

SUMMARY AUDIT REPORT

***Maersk Logistics & Services Peru S.A.
Cyanide Transport Operation***

***For The
International Cyanide Management Code***

November 2021



Page

Content

| | | |
|----|--------------------------------|----|
| 1. | TRANSPORT:..... | 6 |
| | Standard of Practice 1.1..... | 6 |
| | Standard of Practice 1.2..... | 8 |
| | Standard of Practice 1.3..... | 9 |
| | Standard of Practice 1.4..... | 11 |
| | Standard of Practice 1.5:..... | 13 |
| | Standard of Practice 1.6:..... | 14 |
| 2. | INTERIM STORAGE | 16 |
| | Standard of Practice 2.1..... | 16 |
| 3. | EMERGENCY RESPONSE:..... | 18 |
| | Standard of Practice 3.1..... | 18 |
| | Standard of Practice 3.2..... | 19 |
| | Standard of Practice 3.3..... | 21 |
| | Standard of Practice 3.4..... | 21 |
| | Standard of Practice 3.5..... | 22 |

Information on the audited operation

Name of the Transport Operation: APM Terminals Inland Services S.A.
Name of the Company Ownership: MAERSK - APM Terminals Inland Services S.A.
Name of Operating Company: APM Terminals Inland Services S.A.
Name of Responsible Manager: Luis Enrique Casallo Castilla - HSSE Trucking Supervisor Office

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+571 658 1100 | +571 658 1090 |

Location detail and description of operation

Terminals Inland Services S.A. is a member company of the Danish group AP Moller – MAERSK.

APM Terminals Inland Services S.A. Peru (APM) has inland service facilities in six strategic locations across Peru, including the Ventanilla, Callao facilities. All facilities comply with General Customs Law, and procedures established by the National Supervision, to ensure safe and suitable storage.

APM Terminals Inland Service Peru employees highly qualified, well-trained staff. They liaise closely with the port to prevent any problems that may arise during operations, to ensure cargo is managed correctly and promptly before, during, and after goods delivery.

The company operates a fleet of almost one hundred vehicles and seventy trailers, equipped with 24/7 Satellite Locator and Monitoring. Transport services are offered for dry, refrigerated containerized cargo, and oversized and project cargo.

APM has adopted road safety learnings from their mining industry customers, who have established and adhere to strict road-safety standards. In 2019, APM achieved ISO Standard 39001 certification for their Road Traffic Safety Management System.

APM was certified in full compliance under the Cyanide Code in March 2014, and in November 2018.

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

APM transports sodium cyanide in 20-foot marine containers from the port of Callao to its warehouses in Ventanilla, Callao, where it temporarily stores them for the processing and internalization of the product to the national territory. This is due to the lack of space to store containers in the port of Callao, operated by Maersk. The warehouse in Ventanilla is what they call an Inland port. Once the product passed through customs, APM moves the containers with cyanide to the yard intended for the storage of products and goods already internalized in the country.

In order to return the containers owned by the shipping company Maersk, APM transfers the IBC (Intermediate Bulk Container) boxes to local containers, an operation carried out with a forklift in a specially separated area for this purpose. The containers are temporarily stored until they are taken to their final destination as indicated by the cyanide consignee, Orica. The carrier, following instructions from Orica, will transfer the containers to IBC's Orica transfer plant to isotanks, or to mining customers, in this the main one is Antamina, a large-scale mining operation producing copper among other metals.

APM transports sodium cyanide in wooden presentation boxes for 1TM. APM operation includes management and control of Transportation from the port of Callao, in its interim warehouse located in Callao (where it is stored until its nationalization) and then transport to warehouse of the client.

APM Inland Services S.A.

Name of Facility



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November 16, 2021

Date

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 has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

During the previous three-year audit cycle, this operation did not experienced non-compliance with Code requirements, or significant cyanide incidents, cyanide exposures or releases requiring notification to ICMI.

Audit Company: BP Cyanide Auditors SAC

Audit Team Leader and Technical auditor Bruno Pizzorni
Email: bpizzorni@cyanideauditor.com

Dates of Audit: November 15 and 16, 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 Cyanide Transportation Verification Protocol for the International Cyanide Management Code and using standard and accepted practices for health, safety, and environmental audits.

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

Transport Verification Protocol

1. **TRANSPORT:**

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

Standard of Practice 1.1

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

The operation is in full compliance with Standard of Practice 1.1
 in substantial compliance with
 not in compliance with

APM Inland Services (APM) has evaluated the cyanide transportation route from Callao to Antamina mining, the route that it currently uses for its cyanide transportation operation on behalf of Orica. Potential impacts due to spill accidents has considered. APM identified the population density, any road construction, driving in the road infrastructure, inclination, and slope, has identified the existence of proximity of bodies of water and fog zones.

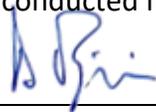
The auditor reviewed the R.SG-03 Antamina Route Study Report which is periodically updated. The evaluation and selection of routes is limited on the one hand to the routes authorized by the Peruvian ministry of transportation and communications to transport dangerous goods through roads and cities and it is also limited because by the route authorized by the client, the mining company Antamina.

The study report of the Antamina route includes a general guide map of the evaluated route, a guide map by main segments describing for each segment the distances, travel time, maximum speed allowed, the type and conditions of the road, the population centers and location of water bodies. It includes a list of the telephone contact the numbers for emergencies, the segment conclusions, general recommendations, and safe places to stop. Also includes a detailed risk assessment whereby means of photographs and symbols identify the hazards of the route and the controls necessary to minimize them

APM has developed and implemented the procedure BHS-04 Procedure for Road Study and according to it evaluated the risks of the selected cyanide transport route and take the measures necessary to manage these risks. The route evaluation conducted for Antamina has considered the characteristics

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

that present a greater risk of accidents or potential impacts such as steep slopes, sharp curves, narrow or rough roads and proximity to surface water resources. The carrier has identified the areas that present increased risks and has documented these in their risk analysis performed such as reducing vehicle speed and also training drivers.

The auditor reviewed APM route study report from Callao to Antamina mine site 430 km route analysis divided into three routes segments, confirming controls are established to manage the risks identified. Also reviewed the risk analysis Annex N° 8 - D.S. 024-2016-EM Hazard Identification, Risk Assessment and Control Measures- Baseline 2020.

The Procedure for Road Study states to periodically reevaluate routes used for cyanide deliveries. APM formally updates as required the identification of road risks, route reevaluation analysis documents were reviewed for the Antamina route. These route analyses considered all ICMC criteria when determining the routes.

APM management members and drivers were interviewed, and confirmation was made that feedback regarding routes is discussed between them and APM for the current transport operations, with participation also of Orica, the cyanide consignor.

The transporter documents it's risk analysis where they have identified the risk and measures taken to control them. Road characteristic's as sharp curves, areas near to waterbodies and high-density population are having special precautions to transit through.

APM personnel were interviewed, and confirmation was made that risks and risk mitigation measures are detailed for the route. They meet to discuss risks and risk mitigation measures before departing in each trip. Route evaluations for the transportation routes used for shipments were complete and records were available for review. Routes are also evaluated for security issues and for cell phone coverage.

APM has the authorization of the Ministry of Transport and Communications of Peru (MTC) to use the route that currently runs from Callao to the mine operation showed. APM participates in the committee of Antamina transporters where there is interaction on the risks involved in the route used for the transport to the mine. Any interaction with the communities is in charge of Antamina according to their request. Orica, the cyanide consignor, has also reviewed the route and authorizes its use to APM. The transporter annually presents annually its contingency plan to Antamina where it updates the risks evaluated on the route.

During this recertification period APM has been interacting with these stakeholders as needed. The auditor reviewed meeting minutes between APM and the mine and Orica to share incidents, learned lessons, and action plans. Also reviewed the resolution of the Ministry of Transport that approves the

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

route.

APM transports sodium cyanide in convoys of five trucks, with two pickup trucks as escorts. The leading escort is from APM with two personnel trained in hazardous materials (HAZMAT), in the back of the convoy travels two persons of the emergency response contractor IFSSEC. It is a requirement of Antamina to transport HAZMAT in convoy, during daylight hours and only allowed to stop at previously authorized places due to their ample capacity for parking and availability of food and security. The convoy makes the route in 2 days, the first section is Lima - Supe and the second day is to mine check point at Conococha. In this place Antamina passes inspection to all drivers checking that they are enabled for driving according to their requirements, also passes inspection to the trucks to ensure that everything is in order. Then they can continue to the mine site. The auditor reviewed Antamina P.POP-02 Mine Transportation Procedure, APM Route Study, the convoys checklist controls and interview drivers and management personnel confirming all the controls mentioned above are in place to transport sodium cyanide.

The transporter does not contract other entities to conduct any of the activities required in Transport Practice 1.1.

Standard of 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 Standard of Practice 1.2
- in substantial compliance with
- not in compliance with

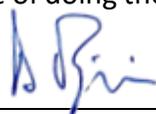
APM only uses trained, qualified, and licensed drivers to operate the transport vehicles. The drivers have a driver's license type A3 that enables them to transport hazardous materials according to the tractor and trailer configuration, this in accordance with local regulations DS 0-21-2008 MTC Hazardous Materials Transportation Regulations.

The Transport area of APM is responsible for monitoring the authorization and validity of driver's licenses and travel insurance. The auditor reviewed the document of the Human Resources area "Job Description" which indicates the requirements that must met the equipment operators: truck drivers, reach stackers and forklifts.

Before hiring a driver at APM, they must go through a driving test and check the criminal record. APM has a Master Driver who is in charge of doing the driving evaluation during the process of hiring

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

drivers and equipment operators. There are fourteen drivers authorized to transport material to Antamina, all trained in HAZMAT 1. The three teams of escorts trained in HAZMAT 3. This training is conducted by the contractor Fire Rescue Hazmat Peru, a company approved by Antamina. Orica also trained the team in the safe handling of cyanide. The auditor reviewed training records and operator documents finding everything compliant.

All personnel who handle equipment related to the cyanide transport operation as the trucks, forklifts and reach stackers, are trained to perform their tasks safely and environmentally responsible. Drivers are trained in the loading and unloading procedures of their trucks and forklift operators are trained in the movement of loads without breaking or damaging cyanide boxes during the transfer operation from one container to another.

The auditor verified that such training has been provided and that it has included elements appropriate to the nature of the transport and the responsibilities of the operator. The auditor reviewed training material including the cyanide transportation work procedure, the forklift and reach stackers operator certificates and attendance records made up of signature sheets. The auditor also interviewed the operators of the equipment verifying that they have received the training. Training is refreshed periodically, and testing is performed to confirm competency.

The transporter does not contract other entities to conduct any of the activities required in Transport Practice 1.2

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is in full compliance with Standard of Practice 1.3
 in substantial compliance with
 not in compliance with

The trucks used by the carrier are configured in accordance with the traffic regulations of the Ministry of Transport and Communications (MTC) of Peru with a configuration T3S3 that refers to the 3-axle tract and respective trailer with capacity to transport a gross weight of 48 T, as it is identified on the respective authorization card of the vehicle. The auditor reviewed the technical specifications of the manufacturer of the Mercedes Benz Actros truck that confirms this load capacity. Fleet specification files were available for review during the verification audit. The tractors and trailers were found to be capable of carrying the loads for which they were being used. Tractor and loaded trailer weights are carefully monitored to ensure that trucks are not overweight.

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

APM 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 is larger than the gross weight of an isotank or a maritime container fully loaded with cyanide which is approximately 22 t.

The maintenance of the vehicles is conducted in the authorized workshop Divemotors. Preventive maintenance is performed every 15,000 km. On the other hand, Antamina randomly reviews the maintenance supports of the vehicles. An APM planner reviews the vehicles mileage weekly and informs to the operations staff about upcoming maintenance. The transporter has formal preventive maintenance program to ensure that its tractors and trailers are safe for transport.

As for the trailers, before each trip the drivers make a visual inspection by means of the form " Pre-trip Report". In case of finding any defect, the trailer will not go out to the service. Every 6 months APM sends the trailers to formal inspections performed by third parties who are trusted suppliers. The auditor reviewed the trailers' manufacturing quality certificates as well as the biannual maintenance records. Also reviewed the annual maintenance plan for trucks, trailers, reach stackers and forklifts. Reviewed the work orders of Divemotors where they indicate the list of changed components including a detailed report of the work conducted on the vehicle. A maintenance weekly report is required to send to APM's management, operations, and maintenance among, other areas. Preventive maintenance to the reach stackers is done with APM's own personnel, who have training courses provided by the distributor of the equipment.

In addition to ensuring that the load capacity of their transport equipment indicated by the manufacturer is adequate, the carrier also verifies that the capacity of that equipment is adequate by inspecting and evaluating their equipment to identify signs of stress or overload. For this purpose, it uses a routine preventive maintenance inspection program. The auditor reviewed documentation of the inspections and through interviews with maintenance personnel and equipment operators confirmed compliance with this provision.

APM is responsible to verify the adequacy of the equipment for the load it must bear according to their procedures, performing inspections regularly before departing the cyanide convoy. APM H&S Supervisor and the escort driver are present to ensure the transporter operates according to recognized H&S standards and are experienced in the handling of hazardous goods.

The carrier has the procedure P.OP-02 Heavy Cargo Transport Operations which indicates that they must check the vehicle to prevent overload and indicates the following: when excessive loads of products (hazardous materials) are identified, they should not start the trip. The supervisor in coordination with the escort must verify and ensure that the quantity of products to be transported must be in accordance with the payload capacity of the unit, as well as the capacity established by the

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

legal norms of the MTC, which must be recorded in the format of weights and measures.

To prevent overloading of the transport vehicle, APM has established that each platform will be loaded with only one cyanide 20-foot sea containers and that each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklists and was confirmed during the interviews.

The load made by the port operator is weighed to confirm the weight of the shipment and recorded in the shipping papers, allowing APM to ensure the weight of the shipment. Records of cyanide shipments 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.

Shipping paperwork and APM policies and procedures were reviewed, and the transporter personnel interviewed to confirm that appropriate practices are used. Shipping records showed that cargo amounts, and weights were within the normal weight capacity of the equipment in use.

The transporter does not contract other entities to conduct any of the activities required in Transport Practice 1.3.

Standard of Practice 1.4

Develop and implement a safety program for transport of 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 1.4 |
|------------------|---|--------------------------|

The procedure PETS-APM-001 Cargo Securing and Lashing Procedure requires the drivers to include in the pre-trip inspections and throughout the transport journey, to check the integrity of the door’s tags, that trailers and containers are locked and secured, all endorsed by the convoy leader. The procedures describe the administrative, operational and safety measures for the proper transportation of sodium cyanide.

The procedure establishes that the load cannot be altered during the transportation process. . APM also shackle the container using chains to secure the container to the trailer, two at the front side

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| APM Inland Services S.A. <hr/> Name of Facility |  <hr/> Sign of Lead Auditor | November 16, 2021 <hr/> Date |
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and other two chains crossing the door of the container for which is no possible to open the door due to these chains. The procedure was found to be compliant with the ICMC requirements.

Shipments of cyanide are identified with the plates and signage required by the Peruvian authority. The auditor inspected the plates and signs used to identify the presence of cyanide in transport vehicles and concludes that this provision is complied. APM requires all sea containers to have appropriate placards showing UN 1689 (solid cyanide) are displayed on all four sides of the sea containers. Also, it is required drivers visually inspect the containers prior to each movement.

The carrier has safety programs that address the various elements required for safe cyanide transportation. The programs consider each of the topics identified by the ICMI as necessary to ensure the safety of cyanide transport and considering the specific circumstances presented by the transport route. Inspections include identification of maintenance needs and safety issues on sea containers being transported, and the process to address any needs or issues identified. The responsibility for the preventive maintenance of the vehicles oversees Divemotors which is the authorized workshop of the Mercedes Benz brand. The frequency of maintenance activities is as specified by the vehicle manufacturer and as scheduled, it informs the various areas weekly to make the vehicles available for maintenance, it is reported weekly to operations on the operating hours of the vehicles. The auditor reviewed maintenance records and interviewed employees determining that this provision is being complied with.

APM's personnel and drivers regularly inspect the cyanide convoys departing to the mine site. Pre-trip checklists performed were reviewed and found to be complete. Pre-trip checklists showed that escort and transport vehicles are in optimal condition, that load capacity is reviewed, that weights to be transported conform to the vehicular configuration, and that characteristics of the transport unit (lights, brakes, chassis, container among others) are without cracks or flaws.

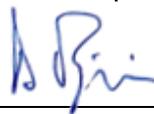
Confirmation was made during the interviews with the trucking company management that perform pre-trip inspections to ensure that trailers are locked and secured and that placards are on all four sides of the trailers, that they perform preventive maintenance to their vehicles according to a stablished schedule. Also, was confirmed that the transporter maintains drug and alcohol abuse prevention policies, which were reviewed during the audit.

According to the transporter's procedure PER-APMT-HE-PL04 Fatigue and Drowsiness Policy, the transport will only be conducted during daytime hours. In the same way, drivers must rest at least eight hours before departing on the trip. The drivers working day traveling with sodium cyanide may not exceed ten hours a day discontinuous, allowing stoppings every two hours at least for fifteen minutes for equipment review, feeding and active stops.

To prevent the load from shifting, APM has developed and implemented the procedure POP.04 Cargo

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

Securing and Lashing. The sea container is shackled with four chains, all containers are filled with 20 IBCs and block and brace 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, minimizing the possibility of displacement during transport.

The procedure CSG-02 Refusal to Unsafe Work, allows workers to refuse performing an unsafe work. Procedure the procedure P.PO-03 Assignment, Transport, Loading and Unloading of Cyanide states the convoy leader, who continuously reports the state of progress of the operation, in any unsafe event can stop the convoy. Transport can continue only if the leader of the convoy has provided the relevant conditions.

APM has developed and implemented the Procedure for the Implementation and Administration of the Alcohol and Drug Policy to establish the general guidelines for the implementation and administration of the alcohol and drug policy of the corporative West Coast of South America (WSA) region of APM. The auditor reviewed with the doctor in charge of the APM medical center, the records of blood alcohol tests conducted before the departure of the convoy.

The transporter does not contract other entities to conduct any of the activities required in Transport Practice 1.4.

Standard of Practice 1.5:

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

- The operation is
- in full compliance with Standard of Practice 1.5
 - in substantial compliance with
 - not in compliance with

APM does not transport cyanide by sea or air. This Standard of Practice does not apply to this operation.

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

Standard of Practice 1.6:

Track cyanide shipments to prevent losses during transport.

The operation is in full compliance with Standard of Practice 1.6
 in substantial compliance with
 not in compliance with

The carrier has cellphones assigned to the drivers and escorts of the cyanide convoy, also satellite phones for the route to Antamina. The trucks have radios to communicate inside the convoy, they have a list of emergency contacts where the numbers of the control center are indicated and as it appears in the contingency plan.

The auditor verified that the transport vehicles and drivers have means of communications such as radio and cell phone, carry written procedures and a checklist where the necessary equipment for each shipment is reviewed. Vehicle operators have the contact information for emergency notification to appropriate individuals and organizations and entities along the route as needed to mobilize appropriate response capabilities.

APM weekly schedules the transport of cargo in general and the Control Center validates the state of operation of the GPS in advance. As for the satellite phone they do random tests to see if the phone works. It was required to include in the equipment check list the operation of the cell phone and the radio as well as include in the checklist the satellite phone. . The carrier is also required to establish a written requirement to ensure that such tests are performed and must retain records demonstrating the application of this procedure.

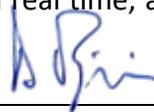
The auditor reviewed completed pre-trip inspection records checking that these include fields allowing to review the correct operation of the communications equipment.

Communication blackout areas along the planned transport route have been identified during the routes risk assessments performed by APM, Antamina and Orica. APM has identified these areas by means of geofencing in the cargo tracking control system. Before entering these areas, the Team Leader of the convoy calls the control center and records the entrance to this area. The auditor reviewed these geofencing in the control center. In the places where there is signal, it indicates the kilometer and the number of the route. APM has a GPS monitoring procedure, the operation monitors all cell phone coverages for all routes. Through the website of the Supervisory Body for Private Information in Telecommunications (OSIPTTEL) they update this data and during the periodically route assessment.

Trucks are monitored along the route in real time, and any delay will be immediately notice at the

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

control board. The auditor interviewed the operators and inspected the travel records verifying that the procedure is applied.

The carrier has a procedure for tracking the load by means of GPS controlled from its control center. The escort supervisor (Team Leader) reports twice a day the progress status of the convoy to Antamina, Orica and APM's control center. The auditor reviewed in the control center the status of progress of a cargo transport service. GPS tracking system allows continuously monitoring of the location of the convoy. The cyanide transporter communicates the mine client and the transporter upon dispatch, upon passing through principal cities and town along the route, on arriving to the mine site, and after unloading is complete. Personnel responsible for tracking shipment status were interviewed, the GPS system was demonstrated, and logs showing that shipment status, other than cyanide, was being recorded were reviewed and were found to be complete.

APM has inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The cargo is weighed in APM, the balance ticket is recorded in the referral guide, the number of containers and boxes of the shipment is also specified in it. Upon arrival at Antamina the operation also weighs the shipment and counts the boxes for its conformity.

Shipping paperwork is conformant to ICMC requirements, including chain of custody requirements. A waybill will accompany the transportation which includes chain of custody data such as container numbers, the amount of cyanide delivered, waybill number, shipping documentation, Safety Data Sheets (SDS), packing list, bill of lading, customs declarations, and producer invoice, among others. Additionally, the containers are locked are tagged and these tags are only removed at the mine.

A waybill accompanies the cyanide transportation in APM, which includes chain of custody data such as container numbers, the amount of cyanide delivered and the SDS, among others. The transport document, the SDS, and emergency response information are carried by each driver. The drivers have an on-board file that include copies of its, licenses, and the cyanide SDS.

The transporter does not contract other entities to conduct any of the activities required in Transport Practice 1.6

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

2. **INTERIM STORAGE**

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

Standard of 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 <input type="checkbox"/> not in compliance with | Standard of Practice 2.1 |
|------------------|---|--------------------------|

APM has interim storage of sodium cyanide in maritime containers with sodium cyanide in its open yard at Avenida Nestor Gambetta km 14.5 Callao, as an extension of its port operation. APM operates part of the port of Callao and must move the containers to its Nestor Gambetta facility due to lack of storage space in the port area. Once the containers are in this facility, the necessary documentation is conducted for the internment of the product in Peruvian territory through customs management. Then the cyanide shipment packed in one-ton Intermediate Bulk Containers (IBCs) is moved with a forklift to another 20-foot sea container to return the container from the shipping company. According with the client requirement, the containers with cyanide are sent to the mine operations, or to Orica's transfer plant located within the APM facilities.

Personnel handling and working near cyanide during temporary storage have been alerted to the presence of cyanide and are reminded of the various relative prohibitions and personal protective equipment necessary for its handling. Signs have been installed in visible places warning about the presence of cyanide, about the prohibition of smoking, generating open flames, eating, and drinking in that area. The Personal Protective Equipment (*PPE*) to be used is also specified, in accordance with the general safety program in the staging facility and the training that personnel receive.

During his visit to the site, the auditor checked by direct observation the signage in and around the temporary storage. Through interviews with facility personnel and review of safety and training programs regarding cyanide safety, staff have been informed about the presence and risks of cyanide.

Cyanide is stored securely, without access to the public, within a fenced area, with limited access to the area. Only authorized personnel with the respective credentials and a magnetic card are authorized to entry to this area. The temporary storage area is controlled and monitored 24/7 with closed circuit TV. The auditor verified that the measures are appropriate through an inspection of the site.

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

APM considers the separation of incompatible materials as a frequent practice in the handling of hazardous materials and is a specific consideration when it comes to the storage of cyanide, keeping it away from incompatible products such as acids, strong oxidants, and explosives. The auditor verified that the handling of cyanide is conducted in accordance with what is indicated in the Material Compatibility Table that APM uses in its usual tasks during the storage of various products in the container yards. Also checked the flow pathways that the released materials might follow, to verify that the releases coming from separate storage areas will not mix in a drain or containment common to both storage areas, finding everything compliant.

Cyanide is only stored in 20-foot sea containers, which is a closed structure to avoid contact with rain. There is no water piping system for drinking use in the area; the safety shower that is present in the vicinity of the cyanide storage area is designed in such a way that potential water leaks do not come into contact with the cyanide containers. The auditor inspected the storage facility to determine that this provision is complied with.

The area where cyanide is stored is an open yard and therefore, they have sufficient ventilation that prevents the accumulation of cyanide dust and hydrogen cyanide gas. The auditor inspected the staging facility confirming compliance with this provision.

The floor and surrounding walls of the storage yard provide sufficient secondary containment for trucks with the cyanide shipments. Due to the maneuver of transfer of the IBCs from the returnable container to the container of the operation that is carried out in the storage yard, they have established measures to control the possible releases of solid cyanide, such as a remote observer, blocking of the tracks during the operation, they have procedures, trained personnel, materials and tools to collect the cyanide that has spilled on the asphalt pavement.

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

3. **EMERGENCY RESPONSE:**

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with Standard of Practice 3.1
 in substantial compliance with
 not in compliance with

APM has an emergency response plan (ERP) for the interim storage PER-APMT-HSSE-PLN-003 Contingency Plan v6 dated November 2021 and another ERP for the transport operation LHS-01 Contingency Plan for the Transport of Hazardous Materials – Antamina v3 dated November 2021.

The plans describe the physical form of cyanide and the method of transportation. The emergency scenarios described in the plans are specific to the delivery route taken, the state of the road, the physical and chemical form of the cyanide transported, and the design of the transport vehicles used.

The transportation ERP reflects the risks assessed on the transport route to Antamina and also to other mining operations. The ERP for the interim storage in addition describes the transportation and storage equipment such as forklifts and reach stackers, as well as the area designated in the container yard for temporary storage of sodium cyanide. The auditor reviewed the plans verifying that they are adequate in identifying potential emergency scenarios and necessary response actions.

The revised versions of the emergency response plans describe the nature of the response actions to be taken for the types of emergency situations identified. The level of detail is appropriate to the nature of the potential emergencies identified in the plans and the response capabilities available. In all cases, the immediate response – first response – will be conducted by transport personnel – drivers and escorts – and warehouse brigades.

The carrier has included any details that may be presented in the event of leaks at locations on the route that have been identified as being of greatest risk. The response to a spill that occurs during the transport of cyanide to open water such as a river establishes notifying the authorities of the lower part of the river to alert the surrounding populations to refrain from using the water of the river.

The auditor reviewed the plans verifying that, to the extent possible, it outlines the specific response

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

actions to be taken for the types of potential spill scenarios identified.

APM considers in its emergency response plans, the participation of external response personnel to participate in the emergency response to spills that occur during the transport of cyanide for large-scale response cases along the transport route. Emergency plans include entities such as the IFSEC external hazardous materials responder, police, firefighters, and medical facilities located along the route.

IFSEC is the third-party service provider that has designated convoy escort functions and that in addition to its typical contracted first responder activities, would also assist in the larger-scale second emergency response.

The auditor reviewed the carrier's emergency response plans verifying that IFSEC's functions are identified, as well as the contractual documentation with this IFSEC contractor specifying its functions.

Standard of Practice 3.2

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

The operation is in full compliance with Standard of Practice 3.2
 in substantial compliance with
 not in compliance with

APM provides emergency response training to drivers, convoy leaders and supervisors. Training on emergency response is given periodically according to an Annual Training Program. Personnel is 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. The auditor reviewed several training records in hard copies, which include the persons trained, the nature and dates of the training. Administrative personnel, drivers and escorts were interviewed, and awareness of emergency procedures and documentation was confirmed.

The ERPs describe the emergency response duties and responsibilities of the transporter. The plans have 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 and the Convoy Leader, among others. The roles and responsibilities of relevant internal

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

and external personnel are clearly described. The information in the plans was found to be acceptable.

APM has a list of emergency response equipment that must accompany the cyanide shipment or that must be available along the transportation route and for the interim storage. The lists are part of the plans and include checklists for inventorying equipment. The lists include all the equipment and materials required for emergency response during transportation along the route and temporal storage, including spill response equipment. The emergency equipment and Personal Protection Equipment (PPE) includes Tyvek suits, leather and impermeable gloves, PVC boots, safety goggles, isolating tape rolls, HCN detector, Cyanokit, disposable respirators, oxygen, shovels, sweeps, polyethylene bags, and empty containers. The HCN detector has been calibrated during the recertification period in accordance with the manufacturer's recommendations. The Cyanokit is stored in a manner consistent with the manufacturer's recommendations. The oxygen tank is routinely inspected for the volume of oxygen. The auditor considers that the equipment and materials are suitable for the activities required in the emergency response plans.

The plans define what equipment must be available and extra personal protective equipment available. Equipment is checked as part of the pre- trip/ pre-task inspection process. The auditor reviewed the completed emergency equipment checklists and although at the time of the audit there were no cyanide shipments, he observed the storage and availability of the equipment at the carrier's facility. It also interviewed appropriate personnel to verify compliance with this provision. The emergency response equipment for the temporary storage is kept safe near the medical centre.

IFSEC, the emergency response contractor, escorts the convoy with a pickup truck closing the convoy carrying a complete emergency response equipment, including personal protective equipment, spills containment kit, and cyanide antidote. PPE's, spill containment tools and materials is also transported in APM's escort truck leading the convoy, including mechanical items, among others. A checklist is used to verify that it is available, these were reviewed and found to be appropriate.

APM has written provisions in its emergency response plans establishing that the emergency response equipment identified must be inspected and evaluated regularly so that they are available in good working order when needed for use. There pass through monthly inspections and also before the departure of each convoy. The carrier has implemented this provision by doing inspections and tests as planned and maintains the records. The auditor reviewed these records and verified on site that the equipment is in good working order for the transport of cyanide.

The transporter does not contract other entities to conduct any of the activities required in Transport Practice 3.2

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting

The operation is in full compliance with Standard of Practice 3.3
 in substantial compliance with
 not in compliance with

The carrier has in its plan's procedures and flowcharts of communications for emergencies, as well as updated contact information for the necessary internal notification and external notifications in case of a cyanide emergency during transport or provisional storage.

The auditor reviewed the notification procedures and the carrier's contact information telephone list verifying compliance with this provision. It is listed current emergency numbers for local hospitals, and for ambulance, fire, and environmental responders. Phone lists also included up-to-date contact information for the mine site, Orica and Antamina, among others.

APM's revised versions of the emergency response plan states to be updated annually the emergency contact list evaluating the numbers and by internet search.

The new versions of the ERPs included statements to report the ICMI in case of a significant incident with cyanide, as defined in the Code Definitions and Acronyms document.

Standard of 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 Standard of Practice 3.4
 in substantial compliance with
 not in compliance with

APM and his contractors Ecomarine, the environmental remediation contractor and IFSEC the emergency responder escorting the convoys, have procedures in place to provide safe and environmentally appropriate remediation and handling and disposal of cyanide waste materials.

The carrier, together with IFSEC, will carry out its own remediation actions at the first response level for which it has cleaning and decontamination procedures that detail how the recovery and

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

neutralization activities of solutions will be carried out and solids, the decontamination of soils or other contaminated media and the management and disposal of the remains of the spill cleanup, in accordance with the provisions of the procedure PER-APMT-HSSE-PRE-004 Response Procedure for HAZMAT and Hydrocarbon Spills, item 3.4 Procedure in case of NaCN Spill (cyanide).

The final cleaning of spills that occur during transport will be conducted by Ecomarine, a commercial chemical remediation contractor. Ecomarine is identified as such in the carrier's Emergency Response Plan and in the Spill Response Procedure. The auditor verified the company is available and active to conduct remediation activities.

The auditor reviewed the remediation elements included in the Plan and Procedure. It also verified that the Ecomarine remediation contractor has procedures in place to provide safe and environmentally appropriate remediation and handling and disposal of cyanide waste materials.

APM's transportation emergency response plans and procedures of its commercial contractors for emergency response plan specifically prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide for treating a cyanide spill into surface water. The plan address that the use of these chemical substances in any incident for the treatment of solid sodium cyanide spilled in surface waters is prohibited. Neutralization chemicals are not allowed to be used in or near surface water bodies.

Standard of Practice 3.5

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

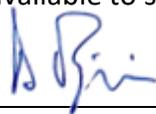
The operation is in full compliance with Standard of Practice 3.5
 in substantial compliance with
 not in compliance with

The carrier has a process in place to ensure that the emergency response plans are reviewed, evaluated, and updated as needed to account for changes in potential spill scenarios and necessary response actions that may vary over time such as transport routes, the form of cyanide transported, and the types of transport equipment used.

The auditor reviewed these provisions contained in the emergency response plans, assessing the process and its implementation by reviewing the documentation of the various versions of the Plan and through interviews with staff. APM's Plans state to periodically review the emergency procedures and to evaluate the plans adequacy. The plans reviewed were maintained as latest versions and under formal document control. Records were available to show that this is done.

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date

The carrier has provisions for cyanide emergency drills as hands-on response training to familiarize personnel with the necessary procedures. The provisions contained in the emergency response plans state that the carrier must perform emergency drills that simulate transport-related cyanide exposures and releases, in order to be better prepared in the event of actual exposures and releases. The drills have been evaluated to determine if the response procedures are adequate, the response team is appropriate, and the staff is professionally trained. The written documentation of these assessments is used as a basis for any changes in procedures, equipment or training that may be required. The auditor reviewed the drills reports performed during the recertification period and interviewed the relevant staff confirming compliance with this provision.

In November 2019 APM, Antamina mine and Orica, performed a cyanide emergency mock drill simulating an 8 kg cyanide spill in the route to Antamina with eleven participants.

In 2020 no mock drill was performed due to local prohibitions during the COVID-19 pandemic.

In 2021 they conducted a simulation con Antamina where the scenario was km 10 of the Conococha – Antamina highway (route 111). The driver in position two of a convoy of five units, suffers the impact of a private semi-trailer that was traveling at excessive speed, leaving the Casa Blanca checkpoint, Product of the maneuver, the container falls, deforms and spills approximately 5 k of sodium cyanide out of the container. As a result, the Contingency Plan was activated. Both drivers emerged unscathed from the event.

The new versions of the emergency response plans state the plan will be revised for this reason, resulting this Protocol Question in Full Compliance. Such reviews have not been conducted during this recertification period as no emergency occurred needing to activate the Plan.

APM Inland Services S.A.

Name of Facility



Sign of Lead Auditor

November 16, 2021

Date