SUMMARY AUDIT REPORT

Maersk Logistics & Services Peru S.A.

Cyanide Transport Operation

For The

International Cyanide Management Code

March 2026

BP Cyanide Auditors

Content

Operation General Information

Name of the Transport Operation:	Maersk Logistics & Services Peru S.A. (former APM Terminals Inland Services S.A.)
Name of Facility Owner:	Maersk
Name of Facility Operator:	Maersk Logistics & Services Peru S.A.
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State/Province:	Lima, Callao Country: Peru
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Operation Location Detail and Description

Maersk Logistics & Services Peru S.A. (former APM Terminals Inland Services S.A.) is a member company of the Danish group A.P. Moller – Maersk. Maersk Logistics & Services Peru S.A (Maersk), located at Avenida Nestor Gambetta, Km 14.5, Ventanilla, Constitutional province of Callao, Lima Perú. The company has more than 25 years of experience in the Peruvian market. It offers comprehensive container logistics solutions for general customers, shipping lines and freight forwarders. Maersk's transport division has a fleet of tractor-trailers for container transport, haulage and loose cargo in general. Among the main services they offer is the transport service from the Callao Maritime Terminal (Callao Port) to the Maersk warehouses (former ALCONSA - South American Container Warehouses) and vice versa; and the transport service from the warehouses to the end customer anywhere in the country.

Maersk provides services including warehousing, consolidation, distribution, asset logistics, hazardous materials (hazmat), cargo handling, and container storage with dedicated staff and equipment for operations, inventory control, and traceability. It operates inland facilities at six key locations in Peru, such as Ventanilla and Callao Port which cover cyanide

interim storage audited here. All sites adhere to General Customs Law and National Supervision procedures to ensure safe, compliant storage.

The company operates a fleet of trucks equipped with 24/7 satellite locator and monitoring. Transport services are offered for dry and refrigerated containerized cargo and oversized and project cargo.

Maersk has adopted road safety learnings from their mining industry customers, who have established and adhere to strict road-safety standards. In 2019, Maersk achieved ISO Standard 39001 certification for their Road Traffic Safety Management System. Maersk was certified in full compliance under the Cyanide Code in March 2014, November 2018 and in July 2022.

Maersk transports sodium cyanide in 20-foot marine containers from the port of Callao with a contractor trucking company THB SAC (THB) to its warehouses in Callao and Ventanilla, where it temporarily stores the containers for 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, Maersk 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, the transporter transfers the IBC (Intermediate Bulk Container) cyanide 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.

Maersk, following instructions from Orica, will transfer the cyanide containers to the adjacent´ s Orica´s cyanide transfer plant located at the back of the Maersk warehouse premises. Also, Maersk transports cyanide containers to his mining client Antamina, a large-scale mining operation producing copper among other metals.

Maersk transports sodium cyanide in 1 ton wooden boxes, managing its movement from the port of Callao to the interim warehouse in Ventanilla, where it is stored until nationalization. From there, it is delivered to Orica's cyanide transfer plant and mining clients. Contractors handle transport between the port and storage, as well as from storage to the transfer plant, while Maersk's fleet manages delivery from storage to Antamina.

Auditor's Finding

This operation is

- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

with the International Cyanide Management Code

Compliance Statement

This operation has experienced compliance issues or significant cyanide incidents during the previous three-year audit cycle which are discussed in this report under the following Standard of Practice 1.1

Auditor Information

Audit Company:	BP Cyanide Auditors SAC
Lead Auditor and Technical Auditor:	Bruno Pizzorni bpizzorni@cyanideauditor.com
Dates of Audit:	June 12 and 13, 2025

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.

Maersk Logistics & Services Peru S.A		March 2, 2026
Name of Operation	Bruno Pizzorni – Lead Auditor	Date

Transport Verification Protocol

1. *TRANSPORT:*

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

Transport Practice 1.1

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

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

Maersk reviews transport routes and selects options that reduce accident risks and their impacts. The company considers factors such as population density, road conditions, water bodies, fog, natural hazards, security concerns, and other elements affecting route safety.

Maersk has assessed the cyanide transportation route from Callao to the Antamina mine for Orica, considering possible spill impacts. The evaluation included factors such as population density, road construction, infrastructure conditions, slope, proximity to water bodies, and fog zones.

The auditor reviewed the periodically updated R.SG-03 Antamina Route Study Report. Route evaluation and selection are restricted to those authorized by both the Peruvian Ministry of Transportation and Communications for dangerous goods transport and by Antamina mining company.

The Antamina route study report provides a guide map covering segment distances, travel times, speed limits, road conditions, population centers, and water bodies. It lists emergency contacts, conclusions, recommendations, safe stops, and includes a risk assessment with photos and symbols highlighting hazards and required controls.

THB SAC (THB), the trucking company responsible for transporting cyanide between the port of Callao and Maersk's warehouse located at Av. Nestor Gambetta km 14, has implemented a route selection procedure, according to the Code requirements, designed to minimize the risk of accidents, releases, and their potential impacts. The distance

between the port of Callao and Maersk's interim warehouse is approximately 14 kilometers, which typically takes about one hour to cover due to traffic conditions.

Maersk's BHS-04 Procedure for Road Study evaluates risks along the cyanide transport route and outlines measures to manage them. For Antamina, factors such as steep slopes, sharp curves, narrow roads, rough terrain, and proximity to water resources were assessed. The carrier identified high-risk areas and addressed them through risk analysis, speed reduction, and driver training.

The auditor examined Maersk's route study report for the 430 km journey from Callao to Antamina, confirming that controls are in place for identified risks across three segments. The auditor also reviewed Annex Nº 8 – D.S. 024-2016-EM on hazard identification, risk assessment, and baseline control measures.

THB has also evaluated the risks of the cyanide transport route and take the measures necessary to manage these risks. Given the route of THB in the metropolitan area they do not have options to choose the route but must travel along the permitted routes for transportation of hazardous materials.

According to the Procedure for Road Study, routes used for cyanide deliveries are periodically reevaluated. Maersk updates the identification of road risks as required and has provided route reevaluation analysis documents for the Antamina route. These analyses address all Cyanide Code criteria in the selection of delivery routes. Interviews with Maersk management personnel and drivers confirmed that feedback concerning routes is regularly communicated between the staff and Maersk, with Orica, the cyanide consignor, also participating in discussions related to current transport operations.

According to the THB Vehicle Operation Procedure and the Control of Cyanide Transport guidelines for Maersk, the route is continuously evaluated. Updates regarding any changes, construction, or incidents along the route are reported during each trip via a WhatsApp group.

The transporters records its risk assessment, noting identified risks and control measures. Special precautions are taken when passing sharp curves, waterbodies, and densely populated areas.

Maersk and THB personnel were interviewed, and it was confirmed that risks and risk mitigation measures are documented for the route. Meetings are held to review these measures before each trip. Route evaluations for transportation routes used for shipments are completed, with records available for review. Routes are also assessed for security concerns and cell phone coverage.

Maersk has received authorization from the Ministry of Transport and Communications of Peru (MTC) to operate along the route currently utilized from Callao to the indicated mine site. Maersk also participates as a member of the Antamina transporters committee, which facilitates discussions regarding potential risks associated with transportation to the mine. All communication and interaction with local communities are managed by Antamina upon request. Additionally, Orica, the consignor of cyanide, has conducted a review of the route and granted approval for its use by Maersk. Each year, the transporter submits an updated contingency plan to Antamina, reflecting the most recent risk assessments for the designated route.

Throughout the recertification period, Maersk has engaged with relevant stakeholders as required. The auditor examined records of meetings between Maersk, the mine, and Orica, in which incidents were discussed alongside lessons learned and proposed action plans. Additionally, the auditor reviewed the Ministry of Transport's resolution approving the designated route.

THB has submitted its emergency response plan to the transport authority, and it has been approved. Any further action or interaction along the route will now be handled by MAERSK.

Maersk transports sodium cyanide using convoys consisting of four to six trucks with maximum of nine trucks, accompanied by escort pickup vehicles. The lead escort, staffed by two Maersk personnel trained in hazardous materials (HAZMAT), is followed at the rear by two emergency response specialists from IFSSEC. In compliance with Antamina's regulations, HAZMAT shipments must travel in convoys during daylight hours and are only permitted to stop at authorized locations that provide adequate parking, food, and security.

The journey is completed over two days: the first segment covers Lima to Supe, and the second day continues to the mine checkpoint at Conococha. At this checkpoint, Antamina conducts inspections of all drivers to verify compliance with their qualifications and inspects each truck to ensure operational readiness before granting access to the mine site. The auditor reviewed Antamina's P.POP-02 Mine Transportation Procedure, the Maersk Route Study, convoy checklist controls, and conducted interviews with drivers and management personnel, confirming that all described safety measures for the transport of sodium cyanide are rigorously implemented.

The THB metropolitan route may face security concerns. MAERSK closely monitors its cargo throughout the entire journey using a GPS tracking platform.

The transport route linking the Port of Callao with Maersk's warehouse located at Av. Nestor Gambetta km 14 is managed by THB SAC (THB), a trucking company.

As the consignor of cyanide, Maersk did not notify the ICMI about hiring THB to handle the transportation of cyanide along this metropolitan route covering approximately 14 kilometers from Callao to its warehouse in Ventanilla. Furthermore, Maersk failed to establish procedures to ensure that the contractor was informed of the relevant Code required in Transport Practice 1.1 and did not confirm that these requirements were being followed.

During a Maersk recertification audit conducted on June 12 and 13, it became evident that THB had not been acknowledged by Maersk as a participant in this supply chain until prompted by the auditor. Subsequently, on October 2 and 3, the auditor visited THB's headquarters to assess the company using the ICMI Transport Verification Protocol. By December 2025, THB successfully addressed and resolved all audit findings.

Over the past six months, following Maersk's assessment, they have actively implemented and monitored THB's adherence to the requirements outlined in the Cyanide Code's Transport Verification Protocol. With regular inspections conducted throughout this period, no further information was needed to confirm that this Protocol Question is fully compliant with the Code.

Transport Practice 1.2

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

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

Maersk and THB employs drivers who are thoroughly trained, duly qualified, and properly licensed to operate transport vehicles. All drivers hold an A3 driver's license, which authorizes them to transport hazardous materials in compliance with tractor–trailer configurations and local standards, specifically DS 0-21-2008 MTC Hazardous Materials Transportation Regulations.

The Transport division at Maersk monitors the authorization and validity of driver's licenses and travel insurance. The auditor reviewed the Human Resources document "Job

Description," which outlines the requirements for equipment operators, including truck drivers, reach stackers, and forklift operators.

Prior to employment, each driver undergoes a driving assessment and a criminal background check. The Master Driver at Maersk is responsible for conducting the driving evaluations during the recruitment process for both drivers and equipment operators.

At present, several authorized drivers are qualified to transport materials to Antamina, each having completed HAZMAT 1 training. In addition, three escort teams have undergone HAZMAT 3 instruction provided by Fire Rescue Hazmat Peru, a contractor accredited by Antamina. Orica has also delivered targeted training in cyanide handling procedures. The auditor's examination of training records and operator documentation verified comprehensive compliance with all established requirements.

During the site visit audit to the interim storage, documentation verifying the licenses for forklift and reach stacker operators was unavailable. A verification process was necessary to ensure operator competency. Following the audit, Maersk provided the licenses for all operators handling forklifts and reach stackers involved in the cyanide operation. No further information was needed to confirm compliance in this matter.

All personnel involved in managing equipment for cyanide transport operations, such as trucks, forklifts, and reach stackers, receive training to ensure they carry out their tasks safely and with environmental responsibility. Drivers at Maersk and THB are trained in the correct loading and unloading procedures for their trucks. Additionally, Maersk forklift operators are instructed on how to handle loads without causing damage or breakage to cyanide boxes during container transfer operations. The auditor confirmed that relevant training was provided to operators, reviewed training materials and attendance records, and interviewed equipment operators to verify completion. Training is regularly updated and includes testing to ensure competency.
Maersk SSMA personnel periodically carry out inspections of the port transporter THB to confirm that they employ qualified, licensed drivers who are trained to perform their duties in a way that reduces the risk of cyanide releases and exposures.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Both Maersk and THB trucks are configured in compliance with the traffic regulations of Peru's Ministry of Transport and Communications (MTC), specifically adhering to the T3S3 configuration, which refers to a 3-axle tractor and corresponding trailer capable of transporting a gross weight of 48 tonnes, as indicated on the vehicle's authorization card. The auditor examined the technical specifications provided by the trucks manufacturer, confirming its rated load capacity. Fleet specification documents were reviewed and available during the verification audit. Both tractors and trailers were found to be suitable for their designated load requirements. Vehicle weights, including tractor and loaded trailer, are closely monitored to prevent overloading.

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 Maersk 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 carried out on the vehicle. A maintenance weekly report is required to be sent to Maersk´s management, operations and maintenance among, other areas. Preventive maintenance to the reach stackers is done with Maersk's own personnel, who have training courses provided by the distributor of the equipment.

During the audit, Maersk and THB trucks and trailers were evaluated. All units inspected were certified for weights exceeding the maximum loaded weights. The platforms' load capacities surpass the gross weight of a fully loaded isotank or maritime container containing cyanide, which is approximately 22 tonnes.

Maersk vehicle maintenance is handled at the authorized Divemotors workshop every 15,000 km. Antamina randomly reviews maintenance records, while a Maersk planner tracks weekly mileage and alerts staff to upcoming service. The transporter runs a formal

preventive maintenance program to ensure tractor and trailer safety.

Both carriers handle standard loads of approximately 22 tons, ensuring equipment capacity is assessed by adhering to manufacturer guidelines and performing regular preventive maintenance inspections to identify any signs of stress or overloading. Compliance was confirmed by the auditor through a review of inspection records and interviews with maintenance personnel and operators.

Maersk verifies equipment adequacy and conducts regular inspections before the cyanide convoy departs. The Maersk SSMA Supervisor and escort driver oversee operations to ensure compliance with safety standards and have experience handling hazardous goods.

Maersk follows procedure P.OP-04 Heavy Cargo Transport Operations, which specifies that vehicles must be checked to prevent overloading. According to this procedure, if excessive loads of hazardous materials are identified, the trip should not commence. The supervisor, together with the escort, is responsible for verifying and ensuring that the quantity of products to be transported aligns with both the unit's payload capacity and the limits established by MTC regulations. This verification is documented on the weights and measures form.

Shipping paperwork of Maersk and THB 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.

To avoid overloading transport vehicles, the transporters require that each platform is loaded with only one 20-foot cyanide sea container, and each truck may haul only one platform trailer. This policy is reflected in inspection checklists and was confirmed through interviews.

The port operator weighs each load to confirm details noted on shipping papers, which enables THB and Maersk to verify shipment weights. Records for cyanide shipments are compared with established weight capacities and regulatory limits. The equipment used is capable of handling loads exceeding those shipped, and truck weight regulations typically set the maximum amount of cyanide that may be transported.

Maersk SSMA personnel conducts regular inspections of the port transporter THB to ensure the transport company exclusively uses equipment that is intelligently designed and maintained to handle the designated loads. They verify the suitability of the equipment for the loads it will carry and ensure that established procedures are followed

to prevent overloading the transport vehicles used for handling cyanide.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Maersk Procedure P.OP-05 Cargo Securing and Lashing and THB procedure Vehicle Operation Procedure and Control of Cyanide Transport, stipulate that the doors of cyanide containers must be closed and secured to preserve cargo integrity throughout transport, including during loading and unloading when applicable. The procedures outlines specific requirements to verify that the container doors carrying cyanide are properly closed, the seals remain intact, and chains are crossed over the doors to safeguard the shipment. These measures are to be observed at the outset and during the entirety of the transportation process.

The procedures specify that pre-trip inspections are required throughout transport to verify the condition of door tags and ensure that trailers and containers remain locked and secure. These inspections are documented by Maersk convoy leader . The procedures outlines the administrative, operational, and safety requirements for transporting sodium cyanide.

Maersk secures containers to trailers using chains: two at the front and two crossing the container doors, which prevents access to the doors during transport.

Cyanide shipments are marked with required Peruvian plates and signage. The auditor confirmed compliance after inspecting vehicle identification. Maersk and THB mandates UN 1689 placards and the security diamond on all four sides of sea containers, and drivers must visually inspect containers before each movement.

The carriers have implemented comprehensive safety programs that address all elements necessary for the safe transportation of cyanide, as identified by the ICMI. These programs thoughtfully consider each required topic and are adapted to the specific circumstances of the transport routes. Inspections encompass the identification of maintenance

requirements and safety concerns related to transported sea containers, with established processes in place to resolve any issues discovered. Preventive vehicle maintenance is managed by Divemotors for Marsk, an authorized workshop for the Mercedes Benz brand. Maintenance activities occur at intervals specified by the vehicle manufacturer, and schedules are communicated weekly to relevant departments to ensure vehicle availability. THB performs its own trucks maintenance. Operational reports on vehicle operating hours are also issued weekly. The auditor reviewed maintenance records and conducted employee interviews, confirming compliance with these provisions.

Personnel and drivers from Maersk routinely conduct inspections of cyanide convoys prior to departure for mine sites. Audited pre-trip checklists demonstrated completeness and confirmed that both escort and transport vehicles are maintained in optimal condition. Items verified included load capacity, conformity of transported weights to vehicular configurations, and the integrity of vital transport unit features such as lights, brakes, chassis, and containers.

Interviews with management at the trucking company corroborated the regular performance of pre-trip inspections, including verification that trailers are locked and secured, placarding is maintained on all four sides, and preventive maintenance is performed according to a defined schedule. Additionally, the transporter's drug and alcohol abuse prevention policies were examined during the audit.

Per procedure Maersk procedure PER-APMT-HE-PL04 Fatigue and Drowsiness Policy, transportation is restricted to daytime hours only, and drivers are required to have a minimum of eight hours rest before starting a trip. Drivers transporting sodium cyanide may not exceed ten hours on duty per day, with mandatory breaks every two hours lasting at least fifteen minutes for equipment checks, meals, and active resting.

To ensure cargo stability, Maersk implements procedure POP.04 Cargo Securing and Lashing. Each sea container is secured with four chains, filled with 20 IBCs, and block and brace measures are applied at the production plant to prevent movement. Trailers feature pins that secure containers and prevent shifting, while all cyanide is transported in sealed containers that are firmly fastened to the platform to minimize displacement risk.

Procedure CSG-02 Refusal to Unsafe Work empowers employees to refuse work deemed unsafe. Additionally, procedure P.PO-03 Assignment, Transport, Loading and Unloading of Cyanide designates a convoy leader responsible for continuously monitoring operational progress. In any unsafe event, the convoy leader has the authority to halt operations, and transport will resume only when adequate conditions are verified by the leader.

Maersk has established the Procedure for the Implementation and Administration of the Alcohol and Drug Policy to provide general guidelines for managing the alcohol and drug

policy in the West Coast of South America (WSA) region. The auditor, together with the medical center doctor, reviewed records of blood alcohol tests conducted prior to convoy departures. Random register reviews confirmed that these activities took place.

THB has established a safety program for the transport of cyanide, incorporating several key measures. These include performing vehicle inspections before each shipment, maintaining a preventive maintenance routine, imposing restrictions on drivers' working hours, and implementing procedures to prevent cargo from shifting during transit. The program also outlines steps to modify or halt transportation in response to adverse conditions such as severe weather or civil unrest, as well as a drug abuse prevention initiative. THB keeps detailed records to document the execution of these activities.

Maersk SSMA personnel conducts regular inspections of the port transporter THB to ensure the transport company maintains its safety program for transport of cyanide as required in Transport Practice 1.4 of the Transport Verification Protocol.

Transport Practice 1.5:

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

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

Maersk does not ship cyanide by sea. This section of the ICMC does not apply to the operation.

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

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

Maersk provides cellphones to drivers and escorts of the cyanide convoy, as well as satellite phones for use along the route to Antamina. Each truck is equipped with radios for internal convoy communication, and an emergency contact list is maintained, which includes control center numbers as stipulated in the contingency plan. THB drivers have cellphones for use along the route and a n emergency contact list.

The auditor confirmed that vehicles and drivers are equipped with communication tools like radios or phones, written procedures, and checklists for required equipment. Operators also have emergency contact information to alert relevant parties along the route if needed.

Maersk schedules cargo transport weekly, and the Control Center checks GPS operation in advance for Maersk and THB. Equipment checklists include cell phone, radio, and satellite phone functionality. The auditor checked complete pre-trip inspection records for both transporters confirming they verify communications equipment operation.

Maersk, Antamina, and Orica have identified communication blackout zones along transport routes through risk assessments and geofencing in the cargo tracking system. Team Leaders notify the control center when entering these zones, which is recorded. Auditors checked geofencing at the control center. Where signal exists, the kilometer and route number are displayed. Maersk's GPS monitoring procedure tracks cell phone coverage on all routes, updating data periodically using the website from the Supervisory Body for Private Investment in Telecommunications (OSIPTEL due to its acronym in Spanish) during route assessments.

Trucks are tracked in real time, with delays instantly flagged on the control board. The auditor confirmed through operator interviews and travel record checks that the procedure is followed.

THB does not have communications blackout areas due to its metropolitan route.

The carriers utilize a procedure for load tracking through GPS technology managed from its central control center. The escort supervisor (Team Leader) provides bi-daily progress updates on the convoy to Antamina, Orica, and Maersk's control centers. During the audit, the status of cargo transport services was reviewed at the control center. The GPS tracking system enables continuous real-time monitoring of the convoy's location for Maersk and THB. The cyanide transporter communicates with both the mine client and the transporter at key milestones: dispatch, passage through major cities and towns along the route, arrival at the mine site, and upon completion of unloading. Personnel responsible for shipment monitoring were interviewed, the GPS system was demonstrated, and logs documenting shipment status—including items other than cyanide—were examined and found to be comprehensive.

Maersk uses inventory controls and chain of custody documentation to track cyanide shipments and prevent loss. All paperwork, including weight records and container counts, is signed upon delivery to the customer. When the shipment arrives at Antamina, the cargo is reweighed and boxes are counted to confirm accuracy.

Shipping paperwork of both transporters comply with ICMC requirements, including chain of custody protocols. A waybill accompanies the transport, detailing chain of custody information such as container numbers, the amount of cyanide delivered, waybill number, shipping documents, Safety Data Sheets (SDS), packing list, bill of lading, customs declarations, and producer invoice, among other items. In addition, containers are secured and tagged, with tags removed only upon arrival at the mine.

A waybill accompanies Maersk and THB cyanide shipments, listing chain of custody details like container numbers, delivered amounts, and the SDS. Drivers carry transport documents, SDS, and emergency response info onboard, along with a file containing their licenses and the cyanide SDS.

Maersk SSMA personnel conducts regular inspections of the port transporter THB to ensure the transport company track cyanide shipments to prevent losses during transport as required in Transport Practice 1.6 of the Transport Verification Protocol.

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	✓	in full compliance with	Transport Practice 2.1
	☐	in substantial compliance with	
	☐	not in compliance with	

Maersk stores sodium cyanide temporarily in maritime containers at its open yard located at Avenida Nestor Gambetta km 14.5 in Callao, as part of its port operations. Due to limited storage space within the port area, Maersk transfers these containers to the Nestor Gambetta facility. After arrival, documentation is completed for customs management to allow entry of the product into Peruvian territory. The cyanide shipment, packed in one-ton Intermediate Bulk Containers (IBCs), is then transferred using a forklift to another 20-foot sea container for return to the shipping company. According to client requirements, containers with cyanide are subsequently dispatched either to mine operations or to Orica's transfer plant situated within Maersk facilities.

Warning signs prohibit smoking, eating, and drinking are in the area. Required PPE is specified according to the facility's general safety program and personnel training.

Maersk was required to put up signs indicating the presence of cyanide in the area, along with a notice banning open flames. Following the audit, Maersk provided photographs confirming that all temporary cyanide storage areas were appropriately marked. No further measures were necessary to confirm compliance with this protocol question.

Cyanide is securely stored in a restricted, fenced area accessible only to authorized personnel with credentials and magnetic cards. The site is monitored 24/7 by CCTV, and the auditor confirmed these measures during inspection.

It was verified during the site visit that there is a selection and monitoring procedure in place to ensure that materials are separated in such a way as to keep incompatible materials separate, mainly cyanide, which is kept separate from strong oxidizing acids

such as chlorine and explosives.

Cyanide is stored exclusively in 20-foot sea containers, which are sealed to prevent rain contact. The area lacks drinking water piping, and the safety shower is designed to prevent leaks from reaching the cyanide containers. The auditor verified compliance during the facility inspection.

Cyanide is stored in an open yard with adequate ventilation to prevent cyanide dust and gas buildup. The auditor inspected the facility and confirmed compliance.

The storage yard's floor and walls offer adequate secondary containment for cyanide shipments. During IBC transfers, measures such as remote observation, track blocking, established procedures, trained staff, and spill response materials are in place to control and collect any solid cyanide releases.

3. *EMERGENCY RESPONSE:*

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Maersk has an Emergency Response Plan (ERP or Plan) for its cyanide transportation operation: LHS-01 Contingency Plan for the Transport of Hazardous Materials – Antamina.

THB has the Cyanide Transport Emergency Response Plan - Maersk Principal.

The auditor reviewed these plans including the ERP associated with the cyanide interim storage.

The emergency response plans are designed to address evaluated risks and potential emergency situations associated with transporting sodium cyanide along designated routes and during interim storage. These scenarios are customized based on the specific delivery route, road conditions, the solid briquette form of the cyanide, its chemical properties, and the use of three-axle trucks with trailers carrying 20-foot containers. The auditor verified that the plans adequately identify possible emergencies and outline appropriate response measures, fully complying with Code requirements without requiring additional details.

Maersk was tasked with reviewing their Emergency Response Plan (ERP) due to unclear or inadequately detailed requirements. Specifically, the plan needed to outline actions to take when alarms are triggered on the HCN gas monitor at 4.7 ppm (first alarm) and 10 ppm (second alarm). Procedures were also required to ensure personnel secure the area by monitoring HCN gas levels before assisting any victims. The instructions had to include steps such as covering spills with plastic sheets and constructing earthen dikes to prevent

water contamination.

A comprehensive review of emergency response measures was necessary, with a particular focus on clearly defining first aid responsibilities for escorts and addressing scenarios involving cyanide poisoning. Additionally, protocols for spill incidents involving water bodies required attention, mandating immediate notification of downstream communities to cease use of the water for drinking or livestock purposes. The review emphasized the importance of avoiding vague guidance and ensuring all instructions are detailed and precise.

Following the audit, Maersk provided an updated version of the ERP, which successfully addressed all findings from the auditors. The revised plan was deemed more specific and operationally effective, with no further information needed to confirm compliance with the protocol requirements.

THB´s ERP include descriptions of response actions, as appropriate for the anticipated emergency situation.

Maersk 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 contractor for hazardous materials emergency responder, police, firefighters, and medical facilities located along the route.

IFSEC serves as a third-party provider tasked with convoy escort duties and extends its support to broader second emergency responses beyond its typical first responder role. The auditor verified that the carrier's emergency response plan accurately defines IFSEC's responsibilities, with contracts explicitly detailing these obligations. However, Maersk Plan fails to include IFSEC's contact information, presenting a notable omission. After the audit, the new version Maersk´s ERP included all the necessary contact information from IFSEC and all other externa responders. No additional information was required to find this Protocol Question en compliance.

THB Plan identifies the roles of external responders, medical services and relies on Maersk support 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	Transport Practice 3.2
	☐	in substantial compliance with	
	☐	not in compliance with	

Maersk and THB conducts emergency response training for staff through Orica and other trainers, with refresher sessions for drivers, convoy leaders, and supervisors. Training follows an annual schedule and covers safe cyanide management, firefighting, first aid, and hazardous materials. The auditor reviewed both hard and electronic records of participants, content, and training dates.

The ERPs outline the emergency response duties for transporters, with clear roles for managers, coordinators, and convoy leaders before, during, and after incidents. Responsibilities of internal and external personnel are well defined. The content of the plans is deemed acceptable.

The audit revealed that the list of emergency materials and equipment in the Maersk transport plan was incomplete. During the site inspection, the auditor identified items like hypochlorite and lime, which were not mentioned in the list. Maersk has been instructed to update the list to include all emergency materials and equipment available during sodium cyanide shipments, along with specifying the exact location of these items. After the audit Maersk included in the ERP a complete list of its emergency materials and equipment, reflecting those materials they have in stock. No additional information was required to find this Protocol Question in compliance. THB has a list of all emergency response equipment that should be available during transport.

The ERPs outline the essential equipment requirements, including additional personal protective gear, which must be readily accessible. Equipment is inspected as part of the pre-trip or pre-task check process. During the audit, the auditor reviewed complete emergency equipment checklists. While no cyanide shipments were active at the time, the auditor examined the storage and availability of emergency equipment at the carrier's facility. Interviews with relevant personnel were also conducted to confirm compliance with these protocols.

Emergency response equipment designated for temporary storage is securely kept near

the medical center. IFSEC, the contracted emergency response provider, accompanies convoys with a pickup truck positioned at the rear. This vehicle carries comprehensive emergency response supplies such as personal protective equipment, spill containment kits, and cyanide antidotes. Additionally, Maersk's escort truck, leading the convoy, transports protective equipment, spill containment tools, and mechanical items among other resources. A checklist is utilized to ensure these supplies are present, and the reviewed checklists were deemed adequate.

The audit revealed several concerns regarding the handling and storage of emergency response materials. Sodium thiosulfate and sodium nitrite were identified as expired for one month, and their scheduled monthly inspections had been neglected for two consecutive months. These substances were stored in a sea container located within the temporary storage area, where they were subject to abrupt temperature fluctuations. It was required that these materials be relocated to the infirmary, situated 30 meters away, which is overseen by personnel authorized to administer injectable substances.

Furthermore, the alarm thresholds for hydrogen cyanide (HCN) gas monitors require recalibration. Specifically, the initial alarm should be set to activate at 4.7 ppm and the secondary alarm at 10 ppm.

Additional issues were noted regarding the accessibility of critical emergency equipment. A cabinet containing oxygen and first aid supplies was secured with a padlock, rendering it inaccessible during inspection since the designated key holder was unavailable. Moreover, an inspection of the oxygen cylinder stored within the shipping container revealed it to be nearly empty. Lastly, the portable eyewash station was found to contain water that had been expired for two months, raising concerns about its suitability for emergency use.

Following the audit, Maersk acquired new cyanide antidote kits and relocated them to the infirmary. They recalibrated the HCN gas monitors, removed the padlock from the cabinet housing oxygen and first aid supplies, refilled the oxygen tanks, and restocked the eyewash stations. No further information was necessary to confirm that this protocol question met compliance standards. THB has available the necessary emergency response and health and safety equipment, including personal protective equipment during transport.

Maersk and TBH have incorporated specific provisions within its emergency response plans, stipulating that all designated emergency response equipment is subject to regular inspection and testing. These measures are designed to ensure the equipment remains operational and readily available when required. Inspections are conducted bimonthly and prior to the departure of each convoy. To uphold these provisions, the carrier

systematically performs the scheduled inspections and tests while maintaining meticulous records of these activities. During an on-site review, the auditor examined these records and confirmed that the equipment was in proper working condition, suitable for the transport of cyanide.

Maersk SSMA personnel conducts regular inspections of the port transporter THB to ensure the transport company has designated appropriate response personnel and commit the necessary resources for emergency response as required in Transport Practice 3.2 of the Transport Verification Protocol

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	

The carriers ERPs include detailed procedures and communication flowcharts tailored for emergency situations, alongside updated contact information necessary for both internal coordination and external notifications in the event of a cyanide-related emergency during transport or temporary storage.

The auditor conducted a review of these notification protocols and assessed the carrier's contact list to confirm adherence to this requirement. The lists contains current emergency contact numbers for local hospitals, as well as services such as ambulance, fire department, and environmental response teams. Additionally, it provides updated contact details for the mine site, Orica, and Antamina, among other relevant entities.

There were no guidelines established for updating the emergency contact list within the transporter’s ERP. Following the audit, the updated version of the ERP included requirements to ensure that both internal and external emergency notifications, along with reporting procedures, are reviewed and updated at least annually during the ERP revision process.

The Emergency Response Plans comprises provisions for notifying the International

Cyanide Management Institute (ICMI) in the event of a significant cyanide-related incident, as outlined in the definitions and acronyms detailed within the Code.

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	

The auditor found that the ERPs and procedures must detail clear steps, including labeling all bags containing collected cyanide; adding lime to materials to increase pH levels; assessing the necessity for sodium hypochlorite, specifying the proportion required to achieve a 5% solution, or alternatively sourcing commercial bleach, in order to neutralize cyanide and decontaminate cleaning equipment. The Plan should specify parameters in parts per million for declaring an area free of cyanide, and review established protocols for spills involving overturning and the presence of HCN gas.

The environmental remediation contractors, Ecomarine and JAC Soluciones Ambientales, did not have provided documented procedures for cleaning and remediating cyanide spills. Consequently, the auditor was unable to verify whether the contractors had established protocols to ensure the safe and environmentally sound management, remediation, and disposal of cyanide-related waste. Maersk was instructed to provide detailed procedures from the remediation contractors, as well as those from IFSEC, the emergency response team accompanying the convoy, detailing the handling, cleanup, disposal, and decontamination of cyanide spills. Furthermore, Maersk was required to present supporting evidence—such as agreements, contracts, or correspondence—demonstrating that the remediation contractors were available and prepared to assist with these critical tasks.

After the audit, Maersk provided all information requested and incorporated in the new version of the ERP, the audit findings listed in the paragraphs above.

According to the ERP, the carrier, in collaboration with IFSEC, will implement its own remediation measures at the first response level. These measures include cleaning and decontamination procedures that outline the steps for the recovery and neutralization of

solutions. All actions will be conducted in compliance with the guidelines specified in procedure PER-APMT-HSSE-PRE-004, Response Procedure for HAZMAT and Hydrocarbon Spills, specifically under item 3.4, which addresses the procedure for handling NaCN (cyanide) spills.

Ecomarine or Jack Soluciones Ambientales will handle the final cleanup of any spills occurring during transport, as designated in the carrier's Emergency Response Plan and Spill Response Procedure. No additional information was required to find this in compliance.

Maersk's an THB transportation ERPs explicitly forbids the use of chemicals like sodium hypochlorite, ferrous sulfate, and hydrogen peroxide for treating cyanide spills in surface water. The Plans clearly states that the application of these substances in any incident involving the treatment of solid sodium cyanide spilled into surface waters is strictly prohibited. The use of neutralizing agents is not permitted in or near surface water bodies.

Transport Practice 3.5

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

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

The carriers have 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 transport 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. Maersk´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.

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The carriers have 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 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.

Emergency mock drills conducted during the recertification period:

- On March 27, 2024, a cyanide spill simulation was conducted in collaboration with Antamina, with support from IFSEC. A total of 10 participants took part in the drill. Following the exercise, a feedback session was held to identify areas for improvement.
- On September 4, 2024, an emergency drill was conducted in partnership with IFSEC and Antamina near the town of Casa Blanca, along the route to the mine. This drill simulated a vehicle crash resulting in a cyanide spill and involved 15 participants. A subsequent feedback meeting spotlighted areas for enhancement, particularly regarding incident command.

During the review of the emergency response plans, no guidance was identified mandating a review of the plans following their activation during an emergency. After the audit, the transporters provided an updated version of their Emergency Response Plans (ERPs), which included provisions for evaluating the plan's effectiveness after activation and revising it as necessary. However, since no emergencies occurred requiring activation of the plan during this recertification period, such reviews have not yet taken place.