Submitted to:

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

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Washington, DC 20005, USA

Variante Uchumayo Km 2.5 Cerro
Colorado, Arequipa / Perú
Transportation Company
Three year cicle recertification audit

Submitted by:

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DCR Minería y Construcción, S.A.C.
Name of Facility

Signature of Lead Auditor

July 6th, 2023
Submittal Date

JUNE 2021

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A- Operation General Information

Name of Transport Operation: DCR MINERIA Y CONSTRUCCION S.A.C. (DCR)
Name of Facility Owner: DCR MINERIA Y CONSTRUCCION S.A.C. (DCR)
Name of Facility Operator: DCR MINERIA Y CONSTRUCCION S.A.C. (DCR)
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B- Operation Location Detail and Description:

DCR Minería y Construcción, S.A.C. operates truck transportation services in the southern region of Peru, specifically in Arequipa. Their main base of operations is located at PJ. Villa Independencia s/n Int. B km 2.5 Variante Uchumayo Cerro Colorado, Arequipa, Peru. Additionally, they have offices in Lima, at Av. Nicolás Arriola, 791.

The company receives cyanide directly from port facilities or other storage sites, and it is transported in containers. DCR does not have its own storage facilities and does not handle the product directly, as it remains within the containers throughout the transportation process.

The scope of this audit includes the ground transportation operations starting from the Port Authority in Callao, Peru, and extends to the certified warehouse under the Cyanide Code, and ultimately to the delivery at the customer's facility. The cyanide is received from either the manufacturer or consigner and is received in the following packaging presentations:

DCR transports solid cyanide using metal containers (drums) weighing 50 kg from the producer HEBEI CHENGXIN CO. LTD. Additionally, they transport cyanide in "interior Poly-propylene super-sack" form, weighing up to 1 ton, from the producer ORICA. Both types of shipments will be transported in sea containers.

DCR also transports cyanide in Isotanks, where the gross weight of the sea containers is 20 tons, with 17 tons being the weight of the cargo and 3 tons being the weight of the structure.

The weight of the 20-foot sea containers when loaded with cyanide is 20 tons, and the maximum allowed payload for the low-bed trailer is 30 tons.

The weight of the 40-foot sea containers loaded with cyanide is 22 tons, and the maximum allowed payload for the flat-bed platform is 30 tons.

DCR obtained its initial certification for the Cyanide Code in 2010 and has since been recertified in 2014, 2017, and 2020. The current audit marks the fourth cycle recertification for the company. It is worth noting that throughout the past three years, DCR has successfully conducted these activities with ZERO (0) cyanide related incidents.

Auditor's Finding

This operation is

- ✓ in full compliance with the International Cyanide Management Code.

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

Auditor Information

Audit Company: Geosoluciones Panamá, S.A.
Lead Auditor: Jorge Efrén Chong Pérez
Lead Auditor Email: geosoluciones@cwpanama.net

Auditor 1: **Jorge Efrén Chong Pérez, Lead Auditor** _____
Name Signature

Dates of Audit: May 16-17th, 2023

Auditor Attestation

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

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

DCR Minería y Construcción, S.A.C.		July 6th, 2023
Name of Operation	Signature of Lead Auditor	Submittal Date

DCR Minería y Construcción, S.A.C.		July 6th, 2023
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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 Standard of Practice 1.1

Summarize the basis for this Finding Identified:

DCR Minería y Construcción, S.A.C. (hereinafter DCR) maintains the document QHSE-DCR-QHSEpro004, Version 12, which has been updated to incorporate relevant legal requirements in Peru, in section 4. Notably, there has been a change in the position title of the “encargado de seguridad” (Safety Officer), now referred to as "Jefe de Seguridad," (Safety Manager).

“Procedimiento para la selección de rutas en el transporte de materiales peligrosos” (Procedure for the selection of routes in the transport of hazardous materials) found in item 6-H on page 8 continues to implement the route evaluation procedure. This procedure has been updated as of May 10th, 2023. The updated version now includes a route risk assessment, taking into consideration various aspects related to hazard and risk identification. These aspects include:

- Dangerous curves
- Steep climbs
- Steep drops
- Inclinations and slopes
- Population density
- Presence of masses/bodies of water
- Resting places and overnight stay locations for the units
- Major cities
- Significant bridges, particularly those over water sources
- Railroad crossings
- Areas prone to frequent landslides
- Areas with adverse weather conditions such as snowfall, rain, and flooding
- Foggy areas
- Environmentally protected areas as defined by Peruvian Law and/or sensitive areas

- Areas at high risk of theft
- Any additional conditions deemed relevant based on the best assessment of risk and consequences
- Emergency stop locations.

DCR has made updates to the role of the "Jefe de Seguridad" (Safety Manager) in the procedure for hazard identification, risk assessment, and en-route control measures outlined in QHSE-DCR-QHSEpro003, which was updated on May 10th, 2023: “Procedimiento de Identificación de Peligros, Evaluación de Riesgos en Ruta”.

The procedure itself remains unchanged; however, new positions have been incorporated and are reflected in the updated DCR organization chart.

DCR is currently engaged in cyanide transport on the following routes:

La Arena Mine: DCR transports isotanks.

Inmaculada Mine: DCR transports both containers and isotanks.

Pucamarca Mine: DCR transports containers.

Cerro Óxidos Mine: DCR transports isotanks.

Yanacocha Mine: DCR transports isotanks.

Shahuindo Mine: DCR transports containers.

Four routes, namely Pierina Mine, Volcan Mine, Lagunas Norte Mine, and Pasapalca Mine, are no longer part of DCR's transportation process. No new routes have been added in their place.

The MATPEL supervisors who ride in the escort vehicles accompanying the convoys document their findings on page 2 of the trip reports. If there are any deviations at a specific kilometer or time, this information is immediately communicated to all transport vehicles and is incorporated into the risk analysis.

All reports are reviewed by Andy Dávalos, the head of MATPEL. The escort checklist has not been changed. Anyela Ali is responsible for the trip checklist.

Route findings also include deviations on roads due to maintenance carried out by the government of Peru.

For each route, there is a corresponding sheet. The auditor reviewed the route sheets for both the La Arena mine and Cerro Óxidos, which included average times and distances. Despite ongoing maintenance of the access roads, there have been no changes in the recorded times.

Furthermore, the format for route selection underwent modifications. The route recognition report was combined with the route selection process. Additionally, safety glasses covers were added to the list of required personal protective equipment.

In 2020, communications could not be delivered due to COVID-19. In an interview with Diana Flores, the safety supervisor, evidence was presented showing delivery of letters in 2021, 2022, and 2023 to fire departments, police stations, and healthcare centers located along the convoy routes. The evidence included the respective signatures and stamps confirming receipt.

Section 6.5 has not undergone any changes. The procedure QHSE-DCR-HQSEpro006, revision 10, dated May 10th, 2023, requires the use of escorts.

- It is established that, starting from 7 units, it is recommended to divide into 2 or more convoys based on the configuration or type of units.
- Only one container can be loaded per platform and/or low-bed trailer, and each tractor unit can only tow one chassis. The kingpin must be secured, and steel chains with tensioners will be used to reinforce its fixation on the platform and/or low-bed trailer. The MATPEL Supervisor will approve such fixation.
- The movement of the convoy will depend on weather conditions. The MATPEL Supervisor will assess the route's safety in each case and may halt the convoy if, in their judgment, the conditions do not allow for safe transit.
- The emergency kit is transported in the escort vehicle and is under the responsibility of the MATPEL Supervisor.

“DCR” does not subcontract other entities to conduct any of the activities required in Transport Practice 1.1.

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 Standard of Practice 1.2

Summarize the basis for this Finding Identified:

Samples of driver's licenses from three drivers, namely Percy Fernandez Melgar, Roberto Neira, and Jesús Serrano, were reviewed. Documentation of training records in defensive driving, first aid, and firefighting, issued by MAPFRE, was also collected. These records cover the years 2020, 2021, 2022, and 2023. Additionally, the drivers have completed other courses instructed by DCR trainers.

DCR does not operate any equipment for moving containers or isotanks to or from trailers. Instead, the cargo is placed at ports using port handling equipment and by the certified company Almacenera Pacífico, S.A.C. (ALPA). Upon reaching the mine, the mining unit takes on the responsibility of unloading the cargo using its own equipment.

A virtual conference interview was conducted with drivers and a hazardous materials supervisor to discuss the courses they have taken and their experiences in the transportation process over the past three years. These DCR workers were located in Lima and participated in the interview remotely.

“DCR” does not subcontract other entities to conduct any of the activities required in Transport Practice 1.2.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is

- ✓ in full compliance with Standard of Practice 1.3

Summarize the basis for this Finding Identified:

According to section 6.2.1 of the QHSE-DCR-QHSEpro006 procedure, revision 12, updated on July31th, 2023, it is mandated that appropriate and ready transportation units for Sodium Cyanide transport are to be permanently available.

The truck hauling the container falls under the T3S3 vehicle configuration, complying with Supreme Decree 058-2003 issued by the Ministry of Transportation and Communications (hereinafter MTC).

The main characteristics of the means of transport are indicated below:

• 6x4 road truck tractor
• Wheelbase of 3,700
• Scania 6-cylinder engine
• Equipped with hydraulic retarder
• Hydraulic steering
• 24V electronic system
• Electronic tachograph

There is a policy in place that each driver should use only one assigned vehicle for cyanide transport, which must not be more than 5 years old, as stated in section 6.2.1.
There are approximately 20 VOLVO units exclusively assigned for cyanide transport, manufactured in the years 2020 and 2021. The main characteristics of the Volvo units are indicated below:

- **Suspension:** Balancer model with a spring package and a capacity of 33 tons. Equipped with a mechanical lifter on the first axle.
- **Axles:** Three tubular axles.
- **Coupling:** For 6x4 and 4x2 truck tractors with kingpin.
- **Support Jack:** Mechanical.
- **Pneumatic Installation:** One outlet with a quick release valve and a 3/8” chain hoist.
- **Pneumatic Installation:** One outlet with a quick release valve and a 3/8” air pipe.

- **Electrical Installation:** 12V and 24V. Includes directional, position, reverse, and brake lights, as well as a 7-way electrical earth connection.
- **Brakes:** Compressed air brakes, with shoe brakes for parking, service, and emergency purposes. Manual brake regulators. Safety brake system.

The QHSE-DCR-QHSEpro006 procedure has been updated, specifically on page 7, table 4, rev. 12, July 31, 2023. This table outlines the maximum allowable load capacities for platforms**.**

Samples from three travel reports using 40-foot platforms were reviewed. In all reports, the cyanide load does not exceed the established payload. The vehicle cards issued by the Peruvian government, which were reviewed, support the maximum loads as required. Additionally, weight and dimension controls are present on Peru's public roads.

The weight of the 20-foot sea containers when loaded with cyanide is 20 tons, and the low-bed is permitted to carry a payload of up to 30 tons.

The 40-foot sea containers containing cyanide have a weight of 22 tons, while the maximum permissible payload for the flat-bed platform is 30 tons.

The iso-tanks being transported have a total gross weight of 20 tons, comprising 17 tons for the cargo and 3 tons for the structural weight.

The delivery guide for cyanide with an isotank and the vehicle ownership card (registration) were reviewed.

Annual and semi-annual non-destructive vehicle inspections are conducted by a company authorized by the MTC to issue "Vehicle Technical Inspection Certificates". These certificates are valid for 6 months.

Visual inspections are conducted on both flat-bed and low-bed trailers. Additionally, non-destructive magnetic testing is performed for the Yanacocha Mine on low-bed trailers with a payload capacity of 25 tons.

The weight of the tractor-trailer and its carrying capacity are specified in the vehicle registration document.

Additionally, at each warehouse where the vehicles are loaded, they are weighed upon entry and exit, and this information is documented in the trip reports.

Each transport vehicle has a coded registration card processed by the National Superintendence of Public Registries, which indicates the maximum allowable capacities as well as the technical specifications of the equipment.

Additionally, on the highways in Peru there are weight checkpoints where vehicles must undergo cargo weight verification.

"DCR" does not subcontract other entities to conduct any of the activities required in Transport Practice 1.3.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is

- ✓ in full compliance with Standard of Practice 1.4

Summarize the basis for this Finding Identified:

The QHSE-DCR-QHSEpro006 procedure, revision 10 dated May 10, 2023, establishes the same requirements during the transportation of cyanide.

The MatPel Manager (Hazardous Material Manager) coordinates the loading schedule in advance of the date.

The tractor operator (Driver), before entering the loading zone, will verify that their documentation is in order and ensure that all the information included in the sender's and carrier's Waybills is correct. They should also verify the gross weight in the Weights and Measures Certificate issued by the supplier.

The driver will only load the maximum quantity of 20 boxes of sodium cyanide, each of which includes a 1-ton (Big-Bag) sack, according to the configuration and design of the unit.

The MatPel Supervisor will verify the condition of the boxes and their proper distribution, which will be reviewed according to the Sodium Cyanide Receipt and Delivery format.

The MatPel Supervisor is authorized to reject any cyanide box that does not meet the corresponding safety measures for transportation (defective boxes or broken wooden pallets).

The MatPel Supervisor will provide authorization for the closure and placement of the security metal seal on the containers.

The driver proceeds to secure the access doors and verify the seals, ensuring that they have been properly closed. It is prohibited for the driver to manipulate these seals (only destination

personnel are authorized to break the security seals). In parallel, the MatPel Supervisor will check the seals, chains, couplings, etc., which will be recorded in the unit's checklist.

DCR MINERIA Y CONSTRUCCION S.A.C. sends the cyanide supplier companies (Mercantil, Quimtia, and Orica) the situational status of each of their transport units at established checkpoints throughout the day, indicating their location and estimated time of arrival.

Procedure QHSE-DCR-QHSEpro006, revision 10, dated May 10, 2023, has not been modified in the section related to signage, and it establishes the labeling requirements in section 6.2.3 p.7:

a. Cyanide transport units must have appropriate signage complying with Peruvian Technical Standard NTP399.015-2001.

b. The containers will have the UN code - 1689, as specified in the United Nations Orange Book.

c. NFPA 704 is the standard that explains the "hazardous materials diamond" established by the National Fire Protection Association, used to communicate the risks of hazardous materials.

d. All containers must have clear and visible identification.

e. The cargo containers must have on each side: 1 NFPA diamond sign, 1 UN code sign, 1 United Nations hazardous materials classification sign, and 1 marine pollutant sign. And on each end of the unit, it must have: 1 NFPA diamond sign, 1 UN code sign, and 1 United Nations hazardous materials classification sign.

f. In accordance with these rules, the units will be marked.

All transportation vehicles, including escort vehicles, undergo inspections. Two samples of complete travel reports were reviewed, which contain the inspection checklists.

An interview was conducted with Gianpol González, the maintenance supervisor, who was located in the city of Lima, clarifying the following:

Preventive maintenance for the fleet that transports cyanide is carried out through a program at 10,000 km, 20,000 km, and 30,000 km intervals. The maintenance plan is established by the representative of the Volvo truck brand.

The platforms are allocated to specific mining units and receive maintenance activities covering two phases (T1 and T2) from DCR every 3 months.

An inspection was conducted at the minor maintenance workshop, which includes welding, battery charging, and tire repairs, to verify the safety devices, guards, signage, and guards on machinery.

VOLVO vehicles come with a 2-year warranty, and the dealership issues a certificate of conformity after each maintenance service.

DCR maintains the established procedure QHSE-DCR-QHSEpro006, revision 10, dated May 10, 2023, section 6.3, page 8, without any modifications.
Trips will be scheduled exclusively during the daytime hours (in daylight), unless there are changes due to force majeure or direct coordination with clients.

To prevent excessive workload, the maximum daily working hours will be 12 hours, including a 1-hour break for breakfast and a 1-hour break for lunch (a total of 2 hours of break time). After that period, the personnel will be required to rest for 8 hours.

The MatPel supervisor, who accompanies all transportation vehicles at all times, is authorized to halt the convoy in case of severe weather conditions or social conflicts.

In February 2023, the QHSE-DCR-pl002 substance abuse maintains the established program.

DCR implements the procedure to document the activities carried out QHSE-DCR-QHSEpro006, revision 10 dated May 10th, 2023 "Cyanide Transport Operational Safety Procedure" item 7.6 a, b and c, page. 13. has not undergone modifications.

i. The escort supervisor delivers the route sheet, the check list, the control record, waybill “Guía de remisión del remitente-GRR”, carrier forwarding guide “Guía de remisión del transportista-GRT,” along with the travel report that records the route, which will be presented to the client upon request.
ii. The track operator (driver) will return to the base and deliver the sender's and carrier's reference guides to the Operations Coordinator.
iii. The tractor operator (driver) submits a maintenance request, which will be forwarded to the maintenance department to monitor the unit's performance.

The operation is committed to maintaining records that document vehicle maintenance aspects, driving hours limitations, meals and rest periods, as well as alcohol and drug tests conducted.

In the form Registration of Controls- QHSE-DCR-Fmatpel002: “Informe de Viaje de Materiales Peligrosos” (Hazardous Materials Travel Report), rest stops, meals, as well as any anomalies or observations along the route, will be recorded.

"DCR" does not subcontract other entities to conduct any of the activities required in Transport Practice 1.4.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is

- ✓ in full compliance with Standard of Practice 1.5

Summarize the basis for this Finding Identified:

"DCR" does not transport by sea.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is

- ✓ in full compliance with Standard of Practice 1.6

Summarize the basis for this Finding Identified:

DCR has 20 satellite phone units available for the units assigned to transport cyanide, with one satellite radio assigned to the hazardous materials supervisor or MatPel supervisor.

Additionally, drivers carry cell phones and radios for internal communication, which, according to the auditor's opinion, is suitable for the transportation process.

The proper functioning of communication devices such as cell phones, satellite phones, and radios is tested before each transportation process, and it is recorded in the checklist by each convoy driver. The checklist is part of the consolidated travel report for each transportation process carried out to a mine.

Due to the topographical conditions and uninhabited areas, DCR has established and implemented the identification of such areas. In each transportation process, a satellite phone is included as part of the backup communication equipment.

In the procedure QHSE-DCR-QHSEpro004, revision 12 dated May 10th, 2023 "Procedure for the Selection of Routes in the Transport of Dangerous Materials" section 6.1 G p. 8 states that an identification of areas where establishing communication is impossible will be conducted. This procedure has remained unchanged since the 2020 audit.

In QHSE-DCR-Fmatpel006, revision 10 dated May 10th, 2023 "Reporte de Selección de Ruta de Transporte" (Transportation Route Selection Report), these blind areas must be recorded.

DCR actively monitors vehicles involved in cyanide transportation in real-time. Interviews were conducted with a team of operators from the Fleet Monitoring and Control Department, namely Daniel Narvaez, Marco Ríos, and Ozkar Villamonte. During the interviews, they provided insights into the monitoring process and demonstrated how they track multiple vehicles located in different areas.

The vehicle location and tracking platform for the VOLVO vehicle brand was enabled in February 2021, allowing real-time monitoring. In addition to tracking the truck's location, the system also monitors driver fatigue and drowsiness through cameras.

DCR maintains and implements the same procedure established in 2020 during the last audit: QHSE-DCR-QHSEpro006, revision 10, updated on May 10th, 2023, section 7.4 c p.11 "Procedimiento de Seguridad Operacional en el Transporte de Cianuro" (Operational Safety Procedure in Cyanide Transportation), which states:

c) The tractor-trailer operator (driver) verifies that all the data included in the sender's and carrier's dispatch sheet is correct. They must check the gross weight in the weight and measurement record and in the Safety Data Sheet (SDS) issued by the supplier. They will carry this information throughout the course of the service until its destination.

The QHSE-DCR-Fmatpel002 form - "Informe de Viaje de Materiales Peligrosos" (Dangerous Materials Travel Report), and the QHSE-DCR-Fmatpel001 form- "Recepción y Entrega de Cianuro de Sodio" (Receipt and Delivery of Sodium Cyanide) will be used to control the cyanide load from reception to delivery at the mines.

Each transport vehicle is equipped with the sent quantities of cyanide and Safety Data Sheets (SDS) in Spanish. These SDS are received from the loading warehouse and subsequently delivered to the end customer. The SDS from suppliers HEBEI CHENGXIN CO. LTD and ORICA were reviewed.

"DCR" does not subcontract other entities to conduct any of the activities required in Transport Practice 1.6.

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 Standard of Practice 2.1

Summarize the basis for this Finding Identified:

The operation is in NOT APPLICABLE with Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

DCR has no stores or warehouses in territory of Peru.

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 Standard of Practice 3.1

Summarize the basis for this Finding Identified:

DCR has the procedures Sodium Cyanide Transport Emergency Preparedness and Response Plan, implemented for six (6) active routes:

La Arena Mine: QHSE-DCR-MATPELpe001.02-v22 "Transporte de Cianuro de Sodio".

Inmaculada Mine: QHSE-DCR-MATPELpe001.04-v18 "Transporte de Cianuro de Sodio".

Pucamarca Mine: QHSE-DCR-MATPELpe001.11-v12 "Transporte de Cianuro de Sodio".

Cerro Óxidos Mine: QHSE-DCR-MATPELpe001.14-v13 "Transporte de Cianuro de Sodio"

Yanacocha Mine: QHSE-DCR-MATPELpe001.16-v14 “Transporte de Cianuro de Sodio”.

Shahuindo Mine: QHSE-DCR-MATPELpe001.17-v08 “Transporte de Cianuro de Sodio”.

The Emergency Plan has considered various scenarios to comply with legal requirements regarding emergency response. These scenarios include actions to be taken in incidents related to solid, liquid, and gaseous cyanide.

The emergency plans have been updated in the following sections:
- Section 4.1: Hazard identification and risk assessment for Transportation Routes.
- Section 4.2: General Occupational Health and Safety Aspects.
- Table of HCN gas exposure limits.
- Section 6.1: Emergency Organizational Chart.
- Section 7.1: Notification Procedure.
- Section 7.2: Internal Communication Handbook.
- Section 8.1.6: Initial Isolation Distances.
- Annex 7: Emergency Handbook.

7.1.D.e. Communication to ICMI of significant incidents within 24 hours of their occurrence.
8.3. Procedure for Neutralization of spilled product solutions or solids.
9. Training and drills, updating the drill program code (replacing QHSE-DCR-pg007.03 with QHSE-DCR-page 020).
Annex 01: Definitions and abbreviations.
Includes the definition of Significant Cyanide Incident.
Annex 05: SDS sheet (version 04, dated 07/01/2022).

In all Emergency Response Plans of the QHSE-DCR-MATPELpe001 mine, Section 2.1 - “Características del Cianuro de Sodio” (Characteristics of Sodium Cyanide) explains the general aspects associated with intoxication levels. It lists the lethal doses, risks of cyanide in different states, as well as substance identification.

Exposure limits to cyanide are detailed, including their characteristics based on moisture and presentation type.

In Annex 02 of all Emergency Response Plans for the six (6) active routes, the chemical and physical characteristics of cyanide, exposure limits, and product stability are indicated.

The emergency response plans for the six (6) active routes consider the method of land transportation, fulfilling specific objectives for the activity:

• Complying with legal requirements related to emergency response.

• Identifying potential emergency situations to which the company's operations are exposed, minimizing the probability of emergencies through appropriate inventory and risk assessment.

• Establishing communication procedures with the Emergency Response System department of mining clients in the event or imminent occurrence of an emergency.

• Communicating any emergency quickly and efficiently to the mining client, coordinating and supporting the Emergency Response System department.

• Having a structured and planned organization with clear distribution of responsibilities to effectively handle emergencies and minimize post-emergency losses.

• Implementing preparedness measures to respond to potential emergencies, aiming to reduce impacts on people, property, the environment, and the community.

• Having contingency measures in place to restore operations as quickly as possible once an emergency occurs.

The Plan defines terms, definitions, and abbreviations, classifies response levels according to the severity, and organizes the crisis response system or committee, clearly indicating roles and identifying those responsible. Brigades and functions are established at different stages of an incident and intervention, including external responders.

It outlines the training topics associated with land transportation activities. The plan also considers response actions for the most probable emergency scenarios, the response equipment that must be carried in transport and escort vehicles, including communication means and a contact list in Annex 03.

In CHAPTER III of the Emergency Response Plans for all active routes, the road conditions and traffic on each segment to be traveled by the convoy are considered. This identification of potential hazards on the routes is established hour by hour and day by day, following a detailed evaluation of the road conditions, including when entering the warehouses for cyanide loading.

Presence of livestock, bodies of water, and the risk of criminal activity are also taken into account.

According to section 6.2.1 of the QHSE-DCR-QHSEpro006 procedure, revision 10, updated on May 10th, 2023, it is mandated that appropriate and ready transportation units for Sodium Cyanide transport are to be permanently available.

The truck hauling the container falls under the T3S3 vehicle configuration, complying with Supreme Decree 058-2003 issued by the Ministry of Transportation and Communications (hereinafter MTC).

The trucks will be up to 5 years old due to the quality policy of DCR Minería y Construcción S.A.C.

As for trailers, the same specifications as in 2020, the date of the last audit, are maintained:

Container Requirements:

a. DCR Minería y Construcción S.A.C will have 40 and 20-foot containers for the transportation of Sodium Cyanide with their respective labeling.

b. The client will provide 20 and 40-foot containers.

c. The containers are made of corrugated steel, non-refrigerated, and tightly sealed.

d. The container will be permanently attached to the platform and/or low bed and secured using a system of chains and pins to fasten the containers to the semitrailer. This will be documented in the QHSE-DCR-Fmatpel002 Form: “Informe de Viaje de Materiales Peligrosos” (Hazardous Materials Travel Report). Any observations will be recorded in this format.

e. The segment with the container falls under the T3S3 vehicle configuration, which complies with D.S. 058-2003 MTC.

Suspension: Rocker arm model with spring package with 33-ton capacity. With mechanical lifter on the first axis.
Axles: Three tubular axes.
Coupling: For 6x4 and 4x2 truck tractor with king pin.
Support Jack: Mechanic.
Pneumatic Installation: One outlet to fast discharge valve with 3/8” air pipe.

- **Suspension:** Balancer model with a spring package and a capacity of 33 tons. Equipped with a mechanical lifter on the first axle.
- **Axles:** Three tubular axles.
- **Coupling:** For 6x4 and 4x2 truck tractors with kingpin.
- **Support Jack:** Mechanical.
- **Pneumatic Installation:** One outlet with a quick release valve and a 3/8” air pipe.

The emergency response organizational structure is outlined in Section IV of the Emergency Response Plans for the routes.

Section 4.2 establishes the responsibilities of the individuals and entities involved in responding to emergencies. These include the General Manager, Central Manager, MATPEL Chief, Security Chief, MATPEL Supervisor, Tractor Operator, Crisis Committee, Clients, Mining Company, National Police of Peru, National Institute of Civil Defense of Peru (INDECI), and Ministry of Health.

In Section 4.3, response levels are established based on possible scenarios, and it describes actions based on time and degree of impact. It is indicated that a Level 1 incident should be controlled within the first 45 minutes after it occurs using DCR's own resources.

A Level 2 incident is considered if it surpasses the 45-minute mark before being controlled. In such cases, firefighters, brigades, and external entities are involved, and there may be impacts on equipment, personnel, the environment, and processes.

A Level 3 incident is characterized by the emergency being out of control and having the potential to affect residential areas and communities. In such cases, external resources and support from government entities are required to manage the situation.

The Emergency Response Plans for the evaluated routes include Annex 2, which lists the relevant municipalities and external institutions along with their respective telephone numbers for each specific route to a mine.

Among the external institutions are police stations, hospitals, health posts, and fire departments. In section 4.9, a flowchart identifies the roles of external responders when the severity of the response is Level 2 or Level 3.

All external responders, medical services, and municipalities have been sent more than eighty letters along with the SDS (Safety Data Sheet) of cyanide. During the audit, nine (9) letters were reviewed in 2021, six (6) letters in 2022, and six (6) letters in 2023.

Transport Practice 3.2

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

The operation is

- ✓ in full compliance with Standard of Practice 3.2

Summarize the basis for this Finding Identified:

DCR provides initial induction to new workers and consolidation training in emergency response, following an annual training program. The auditor reviewed the training program for the years 2020, 2021, 2022, and 2023, as well as records of group chats conducted by qualified personnel from DCR and the company MAPFRE.

In section 4.2 of the Emergency Response Plans for the six (6) routes, the responsibilities of the step-by-step actions to be taken in case of emergencies are identified.

In section 4.4, the emergency organization is established, outlining the assignments and responsibilities of the responsible personnel led by the Incident Command, which is set up at the physical location where the emergency occurs.

Objectives of the Incident Command:

a) Manage the incident efficiently, being the first trained responder to arrive at the emergency zone.

b) Execute vertical coordination tasks during the emergency to concentrate decision-making and prevent confusion due to information overlap.

c) Channel human resources and materials during the emergency through close coordination with the Crisis Committee.

In Annex 5 of the Emergency Plans for all routes, a Master List of Personal Protective Equipment (PPE) is provided. This comprehensive list includes various types of protective gear such as head protection, eye and face protection, respiratory protection, hand protection, hearing protection, foot protection, and chemical protective clothing.

An inspection was conducted at the warehouse where the inventories of Personal Protective Equipment (PPE) are stored and distributed. It was found that the warehouse is adequately stocked with the necessary PPE items.

Samples of checklist items from travel reports for the years 2020, 2021, and 2022 were reviewed. This included equipment related to spill response, as well as images of shovels, buckets, covers,

neutralizing chemicals, and first aid supplies. Examples of the latter include oxygen and water for body and eye washes.

In the simulation report conducted on May 25, 2023, regarding the incident of intoxication, available emergency response equipment is observed.

A remote meeting was conducted with the hazardous materials supervisor (MATPEL) and drivers. During the meeting, the drivers were interviewed, and they confirmed that DCR company provides and maintains health and safety equipment, including personal protective equipment, in escort vehicles and trucks.

DCR implements the QHSE-DCR-pg-018 VO program, which includes tasks such as monthly inspections of fire extinguishers, monthly inspections of showers and eye wash stations, quarterly inspections of emergency lights, monthly inspections of infrastructure, bimonthly inspections of Personal Protective Equipment availability for maintenance personnel, monthly inspections for Hazardous Materials personnel, quarterly management inspections, and quarterly inspections of work tools.

A verification of the availability of personal protective equipment in the supply warehouse was conducted, and a sample of the inspection program records from the year 2022 was reviewed.

Samples of inspection records for the years 2020, 2021 and 2022, personal protective equipment and emergency response equipment were reviewed, finding compliance.

“DCR” does not subcontract other entities to conduct any of the activities required in Transport Practice 3.2.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is

- ✓ in full compliance with Standard of Practice 3.3

Summarize the basis for this Finding Identified:

In the Emergency Response Plans of the different routes, the names and telephone numbers of the contact persons are indicated in the Annex section.

Each of the six (6) DCR Emergency Response Plans has a similar structure. However, it is common for each client or specific mine to request the inclusion of certain data, such as contact telephone numbers, aligned with the structure of their particular mine's emergency plans.

In Section 10.1 of the Emergency Response Plans, it is stated that the plans should be reviewed and the emergency numbers (medical centers, fire companies, municipalities, police stations) should be updated if necessary.

In the Emergency Response Plans, Section 7.1 D e), it is requested to notify the ICMI (International Cyanide Management Institute) in the event of a Significant Incident with Cyanide and contact them within 24 hours of its occurrence. This communication should include the date and nature of the incident, as well as the name and contact information of a company representative to respond to requests for additional information. Highlighted information will be provided, such as the root cause, impacts on health, safety, and the environment, and any mitigation or remediation efforts within 7 days of the incident.

Phone: +1-202-835-0155.

Email: info@cyanidecode.org

In Section 10.1 of the Emergency Response Plans, it is established that the plans should be reviewed and the emergency contact numbers (medical facilities, fire companies, municipalities, police stations) should be updated if necessary.

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 Standard of Practice 3.4

Summarize the basis for this Finding Identified:

The remediation procedures for the Emergency Response Plans have remained unchanged since the last audit in 2020.

As stated in section 8.3 for the "neutralization of spilled solutions or solids: (…) The spill area and contaminated solids should be decontaminated using an excess of diluted sodium hypochlorite, calcium hypochlorite, or ferrous sulfate, after adding sodium carbonate or lime to raise the pH above 10.5. Wait for 1 hour for complete decomposition before cleaning the spill area with ample water to ensure maximum dilution. Lime is poured over the spilled product to completely cover it and then collected.

Both calcium hypochlorite and lime are transported in the convoy.

According to the procedure outlined in section 8.4, after implementing the specific emergency response procedures, the following actions are recommended for decontaminating the spill area:
a. Decontaminating all affected areas
b. Defining the appropriate container for collecting the cleaning material
c. Removing contaminated soil and debris if necessary
d. Decontaminating all equipment
e. Packaging all contaminated material for disposal
f. Collecting samples for certification: Sampling contaminated water, collecting soil samples, etc.
g. Coordinating the transportation and disposal of the contaminated material with the Carrier and the Receiver of the cargo (mine). This process will be supervised by the Solid Waste Services Provider Companies “Empresas Prestadoras de Servicios de Residuos Sólidos” (EPS-RS) as indicated by the sender or the recipient.

Pursuant to Procedure 8.2.13 (regarding Incidents related to products), DCR is responsible for addressing dry cyanide spills, including recovery, for small-scale spills (spills involving a single box). The incident commander must coordinate the arrival of specialists who can certify the soil contamination status, and appropriate corrective measures must be taken.

In the event of major spills involving the rupture of more than one (1) box, support from the 2nd Response Team, managed by the mining company, will be requested. For spills on wet ground, whether small or large, assistance from the 2nd Response Team, managed by the mining company, will also be requested.

In the Emergency Response Plans QHSE-DCR-MATPELpe001 “Procedimiento de Neutralización de soluciones o sólidos de producto derramado” (Neutralization Procedure for solutions or solids of spilled product), the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide once it has entered surface waters is prohibited as it is counterproductive and of limited effectiveness.

Transport Practice 3.5

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

The operation is

- ✓ in full compliance with Standard of Practice 3.5

Summarize the basis for this Finding Identified:

In Section 10.1 of the Emergency Response Plan, it is requested that the plan be reviewed once a year and, if necessary, the section(s) that are considered necessary should be updated, taking into account the following considerations:

• Alteration or modification of operations.

• Modification of guidelines for the preparation of the emergency preparedness and response plan.

• Changes in the organization of the emergency team.

• Results of drills and exercises.

• Emergency evaluations.

• New applicable legislation.

• If it is a corrective measure following an incident/accident.

• Evaluation of a new route.

• Updating of emergency contact numbers (healthcare centers, fire departments, municipalities, police stations).

In Section 9: Training and Drills, it is established that training and drills will be conducted according to the annual general training and development program, with code QHSE-DCR-pg003.02.

The execution of drills will follow the Drill Program with code QHSE-DCR-pg020. The drill report will be presented using the QHSE-DCR-Fqhse022 format, which must be sent to the safety manager within a maximum of 7 business days.

The objective of conducting such evaluations is to identify improvements for the Emergency Preparedness and Response process.

According to the record QHSE-DCR-pg007.03 r.0, approved on December 10th,2020, a total of 9 drills were planned to be executed in the year 2021, and all of them were successfully conducted.

- In the year 2022, a total of 6 drills were conducted in collaboration with Pierina, Shahuindo, La Arena, and Yanacocha mines.
- In 2023, up to the present date, 1 drill has been carried out and 6 drills have been scheduled.

The drill reports were reviewed:

On March 16, 2021, a drill was conducted simulating a collision and spillage scenario on the road. The drill was prepared a week before executing the plan.

On January 5, 2022, another drill involving spillage was carried out.

In accordance with the scheduled simulation program for the year 2023, on May 25, 2023, from 2:43 p.m. to 4:05 p.m., DCR conducted a drill at the Tramo Maersk Almacén (APM Alconsa) – Base DCR La Capitana facility. The simulation involved a scenario where an individual not involved in DCR operations was exposed to cyanide.

In general, DCR conducts drills in collaboration with mining operations. This practice is in accordance with the Supreme Decree DS-024-2016 EM, Article 155, which states that in every mining operation, it is the obligation of the mining activity holder to:

1. Conduct emergency drills at least once per quarter to familiarize workers with emergency response operations.

2. Activate alarm systems at least four (4) times per year to train and evaluate workers' responses.

3. Have the minimum mining rescue equipment specified in ANNEX No. 20 of the Supreme Decree for emergency response.

According to section 10.1 of the Emergency Response Plan, it is requested to review the Plan after an emergency has occurred for its implementation.