

***MAC Transport S.A.C.
Cyanide Supply Chain***

***Summary Audit Report
for the***

***International Cyanide
Management Institute***

December 2023

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Operation General Information

Name of Transport Operation: MAC Transport S.A.C.
Name of Facility Owner: MAC Transport S.A.C.
Name of Facility Operator: MAC Transport S.A.C.
Name of Responsible Manager: Raúl Álvarez - Managing Director
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Operation Location Detail and Description

MAC Transport, S.A.C. (MAC Transport) is a cyanide consigner with headquarters in Lima, Peru. MAC Transport manages a cyanide supply chain which transports cyanide from Callao port and warehouse to its mining clients in the Peruvian territory.

The scope of this audit is for MAC Transport's management of the ground transportation operations performed by its transport contractors from Callao port to the Contrans S.A.C. warehouse and from the warehouse to its mining clients in Peru. Contrans warehouse was audited separately under the ICMI Cyanide Production Verification Protocol as part of the certified Contrans Supply Chain. MAC Transport supply chain hires the trucking company Transportes Meridian S.A.C. (Meridian), who transports cyanide in 20-foot sea containers from the Callao port to Contrans S.A.C. (Contrans) warehouse also in Callao, from where Transportes Zetramsa S.A.C. (Zetramsa) trucking company transports cyanide to the consignor mining clients in sea containers. MAC Transport, as the cyanide consignor, has developed and implemented procedures for contractor selection and oversight procedures.

All participants in this supply are certified companies on the International Cyanide Management Code (ICMC) as listed in the Signatory Directory of the International Cyanide Management Institute (ICMI) website:



- MAC Transport was initial certified in 2018. The deadline for conducting its recertification audit has been extended to July 31, 2023, according to posted in the ICMI website.
- Meridian was initial certified in 2016, then recertified in 2020 and in 2023.
- Contrans was initial certified in 2017, then recertified in 2020 and in 2023.
- Transportes Zetramsa S.A.C. was initial certified in 2014, then recertified in 2017 and in 2022.

Edewit S.R. Ltda. transported cyanide to MAC Transport's mining clients until 2021.

Cyanide briquettes are transported in Intermediate Bulk Containers (IBC) inside poly-propylene super-sack filled up to 1 ton and placed inside a polyethylene bag and wooden box. Around 20 tons of cyanide is placed in sea containers. IBCs are placed in a way to prevent lateral movement within the container. Containers are received locked and tagged.



Auditor's Finding

This operation is

The operation is in full compliance with in substantial compliance with not in compliance with with the International Cyanide Management Code.

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

Auditor Information

Audit Company: BP Cyanide Auditors S.A.C.
Lead Auditor and Transport
Technical Auditor: Bruno Pizzorni bpizzorni@cyanideauditor.com
Dates of Audit: July 24 and 25, 2023

Auditor Attestation

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

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety, and environmental audits.



Transport Verification Protocol

Principle 1 | Transport

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

Transport Practice 1.1

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

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

MAC Transport as the cyanide consignor, requires and oversees all trucking transporters in his cyanide supply chain implement procedures for selecting transport routes that minimizes the potential for accidents and releases. MAC Transport has developed and implemented the document PR-OPE-006 Procedure for Selection and Supervision of Sodium Cyanide Carriers, (procedure for selecting cyanide transport contractors) which also acts like a management manual for cyanide transport, requires all cyanide transporters to evaluate for the routes previous to the first cyanide shipment including the population density, existing infrastructure conditions of the roads, pitch and grade and presence of water bodies and visibility due to weather conditions.

MAC Transport Operations Assistant requests the transporters route assessment and performs the first filter verifying that the assessments meet the criteria of evaluating the occurrence of potential accidents due to route conditions such as population density, construction works and condition of roads, inclination, and slope of the route, as well as the existence and proximity of water bodies and fog. The roadmaps are validated annually. The evaluation and review of the route assessments is carried out in a committee meeting with the carrier in charge, with participation also of the cosignatory Head of Operations and the hazardous materials (Hazmat) Coordinator for its approval.

MAC Transport presented various route evaluations carried out by its carriers Meridian and Zetramsa where they have selected the ones that minimizes the potential for accidents and releases and the potential impacts of such accidents and releases if they do occur. In many cases, the routes evaluated and selected are limited by the availability of alternatives, jurisdictional designations and required routes for transport of dangerous goods. The auditor took these restrictions into account, determining the transporter's process effectively addresses this Transport Practice requirement.



The cyanide consignor overlooks the carrier route assessment to determine if the supply chain routes assessments have identified the need for additional safeguards to address deficiencies in port operations and/or mine transit or other aspects of its supply chain. The carrier is responsible for evaluating the risks of the route and submitting the evaluation report to MAC Transport demonstrating the identification of risks and establishing control measures.

Areas posing increased risks including areas prone to theft and social disturbances have been identified and are subject to additional control measures, such as communications with the monitoring and controlling personnel at the company headquarters, before entering these areas, establishing preplanned alternative routes. Safety measures are documented for driver training.

The auditors reviewed the transporter procedure for selecting cyanide transport contractors and records confirming that the risks of selected routes are evaluated, necessary extra precautions are documented.

MAC Transport procedure for contractors' transporters selection and supervision, requires routes must be reassessed annually. Also, requires the transporters to provide feedback on the route conditions. Feedback regarding routes chosen is gathered during the partner re-evaluation process. The consignor maintains a policy to only work with ICMC certified transporters, collaborating closely with its transporters to ensure that all routes are formally evaluated and reevaluated for risks before delivery to a mine can commence.

MAC Transport's operations assistant will perform the activities described in the procedure Selection, Evaluation and Reevaluation of Suppliers PR-LOG-001 V3 of its certified BASC management system. BASC (Business Alliance for Secure Commerce), It is a not-for-profit international business alliance that promotes safe trade in cooperation with governments and international organizations. Therefore, the carrier (supplier) will have a current safety agreement FO-GCS-011, updated registration in the list of suppliers FO-LOG-002 and score described in the Selection, Evaluation and Reevaluation of the Supplier FO-LOG-001 form. The final evaluation of the waybills will be reflected in the minutes of the committee meeting between MAC Transport and the carrier in charge. If the supply chain route assessment has identified the need for additional safeguards to address deficiencies in port operation and/or transit to mine or other aspects of its supply chain, measures to mitigate the risks shall be implemented. The application of these measures will be documented and filed for review by the ICMI audit.

The auditor reviewed minutes of meetings of from November 2022 and June 2023 with transporter



Meridian, and from November 2022 and September 2023 with Zetramsa. The auditor reviewed recent route reevaluations and by interview with MAC Transport management personnel confirmed that feedback about driving conditions is communicated and routes are being reevaluated.

MAC Transport documents the meetings held with each transporter to oversight the carrier routes assessments to ensure adequate measures have been taken to address risks identified with the selected routes. The consignor submitted records of meetings where these route assessments were reviewed and approved. The final route evaluation is reflected in the minutes of the committee meeting between MAC Transport and the carrier in charge.

The auditor reviewed these meeting minutes and the transporters routes assessments confirming the consignor documents management of risks along the selected routes.

The consignor's procedure for selecting cyanide transport contractors trucking companies include requirements that trucking companies seek community or stakeholder input in their selection of routes. Both transporters in this supply chain are ICMI certified companies, and as such they comply with this Transport Practice requirement.

MAC Transport sends cyanide to the mine sites by mean of the transporter Zetramsa convoys with an escort pickup truck, according to the mine client requirements.

The auditor interviewed MAC Transport management personnel confirming this practice is being maintained. Trip reports and recommendations are provided by the transporter convoy supervisor in the report issued to the consignor after each trip. Both transporters in this supply chain monitor the cyanide shipments by GPS (Global Positioning System) from its respective control room. MAC Transport receives frequent email reporting the shipment departure, then on route and on delivering the shipment verifying the compliant reception by the client.

Cyanide shipments between Callao Port to local Contrans warehouse is performed by individual trucks without escort, but constantly GPS monitored. Contrans along with Meridian have implemented administrative controls for the route between the port and the warehouse due to safety (robbery) concerns. Before departing, each transporter communicates its departure to its base and to the cyanide consignor. Follow up of the cyanide shipment is closely made with GPS and constant cellphone communications by both companies to its respective control centers.

Occasionally, the transport in Callao could be accompanied by guards depending on the security conditions of the area, this at the request of the client. By interview to the consignor management



personnel, the auditor confirmed that cyanide transport operations are closely followed up since its departure until its arrival.

MAC Transport procedure for selecting cyanide transport contractors for supervision of its cyanide carriers and evaluates the capacity of the individual components in its supply chain trucking companies, to meet applicable Code requirements. The procedure requires that all supply chain components are aware of their responsibilities under this Transport Practice, have procedures to meet these responsibilities, and operate in compliance with the Code.

In May 2022 they carried out an internal audit where they evaluated the issues to be corrected and implemented them during the course of the year, supervising their carriers. These audits included routes from Callao port with transporter Meridian. Routes audited to transporter Zetramsa were from Contrans warehouse to mining clients Tantauatay, Orcopampa, La Zanja, and evaluation of alternate routes from Orcopampa through road Abra El Tingo and to Tambomayo and El Brocal mining operations.

The auditor reviewed the consignor procedure and meeting records confirming the contracted entities have designated responsibilities and are being oversighted for compliance with this Transport Practice.

Transport Practice 1.2

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

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

The consignor has the procedure for selecting cyanide transport contractors requiring that contracted trucking companies require the use and have trained and licensed drivers, and oversights that its contracted trucking companies comply with this provision. The auditor evaluated the consignor's procedure confirming the on-the-ground compliance of its contracted cyanide transporters, Meridian and Zetramsa, with the provisions of this Transport Practice.

MAC Transport was able to demonstrate, through periodically supervising visits to both contractors,



which oversights the contractors' personnel operating the cyanide transport trucks and trailers ensuring they have updated training and have the specific license to operate the trucks category, as required in the Peruvian jurisdiction. They keep copies of all operator licenses.

Although the consignor is not involved on training in cyanide handling and transport equipment all the operators in its cyanide are ICMI certified companies, the consignor facilitates the mining training of Zetramsa contracted transporter before being allowed to enter to the mine site. The auditor reviewed these training records. The consignor procedure for selecting cyanide transport and warehouse contractors requires training of employees in the safe handling and transport of cyanide. This procedure also requires oversight activities as periodically inspections of the contractors to ensure that the contracted carriers conduct such training. The auditor reviewed the consignor procedure and training records, confirming compliance of its contracted cyanide transporters and warehouse with the provisions of this Transport Practice.

The consignor procedure for selecting the transporters used in this supply chain and overseeing their activities requires to ensure compliance with this Transport Practice. The selection procedure evaluates the capacity of individual components of the trucking companies, to meet applicable Code requirements. The consignor oversight procedure ensures that such supply chain components are aware of their responsibilities under this Transport Practice, have procedures to meet these responsibilities, and operate in compliance with the Code.

The auditor reviewed MAC Transport's contractors records of driver's qualifications, training, and a list of driver's licenses for suitable drivers. Prior to performing the transport service is require this documentation. Periodically it is required the transporter sends MAC Transport the drivers training in hazardous materials and cyanide spill emergency response training.

The auditor reviewed the consignor's procedure and its inspection records evaluating its contracted entities, confirming compliance with this Transport Practice.



Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

In accordance with the consignor's contractor selection procedure, the carrier is required to send dated and timed photos of the shipping vehicles; the consignor also inspects randomly the cyanide convoy vehicles before departure. For each shipment, the truck carrier sends the consignee the pre-use vehicle checklist that includes verification of the container and securing the twist locks for their correct position.

MAC Transport's procedure for selecting cyanide transport contractors requires that transport equipment be designed and maintained to operate within the loads it will be handling. The consigner's procedure requires to oversight the transporters to that they comply with this provision. The auditor reviewed this procedure and inspection records to its contractors' confirming compliance with this requirement.

MAC Transport cyanide contractor selection procedure addresses the need to oversight and to inspect its contractors handling and transport equipment to verify that its load bearing capacity is adequate for the shipments it will handle. The auditor reviewed the consignor's selection procedure and inspection records evaluating the compliance of its cyanide transporters confirming compliance with the provisions of this Transport Practice.

MAC Transport procedure for cyanide transporters selection requires to oversight its transport contractors to ensure they are implementing measures to prevent overloading their transport vehicles. The auditor reviewed the consignor's procedure verifying compliance with this provision.

To prevent overloading of the transport vehicles, MAC Transport has established that each platform will load only one sea container limiting to 20 the number of one-ton Intermediate Bulk Containers (IBC) with cyanide that can be loaded on each sea container. Also, each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklist and was confirmed during the interviews.

The load made by the port operator is weighed to confirm the weight of the shipment, also on departure from Contrans warehouse. The loads being hauled are standard loads that do not vary in



weight. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. MAC Transport personnel showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

MAC Transport requires in its transport procedures and contractor selection, that the cyanide transporters must develop and implement procedures to ensure that transport equipment is suitable for the cyanide shipment. MAC Transport ensures the contractor complies with the requirements monitoring the carriers as required to send dated and timed photos of the shipping vehicles and inspecting randomly the cyanide convoy vehicles before departure. Both transporters Meridian and Zetramsa are ICMI certified.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Transport Practice 1.4

MAC Transport procedure for contractor selection in the cyanide supply chain requires containers must be inspected before departure, to have the scale weight ticket before leaving the port or warehouse facilities and to verify that the container seal is intact matches the number sent via mail, to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging.

The auditor reviewed the consignor's procedures confirming requirements are in place to ensure compliance of transporters contracted entities having designated responsibility for compliance with this Transport Practice. The auditor also reviewed examples of the transporters completed checklist records of visual inspections of the transport units to ensure during the loading operations, that the sea container has been adequately positioned on the trailer and they are secured with the twist locks. Checklists inspections require checking doors are closed, have seals and container secured with twist locks. The seals are checked at designated points during transportation: on receipt at the Port of Callao; on arriving and departure from Contrans warehouse; at the start of transport to the mines; after every stop on route and on arrival to the mine site storage.

During transport, the containers are secured to the trailer bed using locking clamp mechanisms that



are part of the trailer. The clamps are located at fixed positions on the trailer so that the container is balanced during transport.

The transporters procedures establish that the load cannot be altered during the transportation process. The containers received in the port are placed on platform trailers hauled by trucks without the need of changing the packaging. No shipping can be fractioned. Cyanide cargo is not being removed or distributed into other containers from the maritime container until arriving to a warehouse or to the mining client. Per the interviewed personnel, the load is not removed from the container during transport operations.

The transporters procedures also address inspection procedures to ensure that the integrity of cyanide packaging is maintained during the cyanide cargo loading and unloading. The consignors trucking contractors do not handle cyanide as exclusively transports sealed cyanide containers loaded and unloaded by thirds, as the Callao Port operator, Contrans warehouse and the mining clients.

MAC Transport trucking contractors perform pre-trip inspections to ensure, among others, that placards identifying the shipment as cyanide are on all four sides of the containers as required by the Peruvian jurisdiction through which it will pass. Each cyanide container is labelled to meet International Maritime Dangerous Goods (IMDG) Code labelling requirements. This labelling is posted on each side of the container and includes identification of solid sodium cyanide by UN (United Nations) number 1689 and the skull and crossbones marker used for Class 6.1 toxic substances, along with the Marine Pollutant marker.

The auditor inspected pictures of the truck convoys placards and signages used to identify the presence of cyanide on the shipment verifying compliance with this provision.

The transporter implement a safety program for cyanide transport that includes:

- a) A safety program requiring its cyanide transport contractors Meridian and Zetramsa, and Contrans warehouse, to include as appropriate, vehicle inspections prior to truck departure. MAC Transport procedures requires the transporters to inspect the vehicle prior to each departure with a cyanide shipment, verifying the vehicle to be in good operating conditions, the loaded sea container to be appropriately fixed with the twist locks to the trailer, doors of the sea container secured and to verify that the seal is intact.



- b) Procedures, as the cyanide consignor, requiring overseeing the transporters in the supply chain to ensure compliance with their preventive maintenance programs for vehicles and equipment, where applicable, to ensure that all components of its supply chain are aware of their responsibilities under this requirement.
- c) All contractors in this supply chain are contractually limited to an “on-duty” workday to 12 hours. During hazardous material transportation, drivers must perform 15 minutes active pauses every 2 hours. The procedure for cyanide transportation establishes driving hours is during daylight. It is also required drivers have rest at least 8 hours before driving.
- d) To prevent loads from shifting, MAC Transport procedures requires its transporters to secure the cargo and calls for the securing of the containers to the trailer bed using the clamping mechanisms that are part of the trailer itself. The integrity of the clamping mechanism and the attachment point on the container is checked during a pre-trip inspection prior to the departure of the truck or the cyanide convoy. There are specific locations on the trailer that will accept the container, thereby eliminating the possibility of unbalanced load. For transport to the mines, the containers are secured with chains and a bar is crossed on the container doors to make ensure they cannot be opened.
- e) MAC Transport procedures requires to ensure that all transporters of its supply chain are aware of their responsibilities by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are established in the cyanide transport procedure. Both Zetramsa and Meridian Safety Coordinators and convoy leaders are responsible for evaluating weather and road conditions and determining what actions should be taken. Convoy leaders are senior personnel, experienced with weather and road conditions, and adept at making decisions regarding the need to suspend a shipment or to modify any convoy plans. In addition to weather forecasts, regular reports are received from the Monitoring Central, including cases of civil unrest.
- f) It is also required by MAC Transport that all transporters have a drug abuse prevention program. Before each trip, drivers must undergo alcohol testing and periodically disclose evidence of drug use. Both transporters in this supply chain and warehouse Contrans contractor, maintain drug and alcohol abuse prevention policies.
- g) Example of records documenting all the above are maintained in hard and electronic copies at the consignor’s office and complete records are filed at each supply chain component



headquarters. The auditor reviewed random records for the last 3 years, verifying compliance.

The consigner procedures require oversighting the trucking companies to ensure that such supply chain component is aware of their responsibilities under this Transport Practice and operate in compliance with the Code.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Transport Practice 1.5

MAC Transport does not ship cyanide by sea or by air. This section of the ICMC does not apply to this cyanide supply chain operation.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Transport Practice 1.6

Cyanide shipments are tracked using a GPS tracking system that is monitored by MAC Transport and its trucking companies' partners. The convoy leader is provided with a cellular phone and a satellite phone when necessary. The convoy leader has also a radio and he is responsible of communications with its transport company, with MAC Transport, the mine client and emergency responders in case of an emergency. The drivers also have cell phones as a back-up means of communication.

MAC Transport procedures require that all vehicles carrying hazardous materials must have a GPS system in each of the trucks to provide their exact location and information, cell phone in the truck



and escort, and satellite phone if necessary. Trucks are always in contact with dispatch by cell phone, satellite phone, or an onboard communication system. Transporters also use WhatsApp groups to communicate any news or incident on the route. They have portable base radios on each truck to communicate with the convoy leader.

All communication equipment must be confirmed to be operational at the start of each trip, as required by MAC Transport procedures. Interviews were conducted to confirm that these practices are in place. Communication systems is part of the pre-work inspections and is maintained along with the formal preventive maintenance program. The system is used each day and correct operation of the system is confirmed at that time.

Communication blackout areas along the transport routes have been identified during route risk assessments performed by each transporter. The dispatcher ensures that the driver has a working satellite phone when driving these routes. On approaching to these areas, the convoy leader communicates its position to the Monitoring Central.

Trucks are continuously monitored by each transporter with GPS along the route in real time, and any delay will be immediately noticed at the Monitoring Central. They use GPS and software systems that visually track truck locations on computers and cell phones. Communications with the base are performed upon dispatch, upon arrival at the customer sites, and after unloading is complete. This information is continuously shared to MAC Transport supervisors, so they can also track the cyanide shipment. Personnel responsible for tracking shipment status from MAC Transport were interviewed, communication records showing that shipment status was being recorded were reviewed and were found to be complete. The auditor reviewed examples of continuous emails sent by the transporters during the cyanide transport convoys to the mine sites. MAC Transport practices for tracking cyanide shipment status were reviewed during the audit and found to follow current practices.

Shipping paperwork was found to be conformant to the Code requirements, including chain of custody requirements. A waybill accompanies the transportation which includes chain of custody data such as container numbers, the amount of cyanide delivered, waybill numbers, shipping documentation, Safety Data Sheet (SDS), packing list, bill of lading, customs declarations, and producer invoice, among others. 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 MAC Transport dispatch office.



The auditor reviewed this documentation completed during several shipments finding it in conformance.

All shipments of cyanide are accompanied by shipping papers identifying the amount of cyanide in the load and by SDS describing the necessary precautions for handling of cyanide. The consignor procedures require that this information be available during transport. The bills of lading and shipping papers reviewed clearly indicates the number of packages and amount of cyanide transported. Documentation used to track inventory and movement of cyanide includes the bills of lading and shipping papers which indicate the number of packages and amount of material. Information was found to be compliant.

The consigner procedures require oversighting the trucking companies to ensure that such supply chain component is aware of their responsibilities under this Transport Practice and operate in compliance with the Code.

Principle 2 | Interim Storage

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

Transport Practice 2.1

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

The operation is

<input checked="" type="checkbox"/>	in full compliance with	
<input type="checkbox"/>	in substantial compliance with	Transport Practice 2.1
<input type="checkbox"/>	not in compliance with	

MAC Transport does not operate cyanide trans-shipping depots or interim storage sites in its transport operation. If a delivery is interrupted, loaded cyanide trucks would be stored in a secure location.



Principle 3 | Emergency Response

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

MAC Transport maintains an Emergency Response Plan (ERP or the Plan) called Contingency Plan v4, dated September 2022. The ERP is appropriate for its cyanide supply chains to respond to potential releases of cyanide during transport. The ERP includes details regarding the responsibilities of each actor of the cyanide supply chain, communications procedures to be used in case of incidents and an updated list of notification numbers for emergency responders. Also maintains ERP electronic copies of its cyanide transporters Meridian and Zetramsa as well as from Contrans warehouse.

The auditor confirmed that the MAC Transport, the cyanide consignor, had updated ERP versions of its supply chain actors.

MAC Transport Emergency Response Plan is appropriate for:

The transportation routes. The consigner's ERP consists of coordination with each actor in the supply chain as the emergency arises, where responsibilities have been clearly established for who should act in each section of the supply chain. The plan requires that each contractor respond to the emergency and immediately inform the consignor about the incident. Based on the event, The document was found to be appropriate for the sodium cyanide supply chain transport operation. Emergency scenarios have been identified as result of the contractors' routes assessments and emergency response actions, as appropriate, have been addressed.

MAC Transport ERP and those of its contractors consider the physical and chemical form of the sodium cyanide, with explanation of its characteristics and toxicity based on the SDS for solid sodium cyanide, which is readily available at the ERPs and in the convoys to ensure that chemical-



specific information is always readily available. The emergency scenarios consider the solid state of cyanide.

The Plans consider the trucking transport to the destination. The emergency response actions are appropriate for this type of product and method of transportation. The document provides information regarding the packaging and transportation characteristics of the product, the container, trailer, and truck tractor. All emergency scenarios developed are related to ground transportation.

MAC Transport ERP, based on the route's evaluations, considers the different transport road infrastructure including conditions of the roads (highway, secondary and mine roads) and urban areas. The plan considers existing water courses, bridges conditions and danger of landslides on the route, among others. The plan addresses the emergency response to events that could occur in relation to these risks and hazards.

MAC Transport's Plan considers the trucks and trailers design, including description of the vehicles used by the contractors to transport cyanide shipments. The document defines the contractor is responsible to use appropriate trucks and chassis to transport cyanide. It states that must follow local regulations and that will be transported in sea containers.

The Plan describes the nature of the response actions to be taken for the types of emergency situations identified. The level of detail is adequate to the nature of the potential emergencies identified. It includes contractor's emergency response responsibilities and actions against collision or rollover, spillage to soil and water sources. The Plan also establishes the logical line of actions and communications to be taken when irregularities arise during transport of sodium cyanide, including civil commotion and adverse conditions. In addition to cyanide releases, the consignor's selection and oversight procedures ensure that its contractors' emergency response plans and procedures describe responses to cyanide exposure incidents.

Both the consignor and its contractors have identified the roles of external responders, medical services on its respective emergency response procedures and have they been advised of their roles. MAC Transport ERP relays on its contractors ERP and clearly identifies its roles and responsibilities in case of an emergency.



Transport Practice 3.2

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

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Transport Practice 3.2

The auditor requested MAC Transport to provide refresher training on the latest version of the ERP, to all MAC Transport personnel involved in the cyanide transport operation, given the turnover of personnel during the last year and especially due to the update made due to the additions/corrections requested during this recertification audit. After the audit, MAC Transport sent the ERP refresher training assistance registers, the material used for the training and the comprehension test (exam). Previous training records for the certification period were reviewed and were found to be acceptable. No additional information was required for compliance with the Cyanide Code.

MAC Transport procedures also require all its transport partners must provide emergency response training to drivers, operators, convoy leaders and supervisors. All contractors of this supply chain were found to be complying regarding cyanide training during their respective ICMI certification audits.

The roles and responsibilities of relevant internal and external personnel are clearly described in MAC Transport's ERP and in the transporters partners ERPs. Information is available regarding the contents of emergency kits and the types of equipment maintained were found to be appropriate by the auditor.

Meridian and Zetramsa drivers, managers, and maintenance shop personnel receive an appropriate level of training to enable them to fulfill their role in emergency response. Formal emergency response training is refreshed annually. The specific duties and responsibilities of the convoy personnel and emergency response are clearly identified in the ERP, the auditor reviewed the transporter's Plan verifying that this information was included.

MAC Transport ERP references the list of emergency equipment of each emergency plan of its contractors participating in this cyanide supply chain, which are complementary to the consignor's ERP. Each contractor has a list of the emergency response equipment that must accompany the



cyanide shipments along the transport route and in Contrans warehouse.

MAC Transport partners have defined in their ERPs the materials required for emergency response during transportation along the route including spill response equipment. The list of equipment includes Tychem suits, leather and impermeable gloves, PVC boots, safety goggles, area isolating tape rolls, hydrogen cyanide (HCN) gas detector, water analysis kit, disposable respirators, oxygen, shovels, sweeps, polyethylene bags, commercial leach, and empty containers.

These ERPs define what equipment must be available in each truck and extra personal protective equipment is available in each bag. Equipment is checked as part of the pre-trip inspection process.

MAC Transport ensures through contractual terms and periodic review that the emergency response equipment maintained by its transporters partners is always available. It is also required the emergency equipment and materials to be checked prior to each cyanide delivery. Checklists are used to verify that it is available, and it is part in the operation files. Both Meridian and Zetramsa transporters are ICMI certified transporters and were found in with this requirement during their certification audits. Each carrier has an ERP that includes first and second emergency response.

MAC Transport's role during a cyanide emergency will be to establish the command center to communicate with the stakeholders and coordinate with the carriers ensuring they act quickly and effectively to the emergency.

MAC Transport was required to establish and implement periodic review to confirm its supply chain contractors are inspecting their emergency response list equipment, to ensure they are available if needed. Also, to clarify in responsibilities of the contractors and how MAC Transport will monitor compliance. After the audit, the consignor included in its emergency response plan a responsibilities matrix in agreement with their cyanide contractors where, among others, were established the emergency response equipment inspection responsibilities. Each supply chain is accountable for inspection of its emergency response equipment, MAC Transport oversees these are performed and requires the equipment inspections as part as the convoy shipment documents.

At Meridian and Zetramsa, emergency equipment is checked as part of the pre-trip inspection process. This practice was confirmed through interview with MAC Transport supervisors. Both transporters use pre trip inspection checklists to verify that the emergency response equipment is available prior the convoy's departure, and it is kept in the operation file. Examples of these completed checklists were reviewed during MAC Transport's audit. The auditor reviewed these records verifying that they check the equipment to be in good working order during transport of



cyanide. No additional information was required to find this issue in full compliance with the Code. The consignor's Contractor Selection Procedure requires that contractors in its supply chain must be of their responsibilities under the Code with respect to cyanide emergencies and take the measures necessary to prepare for emergencies. The auditor verified that both the consignor and the entities within its supply chain comply with this provision.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

MAC Transport was required to include into its emergency contact list, the telephone numbers, and names of its supply chain actors as Contrans warehouse, its mining client Buenaventura and MAC Transport's self-emergency contact names and numbers. After the audit, MAC Transport sent the revised version of its emergency response plan where it included the additional required data in its emergency contact list. No additional information was required.

The consignor's ERP includes a communication flow diagram and current contact information for necessary internal notification and external notifications in the event of a cyanide emergency during transport. The auditor reviewed the transporter notification procedure and contact information verifying compliance with this provision.

MAC Transport was required to provision in the ERP a statement describing how they will update the list of emergency contacts and to submit an updated list. After the audit, the consignor included into its ERP that the emergency contact numbers must be updated on an annual basis or when there are changes in routes, clients and contractors, or any other consideration needing to update this emergency contact list.

The auditor reviewed the procedure verifying its implementation through review of the updated contact list for emergencies verifying compliance with this requirement.



MAC Transport ERP includes a requirement and details to notify ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. The Plan states that must describe the nature and extent of such incident, as well as the response of the operation and the measures that have been taken to prevent its recurrence. The operation has not experienced any cyanide incidents during the past three-year audit cycle, so no such incidents were reported to the ICMI.

Transport Practice 3.4

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

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

MAC Transport was required to clearly describe the responsibilities of each actor on its cyanide supply chain. After the audit the consignor included in its emergency response plan a responsibilities matrix in agreement with their cyanide contractors where, among others, it identified for each section of its supply chain, who is responsible responding to the emergency, with whom they should communicate and coordinate.

For cases of a cyanide spill incident requiring remediation, recovery and neutralization of solutions and solids, decontamination of soils and other contaminated, media management and disposal of spill clean-up debris, MAC Transport ERP refers the cyanide consignor, will oversee the quick and effective response from its contractors, which must notify the consignor on the occurrence of any incident.

All contractors in this supply chain area ICMI certified. Their procedures describe impacted soils are to be excavated until spilled material is no longer encountered based on testing with a field test. Recovered product and/or removed soils are to be placed in proper labelled containers and then disposed at a mine or in accordance with environmental regulations. They will be responsible to manage the necessary actions for remediation, recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill



clean-up debris.

No additional information was required to find this in full compliance with the Code.

MAC Transport ERP specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate, and hydrogen peroxide for the treatment of cyanide spilled into surface waters. The contractor's emergency response procedures also include this same prohibition.

Transport Practice 3.5

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

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Transport Practice 3.5

As required during the audit MAC Transport submitted a reviewed version of its ERP including the provision that this document must be updated on an annual basis or when is need as after an emergency mock drill, changes in the route's evaluations, equipment or any other consideration that allows more efficiency and effectiveness. However, the auditor found that the plan had been consistently reviewed each year during this recertification period. The plan reviewed was maintained as latest versions and under formal document control. Records were available to show that this is done.

MAC Transport ERP states to perform and participate on annually mock emergency drills, with the purpose of evaluating the effectiveness of the Plan and correcting the anomalies found.

MAC Transport has established in its ERP to conduct and participate on an annual basis mock emergency drill that simulate transport-related cyanide exposures and releases, so they are better prepared in the event that actual exposures and releases occur.

On year 2022 the consignor participated in the emergency response drills performed by its transporters Meridian and Zetramsa, simulating a cyanide spill in route. Also participated in its mining client Orcopampa, in an emergency mock drill simulating cyanide spill with exposure to mines workers. On August 14, 2023, participated in Zetramsa's cyanide spill mock drill.

The drills have been evaluated to determine if response procedures are adequate, response



equipment is appropriate, and personnel are professionally trained. Written documentation of these evaluations has been retained for the past years and used as a basis for whatever changes to procedures, equipment or training are necessary.

MAC Transport ERP establishes the Plan must be evaluated on its performance after its implementation and revise it as needed. Such reviews have not been conducted during this recertification period as no emergency occurred needing to activate the emergency response plan.

