SUMMARY AUDIT REPORT

Excellence Freights de México, S.A. de C.V.

Transport Operation

For The

International Cyanide Management Code

April 2021

BP Cyanide Auditors

SUMMARY AUDIT REPORT

Page

Content

SUMMARY AUDIT REPORT

Information on the audited operation

Name and location of Supply Chain Consignor	Excellence Freights de México, S.A. de C.V. S.A.
Name of Facility Owner:	Excellence Freights de México, S.A. de C.V. S.A.
Name of Facility Operator:	Excellence Freights de México, S.A. de C.V. S.A.
Name of Responsible Manager:	Enedino García Sánchez – Gerente de Aseguramiento de Calidad
Address:	Claveles #14, Col. Bello Horizonte
State/Province/Country:	Tultitlán 54948, México
Telephone/E-Mail:	T: +52 (55) 2789 2200; C: +52 (222) 358 3366
	Egarcia@idesa.com.mx

Location detail and description of operation

Excellence Freights de México, S.A. de C.V. is a company operating since 2007 specialized in the transport of petrochemical products, fuels and other hazardous materials, throughout the Mexican Republic. In occasion of the audit the transporter employees 218 drivers plus 60 administrative personnel. For the cyanide transport operation they have 5 trucks dedicated to this operation with 6 employees. The company holds the certification "*Responsabilidad Integral*".

The transporter currently operates one ground transport route in Mexico for cyanide: from the production facility Cyplus - IDESA in Coatzacoalcos, Veracruz, to the port of Salinas Cruz, Guajaca, in the Pacific Ocean coast, and eventually to mine sites. The distance to the port is 344 km, it´s an 8 to 9 hours' drive, including 2 authorized stops with the cyanide shipment.

The truck hauls two trailers, each with a cyanide shipment in 20 foot sea containers. The production facility loads each trailer with a 20 foot sea container with 20 Intermediate Bulk Containers (IBC) of 1,000 kg each one, the exact number of boxes placed in each container serves to prevent lateral movement of the boxes within the container. All containers are received locked and tagged. These tags are removed only at the destination site. Cyanide is delivered to the port in preference by two vehicles at the time, not in convoy.

Cyanide is handled in solid state in sea containers, they do not transport in isotanks. There is no interim cyanide storage facilities in the route operated by Excellence Freights de México, S.A. de C.V.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

SUMMARY AUDIT REPORT

Excellence Freights de México, S.A. de C.V. does not subcontract any transport operation. The transporter has designated a group of drivers and vehicles for the cyanide transport operations and has established a procedure to hire/designate personnel for these activities.

Auditor's Finding

This operation is

- ✓ in full compliance with — with the International Cyanide Management Code
- ☐ in substantial compliance with
- ☐ not in compliance with

This operation is in full compliance with the International Cyanide Management Code.

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle. Excellence Freights de México, S.A. de C.V. has experienced zero significant cyanide incidents during this 3-year recertification audit cycle.

Audit Company:	BP Cyanide Auditors SAC
Audit Team Leader and Technical auditor | Email:	Bruno Pizzorni | bpizzorni@cyanideauditor.com
Dates of Audit:	April 21 and 22, 2021

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, 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 verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the ICMI Cyanide Transportation Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

1. *TRANSPORT:*

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

Transport Practice 1.1

Select cyanide transport routes to minimize the potential for accidents and releases.

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

Excellence Freights de México, S.A. de C.V. has developed and implemented the procedure PAC-916 Identification, Evaluation and Selection of Routes to minimize the potential for accidents and releases or the potential impacts of accidents and releases during transport. According to the procedure, for routes evaluations, the company takes into account the following, among others:
-- Schedule restriction
- Overnight time, food, sanitary and personal grooming
- Estimated time to complete the route
- Total mileage of the route
- Road sections and road type indicating risk levels
- Urban areas and population density
- Features and conditions of the road section
- Pitch and grade
- Water or fog concentration zones

Based on the route assessment, it is discarded the route that presents the highest level of risk to the transit of the units.
The auditor reviewed reports of the annual routes evaluations performed for the cyanide transport operation between the production facility at Coatzacoalcos to the port of shipment at Puerto Salinas covering the recertification period, finding them in compliance.
The procedure for routes identification and evaluation includes steps to identify hazards and to evaluate the routes, requiring that control measures must be stablished to control the risks identified.

Measures are also taken to treat risks identified as high or intolerable in order to minimize the possibility of these occurring. The annual route evaluation reviewed by the auditor included these risk analysis, finding them it in compliance with the Code requirements.

The procedure also states the routes reevaluation must be performed under the same initial analysis methodology and its updating will be carried out annually or as needed and that drivers must inform them

of any situation that may cause risk or deviation on the route, whether temporary or definitive. Based on the feedback received, the Monitoring and Traffic Supervisor must conduct a review of the information in conjunction with the Security Headquarters to manage the route update process following the criteria set out in this procedure, and inform the parties involved. The auditor confirmed this is implemented by review of the route reevaluations performed during the recertification period.

To address the risks identified with the selected routes, the transporter prepares the Route Instruction Letter or updates, taking into account the risks evaluation, the information collected during the trip and the specifications made by the customer for the transits of units such as authorized driving hours, schedule restriction, overnight time, food, sanitary and personal grooming, brief description of the route, road sections and road type indicating risk levels, speed controls, authorized stops, fuel loading places, specifications or special indications for the operator and the map of the path to follow, among other control measures.

The auditor reviewed examples of the Route Instruction Letters used by the drivers during the cyanide transport operation between Coatzacoalcos to Puerto Salinas.

The transporter seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. As required in the procedure for routes evaluations, during the route assessment process, the Director of Logistics and/or Land Transport Manager or to whom they delegate responsibility, should consult with the necessary communities, stakeholders and government agencies in order to obtain feedback that allows Excellence Freights de México, S.A. de C.V. to assess possible routes more accurately, this consultation and comments should be supported by the necessary evidence, be it a minute, memorandum.

The auditor reviewed records of the stakeholder outreach meetings held in March 2018, 2019 and in February 2020 with SEMEDIS (Medical Services), Red Cross, Fire Department, the Cyplus-Idesa production plant and Excellence Freights de México, S.A. de C.V. This within the framework of CLAM (Local Committee for Mutual Aid). Also reviewed record of the meeting held in por Salinas Santa Cruz in occasion of the initial route evaluation previous to the first cyanide shipment, held with SEDENA *(Secretaría de la Defensa Nacional),* which involves the Mexican navy and army.

The transporter do not use convoys or escorts for safety and security. Identified risks are controlled by establishing a serial of measures such as only diurnal driving hours, communication systems, GPS tracking, which includes a panic button, places to stop, speed control, among others. Drivers use Waze application allowing them monitoring the route with the required anticipation.

For example, to determine a safe stop, the site must meet the following requirements:

- Place on flat ground that does not generate any inclination to the unit or its trailer, in order to prevent damage or spillage of the product, packaging or packaging.
- Have security measures, preferably CCTV, guards or custodians.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

- Have access and exit preferably only for a road, avoiding places that connect to gaps or roads.
- Must have a security fence.
- Have enough space so that the unit can leave smoothly.
- Preferably have room for food or convenience store, toilets, showers and fuel load.

The transporter do advises external responders, medical facilities and communities of their roles and mutual aid during an emergency response. The auditor reviewed records of the stakeholder outreach meetings held in March 2018, 2019 and in February 2020 with SEMEDIS (Medical Services), Red Cross, Fire Department, the Cyplus-Idesa production plant and Excellence Freights de México, S.A. de C.V.

The transporter does not subcontract any portion of their cyanide transportation operations. All transport vehicles are owned by Excellence Freights de México, S.A. de C.V. and the drivers are employees of the transport company. The International Cyanide Management Code (ICMC) requirements pertaining to subcontractors are, therefore, not applicable to the organization.

Transport Practice 1.2

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

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

The transporter works with qualified and licensed drivers. To be able to qualify as a driver in Excellence Freights de México, S.A. de C.V. they must pass the company´s evaluation as for experience and test of driving, police records and medical examination, among others. According to the PAC-821 Contracting Procedure and by interview by the Human Resources Manager, the specifications for contracting drivers include those who will transport sodium cyanide are stated in the procedure. The transporter requires previous work referrals, they visit the driver´s home, assess the medical, pass through sensometric evaluation, toxicological and psychological tests. A minimum of 3 years' experience in handling hazardous materials (hazmat) is required, also, the driver is subject to an internal driving test. The drivers have a type E driver's license, which authorize them to transport hazmat. The auditor reviewed the licenses of 3 of the drivers, confirming they were type E and that were current.

Operational training on safe cyanide handling is given upon hire and there is a skills evaluation process to ensure that drivers are competent to perform their job and to drive the designated route prior to their first delivery. Safety related training is given at defined intervals to ensure that all personnel

operating cyanide transportation equipment can perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. The auditor reviewed training registers provided to the drivers by external contractors during this recertification period. The records were found to be acceptable.

The transporter does not subcontract any portion of their cyanide transportation operations. All transport vehicles are owned by Excellence Freights de México, S.A. de C.V. and the drivers are employees of the transport company. The International Cyanide Management Code (ICMC) requirements pertaining to subcontractors are, therefore, not applicable to the organization.

Transport Practice 1.3

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

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

Excellence Freights de México, S.A. de C.V. vehicles are adequate and are maintained to operate within the loads to handle. The transporter has 5 vehicles designated to the cyanide transport operation, currently 4 are in use and one as backup. To assign these vehicles for the cyanide transport operation, the transporter performed a technical study to determine the characteristics of the vehicle needed, taking into account the engine power, haul and cargo capacity, torque and transmission capacity, among others.

The carrier has developed and implemented a procedure with the aim of having the necessary records to identify the load. The procedure includes the process of providing the unit according to the load to be transported. The Operations Coordinator is responsible for assigning the appropriate transport for the shipment according to its presentation, volume and weight. For the cyanide transport operation, the dedicated trucks have double articulated trailers with container chassis. The cargo per vehicle is standard: 2 marine containers of 20 foot weighting 22 tons each. The trucks are Freightliners, with towing capacity of 75 tons.

Trucks and trailers were reviewed during the audit. All available tractors and trailers have been checked and were rated for weights that exceed maximum loaded weights. The load capacity of the platforms

used by the transporter is larger than the gross weight of an ocean container fully loaded with cyanide which is approximately 22 tons.

The auditor reviewed the chassis loading capacity indicated in the plates attached to each chassis, indicating a maximum gross weight of 30 tons, also checked the manufacturer's specifications , finding them in conformance.

The transporter has implemented the guidelines Transport Specification to verify the adequacy of the equipment for the load it must bear, which contains the minimum requirements of the company for terrestrial transportation both for receipt and deliver any kind of shipments. It describes the type of vehicle to use for the load it must bear and specifies the characteristics of the vehicle including load clamping mechanisms, tarps, floor, walls and ceilings, suspension, dimensions, equipment presentation and nominal load capable of transporting. This guidelines, as a complement with the other procedures of the transporter, constitute an excellent tool to ensure that the vehicle is the right for the cargo to be transported.

Prior to loading and use, trucks are inspected by the transporter to ensure there are no deviations that could affect the operation. They are guided by the load capacity of the equipment, also, the load weights are recorded before and during the trip.

The guidelines for Transport Specification and the procedure for Identification and Traceability, states the requirements to prevent overloading of the trucks being used for handling cyanide. Excellence Freights de México, S.A. de C.V. has established that each chassis will be loaded with only one cyanide container and that each truck will haul two articulated chassis. This is consistent with the information included in the inspection checklist and was confirmed during the interviews.

Loading of the sea containers is done by the cyanide production facility using scales to confirm the shipment weight. The loads being hauled are standard loads that do not vary in weight. Records were checked against weight capacities and weight limit regulatory information. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. Office personnel and driver showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

The transporter does not subcontract any portion of their cyanide transportation operations. ICMC requirements pertaining to subcontractors are, therefore, not applicable to the organization.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

SUMMARY AUDIT REPORT

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Excellence Freights de México, S.A. de C.V. transports only solid cyanide in sealed sea containers. Normal safe driving procedures and unloading procedures ensure that the truck and the trailer are not damaged during transit. The transport procedure establishes that the load cannot be altered during the transportation process. To ensure this, tags are placed in the ocean container's locks at the manufacturing facility. These tags can only be removed at the final destination. The containers received in the production facility are placed on platform trailers hauled by trucks without the need of changing the packaging. Per the interviewed personnel, the load is not removed from the container.

The procedure "PAC-936 Emergency care plan" requires passing inspection to the shipment of cyanide in the transport vehicles. The auditor reviewed the associated checklist, "Daily Eye Inspection", of completed inspections performed, finding it in compliance.

Appropriate placards showing UN 1689 (solid cyanide) are displayed on all four sides of the sea containers. Drivers visually inspect the containers prior to each movement. Equipment markings were found to be adequate and conformant.

The transport procedure establishes that placards with cyanide's UN number and poison signs must be placed on the container; this is verified through the vehicle inspection checklist. Per the reviewed operation files, the presence of the placards was verified through the checklist.

Excellence Freights de México, S.A. de C.V. has a safety program for cyanide transport. Drivers conduct a pre-trip inspection before the vehicle departs to the port facility for loading (documented through the vehicle inspection checklist). Mechanical defects are called to the attention of the approved mechanics contractors. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site. Driver interviewed demonstrated knowledge of the process of performing pre-trip inspections. Pre-trip inspection checklists were reviewed and found to be acceptable.

The transporter has a Maintenance Program for their vehicles for preventive and corrective activities. The maintenance program was reviewed and found in compliance.

The distance to the port is 344 km, it´s an 8 to 9 hours' drive, including 2 authorized active stops for equipment review, feeding with the cyanide shipment. The working day of drivers traveling with sodium

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

cyanide may not exceed twelve hours a day discontinuous. According to procedures, the transport will only be carried out during daytime hours.

The load shifting within the container is not considered possible as all containers are filled with 20 boxes and block and bracing is applied at the cyanide production plant to prevent load movement. At the same time, trailers have pins where the container is embedded preventing it from shifting. Cyanide travels in sealed containers, which are secured to the platform safely, eliminating the possibility of displacement during transport. The safety program includes inspection procedures to prevent loads from moving during transport as defined in the procedure "Emergency care plan", to check that trailers manual lock twist are properly subject to the shipping container, reflecting this requirement in the format of checklist associated Daily Eye Inspection in the field". The auditor reviewed examples of completed inspections performed.

According to the sodium cyanide transport procedure the transport can continue only if the leader of the convoy has provided the relevant conditions. The supervisor of the convoy informs the state of progress of the operation and any event in each one of the points indicated in its itinerary, and any event requiring stopping the convoy. If conditions are not favorable to allow the convoy to reach its destination, it will be parked in an appropriate place.

Before each trip, the employee must undergo alcohol testing and periodically through a drug test.. Violation of this policy has resulted in the separation of the worker from the organization.

Records were available to demonstrate that the requirements of each of the above mentioned controls had been fulfilled. Records are maintained in electronic and hard copy at the office for a period.

Transport Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

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

The transporter does not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

The transporter does not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

SUMMARY AUDIT REPORT

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

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

Drivers are provided with a cellular phone provided by the transporter. They have the communication group via WhatsApp application called Cyplus IDESA Cyanide, which involves drivers, cyanide transport operation personnel, the cyanide destination at the port, the cyanide producer Cyplus-IDESA, the chemical plant IDESA and safety personnel from both companies. Drivers report at departing from the cyanide producer plant, report any stop to rest or for lunch, and upon arriving and delivering the cyanide shipping. Any incident in the road is communicated via this group. All cellphones are delivered to drivers with the emergency contact list already registered in the phones.

Cyanide shipments are tracked using a GPS tracking system that is monitored by the transporter and the cyanide production facility. Through this system the drivers have the option to action the panic button who will notify directly to the transport supervision and in case of needed will call the emergency responders.

According to the procedure PAC-915 Monitoring, the GPS must be tested to ensure it functions properly checked before delivering the cyanide shipment: that the GPS it is working properly, that the audio system in the cabin works, and the remote shutdown system of the vehicle works. For this purpose, the carrier uses the checklist Satellite Tracking Equipment, provided by the monitoring platform called My Co-pilot.

To ensure the operation of cell phones, they perform the “Diagnosis of Telephone Technical Service” and every two years they change the equipment.

Communications blackout areas are identified in each route risk assessment. Any blackout area has been identified in the monitoring system where they configured the expected time to the signal to be recovered and keep tracking of this. Excellence Freights de México, S.A. de C.V. GPS tracking system has set geofences identifying this places and they expect to recover communication with the convoy after an established time.

The transporter has GPS tracking system which allows continuously monitoring of the location of the convoy. Drivers communicates by cellphone its base upon dispatch, upon arrival at the port site, and after unloading is complete. Personnel responsible for tracking shipment status from the transporter were interviewed, the GPS system was demonstrated, and logs showing that shipment status was being recorded were reviewed and were found to be complete. Excellence Freights de México, S.A. de C.V. procedure for tracking of shipment status was reviewed during the audit and found to follow current practices.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

The transport documents shows the amount of cyanide delivered. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The amount of cyanide delivered is carefully monitored by the driver and remotely through the transport and the cyanide production facility dispatch office.

Additionally, the containers are locked are tagged at the manufacturer's facilities and these tags are only removed at the final destination The auditor reviewed the trucks cyanide shipment bill of ladings matching the production facility and port scale reports, coinciding the weights always.

The transport document, the Safety Data Sheets (SDS), and emergency response information are carried by each driver. The drivers have an on-board file that includes copies of its, licenses, and the cyanide SDS.

2. *INTERIM STORAGE*

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures

Transport Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental

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

Excellence Freights de México, S.A. de C.V. does not operate any cyanide trans-shipping depots and interim storage sites. Transport Practice do not apply to the transporter.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

3. *EMERGENCY RESPONSE:*

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Excellence Freights de México, S.A. de C.V. maintains an Emergency Response Plan (ERP or Plan) named Plan for Emergency Care in the Transportation of Sodium Cyanide, with the aim of establishing the actions to mitigate road accidents with potential releases and exposures during the transport of sodium cyanide. The ERP is appropriate for all transportation incidents. The transporter personnel were interviewed, leadership understanding and responsibilities was good. Personnel demonstrated a high level of commitment to ensuring that cyanide shipments are made in compliance with ICMC requirements.

The Plan is appropriate and designed for the specific circumstances. The Plan reflects specific issues that could arise during the transportation route: from the production facility IDESA – Cyplus in Coatzacoalcos, Veracruz, to the port of Salinas Cruz, Guajaca, in the Pacific Ocean coast, and eventually to mine sites. The Plan identifies possible emergency situations as sodium cyanide release to road, land, surface water and robbery during transportation. The transporter do not operates an interim storage facility.

The Plan considers the physical and chemical form of the cyanide in Section 8: toxic white solid in the form of briquets or granules. The only form of cyanide to be shipped using this supply chain is solid sodium cyanide. Emergency response procedures address actions to be taken in response to a solid sodium cyanide spill. The Plan includes the sodium cyanide SDS where is defined the physical and chemical form of cyanide: solid white granular cyanide and specific information regarding the hazardous material to be transported.

The procedure ERP, considers the method of transport within Section 2 as by trucks with double-articulated units with 2 semi-trailers type 20-foot container chassis according to the T3S2-R4 configuration. No other methods of transport are used in this trucking company.

The Plan considers all parts of the transportation infrastructures, as it was identified in the route risk analysis, including the condition of road infrastructure, long slopes, curves, bridges and uneven steps, areas

under repair, exits, roads or gaps where they could divert the unit. Considers transit through water concentration zones such as rivers, lakes, lagoons, swamps, fog zones and danger of landslides on the route, among others. Identifies phone and GPS coverage during the travel journey. The Plan addresses the emergency response to events that occur in relation to these risks and hazards.

The ERP considers the trucks design of the transport vehicles. It describes the appropriate trucks and chassis to use to transport cyanide, also indicates cyanide is transported in 20' containers. Each truck hauls two trailers with a 20 foot sea container. Cyanide is received from the production facility in 20 foot sealed sea containers transporting 20 Intermediate Bulk Containers (IBC) of 1,000 kg each one.

Section 6 of the Plan states the importance of considering for any emergency or action, the specifications of the type of design of units that will transport Sodium Cyanide based on the Dry Load Transport Specification, ETR-001T, document that contains the minimum requirements in terms of ground transportation and applies both in the delivery and in the reception of the different cargo presentations. For cyanide transportation the transport vehicles are described as double articulated truck, with two trailers chassis for sea containers. This document also describes the cargo fastening mechanisms, floor, and pneumatic suspension requirements for double articulated units. It also describes the vehicle presentation and load capacity.

The Plan specifically considers response actions that may be needed for emergency situations during transportation. The Plan includes detailed response actions for each case, including spills in both current and open water bodies and for the other risks identified on the routes. The Plan considers a series of instructions covering the potential hazards that could occur during the loading, transportation and unloading of the cyanide cargo. It includes emergency response actions against collision or rollover, spillage of dry cargo to water sources, on the road and landslides. Section 6 of the Plan describe detailed response actions for cases vehicle collisions with and without spillage, vehicle rollover with and without exposure and intoxication, spillage of the product and contact of this with streams, rivers, fire, robbery, assault and kidnapping.

The Plan, also establishes the logical line of actions that drivers must take when irregularities arise during transport of sodium cyanide, including civil commotion, adverse conditions, bad weather, traffic congestion and unplanned stops.

The role of outside responders and medical facilities in the emergency response procedures are clearly stablished. The police will provide support and safety to the transport units during the passage through cities and towns medical facilities and will take control of traffic routes in case of an accident.

The roles of outside responders SEMEDIS and HESCA area identified in the Plan, SEMEDIS (Southeast Comprehensive Medical Service) will go to the scene of the accident and will be in charge of providing medical assistance and transferring the victims to the hospital. HESCA is a company contracted by Excellence Freights de México, S.A. de C.V. specialized in the handling of emergencies with hazardous materials according to the national standards established by the OSHA (Occupational Health and Safety

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

Administration) y DOT (Department of Transport). No additional information was required to find this Protocol Question in Full Compliance.

Transport Practice 3.2

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

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

Training on emergency response is given periodically to drivers, and supervisors. They are trained in appropriate emergency response in safe cyanide management (spill and intoxication), firefighting, first aid, hazardous materials. Training is provided by internal staff and external companies as workouts which are renewed annually complying with the training plan and verifying compliance with specific skills.

Drivers were interviewed and awareness of emergency procedures and documentation was confirmed. Training records were reviewed in emergency response with hazardous materials (sodium cyanide), safe handling of cyanide, first aids and in the Cyanide Code interpretation, among others. ,

Tha Plan states in Section 9 that all personnel involved in the cyanide transport operation, should be trained annually in emergency response care involving sodium cyanide, in accordance with the annual training program for ground transportation.

The ERP has detailed descriptions of the specific emergency response duties and responsibilities before, during and after an incident / accident or an emergency of situation for the managers, transport coordinator, control room, the convoy leader and drivers, among others.

Section 6 of the Plan describes the responsibilities of the Terrestrial Transport Manager, the Safety Transport Supervisor, the driver, the monitoring personnel, Excellence Freights de México, S.A. de C.V. emergency response team and externa emergency responders including the cyanide manufacturer Cyplus - IDESA emergency response team.

The transporter has defined in the ERP the materials and equipment required for emergency response during transportation along the route including spill response equipment. There is a list per transport vehicle and other list for the emergency response pick-up vehicle. The emergency equipment and Personal Protection Equipment (EPP) includes Tyvek suits, autonomous air equipment, encapsulated suits, leather and impermeable gloves, PVC boots, safety goggles, area isolating tape rolls, HCN detector, disposable respirators, oxygen, shovels, sweeps, polyethylene bags, empty containers and lime.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

Each truck has the required emergency response equipment, as the auditor had the opportunity to inspect the vehicles on its arrival to the truck parking area in the Cyplus – IDESA production facility . Each truck travels with gloves, apron and rubber boots, leather gloves, reflective vests, safety cones, half-face mask, with filter against HCN, shovel, peak, dry powder fire extinguisher, lantern with batteries, Tyvek and Tychem suits, canvas, lime, HCN detector de HCN, cords, basic first aid kit, black plastic bags, brush, googles, absorbent material and repair tape.

Excellence Freights de México, S.A. de C.V. drivers receive an appropriate level of training to enable them to fulfill their role in emergency response. Formal training in cyanide is given periodically. Records were checked. Drivers were interviewed and awareness of emergency procedures was appropriate. The auditor reviewed training records in first aids for cyanide exposures, in the procedure for safe cyanide transportation and in the emergency response plan, this last training is given annually.

Among the control measures to adopt for the transportation of hazardous materials, the ERP addresses to perform bi-monthly inspections to the emergency response equipment before loading the truck and also on returning from the transport operation. Also, the emergency equipment is inspected on a regular basis when vehicles trucks are brought in for maintenance and inspections. A checklist is used to verify that it is available, records are kept in the operation file. The availability and completeness of the material and inspection records was confirmed during the audit.

Transport Practice 3.3

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

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

The ERP has current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. Section 5.9 of the Plan has a detailed communications flowchart, stating that in case of a transport emergency the driver should communicate with the Transport Supervisor or with the vehicles monitoring personnel, which will call the Terrestrial Transport Manager and the Health and Safety Manager, who in turn will communicate with the client and other interested parties. In addition, Section 6.9 shows a flowchart detailing the communications in case of robbery, assault or kidnapping.

The Plan has also current contact information both for internal and external emergency communications. The phone contact list of External Emergency Agencies include SETIQ (Transport Emergency System for the Chemical Industry), that provides technical and specific information by telephone to attend emergencies

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

and incidents involving chemical products throughout the Mexican Republic, operates 24 hours a day, 365 days a year.

The external communications list also include, Cyplus – IDESA the cyanide producer, SEMEDIS medical services, CLAM (Local Mutual Aid Committees) to address emergencies associated with the handling of chemical substances, Hesca Environmental Services providing emergency response management, Civil Protection, CENACOM (National Communications Centre / National Civil Protection System) and PROFEPA (Federal Attorney's Office for Environmental Protection)

The Plan states the contact list for internal and external emergency notifications must be updated annually. Also, the Plan is reviewed once each year. During this activity, the phone numbers are checked for accuracy to ensure that internal and external emergency notification contacts are kept current. Records were available to show that this is done.

Transport Practice 3.4

Develop procedures for internal and external emergency notification and reporting.

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

The ERP describes how the recovery will take or neutralize the solid, the decontamination of soils, or other contaminated media and how these wastes are managed. The Plan addresses the immediately actions to follow in case of spills, preventive measures to avoid, cleaning methods and how to treat waste. It includes measures in the event of spills, environmental precautions, methods and material for first containment.

The drivers will perform spill cleanup and cyanide neutralization in case of small cyanide spills. For a significant accident with cyanide spill, will call external responders and a specialized contractor to perform cleanup and remediation activities to ensure the land has been free of cyanide contamination.

The ERP, in Section 6.7.9, prohibits the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The ERP addresses that the use of these chemical substances in any incident for the treatment of solid sodium cyanide spilled in surface waters is prohibited.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date

SUMMARY AUDIT REPORT

Transport Practice 3.5

Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

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

The ERP states to be reviewed once each year. Records were available to show that this is done.

The ERP establishes that mock emergency drills must be carried out every year. Also, that the practices will be scheduled in coordination with the client, to keep the personnel permanently prepared for an emergency. The auditor reviewed the drills reports.

In November 2017, the transporter performed an emergency drill related to an accident on route with cyanide spillage and exposition. Among participants and observers were the marines, Civil Protection, the firefighters from Coatzacoalcos, the federal police and the state transit police. From the outside responder, had the participation of Excellence Freights de México, S.A. de C.V. emergency response team (ERT)), SEMEDIS, Qualitas insurance company, CLAM from Coatzacoalcos, and Cyplus-IDESA

In March 2018 the transporter performed an emergency drill for cyanide truck fire. In December 2019 it simulated a crash without cyanide spillage. In 2020 they simulated overturning of the truck without spillage or exposure to cyanide, with the participation of authorities and outside responders. For the up-coming emergency drill scheduled for November 2021, the auditor recommended as an opportunity for improvement, to conduct a drill that includes spillage and exposure to cyanide.

The Plan stablishes that after implementing the Plan and mock drills, an analysis of the observations or failures detected during it be carried out, for which it will have to prepare a schedule of actions and courses that must be received by the personnel to correct these observations and of that to complete the equipment or information needed. At the date of the audit, there had been no need to activate the Plan, so no revisions to it had been carried out for this reason.

Excellence Freights de México, S.A. de C.V.		April 22, 2021
Name of Facility	Sign of Lead Auditor	Date