

**Addendum 1**  
**to**  
**DRASLOVKA MEXICO SUPPLY**  
**TRANSPORTES FEMA**  
**Trucking Company**

**Summary Audit Report**  
**for the**  
**International Cyanide Management Code**  
**May 2026**

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## Introduction

**Operation General Information**

Name of Transport Operation:	Covoro Mining Solutions Mexicana S. de R.L. de C.V.
Name of the Owner:	Covoro Mining Solutions Mexicana S. de R.L. de C.V.
Name of Operator:	Transportes de Carga FEMA SA de CV
Name of operation:	<ul style="list-style-type: none"> <li>○ Covoro Mining Solutions Mexicana S. de R.L. de C.V. - Cyanide Consignor</li> <li>○ Transportes FEMA - Trucking company</li> </ul>
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## Operation Location Detail and Description

Draslovka Supply Chain has integrated the trucking company Transportes de Carga FEMA SA de CV (commonly known as FEMA or Transportes FEMA) into its Mexican operations. This addition will cover the transportation route from Nuevo Laredo to Draslovka's distribution and transloading center in San Luis Potosi and Hermosillo. The headquarters of the transporter is located at Carretera Aeropuerto Piedras Negras, Km. 0.440 S/n, Nuevo Laredo, Tamaulipas, La Concordia, 88298, México.

Draslovka Mexican Supply Chain, the cyanide consignor, was last certified under the Cyanide Code on June 13, 2025, operates with the commercial name Covoro Mining Solutions Mexicana S. de R.L. de C.V. Draslovka contracts with truck and rail partners to transport cyanide briquettes from the Draslovka Memphis Plant into Mexico through Laredo, Texas and Nogales, Arizona. Cyanide is transported to the Draslovka Bulk Transloading Facility in San Luis Potosi (SLP facility) and the Bag/Flobin to Bulk Transloading Facility in Hermosillo (HMO facility).

This report aims to incorporate FEMA into Draslovka's Supply Chain Mexico. As mandated by the International Cyanide Management Institute (ICMI), each element of the supply chain must undergo an individual assessment. This Detailed Audit Finding Report presents the outcomes of the site evaluation carried out on August 26 and 27. The evaluation was conducted by an ICMI-registered Lead Auditor and Technical Auditor specializing in transport operations at FEMA's headquarters in Nuevo Laredo, Mexico.

Trucked product enters Mexico through Laredo, Texas. Empire Express (Empire), a signatory to the Code, drops off trailers that were loaded with product at the Draslovka Plant in Memphis, Tennessee at a terminal and interim storage yard of Grupo FH Companies, Inc. (GFH) in Laredo, Texas. GFH is responsible for transporting solid cyanide from its terminal in Laredo, US, to the FEMA terminal in Nuevo Laredo, Tamaulipas, Mexico.

Cyanide arrives in 53 foot dry vans (boxes) containing packaged in Ecopaks from the Draslovka plant in Memphis at Transportes FEMA in Laredo in trailers owned by Empire Express Inc. (Empire). The Empire trailers are transported by GFHL across the border,

FEMA is responsible for transporting solid cyanide from its terminal in Nuevo Laredo without opening the dry vans to the Draslovka facilities in San Luis Potosi, and Hermosillo, Sonora. Routes are determined by Mexican regulations that restrict hazardous materials to transport on major toll highways. Transport follows a common route south from Nuevo Laredo to near Monterrey where the route to San Luis Potosi continues southward and the route to Hermosillo diverges westward. The route to Hermosillo traverses the southern Sierra Madre and the more northerly route along the Mexico-US border. They are currently using the northern route since insecurity increased on the southernmost route. The route to San Luis Potosi requires approximately 13 hours one-way while the route to Hermosillo requires approximately 20 hours one-way.

Draslovka, in addition to being the cyanide consignor of the Mexico Supply Chain, has



emergency response brigades that would assist in transportation emergencies stationed at the warehouses in San Luis Potosi and Hermosillo.

Transportes FEMA is a trucking and freight company that has been moving goods across borders for more than 25 years. They handle international shipping for businesses, making sure cargo gets from point A to point B safely and on time. With a solid record of accomplishment in transportation, FEMA helps companies ship everything from industrial equipment to commercial goods across Mexico and beyond.

Transportes FEMA began operations in 1987. Over the years, the company has achieved significant milestones, including prestigious recognitions such as the Tamaulipas Quality Award, acknowledgment as a provider of best practices, and certifications like C-TPAT and NEEC, among others. They operate over 150,000 square meters of secure yard space, establishing the most extensive infrastructure for tractor-trailers in the region. The company currently employs approximately 1,433 people.

### Auditor's Finding

This operation is

- in full compliance
- in substantial compliance
- not in compliance

with the International Cyanide Management Code.

### Auditor Information

Audit Company:	Cyanide Auditors S.A.
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Transport Technical Auditor:	Bruno Pizzorni
Dates of Audit:	August 26 and 27, 2025

### Auditor Attestation

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

Transportes Fema  
Draslovka Mexico Supply



May 21, 2026

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Name of Operation

Bruno Pizzorni - Lead Auditor

Date

## Transport 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.*

- The operation is
- in full compliance with
  - in substantial compliance with
  - not in compliance with
- Transport Practice 1.1

Transportes FEMA has established a procedure to select transport routes aimed at minimizing accidents, detailed in their RSC-PRO-002 Route Analysis, supported by Global Map. Routes are evaluated to identify and select the safest option available. Draslovka applied the First Order Process to assess the truck route from Nuevo Laredo to San Luis Potosí and Hermosillo. Prior to the initial shipment, the Product Safety team conducts site visits to evaluate route risk assessments. This protocol is also implemented when there are changes in packaging types or after a delivery hiatus of three years or more. The auditor verified forms that confirmed compliance and documented Draslovka's approval. Transport operations are actively managed by Draslovka through regular reviews, audits, and training programs for transporters.

The trucking company assessed Transportes FEMA, has established protocols for its land routes from Nuevo Laredo to San Lui Potosí and Hermosillo, integrating these procedures into their operations, with Draslovka approving the truck routes. The transporter considers essential factors such as population density, roadway infrastructure, pitch and grade, proximity to bodies of water, and fog prevalence.

The auditor examined the cyanide route evaluation carried out. They use technological tools like Global Map, applying color codes and controls at the bottom of the map. Additionally, they maintain a verification checklist where risks are identified for each kilometer.

After the route evaluation, a Point-to-Point Report is issued containing information on road conditions, travel times, tollbooth locations by section, and identified rest points with surveillance, telephone signal availability, basic services for personnel, and parking space. Drivers carry a map identifying communication black spots, route risks including theft statistics by area, and mitigation measures.

Rivers, channels, bridges, fog-prone areas, and water bodies are identified as significant



factors. In accordance with Mexican regulations established by the Secretariat of Infrastructure, Communications, and Transport (SICT) under NOM-12, transporters are required to evaluate any new route prior to cargo departure. This includes verifying the points of origin and destination. To comply with these standards, Transportes FEMA utilizes Global Maps, a software recommended by the SICT, to assess risks and consult with experienced operators familiar with the route.

Additionally, they seek guidance from Mexican institutions like INEGI (National Institute of Statistics and Geography) and CAPUFE (Federal Roads and Bridges), entities responsible for road maintenance and for providing vital data regarding the condition of routes, including accident records. As part of the route assessment process, the operator travels along with the Health and Safety Coordinator. Together, they prepare a route evaluation report, which serves as a comprehensive guide highlighting available services and the safety measures implemented.

Transportes FEMA provided the route evaluations conducted for transportation from Nuevo Laredo to Draslovka's distribution and transloading center in San Luis Potosí, as well as to Hermosillo. These evaluations were reviewed and approved by Draslovka, as indicated by their signed acknowledgment. As part of their RASC-PRO-002 Route Analysis procedure, the carrier included a stipulation that any route evaluation involving the transportation of cyanide for Draslovka must undergo review and receive approval from Draslovka before initiating the first shipment. Furthermore, it was mandated that the details of the route evaluation must be communicated to the drivers.

Draslovka and its transport contractors have developed structured procedures for route selection, emphasizing the evaluation of routes to determine whether additional precautions are required at specific points. High-risk areas are identified, and suitable measures, such as speed reductions, are outlined and incorporated into driver training programs. These procedures necessitate conducting a comprehensive risk analysis and detail the steps for preparing roadmaps tailored to all routes managed by the organization during transportation operations. Once risks are assessed, appropriate control measures are established to mitigate them effectively.

Furthermore, the procedures mandate the preparation and regular updating of roadmaps, particularly when introducing new routes, adjusting to changing conditions, or responding to customer requests. Key factors documented include potential hazards such as road and weather conditions, traffic patterns, speed limits for various sections, road signs and restrictions, limitations like bridge heights or tunnels, challenging terrains like hill ridges and water crossings, population density zones, mist-prone areas, and other transportation safety considerations. Input from mining customers plays a role in determining suitable routes. Draslovka thoroughly evaluates and approves transporter routes, ensuring their conformity with the company's safety standards as a cyanide consignor.

Transportes FEMA's route analysis procedure systematically categorizes risks, considering that hazardous materials transport may sometimes be limited to legally designated routes. Each analysis includes a detailed table outlining risks and corresponding mitigation

measures.

The auditor reviewed samples of route analyses, including risk assessment records, control strategies, and due diligence efforts confirming adherence to compliance requirements.

Draslovka and its transport contractors periodically reevaluate cyanide transport routes to identify new risks. This is done through formal administrative reviews, driver reports via WhatsApp, and periodic route inspections. Draslovka controls its transporters' route evaluations through due diligence, internal audits, and training courses.

Transportes FEMA procedures state to reevaluate routes biannually on each route analysis. Drivers provide feedback through written reports, and after each trip, road conditions are logged and monitored by the health and safety area. The auditor reviewed the initial Route Analysis from Nuevo Laredo to San Luis Potosi and Route Condition Reports.

In practice, FEMA consistently reviews their routes to ensure efficiency. They employ various methods to gather quick, informal feedback on route conditions. Discussions with drivers and management staff revealed that updates on driving conditions are effectively shared through WhatsApp groups. Significant issues raised by customers are recorded and distributed to all drivers assigned to the respective routes.

Transportes FEMA conducts assessments of specific routes, documenting any identified risks for use in driver training and as a reference guide. Particular attention is given to sharp turns, areas near water bodies, and regions with high population density, where strict precautions are outlined in the route risk assessments. These precautions include reducing speed, employing co-drivers, limiting driving to daylight hours, prioritizing experienced drivers, reducing load weight, and providing specialized training. Draslovka manages these safety measures through regular reviews, audits, and training initiatives.

The route evaluations account for various risk factors, including population density, infrastructure quality, terrain challenges, proximity to water, adverse driving conditions, security concerns, and cell phone coverage reliability. Records detailing these evaluations are maintained and available for review.

Draslovka has engaged stakeholders in route selection and risk management through collaboration with the Mexico National Association for the Chemical Industry (ANIQ), the Mexico System for Transport Emergencies for the Chemical Industry (SETIQ), and regional mining associations, such as the Sonora Mining Cluster. For instance, the Sonora Mining Cluster released a Manual for First Responders to Chemical Emergencies in Sonora, incorporating Draslovka's input.

Transportes FEMA collects information from government agencies via circulars and bulletins. The company also obtains data online from bulletins published by SETIQ and CANCAR (National Chamber of Cargo Transportation), primarily to avoid safety risks associated with direct contact with authorities on the road in Mexico. During the audit, a communication addressed to the Director of Civil Protection and Firefighters of Nuevo

Laredo was reviewed to verify the suitability of the selected route.

Truck convoys carrying hazardous materials on public roads are prohibited by law in México. However, trucking companies implement administrative controls in areas of special concern, such as prohibiting driving at nighttime. The auditor confirmed through interviews with management personnel that cyanide transport operations at FEMA are performed exclusively during daylight hours.

Transportes FEMA, according to their route evaluation procedure, monitors the route via GPS and issues reports every two hours on the location of the load, sending the system reports to both the client and the established internal distribution list. The trucks depart in pairs, maintaining their distance without forming a convoy, as this practice is not permitted by local regulations in Mexico. As safety measures they have established authorized stops to rest bathrooms and meals.

Transportes FEMA carries out all tasks associated with Transport Practice 1.1 using its own drivers and vehicles. The company does not outsource these cyanide transportation activities to other entities.

## Transport Practice 1.2

*Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.*

The operation is  in full compliance with  in substantial compliance with  not in compliance with Transport Practice 1.2

Draslovka requires its trucking transport contractors to use only operators who are properly qualified, trained, and licensed via their legal contracts; this apply also to this new transporte in the supply chain, Transportes FEMA. Draslovka conducted an initial internal audit to the trucking company and provide them with training courses in sodium cyanide emergency response before first shipments.

Transportes FEMA uses operators who are trained, qualified, and licensed to operate their vehicles. The contractor has implemented written procedures with requirements that consider factors such as two years driving experience, medical examinations, education level, criminal record, vision tests, psychological interviews, drug/alcohol tests, and reference checks, among others. In accordance with Mexican laws, truck drivers for large loads and/or hazardous materials must obtain a Type E license from the Secretary of Communications and Transport (Secretaria de Comunicaciones y Transportes [SCT]), an agency of the Mexican government, and renew the license every two years. The transporter demonstrated that personnel operating their cyanide transport trucks and



trailers were trained, qualified, and had the specific licenses required to operate the trucks in their jurisdiction. The transporter do not use forklifts or reach stackers operators, only has truck drivers for the cyanide operation.

The transporter monitors the validity of their license and medical exams. If these have expired, the system automatically blocks them, preventing the operations department from assigning them to any tasks.

All truck operators transporting cyanide are trained to follow safe and environmentally friendly practices. The company move solid cyanide in sealed dry vans that are loaded and unloaded by staff at production plants, storage locations, or mines.

Draslovka ensures that contractors' drivers are qualified and trained through legal agreements and offers General Cyanide Overview and Cyanide Transportation Safety courses. Draslovka monitors transporter training through due diligence reviews, internal audits, and courses.

Transporters training include topics such as managing fatigue, defensive driving, security, and general health in their annual training programs. Courses also cover Mexican laws, hazardous waste handling, satellite tracking, inspections, record-keeping, and basic maintenance.

The auditor reviewed training materials, attendance lists, and certificates to ensure compliance. Interviews with drivers, dispatchers, management, and maintenance personnel confirmed their training in cyanide transport operations.

The auditor reviewed the FEMA's annual training matrix for transportation, focusing on driving and compliance requirements for the transportation of cyanide. These requirements include having a valid driver's license, an up-to-date medical exam, a drug test, employment references, and at least two years of experience. The training department oversees the validity of licenses and medical exams, ensuring a review is conducted 120 days in advance. They provide instruction on the safe handling of cyanide, which also includes training provided by Draslovka.

Through an Excel system, they track the validity of certifications as well as the completion of training for all drivers. Once all transporters meet the required criteria, responsibilities are delegated. The fleet training leader establishes the specific training requirements and works alongside a master instructor for operators, who conducts interviews and supervises driving tests on closed tracks, highways, and urban areas.

There is also an Operator Training Institute that functions as a specialized educational center for truck drivers. This institute offers a three-month training program, during which drivers undergo extensive preparation that includes simulation sessions. After completing their training, drivers are employed by the company for an additional three-month period to gain further experience. However, during this time, they are not yet authorized to handle cyanide directly.

The transporter does not subcontract cyanide handling or transport.



## Transport Practice 1.3

*Ensure that transport equipment is suitable for the cyanide shipment.*

- The operation is
- in full compliance with
  - in substantial compliance with Transport Practice 1.3
  - not in compliance with

Transports FEMA exclusively utilizes equipment that is specifically designed and maintained to handle the designated loads. Draslovka has verified that the dry vans (boxes) are designed and maintained according to the required load specifications. The maintenance of trailers is conducted by their respective owners.

FEMA fleet consists of Freightliners trucks Cascadia model from year 2025. The auditor reviewed the technical specifications verifying their pulling capacity is 80,000 pounds which according to the head of maintenance, is more than enough to transport the cargo along the selected routes, including mountainous areas.

Truck maintenance is performed every 40,000 km. The mileage is recorded each time the trucks are refueled, and this information is transferred to the Máximo system, which indicates the next scheduled maintenance. The auditor reviewed work orders detailing the changes made, and the entire history is also available in Máximo system. FEMA performs the maintenance in its own workshops, as its mechanics have been trained by Freightliner's headquarters.

The trailers have sufficient capacity to transport 18 IBC (Intermediate Bulk Container) boxes of cyanide, with a total weight of 19,503 kg. The trailers are inspected upon arrival at the FEMA base in the exchange area. If any anomalies or damage are found, the client is informed. FEMA can provide maintenance service for the fleet if required.

The auditor reviewed the maintenance procedures and programs for cyanide transportation, addressing the responsible practices for sodium cyanide transportation to ensure that safety standards are met and maintain the integrity of the packaging. Also reviewed documentation of the load capacities as evidence of compliance, reviewed maintenance records and interviewed maintenance personnel to verify that the transporter's procedures are followed.

The auditor conducted interviews with the transport manager to verify compliance with the provision. Shipment records were examined to confirm that standard weights within the capacity of tractors, trailers, and containers were being shipped. Weight capacities and adherence to cargo inspection requirements were reviewed during the audit and found to be compliant. Shipping records indicated that the equipment was not overloaded.

Transportes FEMA has implemented documented visual inspections to ensure the adequacy of the equipment for the loads it will bear. Requires daily inspections that cover each side of the tractor, trailer, or intermodal container, including tires, rims, axles,



suspension, chassis, nuts/bolts, air/hydraulic lines, brakes, connections, and others. The daily inspection forms specifically mention conditions related to load-bearing performance, such as fissures and cracks in various components. The auditor reviewed examples of the Daily Visual Inspection Forms to verify compliance.

Draslovka has managed the loading of trailers at its ICMI-certified Draslovka plant in Memphis, Tennessee, adhering to controlled procedures to prevent overloading. The company ensures its transporters adhere to these procedures through due diligence reviews, internal audits, and training courses.

Transportes FEMA role involves verifying paperwork Empire Delivery Format to ensure the actual load is below the allowable limit upon departure. Information in this Empire Delivery Format documents the border crossing permit, invoice, and hazardous material manifest detail the actual load. The auditor examined these records and verified compliance with regulatory limits on weight. Equipment used for transporting cyanide was found capable of handling loads within prescribed regulatory limits. All personnel demonstrated an understanding of weight capacities and relevant regulations.

Transportes FEMA does not subcontract cyanide handling or transport.

### Transport Practice 1.4

*Develop and implement a safety program for transport of cyanide.*

- The operation is
- in full compliance with
  - in substantial compliance with
  - not in compliance with
- Transport Practice 1.4

Draslovka has overseen the loading processes at its ICMI-certified facilities in Memphis, San Luis Potosi, and Hermosillo to maintain the integrity of packages across trailers, boxcars, hoppers, and isotankers. The company has also regulated packaging practices through due diligence reviews, internal audits, and training sessions.

Transportes FEMA does not open the sealed trailers or intermodal containers; their role is to inspect the exterior for any damage that might affect the integrity of the containers inside. As per procedure TRAC – IT-003 P- 853-0202 High-Risk Shipments

In the exchange area, FEMA oversees the vehicles and cargo entering the yard. They inspect for any breaches in seals, check latches, signage, and the condition of dry containers. During the site visit, the auditor observed this process, confirming that the transporter conducts a thorough inspection of every vehicle entering their premises, recording the details in a checklist.

Draslovka has supervised the loading of trailers transported by Empire at its Memphis, Tennessee facility, ensuring that proper placarding and signage are in place for cyanide



shipments. Transportes FEMA has met Mexican regulations by affixing the United Nations 1689 placard to all sides—front, back, and both sides—of the tractor/trailer units. Additionally, drivers carry an extra placard for emergency situations. To verify compliance, the auditor interviewed a driver and inspected a tractor along with several trailers at the Nuevo Laredo Yard. Photographs of the placarding on intermodal containers were also reviewed to confirm adherence to regulatory standards.

Draslovka has controlled its transporters' safety programs through due diligence, audits, and training.

Transportes FEMA has implemented a comprehensive safety program encompassing vehicle inspections prior to departure through the use of two forms: Pre-trip Inspection Forms and Equipment and Interchange Forms. The program also includes the maintenance of its fleet of tractors dedicated to the transport of hazardous materials, including cyanide. The maintenance of trailers is conducted by their respective owners. The trailers are inspected upon arrival at the FEMA base in the exchange area. If any anomalies or damage are found, the client is informed. FEMA can provide maintenance service for the fleet if required. Preventative maintenance is scheduled based on distance—specifically, 40,000 kilometers for tractors and trailers. The auditor reviewed examples of maintenance records that demonstrated both preventative and corrective maintenance had been completed.

Driver operating hours are restricted daytime driving with mandated rest periods, and these hours are tracked using the register DAT-REG-005 Pre-driving vehicle inspection report where the operator conducts a safety check of the vehicle and records the start and end times of operation. This inspection includes checking to prevent loads from shifting. This inspection includes verifying if the cargo is properly secured, the back door is locked and properly sealed. The carrier does not open the doors of the dry van at any time. transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered. The carrier's procedures include empowering the driver to communicate to the control center so that they cannot continue the trip due to problems on the road.

Drivers are subjected to random drug and alcohol testing for each trip. The auditor reviewed records verifying that alcohol testing is conducted as required. Furthermore, extensive documentation—both in hard copy and digital PDF format—was examined, showing that FEMA consistently maintains records to confirm these activities. The auditor noted that Transportes FEMA ensures proper retention of these records across both physical and digital formats.

Transportes FEMA does not subcontract cyanide handling or transport.



## Transport Practice 1.5

*Follow international standards for transportation of cyanide by sea.*

The operation is  in full compliance with Transport Practice 1.5  
 in substantial compliance with  
 not in compliance with

Transportes FEMA does not transport cyanide by sea.

## Transport Practice 1.6

*Track cyanide shipments to prevent losses during transport.*

The operation is  in full compliance with Transport Practice 1.6  
 in substantial compliance with  
 not in compliance with

Draslovka closely monitors its transporters' vehicle communication systems through thorough due diligence reviews, internal audits, and training initiatives. All drivers involved in the supply chain are well-prepared to communicate with the transport company, mining operation, cyanide producer, and emergency responders whenever necessary. Their cyanide transportation protocols necessitate that every truck is equipped with reliable communication tools.

Transportes FEMA drivers are provided with company cell phones, GPS devices, and panic buttons. The transportation procedure requires the use of GPS tracking and mandates cell phone functionality checks upon departure from Nuevo Laredo Yard. As part of the pre-trip inspection, drivers must confirm that both the cell phone and GPS system are working correctly. Additionally, the driver's packet includes crucial emergency contact information for SETIQ, Draslovka, and FEMA.

Draslovka has managed its transporters by testing communication equipment during due diligence, audits, and training.

Transportes FEMA has conducted periodic tests on the communication equipment to ensure it functions correctly. Procedure RASC-IT-003 GPS Equipment Revision includes validating that both the GPS and the cell phone are working during the departure process from the Nuevo Laredo Yard, this step is included in the Pre-trip Inspections checklist. Additionally, the active monitoring forms, which document check-ins at specified points along the route, have also verified the functionality of the cell phones. The auditor reviewed samples of these forms to confirm compliance.

Draslovka has implemented measures to manage its transporters in relation to



communication blackout areas through due diligence reviews, internal audits, and training programs.

Transportes FEMA identifies blackout areas during route analysis. These analyses specify blackout zones and transit times. GPS alerts the dispatcher when trucks enter and exit these areas. Trucks travel in pairs as convoys are prohibited.

In the Zacatecas area, heading towards Hermosillo, a silence zone spanning several kilometers has been identified. Geofences have been set up for entry and exit points within their GPS tracking system. The time required to cross this zone is well-defined, and if a vehicle fails to appear within the allotted timeframe, a search program is activated. On the monitoring system's display, the auditor was able to observe this silence zone along with other sections where signal loss occurs. The tracking operators are fully aware of the procedures in place and know precisely how to initiate a search if needed.

Transportes FEMA oversees cyanide shipments using a GPS system that provides constant tracking of truck locations. A specific procedure, RASC-PRO-001 Tracking Protocol, has been implemented to manage the monitoring process effectively. The GPS system operates automatically, continuously recording the trucks' positions. Additionally, drivers complete active monitoring forms and contact dispatchers at designated points throughout the journey. Several times a day, FEMA shares location reports with Draslovka, detailing the shipments' whereabouts. To verify compliance, the auditor examined samples of these records covering the entire recertification period.

Draslovka has maintained stringent control over its transporters regarding inventory management through due diligence reviews, internal audits, and training programs. In certain cases, depending on the transporter, an additional seal may be affixed to the original seal applied at the production facility. On rare occasions, seals have been broken during transit to facilitate government inspections. Draslovka has provided examples of email communications from transporters documenting instances where seals were broken and/or replacement seals were applied.

Transportes FEMA uses inventory controls to prevent cyanide loss during shipment. Drivers carry documents recording container counts, load weight, border crossing forms, invoices, and hazardous materials manifests.

Before departing and at each stop along the route, drivers inspect the door of the dry van to ensure the seals are intact, and they visually examine the condition of the locking mechanisms and fasteners. This process is part of the company policy outlined in document P 34, Policy for Semi-Trailer Inspections. Additionally, it complies with the requirements of the CTPAT and OEA certification.

The CTPAT (Customs Trade Partnership Against Terrorism) is a voluntary program established by the U.S. Customs and Border Protection (CBP) to enhance supply chain security and mitigate risks related to terrorism and illicit activities. Meanwhile, OEA (Authorized Economic Operator) is a certification program in Mexico managed by the Tax Administration Service (SAT) aimed at facilitating international trade and strengthening customs security.



Transportes FEMA shipping records detail the quantity of cyanide being transported and include Safety Data Sheet information. Every truck is equipped with essential documents, such as the border crossing permit, invoice, hazardous materials manifest, and an emergency sheet in Spanish containing SDS details. The auditor examined these records and conducted an interview with a driver to confirm adherence to regulations.

Transportes FEMA do not subcontract cyanide handling or transport.



## Principle 2 | INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

### Transport Practice 2.1

*Store cyanide in a manner that minimizes the potential for accidental releases.*

- The operation is
- in full compliance with
  - in substantial compliance with Transport Practice 2.1
  - not in compliance with

During the field audit visit, Transportes FEMA did not have an intermediate storage facility as defined by the Cyanide Code. Cyanide shipments arriving at their yard are dispatched to their destinations in San Luis de Potosí or Hermosillo within 24 hours. However, the company is prepared for such a scenario and has a designated, secure, and properly equipped area that can serve as intermediate storage if needed.

The Transportes FEMA Nuevo Laredo Yard includes a designated area for the temporary parking of trailers. In this section, signs are displayed to notify workers about the presence of cyanide. These signs also outline restrictions such as no smoking, open flames, eating, or drinking, and they specify the required personal protective equipment for the yard.

Transportes FEMA operates a security control center that monitors the dry van trailer area containing cyanide around the clock using surveillance cameras. In addition, the area is continuously patrolled by security personnel. The entire perimeter of Transportes FEMA is secured with a safety fence equipped with motion-sensor cameras.

Transportes FEMA parks its trailers carrying cyanide within a designated area outlined with lines, cones, and a red plastic chain to ensure separation from incompatible materials. The sealed trailers remain unopened, significantly reducing the risk of any leakage. Observations on-site confirm that this parking area is situated away from locations containing incompatible products.

Transportes FEMA securely stores cyanide in sealed trailers specifically designed to prevent water intrusion. The dry van trailers undergo thorough inspections to ensure impermeability—first at the FEMA yard, then by the GFH transporter, and finally at the Draslovka production center prior to loading, guaranteeing their hermetic sealing. The FEMA trailer storage yard in Nuevo Laredo is engineered with a carefully designed slope that directs surface runoff from rainwater towards the yard's exit. Additionally, the trailer boxes are positioned at a height of 1.20 meters, offering effective insulation against water.

Transportes FEMA parks its trailers outdoors with open-air ventilation.

Transportes Fema positions its trailers on a concrete pad to minimize the risk of environmental impact in case of a spill. An emergency response kit is readily available at the Nuevo Laredo Yard, and trucks are outfitted with spill kits for added precaution.



### Principle 3 | EMERGENCY RESPONSE

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

#### Transport Practice 3.1

*Prepare detailed emergency response plans for potential cyanide releases.*

- The operation is
- in full compliance with
  - in substantial compliance with Transport Practice 3.1
  - not in compliance with

Transportes FEMA has designed the emergency response plan, TRAC-PCO-0032 Sodium Cyanide Emergency Protocol, dated December 2025. This plan aims to establish the necessary actions to prevent, manage, and respond to emergencies during the transportation of sodium cyanide, while minimizing risks to people, the environment, and infrastructure safely and promptly.

Draslovka has developed an emergency response plan tailored to support its contractors along the transportation routes within the Mexico Supply Chain. The Global Response Plan for Off-site Incidents, titled Sodium Cyanide Spill Control Guidelines, outlines procedures for addressing dry or wet spills of solid cyanide. These guidelines are applicable to spill scenarios on roadsides, within trailers, or at ports and terminals. The Plan considers both the chemical and physical forms of cyanide.

The Global Response Plan for Off-site Incidents specifies that the plan is designed for sodium and potassium cyanide. It comprehensively addresses all methods of transport and storage facilities leading to final customer locations, including truck, rail, maritime, port, and terminal components worldwide. The Plan also considers the transport infrastructure and vehicle design, acknowledging that incidents may occur anywhere along the supply chain—from the original manufacturing facilities to the final destination.

Transportes FEMA has developed an emergency response plan for routes and the Nuevo Laredo yard, focusing on truck transport emergencies on highways. The Plan address specific response actions against cyanide spills and exposures and considering its properties. The Plan covers handling solid cyanide briquettes and transport methods, including dealing with emergencies at Transportes FEMA installations at Nuevo Laredo Yard, and addressing transport emergencies. The plan is designed to suit dry vans trailers and intermodal containers. The Plan states that drivers will handle minor cyanide spills.

Transportes FEMA's emergency response plan specifies measures for handling different scenarios. It addresses alarm activation procedures, detailed response protocols for incidents occurring in the parking yard, on roads and highways, as well as procedures for



closures caused by customs issues, threats, or blockades. The plan also outlines actions for managing solid cyanide spills on both dry and wet soil.

Draslovka has established a comprehensive emergency response plan that outlines the roles and responsibilities of external responders, medical facilities, and local communities in handling emergencies. The Global Response Plan for Off-site Incidents includes a flowchart highlighting Chemtrec and the Draslovka Cyanide Hotline as the primary points of contact. The specific roles of external responders, medical services, and communities are determined collaboratively with regional or local government agencies, hospitals, and community representatives. Draslovka maintains oversight of its transporters through annual due diligence reviews, internal audits, and training programs.

In Mexico, the designated external entities include HESCA who serves as an external emergency response contractor, ready to handle any emergency situation upon Draslovka's request; SETIQ for highway-related emergencies, and Codefront for addressing incidents at the Columbia Bridge. Depending on the incident's location, Chemtrec, SETIQ, or Codefront takes charge of leading the emergency response, working closely with external responders, healthcare providers, and nearby communities.

The Transportes FEMA emergency response plan covers transportation methods, with a particular focus on truck transport. It also addresses the involvement of external responders, including Draslovka and Civil Protection, to tackle transport-related emergencies effectively.

### Transport Practice 3.2

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

- The operation is
- in full compliance with
  - in substantial compliance with      Transport Practice 3.2
  - not in compliance with

Transportes FEMA has conducted initial training sessions for drivers and brigade members on the emergency response plan. According to the 2025 training matrix, the emergency plan will be updated and refreshed annually. Attendance records confirm that this training has been consistently carried out this year in Nuevo Laredo. Additionally, brigade members in Nuevo Laredo yard receive specialized training from external providers. The auditor examined samples of training matrices, records, and certificates to ensure compliance with standards. The initial training includes eight hours of supplementary instruction covering Hazardous Materials, emergency response plans, contamination prevention, and safety induction protocols. Transportes FEMA drivers also receive specialized training from Draslovka, focusing on Emergency Response to Cyanide on



arriving to both Hermosillo and San Luis Potosí.

The Transportes FEMA emergency response plan specifies the duties and responsibilities of key personnel. It outlines the roles of the general director, operator, base manager, department heads, doctor, brigade, dispatch team, security guards, and safety manager. Among these, the safety manager holds the primary responsibility for overseeing emergency management.

Transportes FEMA's emergency response plan outlines the available equipment designated for transport along the route. Emergency Kit #3 consists of a pre-trip inspection form that details the emergency and personal protective equipment drivers are required to carry. This equipment is specifically chosen to address anticipated emergencies, including scene management and containment of spilled solid cyanide. Furthermore, the organization keeps a warehouse inventory of additional equipment intended for emergency response situations.

Transportes FEMA specializes in delivering emergency response and personal protective equipment during transit. The pre-trip inspection forms detail the equipment drivers are required to have on hand, such as Tyvek suits, gloves, hard hats, safety glasses, barrier tape, first aid kits, silicon tubes, brooms, dustpans, garbage bags, tarps, absorbent tubes, and reflective triangles. To ensure compliance, an auditor reviewed the completed forms, conducted an inspection of a truck's equipment at the Nuevo Laredo Yard, and interviewed a driver.

Transportes FEMA regularly carries out inspections of emergency response equipment utilizing the Emergency Kit #3 checklist. As part of this process, the auditor examined completed inspection records for spill kits in Nuevo Laredo and conducted an on-site inspection of the equipment in a truck located at the Nuevo Laredo Yard verifying compliance.

Transportes FEMA does not subcontract cyanide handling or transport.

### Transport Practice 3.3

*Develop procedures for internal and external emergency notification and reporting.*

- The operation is
- in full compliance with
  - in substantial compliance with      Transport Practice 3.3
  - not in compliance with

Transportes FEMA has implemented procedures that encompass notification processes and up-to-date contact information. The emergency response plan features a flow diagram outlining the steps for notifications. Additionally, it includes an accident reporting form containing all the essential details required for submitting a notification. The transportation emergency response plan provides contact details for FEMA headquarters,



Draslovka management, and various emergency response organizations located in states and cities along the transport routes. These include Civil Protection agencies, hospitals, fire departments, the Red Cross, police departments, and highway authorities. Furthermore, contact numbers for SETIQ are readily available on the Emergency Sheet included in the driver's packet and on a sticker affixed to trucks and trailers.

Transportes FEMA has established an emergency response plan that requires annual updates to emergency contact details. This plan outlines the necessity of updating contact information for FEMA staff, SETIQ, and clients on a yearly basis. As part of this process, the annual request to SETIQ also incorporates updates for regulatory agencies, external responders, medical facilities, and other pertinent contacts.

During quarterly meetings with ANIQ and SETIQ, as well as on an as-needed basis, the emergency departments' telephone directory is reviewed and adjusted to account for any changes. This directory also includes the latest emergency contact numbers for Draslovka, ensuring that all critical phone numbers remain accurate and current..

The Draslovka Global Response Plan for Off-site Incidents mandates that supply chain contractors report any significant cyanide-related incidents, as outlined in the ICMI's Definitions and Acronyms document, to Draslovka. Draslovka, in turn, is responsible for notifying the ICMI. Transportes FEMA Emergency Response Plan (ERP) includes this requirement. To date, no significant cyanide-related incidents requiring reporting to the ICMI have occurred.

### Transport Practice 3.4

*Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.*

- The operation is
- in full compliance with
  - in substantial compliance with      Transport Practice 3.4
  - not in compliance with

Draslovka has established procedures for remediation, encompassing recovery, neutralization, decontamination, and residue management. Appendix C of the Global Response Plan details measures for managing sodium cyanide spills, which include the recovery of solid cyanide and contaminated soil, followed by area decontamination using agents like sodium hypochlorite or hydrogen peroxide. Larger-scale remediation efforts are typically managed by insurers or government authorities. Draslovka ensures oversight of its transporters through periodic due diligence reviews, audits, and training sessions.

Transportes FEMA has its own emergency response plan, outlining remediation protocols. According to this plan, FEMA is responsible for securing the affected area and notifying management, the client Draslovka, and SETIQ. For spill scenarios, FEMA's insurance



provider arranges specialized companies to carry out remediation, although FEMA may handle small-scale clean-up efforts involving briquettes. In cases of significant spills, Civil Protection, through SETIQ, would oversee the remediation process. Regardless of the scenario, FEMA will adhere to Draslovka's prescribed procedures and instructions. Additionally, FEMA holds an insurance policy that provides coverage for spill incidents and other related risks.

Draslovka has banned the use of chemicals harmful to aquatic life for treating cyanide in surface water to all contractors in its supply chain. According to the Global Response Plan for Off-site Incidents, sodium hypochlorite, ferrous sulfate, and hydrogen peroxide are prohibited. Draslovka ensures compliance of subcontractors through annual due diligence reviews, audits, and training.

Transportes FEMA emergency response plan explicitly forbids the prohibition to use chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

### Transport Practice 3.5

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

The operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.5  
 not in compliance with

The Transportes FEMA emergency response plan mandates biannual reviews to ensure its effectiveness and relevance. According to the plan, updates must be undertaken at least once every two years or following audits, drills, or incidents. The emergency response plan, referred to as TRAC-PCO-0032 Sodium Cyanide Emergency Protocol and dated August 18, 2025, is currently in its first version and remains relatively new. As of the latest site audit, no revisions have been made to the plan yet.

The Transportes Fema Health and Safety Program has been established to carry out an annual cyanide emergency response plan. This program requires the yearly development of a drill schedule, incorporating tabletop or field drills. During the recent audit, Transportes Fema conducted a tabletop drill addressing scenarios such as cyanide spills (specifically small solid cyanide spills), with the participation of eleven workers. The auditor assessed the drill report and the participant register, followed by a post-drill meeting. No areas for improvement were identified during this review.

However, the auditor recommended performing a field cyanide mock drill involving cyanide spills with worker exposure. This is intended to identify improvement



opportunities and ensure the drills are more practical and beneficial. On an annual basis, Draslovka conducts spill and exposure exercises at its transloading facilities in San Luis Potosi and Hermosillo, including comprehensive reports and corrective actions following these activities. Draslovka also monitors its transport partners through annual due diligence reviews, internal audits, and training sessions. It is anticipated that Transportes Fema will be included in these drills moving forward.

ICMI asks the auditor to confirm that Transportes FEMA is fully informed of the requirement for transporters to participate in annual mock emergency drills. These drills should simulate transport-related cyanide exposures and releases, ensuring improved preparedness to handle real-life incidents effectively.. This requirement, as described in ICMI's [Guidance for Use of the Cyanide Transportation Verification Protocol](#) (2021), will be evaluated during the operation's next recertification audit.

Transportes FEMA has established an emergency response plan, which incorporates an assessment of its performance following implementation. The plan outlines that it should be reviewed and updated, particularly after incidents. However, during this period, the transporter confirmed that no cyanide-related incidents occurred that would require activating this provision

