INTERNATIONAL CYANIDE MANAGEMENT CODE

2026 RECERTIFICATION AUDIT

Summary Audit Report

Draslovka Canada Bulk Transloading Facility



Draslovka | CN Auditing Group

Submitted to:

The International Cyanide Management Institute
1012 14th Street NW, Suite 825
Washington, DC 20005 USA
USA

www.cnauditing.com

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Operation General Information

Name and location of Operation:	Draslovka Canada Bulk Transloading Facility 80 Route 117 Malartic, QC JOY 1Z0
Name and contact information for this Signatory:	Joaquín Corres Barragán DMPS Risk Manager Draslovka Mining Process Solutions Email: joaquin.corres@draslovka.com
Information for operation audited:	**Octium Solutions** Jennifer Tremblay Quality Audit Manager 80 Route 117 Malartic, QC JOY 1Z0

Company Background Information

Draslovka Mining Process Solutions produces sodium cyanide in the United States for the mining sector globally. It is a fully owned subsidiary of Draslovka Holdings, a.s. Cyanide is produced in the United States in the Memphis, Tennessee plant.

The parent company is a chemical technologies, products and services company that serves the mining, agricultural, and manufacturing sectors. The Draslovka global headquarters is in Prague, Czech Republic. Draslovka's European manufacturing plant is in Kolín, Czech Republic.

Description of the Operation

The Draslovka Canada Bulk Transloading Facility (Draslovka) in Malartic, Quebec is operated by Octium Solutions (parent company Quadra). Sodium cyanide briquettes are received at the Draslovka Canada Bulk Transloading facility in Malartic, Quebec where they are re-packed from rail hopper cars into isotainers (iso tanks) mounted on truck chassis. The facility has been in operation since 2015 and was first certified to the International Cyanide Management Code (Cyanide Code) Production Protocol in 2020.

Auditor's Finding

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

The Draslovka Canada Bulk Transloading Facility cyanide safety performance for the re-certification period was excellent, there were no cyanide-related safety incidents, accidents, spills, or exposures.

The auditor found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was excellent. Management systems upon which the operation is based are mature, and requested records were readily available for review.

The results of this re-certification audit demonstrate that the Draslovka Canada Bulk Transloading Facility cyanide-related production activities are in **FULL COMPLIANCE** with International Cyanide Management Code requirements.

Compliance Statement

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

Auditor Information

Audit Company:	CN Auditing Group www.cnauditing.com
Lead / Technical Auditor:	Ralf Jurczyk, Ph.D. E-mail: rj@cnauditing.com
Date of Audit:	March 17-18, 2026

Auditor Attestation

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

I attest that this Summary Audit Report accurately describes the findings of the re-certification audit. I further attest that the re-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.

Draslovka Canada Bulk Transloading Facility		September 2, 2026
Name of Operation	Signature of Lead Auditor	Date

Principles and Standards of Practice - Cyanide Production Verification Protocol

Principle 1 | OPERATIONS

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

Production Practice 1.1: Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

No significant changes were made to the facility during the recertification period (2023-2026). Original build records and the detailed record of the transloading facility inspection by a qualified individual continue to be maintained. The report concluded that continued operation of the Draslovka Malartic facility within established parameters will protect against cyanide exposures and releases. Confirmation was made during the audit that the facility continues to be suitable for its intended purpose.

Process equipment is constructed of materials that are compatible with solid cyanide and cyanide solutions (steel, chemical resistant plastics, and concrete). No brass, copper or aluminum are used. Interlocks are in place to shut down the transloading process in the event of specific upset conditions or power outage. All process equipment and tanks are built on concrete. The concrete surfaces observed during this audit were suitable for prevention of seepage to the subsurface.

High level alarms and interlocks are in place on tanks containing cyanide and load weight interlocks are employed at the transloading facility. In addition to the original load monitoring equipment, a new monitoring / alert system was added during the recertification period. This new system alerts the Plant Manager directly of upset conditions. Records showing regular inspection and maintenance of equipment, including interlocks and monitoring equipment, during the recertification period were reviewed and found to be complete. The pit below the rail car loading area provides secondary containment. The capacity of this secondary containment area is more than twice the capacity of the wash water tank and associated piping. This is a solid sodium cyanide transloading facility, and the wash water tank is the only tank that has dilute cyanide-containing water in it.

There is a Poly-Flex membrane liner at least 30 mils thick under the entire site. All pipelines are contained within a building and are over concrete. Piping and tanks are inspected weekly for leaks in accordance with documented inspection procedures. The site transloads cyanide entirely within a building, thereby protecting the cyanide from potential exposure to moisture. All water systems for potable use, safety showers, and washing equipment are designed such that leaks or other potential releases will not come into contact with cyanide.

The facility is well ventilated with systems to ensure that the air is turned over at least four times per hour. The perimeter of the site is well secured with a perimeter fence and access to the process areas is highly controlled with additional security measures. No incompatible materials are stored on-site or near the cyanide.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.1

Production Practice 1.2: Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

Extensive procedures are in place in French and English for normal, upset, and emergency conditions. A sample of procedures was reviewed during the audit. Sampled procedures included information about hazards and requirements for PPE and tools. An annual procedure review process is used to ensure that procedures stay current. All procedures were last reviewed in 2025. Procedures reviewed during the audit of the facility were found to be appropriately detailed, up-to-date, and fully implemented.

Individual contingency plans are maintained for non-standard operating situations such as power failure and other upset operating conditions. The Emergency Response Plan (ERP) also details steps to be taken for different scenarios, including situations that may present potential for cyanide exposures or releases. The ERP was reviewed during the audit and was found to be appropriately detailed. The facility also maintains a Crisis Management Plan.

Management of Change (MOC) procedures are used to evaluate any changes that will be made to the facilities or procedures and require the review and sign off by environmental, health and safety management. No changes were reportedly undertaken during the recertification period that would have required the use of this process.

Preventive maintenance programs are in place. Work permits are issued whenever maintenance is to be performed. Equipment is decontaminated prior to work being done. Regularly scheduled maintenance and functional checks (including calibrations for personal and stationary HCN monitors) are performed on all process equipment and instrumentation. Preventive Maintenance records were available during the audit and were found to be complete. Confirmation was made during the audit that calibration records are retained for at least three years.

All water contaminated by cyanide is stored on-site and sent off-site as a by-product to customers for reuse on a leach field. Procedures are in place for the handling of cyanide containing wash water and solids. Any solids that cannot be decontaminated appropriately are disposed of as hazardous waste. Waste manifests and product shipping records were available and were acceptable. The final method of disposal is the treatment and transformation of the waste into an inert cementitious mass that is then landfilled using a waste treatment operator authorized by the Québec Ministry of Environment.

Procedures are in place for specific placarding requirements for the sodium cyanide shipments. Transportation equipment observed during the audit was appropriately placarded. Packaging is not used

in this part of the supply chain. Only bulk shipments are sent out to mine sites from this facility. There are no storage tanks or secondary containment areas outside of the building.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.2

Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

Tanks are visually inspected weekly and integrity testing is done every 5 years. Tank testing was current at the time of the audit. Weekly and monthly inspections are done on all Cyanide Code mandated items, according to a documented procedure that was reviewed during the audit. The procedure details the inspections of tanks, secondary containment within the building, valves, pipelines, and containments for integrity, closure of drains, presence of fluids, and deterioration. Sumps inside the building are also checked through this inspection program, but there are no secondary containment areas outside of the building.

Transportation equipment inspections are conducted pre-use and once per week as part of the formal Preventive Maintenance (PM) program for all equipment. Records of the transportation equipment inspections, including pressure testing records for bulk transportation containers (ISO tanks), were available and were found to be complete. The method used for tracking pressure testing of the bulk containers was acceptable.

The inspection and preventive maintenance programs were found to be appropriate for ensuring that equipment functions safely within its design parameters. Inspection frequencies are weekly, monthly, every three months, and annually, depending on the equipment under evaluation. The frequencies of documented inspections were found to be appropriate for the site. Inspections are documented. The inspection forms have the date, inspector, and results of inspection. Deficiencies are entered into an action list and corrections are made. Records from the recertification period were reviewed and were found to be complete.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.3

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.

Worker exposure to cyanide is minimized through the safe operation of facility equipment, ventilation systems, engineering controls (interlocks), and personal protective equipment (PPE). The minimum PPE requirements are defined in a documented procedure. PPE information is also included in the Operating Procedures. PPE requirements are defined for all types of operations from receipt of material, through operations, and packaging and shipping.

Procedures are in place for describing the risk management process to be used for non-routine tasks. An Emergency Response Plan (ERP) is in place for emergencies. Maintenance activities are done following standard procedures. PPE requirements are defined in the procedures, or the individual work permits for the task. Work Permits are used for non-routine activities, and managers participate in the detailed planning of non-routine tasks to ensure that all hazards and precautions are evaluated prior to the commencement of work.

Employees are involved in the development and periodic review of health and safety procedures. Daily safety meetings are held. Interviews during the audit confirmed that all operational personnel attend the meetings and that two-way dialogue is encouraged. Operations where cyanide exposure may be elevated have been identified and additional PPE requirements are defined in the appropriate procedures. Stationary cyanide detectors are in place to ensure cyanide concentrations are below 10 ppm instantaneously and 4.7 ppm continuously over an 8-hour period. Personal cyanide detectors are also used to monitor cyanide concentrations to ensure that they are below defined limits.

The location of the stationary monitors and when personal HCN monitors are required are procedurally defined. Procedures detail when the 2.7 ppm alarm sounds that operators must stop working, identify the source of the gas, and eliminate it by cleaning (as necessary) and/or ventilating the area. Operators evacuate the area if the 4.7 ppm alarm sounds and ventilate the building by opening the overhead doors. If cleaning or decontamination activities are required, additional personal protective equipment (PPE) such as respirators must be worn. Operators showed good awareness of PPE requirements and actions required in the event of an alarm.

The stationary monitors and the personal monitors are part of the maintenance system to ensure their continued functionality and calibration. Records were available and retrievable to demonstrate that the appropriate calibrations were being done throughout the recertification period and that equipment was suitable and functional.

A Buddy System procedure is maintained in which the requirement is stated that operators must always

have another person with them when there is potential to come into contact with cyanide (operational area). Radios are also used throughout the facility by all operators. Interviews confirmed that no one works at the facility alone.

The Supervisor is responsible for monitoring employees daily to confirm fitness for duty. All employees are assessed upon new hire and at a designated frequency to determine fitness for duty. These exams include vision and hearing checks, blood tests, and respiratory function. Personnel who may need to wear respirators undergo fit testing to confirm that they can safely do so. This is done annually.

Site safety rules include the requirement that all employees, visitors, and contractors change clothes before and after being in the transload building. This practice was observed during the audit. PPE signs and "Authorized Personnel Only" signs were posted throughout and eating, drinking, and smoking restrictions were in place. Signage was found to be appropriate and acceptable by the auditor. Employees showed excellent cyanide safety awareness.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 2.1

Production Practice 2.2: Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The facility procedures addressing response to cyanide exposures were found to be appropriate. The response actions are described for cyanide exposure through ingestion, inhalation, and absorption through the skin and eyes. Commercially supplied combination shower / low-pressure eye wash stations and non-acidic fire extinguishers were available at the site. Regular equipment maintenance, inspection, and testing were confirmed. The facility has oxygen, resuscitators, antidote, and a means of communication readily available.

First aid equipment and medicines are appropriately maintained to ensure their availability during an emergency. The antidote is not stored in a refrigerator, but it is stored in temperature-controlled areas. The manufacturer recommended temperature range is upheld. Inspections of equipment and necessary replacements are made to ensure they are available and effective when needed. Safety Data Sheets (SDSs) were readily available and were observed to be in English and French. Awareness and ability to access SDS was confirmed with operations personnel. Facility piping shows the contents and direction of flow, and the wash water tank is appropriately labeled.

The facility has decontamination procedures and change out area for personnel to ensure cyanide does not come out of the transload building or leave the area. There are employees on-site who have been trained in CPR and first aid. The antidote can only be administered by a doctor or nurse in Canada. A procedure is in place requiring that 911 be called to arrange for an ambulance for transport to the hospital.

Draslovka personnel contacted the local hospital and doctor to re-confirm capability for treating a cyanide exposure victim. A procedure is in place addressing incident investigation requirements, including near misses. No cyanide-related incidents occurred during the recertification period.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 2.2

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.

There are no direct or indirect discharges of process water to surface water from the facility. Cyanide transloading activities are conducted indoors over concrete containment, and the site is underlain by an engineered membrane liner (Poliflex304). Cyanide-containing process and wash water is collected and managed on-site before being shipped off-site for reuse. The entire building acts as secondary containment and the floor is sloped to direct water to the sump in the center of the building. Water is then pumped into a tank. Site inspections are performed twice per day at the beginning of each day. There have been no known releases of cyanide to the ground or stormwater at this facility.

Groundwater monitoring is performed according to a site procedure at the two observation wells located on the downgradient east side of the facility. There has been no contamination of groundwater. There are no identified beneficial uses of groundwater or numerical standards identified by the jurisdiction. Draslovka operations are compliant with ICMC requirements, and its operations do not impact beneficial uses of groundwater.

In the unlikely event that impacts beneficial use of groundwater occur, Draslovka is committed to performing remedial activities. There are no cyanide emissions from the facility and there are no government-related air permits. Indoor air cyanide concentrations are monitored using stationary HCN detectors and operators use personal cyanide monitors. Work areas were found to be clean and protective of worker health. Monitoring frequencies are appropriate for the facility based on prior test results and regulatory requirements.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.1

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 facility trains workers annually on the hazards of cyanide. The training adequately addresses cyanide hazards, including the hazards of solid sodium cyanide, the health effects of cyanide, and symptoms of cyanide exposure. The proper use of PPE is a part of appropriate training programs. Respirator fit testing is done annually. Employees are trained in procedures every two years and training is provided after a change to a procedure. Training is done for procedures covering activities from the receipt of material through transloading and maintenance activities. Procedures identify the appropriate PPE for the task. Employees are trained prior to working with cyanide. Critical procedures are reviewed with the team annually and other procedures are reviewed every two years. The training elements for each job are contained in the training materials. Training is primarily provided by the Operations Supervisor, a highly qualified member of the leadership team. The Operations Supervisor has more than 20 years of experience as a process operator in the mining sector, including more than 6 years as a cyanidation operator and 7 years as a cyanide transfer operator/supervisor. The Operations Supervisor holds numerous certifications and was found to be highly competent during audit discussions. The Operations Supervisor trains employees in all operational and cyanide safety topics. appropriately qualified personnel. The operational training is given by highly experienced Staff. Experts from the Fire Department give emergency response-related training, training on use of supplied air, harnesses, and fire extinguishers. Experts from Draslovka provide training to site personnel on cyanide awareness. The facility evaluates the effectiveness of cyanide training through testing and observation.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.1

Production Practice 4.2: Train employees to respond to cyanide exposures and releases.
Training on the spill response procedure is given upon hire and if the procedure is changed. The procedure addresses actions to be taken in the event of a spill or leak of cyanide and first aid to be given. The site trains employees in what to do in the event of cyanide exposure. All operators are trained in the procedure which requires that 911 be called to arrange for an ambulance. Additionally, all operators have received training in fire extinguisher use, detection of gas, and CPR. Detailed training records were retained in each

employee file sampled during the audit. Records are maintained for at least as long as the employee is working at the site.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 4.2

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 site has an Emergency Response Plan (ERP) to address a potential release of cyanide. The ERP functions as a roadmap to other emergency response procedures that are scenario-based. The ERP considers the potential failure scenarios appropriate for its site-specific environmental and operating circumstances. Individual procedures are also in place to address specific situations such as those listed in the standard. Specific response actions are detailed for each type of emergency scenario, including the need to evacuate. Confirmation was made that the local hospital also has the antidote and the capabilities for managing a cyanide exposure victim. A specific procedure is in place that details the steps to be taken if a person is exposed to cyanide dermally, through ingestion, or inhalation. This procedure includes precautions to be taken during decontamination, treatment with oxygen, and the provision of the antidote to responding medical personnel. Spills are controlled at their source by shutting down the equipment and stopping the transload process. Procedures are in place for containment, assessment, mitigation and future prevention of releases.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 5.1

Production Practice 5.2: Involve site personnel and stakeholders in the planning process.
Octium involves its workforce and external responders in the emergency response planning process. Draslovka is also involved in emergency planning. Interviews and a review of records showed that Draslovka has reached out to external stakeholders regarding emergency planning. The pandemic years were difficult for community outreach activities, but the actions taken during the recertification period were deemed to be sufficient. Octium employees participate in daily safety meeting discussions regarding

safety and emergency response.

Octium and Draslovka are committed to engaging stakeholders on a regular basis to ensure that its emergency plans remain current and address changing conditions. Draslovka communicates information regarding the nature of their risks with the Canadian government. In addition, the operation met with local emergency responders in 2026 to discuss the nature of the operation, potential risks, and emergency plans.

Additionally, Draslovka has trained its Canadian response contractor, per the Draslovka Emergency Response Assistance Plan (ERAP) that is required by Canadian regulations. Confirmation was made that the sodium cyanide is included in the ERAP approval. The ERAP covers transport of materials by road, rail, and marine modes. All of Canada is covered by the ERAP.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 5.2

Production Practice 5.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

Roles and responsibilities in a crisis are defined in the crisis plan. There is a checklist provided for each of the members of the crisis management team. A Team Leader and backup are named in the plan, and these roles have explicit authority necessary to implement the plan. Emergency Response Team members are identified in the plan with emergency contact numbers. Each person is trained in the individual emergency response procedures. The facility coordinates with external responders such as the fire department and ambulance for emergency response. 24-hour call-out information is included for internal and external contacts, as appropriate. The ERP includes a list of emergency equipment that should be available. Emergency response equipment is checked monthly to assure its availability when required. The ERP describes the roles of external emergency responders and medical facilities. The site meets with the Fire Department and the ambulance response team at least once each recertification period during the tabletop exercise. The involvement of external entities is confirmed, and response systems are evaluated during these meetings. Emergency drills are run together with the transporter, Draslovka, and occasionally a mining customer. Draslovka reached out to the local hospital during the recertification period to re-confirm capability for treating a cyanide exposure victim.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 5.3

Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.		
The list of contact personnel to be notified in case of an emergency is documented in a procedure. The call lists include members of management, regulatory agencies, external response providers, and medical facilities. The crisis plan addresses communication with the media and identifies who is authorized to talk with the media. Octium procedures included definitions and reporting requirements that were consistent with the ICMI's code and included a statement requiring notification to ICMI within 24 hours of a significant cyanide incident. There were no significant cyanide incidents during the recertification period.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 5.4

Production Practice 5.5: Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.		
In the event of a spill that requires remediation, the recovery procedure addresses the requirements for an environmental firm to be brought in to consult with Draslovka on the remediation options. The final method of disposal for contaminated soil and/or solids would be the treatment and transformation of the waste into an inert cementitious mass that is then landfilled using a waste treatment operator authorized by the Québec Ministry of Environment. Cyanide-contaminated liquids are sent to a mine under an existing agreement for reuse on a leach field. There is no need for the provision of an alternate drinking water supply in this area as the water is not potable, as reported by the operation. The area is already supplied with bottled / imported water for drinking. This response was accepted by the auditor. The procedure prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide spills. The remediation contractor has been made aware of the ban on using these chemicals in surface water. A record of the written communication to the contractor was available for review and was accepted. Environmental monitoring needs would be determined together with Draslovka subject matter experts and authorities.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 5.5

Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.		
The ERP calls for annual reviews of the emergency response plans and an annual hands-on drill to test the emergency response procedures and training. The site conducts annual emergency drills, holds drill critiques, and evaluates the need for further training or adjustment to the emergency procedures in accordance with the site procedure. Emergency response drill records were available for each year of the recertification period and included records from a tabletop drill held with firefighters, a simulated environmental release, simulated human exposure, ingestion of cyanide simulation, and a Man Down drill in the operations. At least one drill was available for each year that demonstrated that the emergency plans, from initial emergency callout notification through to the close-out of the response process. Records were found to be acceptable. The ERP procedure states that the plan and documentation will be reviewed following any emergency where the emergency plans need to be activated and at least every year. There have been no actual emergencies that required the plan to be activated at the site. The most recent drill and ERP revisions were dated 2026. No significant changes to the ERP were deemed necessary following the different drills and exercises.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 5.6