Draslovka Canada Supply Chain

ICMI Cyanide Code Summary Audit Report

2026 Re-Certification Audit



Submitted to:
The International Cyanide Management Institute
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Operation General Information

Name and location of Signatory:	Draslovka Canada Supply Chain 2571 Fite Road Memphis, TN 38127 USA
Name and contact information for this Supply Chain:	Joaquín Corres Barragán DMPS Risk Manager Draslovka Mining Process Solutions Email: joaquin.corres@draslovka.com

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 Canada Supply Chain includes the Draslovka organization and management of the supply chain and the trucking and interim storage operations in Varennes, QC and Rouyn-Noranda, QC Canada.

This Supply Chain interfaces with, and supplements, the following Draslovka certified supply chains and operations:

- Memphis Plant Production (including Carlin, NV and Memphis, TN packaging operations)
- US/Canada Rail & Barge Supply Chain
- Global Ocean Supply Chain
- Canada Bulk Transloading Facility in Malartic, QC Canada

Each of these operations and supply chains is currently Cyanide Code certified.

The Draslovka Memphis, TN production facility ships cyanide to gold mines in Canada in the following ways:

1) Transport via truck using Groupe Robert and its interim storage facilities in Canada (this report).
2) Transport by rail to the Canada Bulk Transloading operation in Malarctic, Canada (separate certification), where it is picked up by Groupe Robert drivers for truck transport to the mines (this report).
3) Transport by ocean carrier to the Port of Montreal (separate report) where it is picked up by Groupe Robert drivers who are dispatched out of the Varennes Terminal (outside of Montreal) and brought to gold mines using the Groupe Robert Terminal operations and interim storage facilities in Rouyn-Noranda and Varennes (this report).

The Varennes Terminal functions as a Groupe Robert corporate office and activities such as the coordination of drivers and equipment, training of personnel, provision of emergency response services, the oversight of the proper maintenance, and the tracking of equipment and shipments were audited at this location. The product is transported from the Malartic facility to mine sites using drivers dispatched from the Groupe Robert Varennes Terminal or from the Groupe Robert terminal in Rouyn-Noranda, Quebec.

Groupe Robert personnel have been transporting dangerous goods in Canada safely for many years. The company was established in 1946 and maintains its headquarters in Boucherville, Quebec. Groupe Robert is very diverse and has 41 distribution centers and terminals in Canada.

Groupe Robert manages all aspects of the trucking and interim storage operations including driver selection, training, dispatch, communication, equipment maintenance, and emergency preparedness and response. Groupe Robert personnel were included in this Cyanide Code Re-Certification Audit. Both the Varennes and Rouyn-Noranda Terminals and Interim Storage operations were physically audited on-site during this audit.

Both locations were found to be in full compliance with Cyanide Code requirements.

Auditor's Finding

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

The Draslovka Canada Supply Chain cyanide safety performance for the re-certification period was excellent, there were reportedly no cyanide-related safety incidents, accidents, spills, or exposures. The cyanide management practices for the Draslovka Canada Supply Chain were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol.* Draslovka Canada Supply Chain internal standards, policies, practices, and procedures regarding the management of the cyanide operations were reviewed.

The results of this re-certification audit demonstrate that the Draslovka Canada Supply Chain cyanide-related distribution and transportation 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 16 and 19, 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 Transportation Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

Draslovka Canada Supply Chain		June 13, 2026
Name of Operation	Signature of Lead Auditor	Date

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Principles and Standards of Practice - Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.

Groupe Robert maintains a documented process for route risk assessment. The process addresses ICMI requirements regarding route selection, route risk assessment, route approval, and driver feedback. The previous audit confirmed that routes were originally reviewed according to the new route assessment process and included considerations for population density, road infrastructure, pitch and grade of the roads, and proximity of the routes to water bodies.

Routes did not change during the recertification period and were re-reviewed in 2026. This was done according to a newly developed procedure for a periodic re-assessment of cyanide roads and routes. The re-evaluation takes into consideration new road conditions, driver feedback, past incidents, and seasonal conditions. Feedback from drivers is given in real time using the satellite communication system or to the Supervisor immediately after a trip. Routes are reviewed when changes are communicated by the authorities or the drivers or at least once every three years. Review records for 2026 were available for the current routes.

Risk mitigation measures to be taken on a specific route are documented. Routes are reviewed on a set frequency or whenever changes are communicated by the authorities or the drivers. Specific routes, risks, and risk mitigation measures are detailed in the original route records. The consideration of stakeholder concerns such as the use of only government-designated hazmat routes ensures adherence to local requirements regarding hazardous materials. Stakeholder concerns are also considered during the establishment of the Emergency Response Assistance Plan (ERAP) that is on file with the Canadian government (Transport Canada). There are no special security concerns on the selected routes. Drivers are instructed not to stop in undesignated locations or take detours from the pre-established routes. Groupe Robert does not subcontract any portion of its cyanide transportation operations.

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

Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform theirjobs with minimum risk to communities and the environment.		
Groupe Robert uses only trained, qualified and licensed drivers. Drivers receive annual Draslovka cyanide training including general awareness, first aid, and cyanide transportation modules. Hazardous Materials training and GHS (Global Harmonization System) training are required every three years. Groupe Robert requires all drivers to have five years of CDL experience and Draslovka requires three years of HazMat driving minimum with no incidents. Draslovka requires annual cyanide safety training for all drivers. Training includes general awareness, first aid, and cyanide transportation modules. Hands-on training and training on the specific routes and mine delivery requirements is managed by the Supervisor. Groupe Robert uses a detailed training evaluation checklist to record driver performance. The Driver Supervisor ensures that new drivers successfully deliver product on three supervised loads before being approved for independent deliveries. The first delivery to each location is always supervised, regardless of driver experience. The process was deemed to be effective for determining driver competence. Records were complete and readily available for current drivers. Groupe Robert does not subcontract any portion of its cyanide transportation operations.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.2

Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.		
Groupe Robert maintains a "Weight and Restrictions" procedure (“Charte de Poids”) that details the allowed weights per axle and per trailer. Transportation equipment was found to be suitable for Draslovka standard shipping weights indicated on shipping papers. The equipment is capable of handling loads far in excess of the amounts of cyanide that are shipped by Draslovka. The dispatch system would provide an automatic warning if the load were overweight. Groupe Robert does not subcontract any portion of its cyanide transportation operations.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.3

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.		
Draslovka and its packaging partners load the cyanide into ISO tanks and intermodal containers using formal procedures and checklists. Groupe Robert drivers check the axle weights to ensure that the product is evenly distributed and to ensure that packaging integrity is retained. UN 1689 placards are displayed on all four sides of the trailers and containers to clearly identify the shipment as sodium cyanide for the delivery to the mine. The placards are changed to 3414 (sodium cyanide solution – residue) for the return trip. Pre-trip inspections are performed, and results are recorded in the electronic log system. There is a formal preventive maintenance program in place for trucks, trailers, and chassis. Draslovka maintains the ISO tanks. Records showing this practice were confirmed during the audit of the Draslovka Canadian transload facility. The transportation manager receives a warning from the electronic log system if a driver is driving beyond the allowed hours. The loads are secured by the shipper, and the loads are not opened by the driver. Groupe Robert drivers are empowered to stop a shipment if weather or road conditions are unsafe. Interviews confirmed this practice. There is also a driver fatigue program to ensure that drivers know that they can stop a shipment and rest if necessary. Groupe Robert has a documented Drug and Alcohol policy. There is a zero tolerance for drug and/or alcohol use while on duty. Records were available to demonstrate that the Cyanide Code safety program requirements have been fulfilled. Groupe Robert does not subcontract any portion of its cyanide transportation operations.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.4

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.		
Not applicable. Groupe Robert does not transport containers by sea.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 1.5

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.		
The communication equipment is used daily and is checked during the pre-trip inspections to ensure that it functions properly. Groupe Robert provides drivers with tablets and CB radios to ensure that drivers are always able to communicate with dispatch personnel and others, as necessary. Blackout areas do not present a significant problem on the routes traveled due to the use of satellite connected tablets and GPS tracking. Groupe Robert trucks are automatically tracked by GPS and by satellite tracking with continuous communication available, if needed. Trucks are locked / sealed once loaded and are not opened by Groupe Robert personnel. Bills of Lading are sent with the drivers and chain of custody paperwork is maintained with signatures. Drivers have shipping documentation, including the Bill of Lading with clear details regarding the amount of cyanide, with them always during a shipment. Drivers carry Emergency Response Guides and safety data sheets with them during deliveries. Groupe Robert does not subcontract any portion of its cyanide transportation operations.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of 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.
Warning signs are posted at the Rouyn and Varennes terminals alerting workers when cyanide is present. Signs are in place that forbid smoking, open flames, eating and drinking when cyanide is present. The interim storage is not a warehouse with packages, but rather the parking of loaded transportation containers. Interim storage for the cyanide commodity is seasonal in Varennes and is not a common practice in Rouyn. In Rouyn interim storage typically only occurs during poor weather conditions when the truck is stored inside for short periods of time. PPE requirements are identified as reflective vests, safety shoes, and eye protection in areas where trucks containing cyanide are parked. The terminals both have a locked fence with card access and remotely monitored camera surveillance. Unauthorized access is prohibited, and unknown personnel are challenged as a policy. The sodium cyanide is either stored outside and at least 50m away from any incompatible materials (Varennes) or in a dedicated garage building where no other chemicals are stored (Rouyn). The sodium cyanide is stored in the transportation containers which are designed for outdoor use and transportation and remain sealed and unopened while at the facility. There is no potential for contact with water. Unopened intermodal containers are stored outside in Varennes with no possible hydrogen gas build-up. Unopened ISO tanks are stored occasionally in a garage building with adequate ventilation in Rouyn. Spill kits are available in each location to minimize

the extent of a release.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 2.1

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.

Several emergency planning documents are maintained in this supply chain. The most recent Groupe Robert Cyanide Dangerous Goods procedure was dated December 2025. Draslovka also maintains an Emergency Response Assistance Plan (ERAP) was last issued in 2025 and is valid until 2028. Groupe Robert also maintains an "Emergency Response Procedure – Cyanide (UN 1689 / 3414)".

The Draslovka Emergency Response Guide is also always kept in the truck. The cumulative emergency planning information was found to be appropriate for the routes driven and the two interim storage locations.

The Draslovka ERAP addresses all modes of transport. Groupe Robert only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck or interim storage incidents. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, and the roles of the different emergency responders are discussed in the planning information.

The solid cyanide is dissolved into solution at the mine sites in some cases during the offload process. Emergency procedures for upset conditions that may be experienced during the offload process are included in the standard operating procedures used for such dissolution processes. Emergency plans were found to be appropriate for the transportation, interim storage, and offload operations.

The planning information was found to be appropriate for the different types of containers and trailers that are used in this supply chain. The emergency planning information and Driver's Manual were found to be appropriate for the routes driven. The documentation describes what steps are to be taken in response to traffic accidents. The procedures include cyanide-specific response actions and general cyanide safety information. Draslovka communicates emergency response information to external responders who would respond in the event of an emergency. Draslovka has trained its Canadian response contractor, per the Draslovka Emergency Response Assistance Plan (ERAP) that is required by Canadian regulations.

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

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

The initial and annual refresher Draslovka training provided to drivers includes information on spill response. Emergency response training is also conducted at least every three years by Draslovka for its emergency response contractor as part of its legal obligations under Canadian law. The responsibilities of the drivers and/or interim storage personnel are clearly defined in the Groupe Robert Cyanide Contingency Plan and the Draslovka ERAP. The required emergency response equipment is identified in the "Minimum Spill Kit for Each Truck" document. The interim storage locations also have a list of equipment that is kept in each location. Groupe Robert provides the drivers with the required PPE and spill response equipment. The equipment is maintained in 55-gallon drums attached to the chassis that have seals and dates of packing. The integrity of the seal is checked during the pre-trip inspection and the spill equipment itself is inspected on an annual basis to ensure that it has not degraded. The spill kit is inspected daily before the trip at the same time the trailer and truck are inspected. The spill equipment in the interim storage areas is checked regularly when cyanide is present (occasional storage in Rouyn and seasonal storage in Varennes). The emergency response equipment needed is reviewed on an annual basis. Groupe Robert does not subcontract any portion of its cyanide transportation operations.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.2

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

Drivers are instructed in procedures to call 911, the emergency numbers on the Bill of Lading, and the Robert hotline. Robert personnel will contact Draslovka who will communicate with the customer, regulatory agencies, medical facilities and potentially affected communities as appropriate. Groupe Robert maintains telephone numbers that are to be called in the event of an emergency. The telephone numbers were last updated in 2026. The Draslovka Mining Solutions Global Emergency Response Plan requires procedural review and reauthorization at least every three years. The phone list is required to be checked annually. Groupe Robert procedures call for the transportation partner to report cyanide-related

incidents to Draslovka immediately. Draslovka 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 in this supply chain during the recertification period.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.3

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanidetreatment chemicals.		
If remediation were to be necessary, the emergency response plan includes a requirement to notify Draslovka of the spill. Draslovka would organize environmental cleanup and remediation. The Draslovka Mining Solutions Global Emergency Response Plan was reviewed and were found to be appropriately detailed. The Draslovka Plan prohibits the use of these chemicals to treat cyanide that has been released into surface water. Groupe Robert procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water, but remediation would be managed by Draslovka and its emergency response contractors.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.4

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.		
The emergency procedures are reviewed by Groupe Robert at least annually to ensure adequacy. Changes are implemented as required. The Draslovka Mining Solutions Global Emergency Response Plan requires procedural review and reauthorization at least every three years. The phone list (Appendix B) is required to be checked annually and was last updated in 2026. Draslovka conducts annual mock emergency drills in its supply chains. At least one emergency drill is conducted per supply chain per recertification period. The emergency drill was held in March 2026. Records were available for review and were acceptable. Groupe Robert procedures call for the annual review of the emergency plans and for the revision of the plans, as necessary, following drills and actual emergencies. Records showing that a review of the emergency drill and emergency procedures was done in March 2026 was accepted.		
The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.5