. Pizzorni
Dates of Audit:	August 18 and 19, 2025

Auditor Attestation

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

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

Production Verification Protocol

Principle 1 | OPERATIONS

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

Production Practice 1.1

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

As outlined in previous Detailed Audit Reports and the initial certification audit report from 2013, control and quality assurance (QC/QA) programs were established during the construction of the cyanide warehouse and transloading facilities. This Principle was confirmed to be in compliance, and no changes to the installations or processes have occurred during the audit recertification cycle for 2022–2025.

The CyPlus Idesa warehouse was meticulously designed and constructed to prevent or minimize the risk of cyanide release. Its design includes impermeable barriers provided by the building's floors and walls, ensuring safety measures are upheld. Additionally, forklifts used for moving and storing cyanide Intermediate Bulk Containers (IBC) are suitable for handling these materials effectively.

The warehouse features concrete flooring, block and sheet metal walls, and a sheet metal roof. It was designed by a certified engineer with specific requirements, including concrete resistance testing. As documented in the initial certification Detailed Audit Report from 2013, laboratory tests confirmed that the results exceeded the minimum resistance standards specified in the design. The commissioning of the transloading facilities at the Cyplus Idesa Obregon site, referred to as the SLS project, was finalized during this period.

The design and construction of the SLS meet the guidelines and standards outlined by European and ISO regulations, among others. Each of these components has been certified as compliant with the relevant directives or regulations when considered as individual parts of a broader system.

Documentation related to quality control and quality assurance (QC/QA) programs implemented during the construction phase was made available for audit purposes. These records included QC/QA logs for the racking system, as well as as-built drawings endorsed by a

certified professional engineer. Construction files also contained signed approval from the construction engineer, verifying that the facilities were built in accordance with the specified design and engineering plans. Additionally, evidence was provided confirming compliance with this Production Practice, supported by records of the Mexican regulatory agency's review and approval processes. These included the issuance of building permits for facility design and manufacture declarations for construction completion.

Since the facility's quality control and quality assurance documentation was already in place, it was unnecessary to involve an appropriately qualified individual to inspect the site and provide a report confirming that its ongoing operation within established standards would prevent cyanide exposures and releases.

The materials used for constructing the warehouse are well suited to the intended function of the facility. The operations conducted here do not involve solutions; only solid sodium cyanide is handled. Both the warehouse and transloading areas feature concrete flooring, with epoxy-sealed joints integrated into the design.

The SLS system components meet the requirements set forth by European and ISO standards, as well as other relevant guidelines. These components were declared compliant during the initial certification process, which confirmed that the system was designed with the specific intention of handling cyanide, as reflected in the documentation reviewed at that time.

The SLS system features an interlock mechanism designed to prevent the overfilling of ISO containers. This ensures safe handling of cyanide within Intermediate Bulk Containers, with no containers being opened during the process.

The area housing, the SLS system and the cyanide warehouse features a concrete floor that is generally in good condition. The flooring in the area is constructed using a concrete slab designed to be waterproof, non-absorbent, washable, and slip-resistant, with a flawless, crack-free finish that supports easy cleaning and disinfection. Solid cyanide in IBC packaging is handled and stored within the warehouse on these impermeable concrete surfaces, ensuring safety and containment standards are met.

The SLS system is equipped with an interlock mechanism designed to prevent overfilling of ISO containers. Additionally, the ditch that collects wash water from the SLS area features an overfilling control system. In practice, operators adhere to a work procedure specifying that no more than 16 pre-separated boxes should be used to complete the ISO container load, effectively mitigating the risk of overfilling. Furthermore, the operation incorporates procedures to inspect, maintain, and test the SLS interlock system for overfill prevention.

The warehouse floor functions adequately as secondary containment for the stored IBCs, ensuring safe storage conditions. No cyanide solution is used in this operation. The warehouse and transloading areas are built on a concrete foundation with curbing, which acts as an

effective barrier against potential leaks.

In the area where the SLS system is installed, berms and dikes have been implemented to contain any possible spills. Moreover, the ISO tank is thoroughly cleaned before filling, and the resulting solution is directed to two tanks. These tanks located inside the inside the building, are enclosed within a concrete secondary containment structure that has a net capacity surpassing the combined volume of both tanks. The auditor examined the volume calculations of the tanks as well as the net capacity of the secondary containment and verified compliance with safety standards. Additionally, compliance was confirmed through an inspection of the facility and a review of construction and maintenance records.

Measures for spill prevention or containment related to cyanide solution pipelines are not applicable to the warehouse since it does not contain any cyanide solution.

Cyanide is stored under conditions designed to prevent or minimize its exposure to moisture. The warehouse receives cyanide packaged in sealed wooden boxes containing polypropylene bags, which effectively shield the product from atmospheric moisture. Each box has a capacity of one ton and is placed on a concrete floor maintained in good condition to avoid contact with water. The warehouse itself is constructed with concrete walls, sheet metal roofing, and a concrete floor, ensuring durability and protection. Surrounding surfaces are carefully graded away from the structure to prevent water accumulation near the walls. Additionally, the safety shower located near the cyanide storage area is strategically designed to ensure that any leaks do not compromise the cyanide containers.

Cyanide is kept in areas with sufficient ventilation to avoid the accumulation of hydrogen cyanide gas and cyanide dust. Solid cyanide stored in wooden boxes is housed in a warehouse designed to maintain proper air circulation. The warehouse features a forced ventilation system, incorporating air ventilation units installed along the roof. To further enhance airflow, large roll-up doors are available, which help minimize the concentration of cyanide dust and hydrogen cyanide gas. The effectiveness of the ventilation system has been verified through visual inspection.

Cyanide is stored in a highly secure location, accessible only to authorized personnel. The facility is situated within a locked and restricted area, with security measures in place 24/7. Security guards remain on duty at all times, and entry gates are consistently kept locked. Visitors are required to sign in upon arrival, ensuring controlled access. Unauthorized personnel are strictly barred from entering the premises.

Cyanide is stored independently, away from materials it may be incompatible with. It is the sole product kept in this storage.

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
- ☐ not in compliance with

Standard of Practice 1.2

Summarize the basis for this Finding/Deficiencies Identified:

The warehouse operation follows comprehensive operational procedures specifically designed for its activities. These encompass detailed descriptions of processes, safety protocols, and the use of personal protective equipment during routine tasks. Documented procedures are available for operations such as unloading, loading, handling intermediate bulk containers (IBCs) of cyanide, transferring sodium cyanide to isotankers, and managing any contaminated materials. These guidelines ensure that cyanide containers and contaminated materials are handled safely and sustainably, minimizing risks of cyanide releases or exposure.

Additionally, the operation employs process maps for entry, exit, and transloading activities. Each map generates a corresponding risk-and-opportunity matrix, which aligns with internationally recognized standards such as ISO 9001 for Quality Management and ISO 14001 for Environmental Management. The warehouse has held these certifications since 2017. Furthermore, the facility has been certified as a Socially Responsible Company for the third consecutive year.

The auditor thoroughly reviewed a variety of procedures, including the receipt, storage, transfer, and shipping of cyanide; process mapping; implementation of best practices; delivery methods for chemical products; and clothing sanitation protocols. All procedures have been properly codified for reference and compliance.

The operational procedures encompass contingency measures designed to address non-standard situations. For instance, the procedure PSP-97104, concerning the reception, handling, and storage of chemical products, alongside the transloading procedure PSP-97101, which governs the transfer of sodium cyanide to isotankers, outlines the necessary steps for incidents like damaged or unlabeled boxes and other anomalies. These standard operating procedures incorporate contingency actions.

Furthermore, emergency response plans and procedures also include detailed contingency scenarios. The Emergency Response Procedure specifies actions to be taken in cases of incidents like leaks, spills, or fires. It also provides guidelines for warehouse evacuation. To support these measures, spill kits and related equipment are strategically staged throughout various locations in the warehouse.

The warehouse has aligned its Management of Change (MOC) procedure with Cyplus Idesa Production Plant. The procedure mandates the use of an associated change request form that requires approval signatures from departments such as safety, hygiene, and quality, among others.

The process is designed to be applied before the installation of new projects or equipment on-site. It stipulates conducting a comprehensive risk analysis prior to implementing changes in procedures or equipment. The procedure further requires written notification to environmental, health, and safety personnel, along with their formal approval, before any changes can be made. Verification was carried out through an assessment of the documented procedure and a review of completed forms, although not related to cyanide equipment, infrastructure or procedures changes.

The warehouse operation implements a comprehensive Preventive Maintenance Program. This program includes detailed checklists for various equipment, related to product receiving and delivering. Maintenance activities are systematically recorded in an electronic log, with their frequency scheduled and documented in line with the Preventive Maintenance Program. Each type of maintenance is tailored to match the specific requirements of the equipment and machines within the facility.

During the audit, the maintenance records for critical systems were reviewed, including those of the SLS transfer system, forklifts, dock leveling platforms used for loading and unloading sea containers, and smoke detectors.

Maintenance responsibilities for sea containers and ISO tanks fall outside the warehouse's scope. Sea containers are mandated to undergo certification every five years.

Certificates issued by SGS, titled “Tank Container Inspection Report,” were reviewed during the audit, confirming the containers' good condition. Maintenance records pertaining to the recertification period were accessible for inspection and deemed satisfactory.

In this operation, there are no process parameters that require monitoring through instrumentation. The requirement to monitor process parameters using calibrated instrumentation, as recommended by the manufacturer, does not apply to the warehouse. This exemption is outlined in the ICMI's Guidance for Use of the Cyanide Production Verification Protocol from June 2021.

The procedure, titled "Washing Machinery, Equipment, and Water Management," has been established to prevent any unauthorized or unregulated release of cyanide solutions or cyanide-contaminated water into the environment. This specifically includes water collected in secondary containment areas. At the warehouse, the only sources of potential cyanide solutions are isotanker washdown water, equipment decontamination water, and laundry water.

Additionally, the SLS project area is equipped with berms and dikes designed to contain any

spilled liquids. Water collected from these containment structures is sent to the aforementioned plastic tanks for storage and management. In the laundry area, there is a dedicated water tank available for handling contaminated garments, as after addressing spill emergencies or similar incidents.

The facility has implemented and developed the Solid Waste Management procedure, which outlines the proper handling of potentially cyanide-contaminated solids. While awaiting shipment, the waste is securely stored in a fenced hazardous waste area within the warehouse.

Transportes Degam (Degam) is responsible for managing hazardous waste transportation to authorized landfills for hazardous waste located in Hermosillo or Durango. As part of the ICMI certified Cyplus Idesa Mexico Supply Chain, the company has undergone assessment under the ICMI verification protocol and demonstrated compliance with the Code.

Cyplus Idesa manufactures solid cyanide at its facility in Coatzacoalcos, Mexico. All boxes are labeled in three languages at the plant, utilizing UN 1689 and maritime contaminant signaling for each package. Isotankers and sea containers are permanently marked with comparable signage. Upon arrival at the warehouse, packaging is inspected in accordance with the documented procedure "Reception, Handling and Storing of Chemical Products," as well as an associated checklist. This procedure ensures that labeling and packaging integrity is maintained prior to shipment to customers. Documentation was thorough and readily accessible.

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 ☐ not in compliance with	Standard of Practice 1.3

Summarize the basis for this Finding/Deficiencies Identified:

The facility is operated as a dry facility and has only a limited number of tanks, valves, pipelines and containments requiring inspection. These components are regularly inspected as programmed in an annual preventive maintenance plan.

The facility has implemented procedures to conduct routine inspections to its installations. The cyanide warehouse operators perform daily inspections. The workers were knowledgeable regarding the aspects that could present a thread and that they have to notify them to the site manager.

The auditor reviewed inspection records of the loading and unloading areas, SLS installations,

and cyanide storage areas. Documentation is retained and was available for the auditor's review demonstrating that inspections have been conducted, that they have been focused on the identification of releases and on the elements critical to the prevention of releases and exposures, and that necessary clean-up measures and maintenance and repairs are made in a timely manner when deficiencies are identified. The operation inspects the containers used for transportation, as appropriate. The inspection forms provide sufficient detail regarding what to look for or what condition is acceptable. The auditor's inspection of the facilities confirmed evidence that the facility's inspections identify potentially hazardous conditions.

The warehouse does not handle maintenance for sea containers and ISO tanks; its role is limited to cleaning sea containers when necessary. Containers that require maintenance are kept unloaded and sent back to their origin for servicing by the rental supplier, as specified in Production Practice 1.2 under preventive maintenance procedures.

The operation conducts inspections at regular intervals designed to ensure and verify that operations remain within the desired parameters. These inspections occur at varying frequency dependent on the specific item under review. The auditor reviewed examples of completed forms and spreadsheets from the recertification period, which confirmed that the operation consistently follows its inspection schedule.

Facility inspection and maintenance records are systematically documented, detailing the inspection date, the inspector's name, and any identified deficiencies. Corrective actions, along with their nature and implementation dates, are also recorded within the inspection reports. The auditor verified this information, confirming its proper documentation. Hard copies of the records are maintained for the recertification period and were deemed satisfactory.

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

The operation's management system, outlined in Production Practice 1.2, comprehensively covers all aspects critical to the operation, including the reception, storage, and dispatch of cyanide, ensuring worker protection. This system incorporates inspection programs for the cyanide warehouse and preventive maintenance plans for critical equipment during regular operations, non-routine scenarios, emergencies, and maintenance activities. Specific procedures have been developed to reduce worker exposure during maintenance tasks, such as decontaminating equipment that has come into contact with cyanide prior to servicing. The same manuals, procedures, plans, and programs address safety concerns explicitly, detailing safe practices with a level of detail suitable for the associated risks.

The documents emphasize the use of personal protective equipment (PPE) and require pre-work inspections, which are mandatory for operations involving cyanide reception and dispatch. Safety protocols, training materials, and signage specific to cyanide-related areas reinforce PPE usage. The auditor reviewed the procedures and confirmed their alignment with safe working practices. Implementation of these measures was verified through employee interviews and direct observation.

Operators play an active role in creating and implementing procedures that detail steps, documentation, inputs/outputs, and environmental, health, and safety elements for five key activities: receipt, storage, shipping, transfer, and chemical waste management. The auditor examined this process, as well as attendance records, to confirm compliance.

Additionally, the facility uses a suggestion box for workers to submit their feedback. Monthly internal training sessions also provide an interactive setting where employees can discuss potential improvements in work procedures with the operation's ESHQ Manager. Interviews conducted revealed that operators and supervisors are continuously engaged in refining operational and safety protocols. Overall, employee involvement in the development and upkeep of safety practices was deemed satisfactory.

The facility conducted a study on air quality monitoring for its cyanide warehouse starting in July 2013. Monitoring activities were carried out during the transloading process at the bag emptying area and ISO platform. These assessments did not identify any activities with elevated levels of hydrogen cyanide (HCN) or cyanide dust. As per the requirements of Mexican regulation NOM-010-STPS-2014, Cyplus Idesa engages a consultant to perform indoor air analyses for HCN, cyanide dust, and carbon monoxide every two years. Despite this, CyPlus Idesa mandates that operators consistently wear personal protective equipment (PPE), including HCN monitors, chemical suits, boots, gloves, and goggles. Interviews with operators revealed no instances of recurring unsafe working conditions as indicated by HCN monitors during their activities. In emergencies, additional PPE such as Tyvek suits and Self-Contained Breathing Apparatus (SCBAs) are provided for enhanced safety measures.

The facility employs portable monitoring devices, during loading and unloading operations to ensure safe working conditions and verify that cyanide levels remain below 4.7 ppm. Routine warehouse activities, such as handling cyanide boxes, carry minimal risk of producing dust or hydrogen cyanide gas (HCN). However, activities involving the transfer of briquettes from boxes to isotankers using transfer machinery pose a higher risk of dust generation. Despite this, the process remains dry and has a low likelihood of creating HCN. The monitors are configured with an alert threshold at 4.7 ppm and an alarm threshold at 10 ppm. If the monitors issue an alert, workers are instructed to notify the warehouse supervisor, investigate the cause, and improve ventilation in the area using a large portable fan. In case of an alarm, the warehouse is promptly evacuated.

To ensure adherence to these measures, the auditor observed employees actively wearing the monitors and reviewed associated checklists that document their use and maintenance. Operators demonstrated strong familiarity with the control thresholds and confirmed their readiness to vacate the area if prompted by the monitors indicating unsafe conditions.

Cyanide monitoring equipment is maintained, tested, and calibrated according to the manufacturer's recommendations. Records of these activities are kept and were made available for the auditor's review. Calibration records for the hydrogen cyanide gas monitors have been preserved throughout the three-year certification period. During the audit, records spanning the past three years, as well as additional records from periods before this certification cycle, were found to be consistently available., an organization accredited by the Mexican Entity for Accreditation (EMA, as per its Spanish acronym). These calibration records included detailed information confirming that the equipment was properly calibrated.

The warehouse's operational procedures and the "Gold Rules" training presentation mandate the use of a buddy system. Employees utilize radios and cell phones to maintain communication, with the radios featuring a man-down button for emergency situations. Furthermore, the warehouse is monitored by 24/7 video surveillance, both internally and externally. During the site visit, the auditor assessed these procedures and observed staff to

ensure compliance.

CyPlus Idesa adheres to a corporate policy requiring annual occupational health evaluations for warehouse workers to ensure their fitness for specific job responsibilities. New operators undergo a medical examination upon hiring, followed by yearly assessments. These examinations cover a range of tests. Additionally, workers are monitored periodically to verify compliance with the medical recommendations from their examinations.

In line with Mexican regulations on medical record confidentiality, all examination records are securely maintained. During the recertification period, auditors interviewed workers and supervisors to confirm that they consistently underwent their scheduled medical evaluations.

The facility has implemented a procedure to ensure that individuals working at or visiting the site do not leave with cyanide on their clothing. Warehouse operators are required to change into designated clothing before entering warehouse areas, and this clothing is kept on-site for washing after they leave. Visitors are supervised at all times during their stay. The auditor confirmed compliance by inspecting the change room, including lockers and the specialized washing and drying equipment designated for work garments.

Legible signage has been strategically placed across the cyanide operation area within the facility to ensure all potentially exposed workers are aware of the associated risks and take necessary protective measures. These signs clearly communicate the presence of cyanide and emphasize the importance of using appropriate personal protective equipment. Compliance was confirmed by the auditor through observations of the signage, interviews with site personnel, and a review of the facility's safety procedures and training programs related to cyanide handling.

Smoking, eating, drinking, and open flames are strictly prohibited in all portions of the warehouse where cyanide is present. This policy is incorporated into the operation's safety training program and reinforced through visible signage placed in these areas. The auditor conducted a thorough review of the training materials and records, interviewed employees, and inspected signage throughout the facility, confirming compliance with this requirement. Employees demonstrated a strong understanding of these restrictions and an awareness of the risks associated with violating them. Clear signs detailing the prohibited activities are prominently displayed at the entrance to the cyanide storage warehouse as well as in the unloading zones.

Production Practice 2.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The facility has the procedure for cyanide exposure, which outlines the necessary steps to assist any worker affected by cyanide poisoning.

The warehouse has a thoroughly developed Emergency Response Plan (ERP) designed to handle and manage cyanide exposure incidents swiftly and effectively. This plan includes detailed procedures to follow in situations where cyanide is ingested, comes into contact with the skin or eyes, or is inhaled. Instructions for administering the cyanide antidote are also clearly outlined. Furthermore, the ERP provides guidance on transferring affected individuals to a medical facility. The plan is readily accessible to emergency responders, and the antidote response kit is safely stored for immediate use. The ERP has been tailored specifically to meet the needs of this facility.

Safety measures within the warehouse include emergency showers, eye wash stations, and fire extinguishers, strategically positioned in areas where workers may risk exposure to cyanide. The facility has two combination shower and low-pressure eye wash stations located inside the warehouse. Emergency showers and eye wash stations undergo daily testing, while fire extinguishers—non-acidic dry powder types—are placed at key points throughout the facility and regularly inspected. Records of inspections and tests were reviewed and shown to be complete.

The emergency showers, low-pressure eye wash stations, and strategically located fire extinguishers were verified as functional and available where necessary. The emergency showers and eye wash stations operate correctly. Maintenance and inspection records confirm that all safety equipment is routinely assessed and maintained to ensure it remains operational and accessible whenever required.

The warehouse is equipped with essential emergency supplies, including water, oxygen, resuscitation gear, cyanide antidotes, and communication tools. Communication is facilitated via cell phones and radios equipped with a man-down button for emergencies.

The facility ensures that emergency response equipment and antidotes are properly maintained to guarantee their availability during emergencies. Recent inspection records for both the

equipment and antidotes were examined, along with the methods used to manage shelf-life medicines and antidotes. The auditor verified that all antidotes are within their valid expiration dates and are stored at the manufacturer-recommended temperature to preserve effectiveness. These antidotes are kept in an air-conditioned warehouse office, with the thermostat consistently set to maintain a temperature range of 20 to 25 degrees Celsius. Additionally, the facility conducts regular inspections of first aid and emergency equipment on either a monthly or quarterly basis, depending on the specific item.

Safety Data Sheets for sodium cyanide are readily accessible to workers at the entrances of both the warehouse operational area and the transfer area, with information provided in Spanish, the local language. First aid procedures can be found near the first aid kit located in the room next to the warehouse. Additionally, these procedures are displayed in poster format in two specific locations within the warehouse. To further promote awareness of cyanide safety, the facility has signage prominently placed to inform about the presence of cyanide and highlight essential precautions.

The facility exclusively handles cyanide in solid form. Packaging boxes are labeled in three languages, including Spanish, and marked with UN 1689 signage and maritime contaminant symbols to ensure proper identification. Additionally, isotankers and sea containers are permanently marked with similar signage to alert workers about their contents. The auditor confirmed compliance with this standard by inspecting the cyanide containers stored on-site. All cyanide containers were clearly labeled for easy identification.

No cyanide solutions or process tanks are utilized in the operation. A short piping system connects the sump in the transfer area to two HDPE storage tanks. Wash water potentially contaminated with cyanide is collected in these tanks, which are labeled accordingly, and then transported in reinforced intermediate bulk containers (IBCs) for final disposal at designated mine sites. Each container is properly labeled and returned with an official seal documented in the transport records for traceability.

The facility has established detailed safety protocols, which outlines procedures for cleaning work clothes worn by employees exiting areas with potential skin exposure to cyanide. Additionally, two decontamination processes are in place, alongside, a procedure for washing machinery, equipment, and managing water systems. The procedures also apply to all individuals accessing the warehouse area, requiring them to wash their hands before leaving.

Employees exhibited a solid understanding of the decontamination protocols and the importance of safety measures. An assessment of operational practices found that there is little chance of skin exposure to cyanide.

The facility is equipped for onsite first aid and medical support for workers exposed to cyanide. All warehouse staff have been trained as emergency responders. Nevertheless, according to established procedures for cyanide exposure incidents, workers are required to notify the local

hospital and provide oxygen therapy; administration of antidotes is reserved for medical personnel. During the audit, training records were reviewed, confirming that employees had received first aid instruction related to cyanide exposure, including the proper use of oxygen therapy.

The Emergency Response Plan (ERP) outlines the protocol for transferring individuals exposed to hazardous substances, such as cyanide, to a medical facility for treatment. Additionally, the procedure permits warehouse staff to directly transport the affected person to the hospital if necessary. The auditor examined the operation's response procedures and verified that they comply with these requirement.

The site has established an agreement with a hospital in Ciudad Obregon to ensure medical care for workers exposed to conditions requiring attention beyond the site's capabilities. The warehouse operation is confident in the hospital's capacity, as its qualified staff and equipment have been verified during routine visits. Cyplus Idesa has actively contributed by training hospital personnel, supplying antidotes, and providing a detailed written procedure.

The site has developed and implemented the procedure for Accidents and Incidents Investigation to ensure the reporting, evaluation, and investigation of accidents, including cases involving cyanide exposure. Based on interviews, it was noted that procedures and practices would undergo thorough review following any incident to assess whether revisions are necessary. While no cyanide-related incidents have occurred, a review of records for other accidents and incidents confirmed that the overall program for investigating such events is actively being carried out.

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

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

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

Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

The facility does not discharge, either directly or indirectly, to surface water. As there are no nearby surface water bodies, monitoring for cyanide in surface or groundwater, both upgradient and downgradient of the site, is not conducted.

The Environmental Management Plan for the warehouse, submitted to the Secretariat of Environment and Natural Resources (SEMARNAT), indicates that the project area lies within hydrological region RH 9 Sonora Sur and intersects the Yaqui River basin. In the Yaqui Valley, underground water flow predominantly follows a northeast-southwest direction, with static levels ranging between 10 and 65 meters. The aquifer in this region is classified as underexploited. Groundwater is primarily utilized for irrigated agriculture, followed by drinking water supply. A notable example is the Yaqui–Guaymas aqueduct, which sources its water from wells drilled along the right bank of the Yaqui River. This aqueduct transports water over a distance of 120 kilometers—from Loma de Bácum to the Guaymas–Empalme bypass—supplying various rural communities along its route. Groundwater is also used for industrial purposes, although to a lesser extent.

The Official Mexican Standard NOM-127-SSA1-1994, titled "Environmental Health, Water for Human Use and Consumption—Permissible Quality Limits and Treatments for Purification," sets the national limit for cyanides in drinking water (as CN-) at 0.07 mg/l.

The facility does not engage in indirect groundwater discharges into the environment, considering factors like groundwater depth, the physical state of the facility, secondary containment measures, and inspection protocols. Furthermore, SEMARNAT's technical review concluded that neither surface nor underwater monitoring was required for this project. The facility has no direct or indirect water discharges into the surrounding environment.

The facility ensures strict control over atmospheric emissions of HCN and cyanide dust to safeguard the health of both workers and the surrounding community. In compliance with

Mexican regulation NOM-010-STPS-2014, Cyplus Idesa engages a consultant to conduct biennial indoor air analyses for HCN, cyanide dust, and carbon monoxide. Auditors examine the consultant's reports to confirm that the concentrations of HCN and cyanide dust remain below the regulatory thresholds for worker exposure.

According to the auditor's professional assessment, the operation carries out monitoring of atmospheric process emissions at frequencies sufficient to accurately characterize the environment being observed and promptly detect any changes.

Principle 4 | TRAINING

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

Production Practice 4.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The facility conducts annual training and refresher sessions to educate workers on the hazards of cyanide. This structured program is organized through a comprehensive training matrix, which includes topics such as cyanide properties, cyanide safety management, safety equipment use, first aid procedures, safety considerations for the SLS system, emergency response protocols, and participation in emergency drills. Although the Emergency Response Plan is already part of annual training, as confirmed by attendance records and worker interviews, auditors recommended explicitly including it in the Matrix.

Interviews with site personnel verified their completion of hazard awareness training, while audits confirmed that all warehouse staff are trained on cyanide-related topics. Comprehensive training records are maintained throughout each employee's tenure, documenting details such as the employee's name, trainer's name, date of training, topics covered, and evaluation of understanding. These records ensure consistent tracking of certification and recertification within their employment period.

Site personnel undergo specialized training for the proper use, storage, and maintenance of personal protective equipment (PPE) tailored to the activities they perform. As part of this training, PPE usage is incorporated into broader cyanide safety management education. Furthermore, every operational procedure specifies the necessary PPE for executing tasks safely. Auditors confirmed that all personnel received training on operational procedures, including PPE usage, during the recertification period.

All personnel involved in the management of cyanide receive comprehensive training to perform their assigned duties safely and in an environmentally responsible manner. During the re-certification period, all operation personnel underwent internal training focused on operative procedures. The induction training program encompasses safety protocols and

measures relevant to on-site activities experienced by internal and external trainers.

Records of training assessments and evaluations of understanding were reviewed as examples in the employee's file. Employees are equipped with the knowledge to carry out routine operations while minimizing risks to both personal safety and environmental sustainability. Interviews with staff indicated a strong awareness of procedural requirements for normal operations as well as in handling unexpected operational conditions.

Employees receive task-specific training before being permitted to handle cyanide unsupervised. Compliance with these protocols was confirmed by the auditor through an evaluation of training materials and records, as well as interviews conducted with both operational and supervisory staff.

Annual refresher training is conducted to reinforce safe and environmentally responsible practices for tasks involving cyanide. This training is tailored to employees' specific roles and focuses on cyanide-related safety measures. Additionally, work procedures undergo a comprehensive review every three years, which includes a refresher training session as part of the process. A register is maintained to document personnel authorized to handle cyanide, along with the dates of their annual refresher training. Formal evaluations are confirmed through the review of corresponding records.

The facility´s training materials ensures all essential elements are clearly identified. Specific training components are outlined for various roles within the training matrix. A review of the records confirmed their completeness, indicating full compliance with this requirement.

Training is conducted by highly qualified safety and operational trainers.

The facility assesses the effectiveness of its cyanide-related task training by testing employees upon the completion of their training and observing them as they perform their duties after the initial instruction. The auditor examined records of formally documented evaluations and confirmed that the process complies with established standards.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

Employees working in areas where cyanide is present receive specific training on how to

respond in the event of a cyanide release or exposure. The facility conducts annual first aid training and ensures all personnel are familiar with the emergency response procedures outlined in the warehouse's Emergency Response Plan (ERP). This training is included as a standard component of the warehouse's safety program. Interviews with employees demonstrated a satisfactory understanding of these protocols.

All warehouse workers are part of the Emergency Response Brigade and have undergone training to assist colleagues who may be exposed to cyanide. The training includes hands-on practice in oxygen therapy which involves providing oxygen to the patient along with the use of an AMBU bag. . Any corrective actions identified during these drills are implemented, and emergency procedures are updated as needed to reinforce continuous improvement.

The site maintains training records and evaluation results for all workers who have undergone training. These records are kept for at least as long as the employee remains active at the site. Upon review, the records were found to be sufficiently detailed and in compliance with requirements. The auditor examined these documents and conducted interviews with trained personnel to confirm adherence to this provision. The documentation includes details of the training received, such as the employee's name, the trainer's name, the training date, the topics covered, and evidence of the employee's understanding of the materials.

Principle 5 | EMERGENCY RESPONSE

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

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Standard of Practice 5.1

Summarize the basis for this Finding/Deficiencies Identified:

The warehouse holds the document "Procedure on Acting in Case of Emergencies," which serves as the Emergency Response Plan (ERP or the Plan) tailored specifically to the site. The ERP is a dedicated resource focused on cyanide emergency response protocols. Additionally, it includes the Procedure in Case of Cyanide Exposure, offering detailed guidance on administering first aid in the event of cyanide exposure.

The Plan addresses potential failure scenarios relevant to the environmental and operational conditions of its site.

The ERP, along with its related procedures, outlines the following elements tailored to potential emergency scenarios:

a) Detailed Response Actions: It provides step-by-step guidance on handling leaks, spills, fires, confined spaces, injured personnel, and site evacuations. Additionally, it includes a community telephone directory to facilitate communication with neighboring industrial sites in case a wider evacuation is necessary.

b) Cyanide Antidote and First Aid Protocols: The procedures clearly specify measures for cyanide exposure through inhalation, absorption, or ingestion, addressing both conscious and unconscious victims. While warehouse staff are equipped to administer oxygen, only certified medical professionals from the nearby hospital or ambulance—located approximately five minutes away—are authorized to administer antidotes.

c) Source Control Measures: The ERP section dedicated to leaks and spills emphasizes strategies for managing and controlling releases at their origin.

d) Containment, Assessment, Mitigation, and Prevention: Procedures for returning to standard operations include guidelines for containment, assessing the situation, mitigating impacts, and preventing future incidents. This also involves conducting thorough

investigations in line with the organization's separate incident investigation framework.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

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

Summarize the basis for this Finding/Deficiencies Identified:

Workers have actively participated in emergency response planning through process mapping sessions and mock drills. These process maps outline the potential emergencies associated with each activity. Additionally, workers have received training on safe cyanide management and the use of antidotes. Stakeholders were engaged during the initial environmental risk assessment and the process of obtaining the environmental license for the warehouse. Their ongoing involvement includes participation in training sessions and mock drills.

Local emergency response agencies are aware of their roles in case of an emergency.

During this recertification period, the operation focused on training its personnel in various critical areas, including search and rescue, the proper use and handling of fire extinguishers, first aid, the use of autonomous breathing equipment, and evacuation routes. Additionally, they conducted a specialized course on cyanide management and toxicology brigades for the Ciudad Obregón Red Cross.

As part of their activities during this recertification period, the updated Civil Protection Plan for the state of Sonora was presented to relevant authorities. Furthermore, the ESHQ Manager, who serves as president of the ANIQ Cyanide Committee, conducts monthly meetings to address issues related to cyanide handling and safety.

Training sessions have been extended to emergency response agencies, particularly Civil Protection in Hermosillo. This effort reinforces their commitment to safeguarding communities and improving preparedness for hazardous situations.

The facility is situated in an industrial park and has notified nearby establishments and Civil Protection authorities about its activities, ensuring coordination in the event of an evacuation. A copy of its emergency response procedures has been shared with civil protection authorities. During the recertification period, the facility successfully demonstrated through interviews and communication records that it maintains consistent engagement with local authorities and external emergency response teams.

CyPlus Idesa has consistently engaged in consultations and communication with stakeholders to ensure that the Emergency Response Plan effectively addresses current conditions and risks. Throughout the recertification period, CyPlus Idesa conducted regular training sessions for neighbors and external responders. During this timeframe, there have been no significant changes to the facility, its conditions, or associated risks.

In addition, CyPlus Idesa provided cyanide antidote training to various regional entities, including hospitals, firefighters, the Red Cross, police, universities, and others. Staff from two trucking contractors also participated in mock drills as part of ongoing preparedness efforts. The findings reported by the auditor were based on interviews conducted with on-site personnel. The warehouse remains committed to actively contributing to the continuous improvement of the ERP.

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 ☐ not in compliance with	Standard of Practice 5.3

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan:

a) Designates primary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Plan.

Site workers, management personnel, and the customer service employee form the emergency response brigade for the site, as outlined in the civil protection plan. The site manager serves as the brigade coordinator, while the customer service employee is responsible for managing internal and external communications during emergencies. The plan explicitly details the responsibilities, authorities, and duties required for handling emergency situations.

b) Identifies the Emergency Response Teams.

The Emergency Response Team is formally identified within the civil protection plan.

c) Requires appropriate training for emergency responders.

Members of the emergency response brigade have undergone training conducted by qualified Cyplus Idesa personnel and the National Association of Chemical Industry (ANIQ). The Emergency Response Plan (ERP) specifies the responsibilities and training requirements for all emergency responders to ensure preparedness.

d) Includes call-out procedures and 24-hour contact information for the coordinators and response team members.

The ERP maintains an updated list of emergency telephone numbers, which includes contact details for local emergency response agencies and CyPlus Idesa representatives. It clearly outlines call-out procedures for addressing emergencies related to cyanide. Furthermore, this list includes contact information for CyPlus Idesa coordinators and emergency response team members. 24-hour contact information for Mexican operations is also publicly accessible through the CyPlus Idesa website.

e) Specifies the duties and responsibilities of the coordinators and team members.

The ERP comprehensively defines the responsibilities, authorities, and duties for managing an emergency situation.

f) Lists all emergency response equipment that should be available.

The civil protection plan specifies the emergency response equipment that must be available onsite. This includes personal protective equipment (PPE), materials for containment and neutralization, and collection tools for any waste generated during emergencies.

g) Includes procedures to inspect emergency response equipment and assure its availability when required.

The emergency response equipment undergoes monthly inspections using a standardized checklist. The availability and functionality of this equipment were verified during the audit. Reviewed checklists and audit interviews confirmed that this practice is consistently performed.

h) Describes the role of external responders, medical facilities, communities, and entities having designated roles in emergency response procedures.

The role of local emergency response agencies is detailed in the Plan. These agencies have actively participated in emergency drills organized at the site to ensure alignment and coordination in response protocols.

The facility has verified that external organizations involved in emergency response are informed of their responsibilities and have participated in training sessions, including those focusing on cyanide first aid and the use of antidotes. The primary external responder is the San

Jose Hospital, located approximately five minutes from the warehouse. The facility has established an agreement with this hospital, supplied them with antidotes, involved their staff in training exercises, and provided an informational guide for doctors. Additionally, other local and regional groups, such as firefighters, the Red Cross, police units, and universities, have also received training. Comprehensive records documenting these activities were available and complete.

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 ☐ not in compliance with	Standard of Practice 5.4

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan provides a list of emergency contact numbers, including those for the nearest hospital (local emergency services, and CyPlus Idesa representatives). It outlines the responsibilities of designated individuals for contacting external responders and authorities when necessary. The plan also details procedures for assessing an emergency and, if required, informing management, relevant agencies, responders, medical facilities, and other stakeholders. The auditor examined the Plan and confirmed that all information is accessible and current. Furthermore, CyPlus Idesa has established a Crisis Management Plan and a Communication Plan, which include protocols for external corporate communication during emergencies.

The warehouse is situated in an industrial park, with the Plan containing contact phone details alongside the names of nearby facilities that would be alerted during an emergency. It specifies who is responsible for notifying CyPlus Idesa leadership, neighboring industrial partners, and relevant authorities in such scenarios. Additionally, the plan outlines the steps for coordinating with external support to ensure a more efficient emergency response. It also includes protocols for engaging and communicating with media in case of an incident. All relevant information was made accessible for the auditor's assessment within the Emergency Response Plan.

The Emergency Response Plan outlines the requirement to inform ICMI about any major cyanide incidents, as specified in ICMI's Definitions and Acronyms document. To date, no such notifications have been made, as the operation has not experienced any significant incidents.

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
- ☐ not in compliance with

Standard of Practice 5.5

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan describes specific, appropriate remediation measures, such as:

a) Recovery or neutralization of solutions or solids

The warehouse's Emergency Response Plan focuses on addressing the recovery of cyanide briquettes, decontaminating affected media, and effectively managing and disposing of debris collected following spill clean-up activities. The recovered materials are either returned to their original containers, such as boxes or isotankers, or properly disposed of as hazardous waste.

b) Decontamination of soils or other contaminated media.

Following procedures outlined in Solid Waste Management PSP-90064, contaminated soil and other media that cannot be returned to IBCs or isotankers are handled appropriately. Super bags generated in the transfer area are consolidated into larger bags or boxes until they are filled to form bales. These bales include contents from drums identified as hazardous solid waste and are stored in the warehouse designated for hazardous waste. In compliance with local regulations, these centers ensure hazardous waste is delivered to authorized landfills for final disposal. The auditor has reviewed supporting documentation, including logs for Temporary Storage of Hazardous Waste and transport and reception manifests.

c) Management and/or disposal of spill clean-up debris

Although the warehouse does not utilize cyanide process solutions, the Emergency Response Plan accounts for the potential need for liquid cleanup in rare instances. Absorbent materials or sand would be deployed to manage the liquid, followed by recovery methods similar to those used for solid cyanide. In most scenarios, clean-up activities may involve washing with water, if necessary, but neutralization or chemical treatment is not anticipated.

d) Provision of an alternate drinking water supply, as appropriate

The provision of an alternative drinking water supply has not been deemed necessary since the facility handles only solid cyanide on impermeable surfaces, minimizing the risk of a release that could affect local water sources. W. The need for alternative drinking water arrangements is further negated by the facility's location; the city water sources supplying the warehouse and nearby businesses are situated far from the industrial park, ensuring no adverse impact on water supply integrity.

Given that all operations take place within the warehouse site's boundaries and there are no nearby surface water bodies, the operation Plan assumes that any release would not reasonably reach surface water in the surrounding area. As a result, the restriction on using chemicals to treat cyanide spills in surface water is deemed unnecessary and is not included in the Plan.

The contingency plan outlined in document PSP-90014 specifies that, in the event of a significant cyanide spill during transportation, Cyplus Idesa must immediately coordinate with SETIQ (the Transport Emergency System for the Chemical Industry). Cyplus Idesa is required to closely monitor the situation and maintain communication with all key personnel and stakeholders involved until the emergency is fully resolved. Should a spill be carried away by stormwater, authorities must be promptly informed about potential contamination of marine, river, or lake ecosystems. Affected communities relying on contaminated water sources must be alerted, and they should refrain from water consumption until monitored sodium cyanide (NaCN) concentrations fall within legally permissible limits.

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 ☐ not in compliance with	Standard of Practice 5.6

Summarize the basis for this Finding/Deficiencies Identified:

The ERP and accompanying procedure for cyanide exposure contain a section on the history of changes to these documents. The ERP has been updated twice during this recertification period.

Emergency drills have been conducted through the audit recertification period. The drills are evaluated by the site management and worker. Learned lessons are considered to update the Emergency Response Plan and procedures if required. The modifications to the Emergency Response Plan and procedures are notified to the site workers.

The auditor assessed the mock drill reports from the recertification audit period, focusing on

response times, training effectiveness, material handling adequacy, and personnel participation. These reports covered drill evaluations, ERP compliance, and identified necessary corrective actions. All corrective actions were implemented and successfully resolved.

The revised version of the Plan includes measures to assess and update it as needed following any emergency that necessitated its activation. However, no such evaluations have taken place, as no emergencies occurred during this recertification period that required the Plan to be activated.