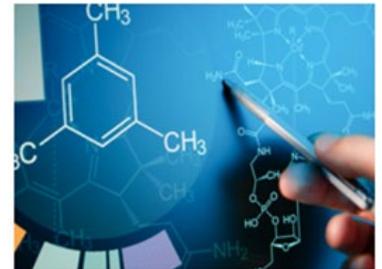


ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

Draslovka a.s. – Global Ocean Supply Chain

2021 Re-Certification Audit



Draslovka

Submitted to:

The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

www.mss-team.com



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Operation General Information

Name and location of Operation:	Draslovka a.s. – Ocean Supply Chain Wilmington, Delaware USA
Names and contact information for this Supply Chain:	Joaquín Corres Barragán Customer Facing Technologies Manager Draslovka Mining Solutions Email: Joaquin.Corres@draslovka.com

Supply Chain Description

The Draslovka a.s. (“Draslovka”) Mining Solutions Global Ocean Supply Chain was assessed during this audit. As of December 1, 2021, Draslovka completed the acquisition of the Mining Solutions business from The Chemours Company (“Chemours”). Draslovka is a CN-based specialty chemicals company producing many products in addition to sodium cyanide, including next generation fumigants and biocides.

While this audit of the Global Ocean Supply Chain was performed when the Mining Solutions business was still owned by Chemours, the Cyanide Code audit reports and re-certification process will not be finalized until early 2022, after the sale of the operation to Draslovka. The Draslovka company name has therefore been used throughout this audit report. Draslovka has been a Cyanide Code Signatory since March 2011 and Chemours was a signatory starting in November 2005. The operation under its new ownership continues to be committed to maintaining Cyanide Code compliance and fulfilling ICMI certification requirements and obligations under the Cyanide Code. According to Draslovka personnel, all systems evaluated during this audit remain unchanged. Only the ownership of the organization has changed.

Solid sodium cyanide for use in the gold mining sector is manufactured at the Draslovka Memphis, Tennessee plant, which is located just outside of Memphis in Woodstock, Tennessee. The Global Ocean Supply Chain is used for shipments from the Memphis Plant that go by rail and then by ocean carrier. The results of the rail and barge audit and associated due diligence evaluations are contained in a separate report.

Draslovka contracts with Ocean Carriers to transport their products from the Memphis Plant to international ports. The Ocean Carriers determine the U.S. ports of departure and manage and control all aspects of the rail movements from Memphis to the U.S. ports. Pursuant to their agreements with Draslovka, the Ocean Carriers identified in this report select rail carriers that comply with applicable environmental, health, safety, and security regulations which were determined through Due Diligence evaluation to be equivalent to ICMI Cyanide Code requirements. The rail segments between Memphis and U.S. ports were included in the scope of this re-certification audit. U.S./Canada rail segments used by Draslovka for routes other than those from its Memphis plant to U.S. ports are contracted and controlled directly by Draslovka and are included in a separate supply chain and certification audit report.

Draslovka Global Ocean Supply Chain
Name of Supply Chain


Signature of Lead Auditor

December 30, 2021
Date

Global Ocean Supply Chain – All global ocean moves of sodium cyanide that originate in the United States are within the scope of this re-certification audit. The Draslovka processes used to manage the ocean transport of its products were evaluated through interview, a review of process descriptions, company standards, policies, shipping records, and due diligence records. In 2021, Draslovka refreshed information and confirmed the accuracy of the due diligence data provided by the carriers. The results of the due diligence evaluations of five (5) ocean carriers are contained within this report. The five ocean carriers for which due diligence investigations were performed by Draslovka are:

1. Hamburg Sud
2. Maersk / Sealand
3. Mediterranean Shipping Co. (MSC)
4. ONE Line
5. Hapag Lloyd

The Due Diligence Investigations were also conducted for U.S. and international ports in use at the time of the audit. Records were sampled to confirm that Draslovka had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by Draslovka for hazardous material shipments.

At the time of the audit, the following ports were in use by Draslovka for sodium cyanide shipments to gold mine customers:

Name of Port	Country
Angamos (Mejillones)	Chile
Antofagasta	Chile
Arica	Chile
Balboa	Panama
Becancour, Quebec	Canada
Belem (Vila do Conde)	Brazil
Buenos Aires	Argentina
Callao	Peru
Colon	Panama
Corinto	Nicaragua
Cortes	Honduras
Deseado	Argentina
Everglades – Ft. Lauderdale	United States
Guayaquil	Ecuador
Iquique	Chile
Kingston	Jamaica
Long Beach, CA	United States
Los Angeles, CA	United States

Name of Port	Country
Manzanillo	Mexico
Miami, FL	United States
Montreal	Canada
New Orleans, LA	United States
Punta Arenas	Chile
Quetzal	Guatemala
Rio Haina	Dominican Republic
Salvador	Brazil
San Antonio	Chile
Santos	Brazil
Santo Tomas	Guatemala
Seattle, WA	United States
San Pedro, CA	United States
Savannah, GA	United States
Valparaiso	Chile
Veracruz	Mexico
Zarate	Argentina

Draslovka Global Ocean Supply Chain
Name of Supply Chain


Signature of Lead Auditor

December 30, 2021
Date

Audit Implementation and Conclusions

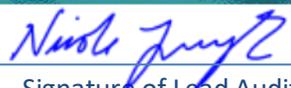
The re-certification audit of Draslovka ocean supply chain management was held on August 11, 2021.

The on-site portion of the audit was performed at the Corporate Procurement building in Wilmington, Delaware – USA. The audit was performed by an independent third-party auditor who is pre-approved by the ICMI as a Lead Auditor for all types of Cyanide Code audits and as a technical expert for Cyanide Code audits of cyanide transportation and production operations.

The re-certification audit of Draslovka Global Ocean supply chain management operations was conducted on-site with additional reviews of due diligence information following the on-site audit activity. The supply chain management processes and the due diligence reviews of ocean carriers, ports, and rail partners utilized by the ocean carriers were conducted in accordance with the agreed upon audit plan and due diligence documentation requirements.

Cyanide transportation management practices for the Draslovka ocean carrier and rail management organizations were evaluated against the Cyanide Code requirements documented in the ICMI Cyanide Code, ICMI Cyanide Code Transportation Protocol, and the ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol. Draslovka internal Standards, Policies, Practices, and Procedures regarding the management of the Cyanide Transportation Supply Chain were reviewed. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at Draslovka. Additionally, records regarding incident tracking, port evaluations, shipment tracking, cargo labeling practices, shipping documentation, and emergency response records were randomly sampled and found to be acceptable. Confirmation was made that each port included in this report underwent an on-site due diligence evaluation upon initial use and a refresh of due diligence information by Draslovka personnel in 2021.

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Name of Supply Chain


Signature of Lead Auditor

December 30, 2021
Date

Auditor's Finding

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

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

The audit team 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 cyanide-related distribution and transportation activities are in **FULL COMPLIANCE** with International Cyanide Management Code requirements.

Compliance Statement

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

Auditor Information

Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Date of Audit:	August 11, 2021

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 Global Ocean Supply Chain



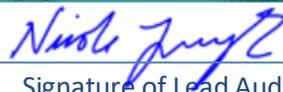
December 30, 2021

Name of Supply Chain

Signature of Lead Auditor

Date

Draslovka Global Ocean Supply Chain



December 30, 2021

Name of Supply Chain

Signature of Lead Auditor

Date

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.

Draslovka maintains formal standards, policies, guidelines, and procedures for ensuring Distribution Safety. Standards exist for Incident Prevention, Emergency Response, Transportation Risk Assessment, Distribution Regulatory Compliance, and Training, and Distribution Handling & Storage.

Draslovka initially qualifies a new customer for sodium cyanide, they follow a standard practice which is called the "First Order Process". Regional Mining Solutions Field Technical Consultants evaluate the new customer for their ability to safely use and store material and they evaluate the possible routes that can be used to transport the cyanide from Draslovka to the customer site. This evaluation of the route includes consideration of population densities, infrastructure issues, pitch and grade of roads, and prevalence and proximity of water bodies. The route evaluation includes an evaluation of all portions of the route including rail transport, origination and destination rail yards, ocean carrier transport, ports, and barges, when applicable. Draslovka generally chooses shorter routes that do not go through population centers or multiple interchange points when possible. Any risks associated with the route used to bring cyanide from Draslovka to a customer are evaluated as part of the First Order Process. The route assessment is performed by the Field Technical Consultant function within the Mining Solutions Business. Any necessary risk-mitigation measures are identified and defined during this First Order Process.

Records were available to show that ICMI Cyanide Code Due Diligence evaluations were conducted for all ocean carriers, all ports, and railroads that are used by the ocean carriers to transport the product while it is under their possession. Draslovka is not involved in the determination of the final marine routes used by the ocean carriers.

Routes are re-evaluated periodically, usually during customer visits. Draslovka has a very formal Product Stewardship Review process in which all aspects of cyanide product stewardship (labeling, product trail, use or transportation incidents, SDS, etc.) are reviewed at least every three years.

Draslovka obtains necessary governmental approvals and export / import licenses for international shipments. Draslovka has concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist ports regarding security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

Draslovka maintains very close relationships with its transportation partners on topics of safety. The primary risks with the ocean transportation supply chain relate to the possibility of losing track of a shipment due to a trans-shipment or other factors, or the risk of having a container opened en-route by a

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Name of Supply Chain


Signature of Lead Auditor

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Date

person who has not been trained in cyanide safety. The overall selection of the routing for shipments gives very strong preference to routing that does not involve a trans-shipment step (transferring the shipment from one carrier to another enroute). In addition to the care taken to avoid trans-shipment situations in the routing process, Draslovka contracts with CLX, a freight forwarding company to arrange and then track shipments closely. Information regarding the Draslovka ability to track ocean shipments was sampled during the audit and was found to be suitable for mitigating the risk of losing track of a specific shipment. In order to reduce the chance that an unauthorized or untrained person opens an inter-modal container, the containers are sealed. Information on the shipping records was appropriate and no problems were evident.

Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.1
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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.

This requirement does not apply to the Draslovka area of responsibility within this supply chain. Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:	<input checked="" type="checkbox"/> In Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.2
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Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

Inter-modal containers used for international shipments are owned and controlled by the ocean carriers that will carry the containers to international destinations. Confirmation was made during the audit and due diligence investigations that container maximum allowable weights are well above the maximum weight that is packed into the containers.

Draslovka ensures authorized packaging is used for the solid sodium cyanide. Package specifications were

Draslovka Global Ocean Supply Chain		December 30, 2021
Name of Supply Chain	Signature of Lead Auditor	Date

reviewed and were found to be compliant. The LSI packaging operation was most recently audited as part of the Draslovka Production Multi-Site Cyanide Code Certification in 2019. LSI checklists and procedures require an inspection of the cargo and containers to ensure that all equipment is deemed to be safe for transport. The loading procedures and sample of filled out loading checklists for the loading of cyanide were evaluated and were found to be appropriate. The shipments of bulk and semi-bulk packages in inter-modal containers are standard weights. Standard blocking and bracing configurations are used. Shipping paperwork was reviewed to confirm that shipment weights were consistent and acceptable.

Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:	<input checked="" type="checkbox"/> In Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.3
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Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.

Draslovka ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during the audit and were found to be compliant. The Draslovka packaging operation was audited and certified to the ICMI Cyanide Code using the Production Protocol in 2019.

All documentation (procedures and checklists) requires proper placarding (all 4 sides) to be confirmed prior to the containers being released. Memphis Plant and LSI operational procedures reviewed during the 2019 Production Re-certification audit required the International Maritime Organization (IMO) marine pollutant signage to be posted on the containers.

Intermodal Cartage employees at the Draslovka / LSI packaging facility transport the inter-modal containers away from Memphis, TN. During the re-certification audit of this operation in 2021, observations were made that drivers conduct a pre-trip inspection prior to departure. Mechanical defects are called to the attention of the on-site mechanic. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site.

Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.4
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Name of Supply Chain


Signature of Lead Auditor

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Date

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.

Draslovka ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance. The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable EHS regulations and have “organized safety programs.”

Current carrier contracts were reviewed during the audit and this standard clause appears in the ocean carrier contract. Each carrier was asked for information regarding fulfillment of Cyanide Code requirements using a customized ICMI transportation protocol. The Draslovka Ocean Carrier contracts require that all transportation is conducted in accordance with all regulatory requirements. This would include U.S. Department of Transportation and IMDG requirements. Responses and information provided by all carriers was deemed to be appropriate by the 3rd-party auditor.

The ocean routes are chosen by the ocean carriers. The ports are evaluated by the Mining Solutions Field Technical Consultants. Records were available to show that all ports used in this supply chain have undergone a Due Diligence review. Shipping lanes and all ports used in this supply chain were identified during the audit. The U.S. Regional Mining Solutions Field Technical Consultant reported that U.S. ports in use at the time of the audit had all been contacted to inquire about emergency response capabilities, environmental policies, security practices, and adherence to Maritime Transportation Security Act requirements. Draslovka has also concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist ports regarding security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

The Draslovka packaging specifications were reviewed as part of the audit and were found to be conformant to the packaging requirements of the IMO DG Code. Packaging reviewed during the 2019 Cyanide Code production audit and the 2021 transportation supply chain audits of Empire Express and IMCG was appropriately marked and was found to be compliant with Chapter 5.2 of the IMO DG Code requirements.

Loaded inter-modal containers were evaluated and were found to be marked and placarded in accordance with the IMO DG Code during the 2021 audit of Draslovka transportation partner IMCG.

Shipping documents were reviewed for a sample of cyanide shipments from the re-certification period for each ocean carrier used in this supply chain. All information required by the IMO DG Code is required as standard practice on Draslovka shipping paperwork. The container packing certificates from shipments during the re-certification period were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMO DG Code requirements.

Draslovka maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements (records including valid SOLAS certificates). Draslovka contractually requires the carriers to maintain this information. The ocean carriers confirmed to Draslovka that they have cyanide emergency response information available on board each

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Date

vessel.

Draslovka confirms that ocean carriers comply with stowage and separation requirements of Part 7 of the DG Code as part of its due diligence review process. Records were available for review during the audit.

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.

Draslovka works together with its freight forwarder CLX to track shipments using a secure web-based shipment tracking system. Appropriate action is taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that location can always be confirmed. Draslovka has access to “real-time” information through the CLX export service provider portal regarding the location and status of its shipments of cyanide. Shipping paperwork was reviewed and was found to be conformant to Code requirements, including chain of custody requirements.

The following documentation is used to track inventory and movement of cyanide: bills of lading and shipping papers indicating the number of packages and amount of material. The abovementioned documents were reviewed during the audit. Ocean carriers reported that they maintain databases with SDS information for the products they carry.

Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:

- in Full Compliance with
 In Substantial Compliance with
 Not in Compliance with
- Standard of Practice 1.6

Draslovka Global Ocean Supply Chain
Name of Supply Chain

Nicole Jung
Signature of Lead Auditor

December 30, 2021
Date

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.

This requirement does not apply to the Draslovka area of responsibility within this supply chain.

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.

Draslovka has several key documents that were reviewed as part of this audit: 1) Mining Solutions Global Emergency Response Plan; and 2) Transportation Emergency Information fact sheet for Draslovka Solid (Sodium or Potassium) Cyanide. Together, the documents provide detailed plans, procedures and information to address all ICMI Cyanide Code emergency response requirements, including transportation related emergencies. The Transportation Emergency Information fact sheet has quick, but complete information that has been seen in use during transportation activities observed during previous Cyanide Code audits. The Transportation Emergency Information fact sheet is designed to address solid briquettes.

The Draslovka plans are more general and universally applicable to all types of emergencies. Professional emergency responders together with technical guidance from Draslovka would be responsible for addressing issues involving the way in which the structure of the vessel should be managed after an emergency. The response plans describe the different levels of response actions for anticipated emergency situations. The Mining Solutions Global Emergency Response Plan describes the steps that are to be taken by Cyanide Hot Line and other Cyanides Business personnel. All of the plans clearly outline the roles and responsibilities of external responders.

The operation is:

- in Full Compliance with
 In Substantial Compliance with
 Not in Compliance with
- Standard of Practice 3.1

Draslovka Global Ocean Supply Chain
Name of Supply Chain


Signature of Lead Auditor

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Date

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

The roles and responsibilities of relevant Draslovka personnel are clearly described in the Transportation Emergency Information fact sheet and the Mining Solutions Global Emergency Response Plan.

Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 3.2
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Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

The notification procedures are described in the Mining Solutions Global Emergency Response Plan reviewed by the Auditor. Emergency contact information is contained in the Plan and the Transportation Emergency Information fact sheet.

The Mining Solutions Global Emergency Response Plan requires procedural review and reauthorization at least every three years. Drills are conducted on an annual basis to ensure notification and reporting procedures are kept current. Appendix B to the Mining Solutions Global Emergency Response Plan requires the Mining Solutions Global Emergency Response Plan Phone List to be checked at least annually. The Mining Solutions Global Emergency Response Plan including Appendix B was last updated in 2021.

The Mining Solutions Global Emergency Response Plan requires the notification of ICMI of any significant sodium cyanide incident within 24 hours. This supply chain has not had any cyanide incidents that would require reporting during the re-certification period.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 3.3
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Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional

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Name of Supply Chain	Signature of Lead Auditor	Date

hazards of cyanidreatment chemicals.

Appendix C of the Mining Solutions Global Emergency Response Plan, entitled Sodium Cyanide Spill Requirements, details immediate actions, cleanup and disposal procedures, and first-aid actions. All aspects of recovery and neutralization are addressed. Appendix C also specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water.

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.

According to the Mining Solutions Global Emergency Response Plan, emergency plans are checked at least every three years and notification numbers are checked at least annually. The Mining Solutions Global Emergency Response Plan and the Appendix B phone list were last updated in 2021.

According to the Mining Solutions Global Emergency Response Plan, the plan is to be tested by conducting drills at least annually. If an actual emergency response event occurs, an evaluation of the actual response may be used in lieu of an emergency response drill. The Mining Solutions Global Emergency Response Plan requires drills to be documented and improvement actions tracked. Several drill critiques from the re-certification period were available for review. Due to the pandemic, there were no drills conducted in 2020. This situation was accepted by the auditor and no further actions were deemed necessary.

The operation is:

in Full Compliance with

In Substantial Compliance with

Not in Compliance with

Standard of Practice 3.5

Draslovka Global Ocean Supply Chain
Name of Supply Chain


Signature of Lead Auditor

December 30, 2021
Date

Ocean Carrier and Port Due Diligence Investigation Results

All global ocean moves of sodium cyanide that originate in the United States are within the scope of this audit of the Draslovka processes used to manage the ocean transport of its products. The results of the due diligence evaluations of five (5) ocean carriers are also contained within this report. The five ocean carriers for which due diligence investigations were performed are:

1. Hamburg Sud
2. Maersk / Sealand
3. Mediterranean Shipping Co. (MSC)
4. ONE Line
5. Hapag Lloyd

The Due Diligence Investigations were conducted for U.S. and international ports in use at the time of the audit. Records were sampled to confirm that Draslovka had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by Draslovka for hazardous material shipments. The due diligence reviews of all entities within the supply chain were conducted after the on-site portion of the evaluation. The following ports are used by Draslovka for sodium cyanide shipments to gold mine customers:

Name of Port	Country
Angamos (Mejillones)	Chile
Antofagasta	Chile
Arica	Chile
Balboa	Panama
Becancour, Quebec	Canada
Belem (Vila do Conde)	Brazil
Buenos Aires	Argentina
Callao	Peru
Colon	Panama
Corinto	Nicaragua
Cortes	Honduras
Deseado	Argentina
Everglades – Ft. Lauderdale	United States
Guayaquil	Ecuador
Iquique	Chile
Kingston	Jamaica
Long Beach, CA	United States
Los Angeles, CA	United States

Name of Port	Country
Manzanillo	Mexico
Miami, FL	United States
Montreal	Canada
New Orleans, LA	United States
Punta Arenas	Chile
Quetzal	Guatemala
Rio Haina	Dominican Republic
Salvador	Brazil
San Antonio	Chile
Santos	Brazil
Santo Tomas	Guatemala
Seattle, WA	United States
San Pedro, CA	United States
Savannah, GA	United States
Valparaiso	Chile
Veracruz	Mexico
Zarate	Argentina

Draslovka Global Ocean Supply Chain
Name of Supply Chain


Signature of Lead Auditor

December 30, 2021
Date

Ocean Carrier and Port Background Information

Draslovka ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance.

Draslovka contracts with Ocean Carriers to transport their products from the Memphis Plant to international ports. The Ocean Carriers determine the U.S. ports of departure and manage and control all aspects of the rail movements from Memphis to the U.S. ports. Pursuant to their agreements with Draslovka, the Ocean Carriers identified in this report select rail carriers that comply with applicable environmental, health, safety, and security regulations which were determined through Due Diligence evaluation to be equivalent to ICMI Cyanide Code requirements. The rail segments between Memphis and U.S. ports are therefore also included in the scope of this audit. U.S./Canada rail segments used by Draslovka for routes other than those from its Memphis plant to U.S. ports are contracted and controlled directly by Draslovka and are included in a separate supply chain and certification audit report.

The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable regulations and have “organized safety programs.” Contracts were reviewed during the audit and this standard clause appears in Article 21 of the ocean carrier contract.

As part of the Draslovka due diligence effort, each of the six ocean carriers was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements using a customized ICMI transportation protocol. The results from these evaluations were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that each carrier is authorized for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid.

In addition to the Draslovka effort to ensure that ICMI Cyanide Code requirements are fulfilled, there are many agencies chartered with the task of confirming that shipping is conducted in a safe and secure manner. One such organization is the International Maritime Organization (IMO). The IMO was established in Geneva in 1948 and it currently headquartered in London, United Kingdom. The IMO is a specialized agency of the United Nations. The IMO's primary purpose is to develop and maintain a comprehensive regulatory framework for shipping. The IMO regulates practices associated with safety, environmental concerns, legal matters, technical co-operation, maritime security and the efficiency of shipping.

One initiative of the IMO is the International Convention for the Safety of Life at Sea (SOLAS), which was enacted in 1974. Records were available for each of the six ocean carriers noted in this report to show that they had successfully passed a SOLAS audit and that they each maintained valid SOLAS certificates. According to information reviewed during the due diligence investigation, the provisions of SOLAS include: fire protection, life-saving equipment, radio communications, safety of navigation, transportation of dangerous goods, management of safe operations of ships, and maritime security.

Additionally, Maersk participates in the voluntary Chemical Distribution Institute – Marine Packed Cargo program (CDI-mpc). Carriers in this program undergo a management systems safety audit using the CDI-mpc protocols that were created in cooperation with the United States American Chemical Council under

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its Responsible Care® initiatives. The CDI-mpc certificates are issues to individual ships. Maersk provided a number of these certificates of examples. All certificates showed that ships had been reviewed for safe operations and adherence to best chemical management practices.

With regard to port safety and security, new amendments to the SOLAS Convention were enacted in 2002. These amendments gave rise to the International Ship and Port Facility Security (ISPS) Code, which went into effect on 1 July 2004. The concept of the code is to provide layered and redundant defenses against smuggling, terrorism, piracy, stowaways, etc. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans. In the United States the Port Facility Security Plans are filed with, and monitored by, the United States Coast Guard (the U.S. authority with jurisdiction over U.S. Ports).

The ocean routes are chosen by the ocean carriers. The destination ports are evaluated by the Draslovka Regional Mining Solutions Field Technical Consultant. Part of the evaluation prior to the first shipment of product is an evaluation of the port. The Mining Solutions Business Regional Field Technical Consultants and the Global Product Stewardship Manager were interviewed as part of this evaluation. Each U.S. and international port and each ocean carrier within the scope of this report underwent a due diligence evaluation to confirm compliance with ICMI Cyanide Code requirements. Site evaluation reports were available for each of the ports used by Draslovka for the global ocean transport of cyanide. Mainline and short-line railroads used by the ocean carriers were also included in the Due Diligence evaluations.

Reviews and investigations included a review of emergency response capabilities, environmental policies, security practices, and adherence to Maritime Transportation Security Act requirements. Draslovka has also concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist U.S. ports regarding security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

Ocean Carrier Due Diligence Reviews:

1. Hamburg Sud

As part of the Draslovka due diligence effort, Hamburg Sud was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements. The results from this evaluation were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that Hamburg Sud is an authorized carrier for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid. Hamburg Sud also reported that it maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis.

2. Maersk / Sealand

As part of the Draslovka due diligence effort, Maersk was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements. The results from this evaluation were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed

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that Maersk is an authorized carrier for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid. Maersk also reported that it maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis. Additionally, Maersk participates in the voluntary Chemical Distribution Institute – Marine Packed Cargo program (CDI-mpc). Carriers in this program undergo a management systems safety audit using the CDI-mpc protocols that were created in cooperation with the United States American Chemical Council under its Responsible Care® initiatives. The DCI-mpc certificates are issued to individual ships. Maersk provided a number of these certificates of examples.

3. Mediterranean Shipping Co. (MSC)

As part of the Draslovka due diligence effort, MSC was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements. The results from this evaluation were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that MSC is an authorized carrier for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid. MSC also reported that it maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis.

4. ONE Line

As part of the Draslovka due diligence effort, ONE Line was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements. ONE Line reported that they are certified to ISO 14001, ISO 9001, and CT-PAT. The results from this evaluation were reviewed by the auditor and were found to be acceptable.

5. Hapag Lloyd

As part of the Draslovka due diligence effort, Hapag Lloyd was asked to perform a self-evaluation against the Cyanide Code Transportation Protocol requirements. Hapag Lloyd reported that they are certified to ISO 14001 and ISO 9001 as well as CT-PAT. This information was reviewed by the auditor and was found to be acceptable. Additionally, the auditor reviewed records on file that showed that Hapag Lloyd is an authorized carrier for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid. To be in legal compliance, Hapag Lloyd must also pass a 3rd-party Safety of Life at Sea audit and maintain current certification.

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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.

All Ocean Carriers:

Ocean routes are chosen by the ocean carriers and are regulated by a number of international organizations. When Draslovka plans a specific shipping route and chooses an ocean carrier, it evaluates safety performance, availability of direct shipping lanes, and authorizations for the transport of hazardous materials. All carriers undergo regular safety performance reviews. Information was reviewed in the Draslovka incident tracking database and was found to be acceptable.

According to interviews, Draslovka gives strong preference to ocean carriers that have been evaluated as part of a Cyanide Code due diligence investigation. Strong preference is also given to direct shipping lanes that do not involve a transfer of the cargo to a different ship. Ports that have been found to be acceptable are chosen based on proximity to end customer. Only in cases where a closer port has unacceptable infrastructure or security is the shipment routed using a longer over-the-road segment.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.1
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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.

All Ocean Carriers:

According to the responses to a questionnaire modeled after the Cyanide Code Transportation Protocol, all ocean carriers reported that they comply with IMO requirements and are in compliance with International Maritime Dangerous Goods (IMDG) and U.S. 49 Code of Federal Regulations (CFR) requirements concerning the transportation of the hazardous materials, including the training of employees.

Inter-modal moves once the shipment reaches the port are controlled by the ocean carrier. Ocean carriers self-reported to Draslovka that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are

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performed by appropriately licensed and qualified personnel.

The operation is:	<input checked="" type="checkbox"/> In Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.2
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Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

All Ocean Carriers:

Draslovka has contractual agreements with all of its ocean carriers that require that they comply with the regulations regarding the safe and appropriate shipping of dangerous goods. Part of the U.S. Department of Transportation Hazardous Materials Registration and Safety of Life at Sea regulatory processes addresses the use of safe and appropriate equipment.

Draslovka ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during this audit and were found to be compliant. LSI checklists and procedures require an inspection of the cargo and containers to ensure that all equipment is deemed to be safe for transport.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.3
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Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.

All Ocean Carriers:

Ocean carriers self-reported to Draslovka that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel.

In their response to the ICMI Cyanide Code due diligence protocol, ocean carriers reported that they have robust safety programs which are mandated by international laws. All safety programs apply to all employees.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.4
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Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.

All Ocean Carriers:

Draslovka ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance. The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable regulations and have “organized safety programs.” Contracts were reviewed during the audit and this standard clause appears in Article 21 of the ocean carrier contract. Each carrier was asked for information regarding fulfillment of Cyanide Code requirements using a customized ICMI transportation protocol. Responses and information provided by all carriers was deemed to be appropriate by the 3rd-party auditor.

The Draslovka Ocean Carrier contracts require that all transportation is conducted in accordance with all regulatory requirements. This includes U.S. Department of Transportation and IMDG requirements.

The ocean routes are chosen by the ocean carriers. The destination ports are evaluated by the Draslovka Regional Mining Solutions Field Technical Consultant. Part of the evaluation prior to the first shipment of product is an evaluation of the port. The Regional Mining Solutions Field Technical Consultants and the Global Product Stewardship Manager were interviewed to confirm this practice. Records were also reviewed and were found to be acceptable.

a) Is the cyanide shipment packaged as required by Part 4 of the IMO DG Code and according to the packaging instructions and packaging provisions indicated on the DG List?

The Draslovka packaging specifications were reviewed as part of the audit and were found to be conformant to the packaging requirements of the IMO DG Code.

b) Are cyanide packages marked as required by Section 5.2.1 of the IMO DG Code and according to the labeling requirements indicated on the DG List?

Packaging reviewed as part of the due diligence evaluation was appropriately marked and was found to be compliant with Chapter 5.2 of the IMO DG Code requirements.

c) Are cyanide packages labeled as required by Section 5.2.2 of the IMO DG Code and according to the labeling requirements indicated on the DG List?

Packaging reviewed during the 2019 Cyanide Code production audit and the 2021 transportation supply chain audits of Empire Express and IMCG. was appropriately marked and was found to be compliant with Chapter 5.2 of the IMO DG Code requirements.

d) If cyanide is shipped in cargo transport units, are the units placarded and marked as required by Chapter 5.3 of the IMO DG Code?

Loaded inter-modal containers were evaluated and were found to be marked and placarded in accordance

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with the IMO DG Code during the 2021 audits of Draslovka transportation partner IMCG.

e) Has a dangerous goods transport document been prepared with the information required under Chapter 5.4 of the DG Code?

Shipping documents were reviewed for a sample of cyanide shipments from the re-certification period for each ocean carrier used in this supply chain. All information required by the IMO DG Code is required as standard practice on Draslovka shipping paperwork.

f) If the cyanide is packed or loaded into a container, has a "container/vehicle packing certificate" been prepared meeting the requirements of Section 5.4.2 of the DG Code?

The container packing certificates from shipments during the re-certification period were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMO DG Code requirements.

g) Does the ship carrying the cyanide have a list or manifest identifying the presence and location of the cyanide or a detailed stowage plan including this information, as required under Section 5.4.3.1 of the DG Code?

Draslovka maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements (records including valid SOLAS certificates). Draslovka contractually requires the carriers to maintain this information. The ocean carriers confirmed to Draslovka that they have cyanide emergency response information available on board each vessel.

h) Does the ship carrying the cyanide have cyanide emergency response information, as required under Section 5.4.3.2 of the DG Code?

Draslovka maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements (records including valid SOLAS certificates). Draslovka contractually requires the carriers to maintain this information. The ocean carriers confirmed to Draslovka that they have cyanide emergency response information available on board each vessel.

i) Does the ship comply with the stowage and separation requirements of Part 7 of the DG Code?

Draslovka confirms that ocean carriers comply with stowage and separation requirements of Part 7 of the DG Code as part of its due diligence review process. Records were available for review during the audit.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 1.5
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Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.

All Ocean Carriers:

Ocean carriers reported that they have computer systems that are used for the tracking and management of all freight containers within their system. The management systems provide among other items the date, time, location, and carrier involved in the last interchange, transport action, or gate move. The Draslovka freight forwarder has access to this information via the internet web sites. Draslovka can request this information at any time.

The sodium cyanide shipments for this segment are containerized loads. All shipping containers are sealed. Shipping papers were reviewed. Auditors confirmed that seal numbers are recorded on the bills of lading. This enables personnel along any portion of the segment to confirm that the containers have not been opened.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with	
	<input type="checkbox"/> In Substantial Compliance with	Standard of Practice 1.6
	<input type="checkbox"/> Not in Compliance with	

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.

All Ocean Carriers:

Ocean carriers reported that during transport, the storage of cyanide both on land and on vessels is in accordance with the applicable stowage and segregation requirements in the IMDG and the Coast Guard 33 CFR regulations. The terminal must segregate containers similar to the segregation onboard vessels.

The packaging used for solid cyanide conforms to IMO and US DOT requirements.

Certifications and approvals were reviewed during the audit and confirmation was made through interviews that no packaging changes have occurred since then. As part of the ocean carrier due diligence audit, documentation was reviewed that confirmed that ocean carriers must contractually adhere to regulatory requirements and maintain formal safety programs. Additionally, safety checklists and seals are used by the Draslovka packaging facility after the containers are packed. The seal enables verification that the container was not opened during transit.

All Ports:

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Each U.S. and international port within the scope of this re-certification audit has been evaluated for its ability handle materials safely. The ports are confirmed to be secure with appropriate roadway or rail infrastructure into the port. Completed checklists showing port evaluations were reviewed during the audit and were found to be acceptable. Draslovka confirms due diligence information with ports every three years.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 2.1
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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.

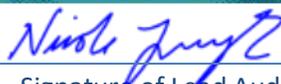
All Ocean Carriers:

Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. Draslovka provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. All ocean carriers provided information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 3.1
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Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

All Ocean Carriers:

Ocean carriers responded that they contract with professional emergency response contractors for landside emergencies. Onboard vessels, the emergency response would be conducted by trained crew members with shore side support and guidance.

Draslovka offers immediate technical assistance for any cyanide spill and offers emergency resources for spills that might occur near a Draslovka site. Draslovka contracts with CHEMTREC to ensure that appropriate notifications and emergency response is initiated if there is an incident.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 3.2
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Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

All Ocean Carriers:

Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. Draslovka provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. All of the ocean carriers provided information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 3.3
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Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

All Ocean Carriers:

Ocean carrier responses confirmed that they coordinate all cyanide incidents with the Draslovka cyanide team for the proper handling of the situation.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 3.4
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Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

All Ocean Carriers:

Draslovka Cyanide Hotline personnel are periodically involved in drills performed by sites and transportation partners.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. All ocean carriers provided information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

Draslovka cyanide safety meetings with its ocean and rail carriers also provide a forum for the discussion and updating of response procedures and expectations. As part of the ocean carrier safety programs, drills and exercises (not necessarily cyanide specific) are conducted to test response capabilities.

The operation is:	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> In Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Standard of Practice 3.5
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