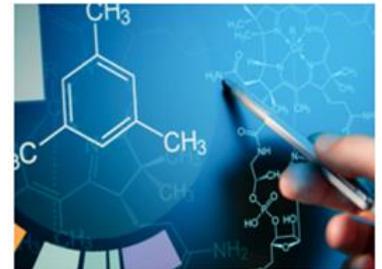


ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

Empire Express, Inc.

2021 Re-Certification Audit



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: | Empire Express, Inc. 999 Channel Avenue Memphis, TN 38106 |
| Names and contact information for this facility: | John Phillips Chief Operating Officer Phone (901) 942-3300 ext 114 john@empireexpress.com |

Operation Description

Empire Express has been an established trucking operation in Memphis, TN since 1985. The operation was audited and was found to be in full compliance to the ICMI Cyanide Code in 2010, 2013, 2017 and again this year. Empire Express is also a Responsible Care® Partner Company and has maintained a certified Responsible Care Management System® since 2008. Empire Express uses its management system to fulfill ICMI Cyanide Code and other environmental, safety, health, and security requirements and demonstrate its public commitment to operate in a safe, secure, and environmentally responsible manner.

Empire Express transports solid sodium cyanide that is loaded into dry van trailers or ISO tanks by the Cyanide Producer or its certified packaging operation, Lemm Services, Inc. (LSI) in Memphis, Tennessee, United States. Cyanide is transported from Memphis to several locations in the USA, Canada, and to the U.S./Mexico border. The Mexican shipments are transported to final destinations by a Mexican carrier that has also been certified as compliant with the ICMI Cyanide Code.

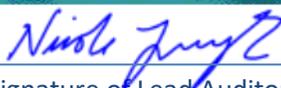
Empire Express is responsible for route determination, shipment tracking, truck inspections, preventive maintenance, training, safety program management, and emergency response planning. All operations were reviewed during the re-certification audit. The ICMI-approved Lead Auditor verified that Empire Express operations are in Full Compliance with ICMI Cyanide Code requirements for transporters.

Audit Implementation and Conclusions

This re-certification audit was conducted through on-site observations, reviews of records and procedures, and interviews with senior management, operations management, engineering, and environmental, health & safety (EH&S) staff. Empire Express personnel were involved in the audit. The auditor used the ICMI *Cyanide Transportation Verification Protocol* (2021 Revision) to evaluate International Cyanide Management Code (Cyanide Code) compliance.

Procedures, equipment condition and records were evaluated during this audit. The assessment was based

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on random samples of information and therefore deficiencies may exist which have not been identified. The depth to which records, and data were sampled was typical of an environmental, health and safety (EH&S) management system audit. Although legally required, records were sampled to evaluate Cyanide Code compliance, legal compliance with federal, regional, and local regulations was not part of the scope of this evaluation.

The audit was performed by an independent third-party auditor who fulfills all ICMI Cyanide Code Lead Auditor and Technical Auditor requirements for cyanide transportation operations.

All aspects of the cyanide operations were included in this Cyanide Code Re-Certification Audit. The operation was found to be in FULL COMPLIANCE with Cyanide Code Cyanide Transportation requirements.

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Auditor's Finding

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

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

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

The results of this re-certification audit demonstrate that the Empire Express cyanide-related transportation is in FULL COMPLIANCE with International Cyanide Management Code requirements.

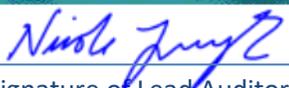
Compliance Statement

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

Auditor Information

| | |
|----------------------------------|---|
| Audit Company: | 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 18-19, 2021 |

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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.

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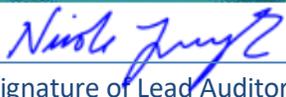
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Principles and Standards of Practice - Cyanide Transportation Verification Protocol

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.

The routes used to transport cyanide were reviewed with the Management Team and operations personnel during the audit. Empire Express uses computerized route planning software, PC Miler, and a documented procedure to determine routes. Computer-recommended routes are evaluated to determine if comparable routes would be available that would reduce the risks associated with proximity to high population densities, poor road infrastructure (sharp turns), pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather and resulting poor driving conditions.

The VP of Safety evaluates risks associated with routes when they are initially established. Routes are reviewed annually by Empire Express management and approved by the Shipper. Risks occasionally include the presence of blackout areas. Security risks associated with U.S./Mexico border deliveries continue to be managed with increased security measures and the use of designated "safe" truck stops.

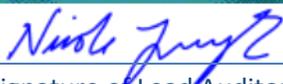
Driver feedback is obtained after each delivery. Routes are re-evaluated as necessary and at least once each year. Feedback from the drivers is considered during this process.

Community input regarding the transport of cyanide is incorporated into the route planning process through the use of routing software, PC Miler with HazMat, that indicates whether communities have restricted use of specific roadways for the transportation of hazardous materials. Additionally, the auditor observed other examples of route adjustment based on stakeholder (including mine sites) feedback to accommodate seasonal weather and road risk conditions.

Empire Express has a formalized security plan and theft avoidance procedures in place. The mine requires an escort along a portion of its route at specific times. Additional security devices are used for transport of drum containing trailers to Mexico.

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| 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 drivers have a U.S. DOT Class A Commercial Drivers License (CDL) with a Hazardous Materials endorsement. In addition, the Shipper has certain requirements regarding who may transport a cyanide load and Empire Express follows these requirements. Empire Express employs a computerized tracking system which blocks drivers from being assigned to loads for which they are not qualified or properly trained. The records for multiple drivers were reviewed. Drivers were interviewed and were found to have an appropriate level of knowledge and safety awareness.

Empire Express utilizes the McLeod Management System. The Operations department is only able to dispatch drivers on a cyanide load when the "CYN" credential is present. The McLeod credential is good for 1 year. The VP of Safety receives an email notification as a driver's certification is set to expire.

All drivers must complete training and testing provided by the Shipper prior to being allowed to move cyanide. Empire Express gives training at defined intervals to ensure that all personnel operating and handling cyanide transportation equipment execute their duties in a manner that minimizes the potential for cyanide releases and exposures. The training is carried out using videos, computer-based training, and classroom sessions. Internal training records for Memphis Terminal personnel were reviewed and found to be acceptable. Cyanide Safety training is given to each driver at orientation and is required again annually. Hazmat training is given annually as part of the employee annual review process.

The operation is: In full compliance with In substantial compliance with Not in compliance with Standard of Practice 1.2

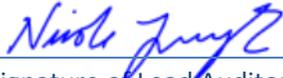
Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

Transportation equipment is designed by US manufacturer engineers to meet U.S. DOT weight rating standards. Gross Vehicle Weight Rating (GVWR) is certified by the manufacturer and documented on each vehicle with a label. Equipment labels were reviewed during the audit.

The procedure Equipment Maintenance Process is used to verify the adequacy of equipment for load bearing. Truck inspections and preventive maintenance actions are performed regularly (at least quarterly) to ensure the adequacy of equipment to carry the specified loads. Inspections are scheduled, tracked and documented. Records show that maintenance activities are being performed as planned.

Empire Express also inspects the tractor, trailers, and chassis as part of its "Safety Lane" process prior to dispatch. The adequacy of all equipment is confirmed regularly through pre-trip inspections by the drivers

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and shop inspections by mechanics during the Safety Lane process. Each time a truck comes to the Empire Express truck yard it has to go through the Safety Lane. This is a 24 point inspection on truck safety and maintenance items. The checklist is part of the Driver Policy and Procedure Manual that each driver receives.

The ISO tanks inspections are managed by the Shipper. Confirmation was made that all ISO tanks observed during the audit were within inspection dates.

Weight tolerances were confirmed through the review of records and placards on trailers. The Driver Handbook requires that drivers confirm the weight of their trucks by driving onto scales. A review of shipping papers confirmed that loads have not exceeded the truck/chassis capacity ratings. Additionally, a review of McLeod Enterprise Software records showed that there have been no weight violations during the re-certification period involving Empire Express vehicles transporting Cyanide.

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| 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.

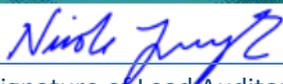
Trailers and ISO tanks are loaded by the shipper. The shipper uses a checklist to confirm that the blocking and bracing has been done properly. Each shipment is photographed by the shipper before a seal is applied to the trailer.

Empire Express drivers confirm that the load has been properly secured after the cargo has been loaded. Drivers are instructed to stop and call the Empire Express Safety office if there is a concern regarding shifting of the load.

Appropriate placards are displayed on all four sides of the transport vehicles. Drivers visually inspect containers prior to each movement. Equipment was observed during the audit as having the proper placarding on all sides of the trailers and interviews with drivers confirmed their understanding and actions. Pro Tread HazMat Training content provided to drivers was also reviewed.

Empire Express employs several mechanics full time who perform preventive maintenance on all transportation equipment at regular intervals. The maintenance frequency is determined by mileage driven and the results of previous inspections. Every trailer is "touched" at least every 90 days. Regular Safety Lane inspections are also performed at the terminal before each vehicle departs. These include checks of in-cab technology. Empire Express uses best practices with regard to the maintenance of equipment. The equipment is in excellent condition, as are the extensive equipment files.

The Safety Program includes limitations on drivers' hours in accordance with U.S. Federal Motor Carrier

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Safety Regulations (FMCSR). Drivers are informed of legal requirements and are encouraged to stop driving if they become too tired (empowerment). Electronic logs are used on each trip and drivers are monitored on a continuous basis to ensure compliance with regulations. The Driver Policy and Procedures Manual details how drivers are empowered and directed to pull over whenever weather, fatigue or other conditions make it unsafe to continue trip.

A drug abuse prevention program is in place. Pre-employment testing is required for all potential employees. The Driver Policy and Procedure Manual details the company drug and alcohol policy. Drivers are subject to random sampling quarterly.

The operation is: In full compliance with Standard of Practice 1.4
 In substantial compliance with
 Not in compliance with

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

Empire Express does not transport cyanide by sea, nor do they deliver intermodal containers to ports. This requirement does not apply to the operation.

The operation is: In full compliance with Standard of Practice 1.5
 In substantial compliance with
 Not in compliance with

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.

Dispatchers maintain contact with drivers and are kept updated as to the location of the trucks. Each truck has GPS signaling and a MobilComm communication system. The drivers also have cell phones. Empire Express uses GPS, MobilComm and cell phones to ensure that trucks are continuously tracked. If a truck or trailer is immobile for too long a period of time the system sends an alert and dispatch will check in with the driver. The equipment is in constant use each day. Problems with the equipment would become readily apparent. A communication equipment check is part of the regularly scheduled maintenance on the trucks. The equipment is also checked during the driver pre-trip inspections and when it is brought through the Safety Lane in the shop.

A risk assessment review of each route is conducted initially and annually and includes identification of blackout areas along transport routes. Blackout areas do not present a significant problem for the majority of routes given today's tracking technology. The information is also refreshed through driver feedback

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and the periodic review of routes. In the event that there is a blackout area, Empire Express has a procedure in place that is communicated to the driver as part of the dispatch process. Drivers are also trained on which routes have blackout areas and what requirements must be fulfilled to ensure safety and appropriate tracking of the shipment. Empire Express maintains Satellite Phones which are issued to the driver when a route with a blackout area is assigned. This negates the blackout issue on that route.

Empire Express uses a number of methods to ensure that trucks are continuously tracked using GPS. The MobilComm system in each cab includes ETA Out of Route alert. The drivers send a message upon leaving the shipper and contact the office again upon arrival at their destination. There are multiple touch points along the routes where the GPS system will automatically send position data. In addition, the units also have an emergency button on them which emails the VP of Safety.

Trailers and ISO tanks are sealed by the driver upon loading and are not opened by Empire Express. Drivers have shipping documentation including the Bill of Lading with them at all times during a shipment. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment are entered on the Bill of Lading by the shipper. Shipping records and U.S./Mexico customs records were reviewed and the seal numbers on containers and the weight of the shipment are confirmed at the point of transfer of custody. Drivers also have the sodium cyanide SDS, Transportation Emergency Sheets from the shipper, and Emergency Response Guidebook with them during deliveries.

The operation is: In full compliance with Standard of Practice 1.6
 In substantial compliance with
 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.

Empire Express provides short-term storage of loaded trailers when business demands require it. In order to be compliant with ICMI Cyanide Code requirements, Empire Express developed a policy and internal requirements for interim storage.

Signs are posted in the area of solid cyanide interim storage at the terminal and include statements that cyanide is present, and smoking, open flames, eating and drinking are not allowed in the area. Access to the storage area by unauthorized people is prohibited. The trailers are not opened and no personal protective equipment is necessary.

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Security on the lot includes fencing with barbed wire, cameras, razor wire, a yard that is manned 24/7, and an AI enabled electronic surveillance security system. Regular yard checks are performed by the Empire Director of Maintenance.

The designated cyanide storage area is separated from other areas to ensure that the cyanide is not stored next to incompatible materials. Empire Express exclusively stores cyanide outdoors in sealed original packaging in originally packed trailers to ensure adequate ventilation and prevent the build-up of hydrogen cyanide gas or dust.

The trailer itself and the packaging keep the material dry. The trailers are included in a regular inspection program, including integrity of each unit. There is a formal daily yard check which includes the placement of the materials and checking for any problems in the yard. There is also an informal daily yard check to ensure that materials are parked in the proper locations.

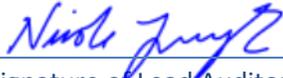
The only material temporarily stored at the truck yard is solid cyanide briquettes in ISO tanks, multiple layers of packaging in 1-ton Eco-Pak or wood box, or in returnable containers (FLO-BIN®) that are manufactured to the Department of Transportation (DOT) specifications within sealed trailers. Empire Express does not transport or store sodium cyanide solution.

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| 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.

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| Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases. |
| <p>Empire Express has a documented Emergency Response Procedure (ERP) for transportation accidents. Empire Express drivers are to secure the scene and make a number of notifications. The response notification plan is included in the Driver’s Manual.</p> <p>Empire Express only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, the type of trailer (dry van or ISO tank), and the roles of the different emergency responders are discussed in the planning information. Detailed information regarding the chemical and physical forms is on a fact sheet provided by the Shipper. This document is considered to be part of the emergency response plan and procedures and is kept in each</p> |

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truck during shipments.

Empire Express provides interim storage of trailers and ISO tanks of solid sodium cyanide. Empire Express prepared emergency response plans for potential releases that could occur at the storage area on the Empire Express terminal yard. Information about response actions, including notifications to offsite authorities was found to be complete. Additionally, identification of roles of outside responders has been addressed in emergency response procedures for terminal emergencies. Furthermore, Empire Express has conducted training on this procedure.

Empire Express has adequately considered interim storage in its emergency plan as described above.

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| 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.

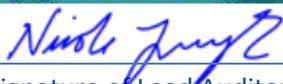
Training on the emergency response plan, including implementation of the emergency response plan, was given to all employees, terminal office, maintenance shop and drivers initially and then periodically thereafter. Refresher training on many topics is given annually, and all topics are reviewed at least every three years.

Empire Express drivers are to secure the scene and make a number of notifications. The information found in the current ERP as well as the Driver Policy and Procedure Manual was reviewed and found to be acceptable.

The emergency equipment list is part of the Driver's Manual and part of the training materials. The emergency response equipment is part of the pre-trip inspection process. The condition of the emergency response equipment is also checked by maintenance when the trucks go through the regular inspection process. The emergency response equipment was checked during the audit and was found to be complete.

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| 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.

Empire Express procedures detail the company's role in an emergency, which is strictly one of notification. The Shipper is immediately notified of any emergency via the Cyanide Hotline and would serve as a critical information point to advise on emergency response and remediation actions through the insurance company that Empire Express has on record. Additional notifications, such as to Chemtrec and to Empire Express dispatch are also made by the driver. Telephone numbers for hospitals, authorities, etc. were found to be up-to-date in the ERP.

The emergency procedures are reviewed at least annually, and as necessary. The last updates to the plan were done in 2021. Information was up-to-date and complete.

Emergency procedures include the requirement to notify ICMI if a significant cyanide incident occurs. There have been no significant cyanide incidents (spills or exposures) since the operation first started.

The operation is: In full compliance with In substantial compliance with Not in compliance with Standard of Practice 3.3

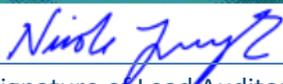
Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

Empire Express procedures detail the company's role in an emergency. During over the road transport, Empire Express employees notify the Shipper and others. There is a spill response procedure for the truck yard, but there is no surface water near the operation.

Empire Express has made arrangements for hazardous materials experts to remediate a spill onto ground or into water and to dispose of contaminated solids. The Shipper serves as a critical information point to advise on emergency response and remediation actions. The Shipper's emergency response plan would be used to manage a cyanide incident. The ERP details immediate actions, cleanup and disposal procedures, and first-aid actions and 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

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Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

The emergency procedures are reviewed every year and after mock drills. The last updates to the plan were done in 2021. Information was up-to-date and complete.

Empire Express conducts mock emergency drills to determine if response procedures are adequate, equipment is appropriate, and personnel are properly trained. Emergency drills were conducted by Empire Express in 2018, 2019, and 2020.

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| 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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Nicole Jung
Signature of Lead Auditor

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Date