Submitted to:

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

1400 I Street, NW – Suite 550
Washington, DC 20005, USA

MARÍTIMA DOMINICANA (MarDom)

TRANSPORT OPERATION

Carretera Sánchez, Km 12 ½
Santo Domingo, República Dominicana

Submitted by:

Geosoluciones Panamá, S.A. (GEOMIN)
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MARÍTIMA DOMINICANA, S.A.S.
Name of Facility

Jorge Chong - Lead Auditor

August 13th, 2025
Submittal date

JUNE 2021

Contenido

A- Operation General Information

Transport Operation: Marítima Dominicana, S.A.S. (MarDom)

Facility Owner: Marítima Dominicana, S.A.S.

Facility Operator: Marítima Dominicana, S.A.S.

Responsible Manager: Zoila Castillo López, HSE and HAZMAT Manager

Address: Carretera Sánchez Km 12 ½, Santo Domingo, Dominican Republic

Telephone: +(809) 539-6000 Ext. 7308 E-mail: zcastillo@mardom.com

B- Operation Location Detail and Description:

The ICMI's Auditor Guidance for Use of the Transportation Verification Protocol (Auditor Guidance), published June 2021, was used as a reference in evaluating compliance measures for Transportation Practices.

Marítima Dominicana, S.A.S. (hereinafter referred to as MarDom) transports various cargoes within the Dominican Republic.

The company's main offices are located near the eastern side of the Port of Rio Haina, in Santo Domingo. It has 54 years of experience in customs services, equipment rental such as dry and refrigerated cargo containers, and mechanical and industrial workshops for the refurbishment of marine accessories. Its operations also include ship agency services, port stevedoring, and integrated logistics solutions throughout the country. With seven offices nationwide and more than 1,200 employees, the company services approximately 2,000 vessels each year. It also maintains a broad network of agents and partners to handle all types of cargo by sea, air, and land, to and from any region of the world.

Cyanide is transported in solid form by ship to the Port of Caucedo. From there, it is delivered exclusively to the Barrick Pueblo Viejo mine using the company's own vehicle fleet, operating in convoy. The route covers approximately 128 kilometers and takes around 2 hours and 15 minutes to complete.

The route initially skirts the northern outskirts of Santo Domingo, following the Santo Domingo Bypass and the Juan Pablo Duarte Highway. This path is designed to avoid high-traffic areas and does not involve the use of interim storage or warehousing at any point.

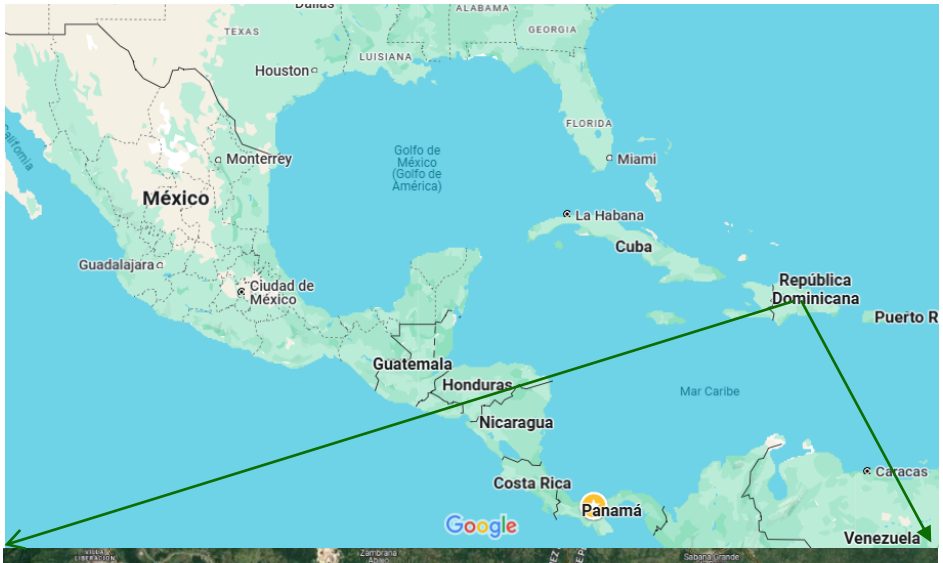
The activities performed by the port authority (ship unloading, interim storage areas operated by the port authority) are not included within the scope of this audit.

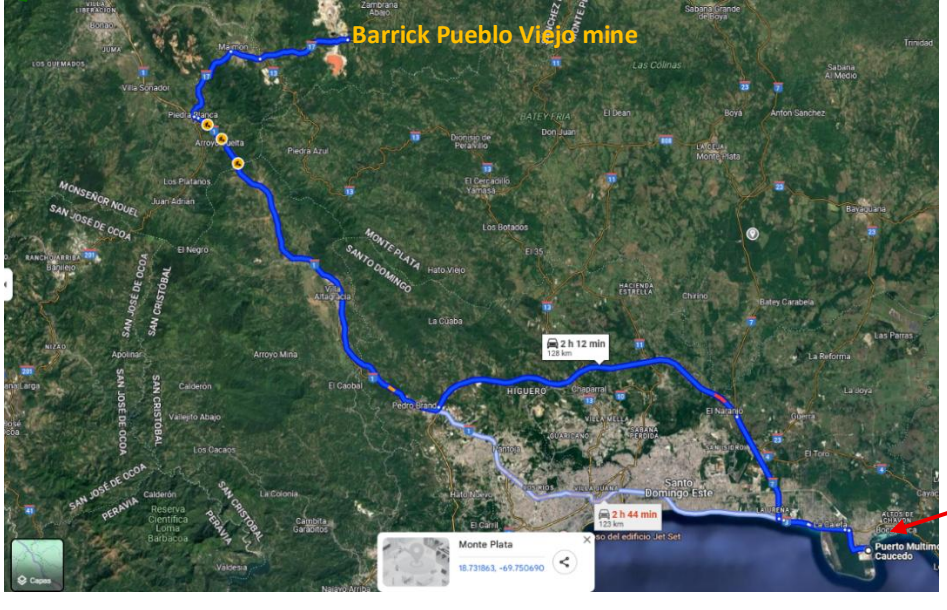
MarDom has been a signatory of the Cyanide Code since May 10, 2010, and has received recertifications in 2013, 2016, and 2019. The most recent certification has been in effect since July 11, 2022.

TRANSPORTATION SUMMARY AUDIT REPORT

MarDom transports solid cyanide in polypropylene supersacks, each weighing up to 1 ton, from the certified producer. The weight of the 20-foot sea containers loaded with cyanide is 20 tons.

The operation has not undergone any significant changes since the last audit, except that shipments now depart from the Port of Caucedo instead of the Port of Haina, and cyanide is no longer transported in ISO tanks.





Auditor's Finding

This operation is

- ✓ in full compliance with the International Cyanide Management Code.

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

Auditor Information
Audit Company: Geosoluciones Panamá, S.A. (GEOMIN)
Lead Auditor: Jorge Efrén Chong Pérez
Lead Auditor Email: geosoluciones@cwpanama.net

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Auditor 1: Jorge Efrén Chong Pérez, Lead Auditor
Name

Signature

Dates of Audit: May 28-29th, 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.

MARÍTIMA DOMINICANA, S.A.S.
Name of Facility

Jorge Chong - Lead Auditor

August 13th, 2025
Submittal date

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Submittal date

Principles and Standards of Practice

Principle 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

Summarize the basis for this Finding Identified:

MarDom implements procedure DO-SIG-020, revision 002, dated October 14, 2024, titled "Evaluation of Hazardous Material Transportation Routes." This procedure provides guidelines for determining the necessary parameters to approve transportation routes for supplier products. It also establishes a system for continuous updates aimed at minimizing the risk of accidents due to road conditions, population types, driving and rest times, and topography. The procedure details factors such as population density, turns, rest stops, bridges, railroad crossings, and other relevant conditions to support better risk assessment and facilitate incident response in the event of a transportation-related event.

Two routes have been evaluated from the Port of Caucedo to the Barrick Pueblo Viejo mine. The only route currently in use begins on the northern outskirts of Santo Domingo, passing through the Santo Domingo Bypass and the Juan Pablo Duarte Highway, which offers faster travel under normal traffic conditions. The alternative route, which passes through the city via the Duarte Highway and experiences heavy traffic, is not currently used.

Section IV of procedure DO-SIG-020, revision 002, states that route evaluations must be conducted physically, meaning through an on-site inspection. For this purpose, the Transportation Route Risk Assessment Form (FM-SIG-036) is used. The evaluation must be carried out while observing all relevant safety measures and following the principles of defensive driving.

Section III of the procedure includes a risk quantification matrix.

A driver from the transportation fleet was interviewed. He emphasized the importance of reporting incidents and road conditions observed during transport, as these help identify and communicate potential risks along the route. He also described the training he has received on this topic and demonstrated to the auditor, using his phone, how visual inspections of transport equipment are recorded.

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A responsible for the occupational health, safety, and environmental program, along with a supervisor of transportation and hazardous materials, were also interviewed. They presented travel records that included visual inspection logs for transport equipment, substance abuse prevention test results, documented driver briefings, and driver observations regarding road conditions.

The auditor reviewed the follow-up documentation for three route evaluations. The first was conducted on March 1, 2024, along the route passing through the Santo Domingo Bypass and the Juan Pablo Duarte Highway, located to the north of the Santo Domingo metropolitan area. The second and third evaluations were carried out on February 20, 2025, and May 7, 2025, respectively.

MarDom maintains an up-to-date Excel document detailing the route from the Port of Caucedo to the Barrick Pueblo Viejo mine. This document includes the localities along the convoy route, the path taken, cumulative distances, and pictograms with warning signs indicating route-specific risks. It also identifies the types of nearby populations, detours, toll points, bridges, proximity to bodies of water, road types, and a quantitative risk assessment.

The auditor randomly reviewed several trip reports. A key improvement noted in recent updates was the addition of designated safe rest points for the convoy.

The auditor reviewed records of community meetings held in Cotuí (November 12, 2024), Maimón (October 23, 2024), and photographic evidence of a meeting conducted on April 1, 2025, with local authorities along the transportation route. These meetings were carried out in coordination with Barrick Pueblo Viejo mine to gather feedback on potential risks and ensure community acceptance. No concerns or comments were reported by the communities involved in these meetings.

According to section 4.2.4, ordinal a, of the Sodium Cyanide Transportation Manual MA-SIG-008, the convoy consists of MarDom trucks, with a limit of four trucks per service and two double-cab four-wheel drive pickup trucks. The Hazardous Materials Operations, Transportation, and Handling Procedure PR-SIG-009, version 007, specifies in paragraph 5.3 under General Standards, as well as section VII (activity 1.8.0), that personnel include two escort drivers, one mechanic, one tire technician, and one convoy leader.

MarDom uses escort vehicles during cyanide transportation, as confirmed by the auditor through the review of trip reports. Each convoy is also accompanied by a technical support vehicle equipped with tools and spare tires to address any potential issues in route. According to Section 4.11.3 of the Emergency Response Plan, escort drivers are given priority in training programs. Currently, the company operates five escort vehicles dedicated to cyanide transport.

MarDom does not subcontract any of its operations related to 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

Summarize the basis for this Finding Identified:

MarDom maintains an annual training program for each position, as outlined in document FM-SIG-067 Rev.4. This includes training for occupational safety inspectors, environmental inspectors, mechanics, and hazardous materials inspectors.

Random training records and photographic evidence were reviewed, confirming that personnel such as drivers, tire repair technicians, and mechanics have received training on cyanide-related risks and emergency response procedures.

All truck and escort drivers were found to have valid driver's licenses. The *Transport Equipment Visual Inspection Form* and the *Emergency Response Equipment Checklist* both include an item requiring verification of license validity.

In the Dominican Republic, the National Land Transport Network (RNTT, by its Spanish acronym) operates under the control of a union. All cargo drivers must be affiliated with this network and hold a valid license. The official license is issued by the National Institute of Transport (INTRAN) and is valid for four years.

MarDom does not use cranes, forklifts, or any lifting equipment in operations related to handling cyanide during transportation.

MarDom conducts onboarding inductions for new employees and provides annual refresher training. Before each convoy departs with cyanide cargo, all drivers, technical and mechanical support personnel, and escort vehicle drivers attend a safety briefing. Risk prevention activities are scheduled in a formal calendar, which includes emergency drills. These drills are preceded by training sessions conducted in the presence of the cyanide supplier, Australian Gold Reagents Pty Ltd (AGR).

Two drivers were interviewed. Both confirmed that they receive regular training and attend safety briefings prior to each convoy departure. During the interview, they also demonstrated the emergency response equipment stored in the trailer carried by the escort vehicle.

MarDom does not subcontract any entity to conduct the activities required under Transport Practice 1.2.

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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

Summarize the basis for this Finding Identified:

Hazardous materials transportation supervisor identifies two kinds of chassis utilized in operations:

- 20-foot fixed straight frame chassis
- 20-foot straight frame chassis featuring sliding tandem axles

Both models are equipped with a two-axle configuration and the standard three-leaf spring suspension, offering a load capacity of 74,100 lb (33.61 t).

The sliding tandem chassis is designed to travel forward or backward along the frame, enabling adjustment of the wheelbase to comply with axle weight regulations or enhance maneuverability. In contrast, the fixed tandem chassis offers a simpler and lighter construction, demanding less maintenance due to the absence of travel mechanisms, and is generally employed in operations where weight distribution or wheelbase limitations do not apply.

For cyanide transportation, each of our chassis features an extendable design, ensuring enhanced flexibility and stability both within port environments and during road transit.

Other trailers are purpose-built units intended for transportation by pickups and feature specialised equipment to address a range of sodium cyanide emergency situations. See image (designs).

MarDom has established a strict vehicle fleet replacement policy. It currently operates a total of forty-three (43) trucks, with an average age of six (6) years. Fifty percent of the fleet is less than six years old from the date of manufacture and commissioning. The trucks are sourced from reputable manufacturers, including Mack, Scania, and International.

There are twelve (12) active chassis available for transporting cyanide, each measuring 20 feet in length. These chassis are painted in a distinctive green-yellow color for unique identification. They are tandem-type, two-axle units with three-leaf spring suspensions. Their load capacity ranges between 33,610 kg (74,100 lb) and 30,814 kg (68,000 lb).

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The trailers used for cyanide transport are dedicated exclusively to that purpose. There are seven units in total, all of which exceed the regulatory requirements set by the government of the Dominican Republic. If additional equipment is needed, it is selected based on the same or higher standards.

Retreaded tires are not used, and tire tread depth must exceed 6 mm, which is double the national requirement of 3 mm.

Workshop Manager and Planning Manager, were interviewed. They presented maintenance records showing that services are performed every 250 hours, as well as at 10,000 and 20,000-hour intervals. Mr. Mueses also provided evidence of multiple training sessions he has completed in fleet maintenance.

All trailers and chassis are manufactured abroad and follow a comprehensive maintenance plan every six months, covering components such as brake linings, bearings, and structural elements. New equipment under manufacturer warranty is serviced at authorized workshops representing the manufacturer in the Dominican Republic.

An inspection was conducted at the workshop area and spare parts warehouse, accompanied by personnel from safety, environmental, quality, and maintenance departments. A visual inspection was also performed on a chassis undergoing routine maintenance and on a newly arrived unit from abroad. Both were found to be in proper operating condition, clean, and well-organized.

All trailers and chassis are delivered with factory specifications, which were presented to the auditor. These specifications align with the power requirements (towing capacity) for the transported load and the terrain between the Port of Caucedo and the Barrick Pueblo Viejo mine.

The chassis are tandem-type, two-axle units with three-leaf spring suspensions, and have a load capacity ranging from 33,610 kg (74,100 lb) to 30,814 kg (68,000 lb).

A maintenance workshop employee, showed the auditor periodic maintenance records for both trailers and chassis, performed at the workshop facility near the Port of Haina. The chassis are stored at a secured location near the Port of Caucedo.

Before each transport process, a thorough inspection is performed by each driver and verified by the MATPEL Transport Supervisor. At rest stops, personnel also conduct inspections alongside maintenance and technical support personnel traveling with the convoy.

Each time a shipment is prepared for transport, the cargo manifest is verified before leaving the port facility to ensure that the weight and number of boxes match the documentation. A driver, and a convoy escort member, were interviewed and described how inspections are conducted and documented using mobile devices.

MarDom has a digitization unit within the Management Systems Department, responsible for developing and updating electronic forms through mobile applications.

Upon arrival at the mine, the cargo is weighed again prior to unloading.

MarDom does not subcontract any entity to conduct the activities required under Transport Practice 1.3.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is

- ✓ in full compliance with Standard of Practice 1.4

Summarize the basis for this Finding Identified:

To ensure the integrity of the cargo during transport, convoy vehicles are required to maintain a maximum speed of 75 km/h throughout the route. All locks, chassis anchoring elements, and seals must be properly secured. These measures are jointly verified by the drivers and the convoy supervisor.

A driver was interviewed and confirmed that regular inspections of the cargo are conducted at each rest or stop point. He also noted that upon arrival at the Barrick Pueblo Viejo mine, only the trucks carrying cyanide and the escort vehicles are allowed to enter. No MarDom driver exits the cab during unloading, which takes place after the cargo is weighed.

Containers carrying cyanide are labeled by the manufacturer. In the travel report images "TOXIC" placards were observed in accordance with local requirements and United Nations international standards.

MarDom carries additional signage in case any labels are lost or damaged. Trip reports included images showing the cargo properly labeled.

MarDom conducts a visual inspection of all units in the convoy, including escort and technical support vehicles, prior to the start of each transport operation. The auditor randomly reviewed visual inspection records completed by drivers using company-issued smartphones. One truck driver also provided a live demonstration of the inspection process.

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This inspection is mandated by the Sodium Cyanide Transport Manual (MA-SIG-008 V.0), specifically in Section 4.2.3(c), which states:

"The Convoy Leader will authorize the departure of each trip only after all truck inspections are complete, drivers have signed the Cargo Acknowledgment Form **(FM-SIG-084)**, the pre-trip hazardous materials (MATPEL) information check has been completed, alcohol testing has been conducted using the Drug and Alcohol Testing Form **(FM-SIG-012)**, and drivers have been briefed on the accident response procedure. Only then may the convoy begin its journey."

Vehicle inspections are documented using the checklist titled General Cargo Transport Inspection **(FM-SIG-016)**.

Section 4.2.4 of the Sodium Cyanide Transport Manual (MA-SIG-008) requires that all trucks and chassis be included in a preventive maintenance program.

A visit was made to the vehicle maintenance workshop, where the auditor received explanations from maintenance supervisors Mr. César Mueses (Workshop Manager) and Mr. Carlos Vallejos (Fleet Planning Manager). They demonstrated the preventive maintenance program on their computer screens, showing both the scheduled maintenance tasks and the corresponding completed work.

The shipping containers are owned by the shipping line, which assumes responsibility for their ongoing maintenance. In this instance, the containers are the property of Mediterranean Shipping Company (MSC).

Section 4.2.3 of the Sodium Cyanide Transport Manual (MA-SIG-008) states that the workday for drivers involved in sodium cyanide transport must not exceed 12 non-continuous hours per day, allowing for scheduled stops and rest periods.

The operators make 10 minutes rest and visual inspection stops of the trucks and cargo approximately every 2 hours along the route.

- Drivers must maintain a maximum speed of 75 km/h throughout the route to maintain complete cargo.
- Commercial invoices must confirm that each container is fully loaded with 20 boxes, avoiding partial loads.
- Visual inspections must be conducted at every convoy stop to verify cargo conditions.

Section 4.2.3 (l) of MarDom's Sodium Cyanide Transport Manual (MA-SIG-008) states that convoy movement is subject to weather conditions. The Convoy Leader is responsible for assessing the safety of the route in each case and may halt the convoy if, in their judgment, conditions do not allow safe travel.

Section 4.4, items (c), (i), and (j) of MarDom's *Sodium Cyanide Transport Manual* (MA-SIG-008) require the following:

- Alcohol testing must be conducted for all participants involved in hazardous materials (MatPel) transport and documented using the *Drug and Alcohol Testing Form* (FM-SIG-012).
- Alcohol tests must be administered to the convoy leader, truck drivers, and escort drivers at the beginning of each travel day, with results recorded in the trip report.
- In the event of any incident during transport, the Convoy Leader is responsible for evaluating the sobriety of those involved using a breathalyzer.

All documentation related to the above activities, including drug and alcohol test records, inspection and maintenance reports, training records, travel reports, and any records related to incidents, will be retained for a period of three years. The auditor reviewed randomly selected travel reports containing the aforementioned information.

MarDom does not subcontract any entities for the operations required in Transport Practice 1.4.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is

✓ in full compliance with Standard of Practice 1.5

Summarize the basis for this Finding Identified:

This provision does not apply to the land transport of cyanide conducted by truck. MarDom does not transport cyanide by sea.

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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

Summarize the basis for this Finding Identified:

Section 4.4(f) of MarDom's Sodium Cyanide Transport Manual (MA-SIG-008) requires verification that all communication equipment is operational prior to the start of the journey.

Each convoy driver, including escort personnel, is equipped with a radio and a backup battery. Additionally, they carry mobile phones from both major telecommunications providers in the Dominican Republic. This redundancy ensures communication coverage in areas where one provider may lack signal. During an interview, a driver showed the auditor both mobile phones used for this purpose.

Communication equipment, including the radios and cell phones assigned to each transport unit, is regularly tested and verified prior to initiating each cyanide transportation process to the Pueblo Viejo Barrick Gold mine. MarDom maintains constant communication with the mine until the final delivery of the cyanide is completed.

There are no communication dead zones between Puerto Caucedo and the Pueblo Viejo Barrick Gold mine, as confirmed through interviews with drivers, emergency response escort personnel, and maintenance staff accompanying the convoy.

The transportation process is monitored via GPS and maintained through continuous communication between MarDom's base office in Haina, the convoy leader, the technical support leader, and the mine, as reflected in MarDom's internal tracking and control summary.

The auditor reviewed uninterrupted email exchanges between MarDom's base, the convoy, and personnel at the Pueblo Viejo Barrick Gold mine, covering the entire route from departure at Puerto Caucedo to arrival at the mine. Continuous communication was verified throughout the

The cargo from the manufacturer, Australian Gold Reagents Pty Ltd. in Australia, is received at the port, where the Customs Agency provides the container documentation (Gate Pass) to MarDom personnel. After verifying the cargo quantity, MarDom personnel distribute the corresponding documents for each container to the convoy drivers. Once each driver's documentation is verified, the driver, together with the convoy leader, inspects both the documentation and the condition of the cargo.

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Upon departing from the port, the convoy drivers are provided with shipping documents that detail the quantity of cyanide being transported, as well as SDS sheets to present to authorities during the journey and upon arrival at Pueblo Viejo Barrick Gold mine.

Throughout the transportation process, the cargo is escorted by personnel from the Dominican Republic's armed forces.

MarDom does not subcontract any entity to conduct the activities required under Transport Practice 1.6.

Principle 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

- ✓ in full compliance with Standard of Practice 2.1

Summarize the basis for this Finding Identified:

The operation is in NOT APPLICABLE with Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

MarDom has no stores or warehouses in territory of Dominican Republic.

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Principle 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

Summarize the basis for this Finding Identified:

MarDom has an Emergency Response Plan IT-SIG-010 (hereafter referred to as "the Plan"), which was last updated on October 04, 2024. The Plan consists of six sections and has been specifically designed for transporting cyanide to Pueblo Viejo Barrick Gold mine located at km 125 of the road Maimón, Cotui.

The purpose of this document is to provide a reference framework for unforeseen situations during transport and to establish a set of guidelines to direct and coordinate all aspects of emergency response preparedness in the event of an accident involving cyanide containers. This is intended to enable those involved to respond effectively to the situation, thereby mitigating adverse effects on human health and the environment and minimizing cleanup costs where applicable.

The Emergency Response Plan is appropriate, as it addresses the route between Puerto Caucedo and the Pueblo Viejo Barrick Gold Mine, incorporating identified risk factors and threats derived from the risk analysis. It specifies the properties and specifications of the cyanide product and outlines general safety precautions to be observed.

Section 4.2 of the Plan defines the product identification, including considerations regarding its shape, size, weight, dimensions, packaging, specifications, and the percentages of sodium hydroxide and sodium cyanide. It also addresses physical properties such as melting and boiling points, specific gravity, and other thermodynamic characteristics. The Safety Data Sheet (SDS) is included as part of the travel documentation accompanying each transport operation

Section 4.2.5 of the Plan specifies that the cargo will be transported on a truck and platform capable of carrying 20-foot containers, each containing 20 wooden crates with one ton of cyanide per crate. The packaging consists of a series of impact- and water-resistant bags.

MarDom conducts periodic route assessments through its HSE and HazMat personnel. Additionally, truck drivers, escort vehicles, and mechanical support teams report any issues along

the route that may impact safety or emergency response. This ongoing monitoring ensures that the Emergency Response Plan remains appropriate and up to date for any potential incidents.

The vehicles meet specifications appropriate for the transported cargo and consist of seven truck units with retractable trailers specifically designed for cyanide transport. This design offers enhanced protection against rear-impact risks. Their capacities have been verified by the government of the Dominican Republic, which has issued the necessary permits.

The trailers are marked in green and yellow.

Section 4.4 of the Plan outlines the responsibilities of each participant in the event of an emergency, for the activation of the emergency response plan:

a. Equipment Manager / Convoy Leader

– Primary responsibility is to secure the accident site, identify hazards, and notify according to the established communication flow.

b. MARDOM

– Provide logistical support as requested by the client.

c. Client

– Coordinate corrective actions to minimize the impact of the incident on individuals and the environment, monitor the implementation of these actions, provide assistance from specialized teams, and facilitate communication among affected parties. The client must also support the tasks required by the Incident Commander.

The supplementary document to the Emergency Response Plan lists contact information for medical care centers, fire departments, police, and civil defense services located along the route to the Pueblo Viejo Barrick Gold mine.

Section 4.5.5 of the Plan addresses the involvement of national emergency response personnel and external services.

Their responsibilities include securing the area to prevent public access, communicating and/or evacuating areas or communities if necessary, and coordinating vehicular traffic at the site.

Fire Department Responsibilities: Follow the Incident Commander's recommendations regarding the product's properties and act accordingly.

Police Responsibilities: Secure the area to prevent public access and notify communities if evacuation is required.

Medical Centers: Support the reception and care of affected individuals.

Communities: Cooperate with the recommendations issued by authorities.

If law enforcement assumes control of the incident, MarDom personnel will be made available to assist.

Section 4.6 of the Plan identifies the roles of external responders, beginning with the obligation of the Incident Commander, Convoy Leader, or Equipment Manager to contact the HSE department's communications center.

If the Incident Commander or Convoy Leader is unable to make contact personally, another team member must do so on their behalf.

The Logistics Coordinator will notify the client of the incident and implement any preventive measures as instructed.

MARDOM, through the Incident Commander, must initiate the following actions:

Instruct the Convoy Leader and/or Intermediate Equipment Manager on the initial steps to control the spill.

Notify public emergency services, if this has not already been done.

Inform the mining company of the incident and coordinate response actions.

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

Summarize the basis for this Finding Identified:

MarDom provides initial and refresher emergency response training through its HSE & HazMat department. Training topics include intravenous access procedures for 40 individuals, conducted by the Occupational Health company VANTER, S.A.

The communities of Piedra Blanca, Maimón, and Cotuí received joint training on cyanide hazards, conducted by personnel from MarDom and the Barrick Gold Pueblo Viejo mine. Informational brochures were also distributed.
The auditor reviewed training records for drivers, including mechanics and technical support personnel who accompany the convoy, covering the period from 2022 (following the Cyanide Code audit conducted that year) through 2023 to 2025. Topics included Hazardous Materials and Emergency Response.

The auditor reviewed training records regarding the use of self-contained breathing apparatus provided by the Emergency Operations Center (COE), Coordination of the Nuclear, Bacteriological, Chemical and Radiological Unit-(NBCR) of the Government of the Dominican Republic.

Emergency response personnel, including the occupational health physician and nurse, were interviewed. The nurse stated that she supports the HSE staff during training sessions.

Section 4.5.2 of the Plan outlines the Convoy Leader's responsibilities for the implementation and effectiveness of the entire sodium cyanide spill cleanup operation. The Convoy Leader holds full authority over cleanup and recovery personnel at the incident site.

Detailed duties and responsibilities include:

i. Request a dedicated communication line with the client to report events and needs.
ii. Assess the situation and plan actions with the Incident Commander.
iii. Develop the response plan for containment and cleanup of the specific incident.
iv. Ensure that assigned responsibilities are fulfilled and that coordination exists among team members.

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v. Prioritize actions based on the emergency's needs.
vi. Secure the necessary human and material resources to complete the tasks.
vii. Ensure that personnel actions prevent personal injuries.
viii. Monitor for potential cyanide gas emissions and take appropriate action.
ix. Conduct cyanide measurements in watercourses.
x. Ensure that cyanide and cyanide-contaminated waste are properly stored and until transported to the mine facilities.
xi. If necessary, apply the most appropriate technique to detoxify the cyanide-exposed area.
xii. Remain at the accident site after cleanup and restoration to verify full recovery of the area.

During the transportation process, MarDom maintains a list of emergency response equipment. From 2022 until mid-2023, the emergency equipment checklist was completed using paper forms. Since 2024, all inspection records for emergency response equipment have been maintained electronically via a mobile application used by truck drivers, escort vehicles, and mechanical-technical support personnel. A driver demonstrated to the auditor how emergency response equipment compliance is recorded using the application.

The following individuals, trained on September 30, 2025, are authorized to administer oxygen and antidote transported by the convoy:

Starlin M Peña, Frank felix Guzman, Jose Casanova and Zoila Castillo, according to a certificate dated September 30, 2025, signed by Dr. Adriana Sánchez, the Medical Manager of VANTER, S.R.L.

The Convoy Leader and truck drivers, as well as escort and mechanical personnel, carry the required personal protective equipment in a trailer that is neatly organized for easy access and protected from the elements. The trailer is transported by a vehicle and contains all necessary materials to respond to spill and poisoning emergencies.

MarDom also has three cyanide detection instruments, all of which were properly calibrated as of the audit date.

The Sodium Cyanide Transportation Manual MA-SIG-008 rev. 0 establishes that the Convoy Leader must inspect the emergency equipment using the MatPel Emergency Transportation and Storage Equipment Inspection Checklist (FM-SIG-040) prior to convoy departure. If any items in the kit have been used, they must be replaced immediately. The expiration date of the sodium cyanide antidote must be checked, and the emergency kit must be inspected monthly, with evidence recorded on the inspection card.

The auditor verified the proper functioning of the emergency equipment and found it to be in acceptable condition.

MarDom does not subcontract any entity to conduct activities required in Transportation Practice 3.2.

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

Summarize the basis for this Finding Identified:

Section 4.3.3 of the Sodium Cyanide Transportation Emergency Plan establishes that, in the event communication is required, contact must be made using the telephone numbers listed in the *Sodium Cyanide Transportation Emergency Plan Contacts document* (DO-SIG-034). This document includes contact information for the cyanide supplier, MarDom, DP World Caucedo, and external emergency response entities.

The auditor reviewed Chapter II of the *Sodium Cyanide Transportation Emergency Plan Contacts* document (DO-SIG-034) and confirmed that updates to contact information have been made consistently over time. These updates—such as changes to responsible personnel and their phone numbers—are based on ongoing communication between MarDom, Puerto Caucedo, and the mine, and are documented by drivers and the convoy leader.

The most recent revision to the contact list was completed on April 15, 2025.

Section 4.3.4 of the Plan requires that any significant cyanide incident be reported to the International Cyanide Management Institute (ICMI), in accordance with the Cyanide Code. The Plan defines significant incidents as including:

a) Human exposure requiring emergency response actions such as decontamination or medical treatment.
b) Unauthorized releases into natural surface waters, whether on-site or off-site.
c) Unauthorized releases occurring off-site or extending beyond the site.
d) On-site releases requiring intervention by an emergency response team.
e) Transportation incidents involving cyanide releases that require emergency response.
f) Wildlife mortality events involving multiple animals where cyanide is known or credibly suspected to be the cause.
g) Theft of cyanide.

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Section 4.3.4.2 further specifies that notification of any significant cyanide incident occurring at a signatory's operation—provided it falls within the scope of the Cyanide Code and is listed in Part II of the signatory application—must be submitted to ICMI within 24 hours of the incident.

The notification must include the date and nature of the incident, along with the name and contact information of a company representative who can respond to follow-up inquiries.

Additional details—such as root cause, health, safety, and environmental impacts, and any mitigation or remediation measures—must be submitted within seven days of the incident.

Notifications must be sent in writing via email at: info@cyanidecode.org
or fax to ICMI at +1-202-835-0155 or Tel +1.202.495.4020

MarDom has not experienced any significant cyanide incidents.

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

Summarize the basis for this Finding Identified:

Section 4.8.3 of the Plan establishes the procedures for spills in dry and wet conditions due to vehicle collisions.

a. Call the HSE department's communications center, providing all necessary information about the accident.

b. Evacuation of people will not be necessary unless the cyanide comes into contact with water, acid, or acidic salts.

c. Check for injuries. If there are any, request that they be treated immediately or sent to the nearest hospital.

d. Turn off the ignition/power to the engine or turn off the lights.

e. Instruct the police or fire department to keep the area clear of people and vehicles.

f. Cordon off the area, informing the police of the nature of the product if it is mixed with water or acidic substances.

g. Request the police to stop vehicle traffic and prevent anyone from entering the danger area.

h. If necessary, in rainy weather or if the threat of rain is present, if the product is spilled on the ground or pavement, alkalize it and place the Emergency Kit tent over the spilled load.

i. Use sandbags or earth to prevent water from canals, irrigation channels, or waterways from approaching the area contaminated with sodium cyanide.

j. If the product has come into contact with water, small amounts of hydrocyanic acid gas may be detected. In this case, work with the wind at your back.

k. Once contained, collect as many cyanide briquettes as possible, wearing waterproof gloves and using a shovel or broom, storing them in plastic bags until the emergency response team arrives to recover them.

l. Remain next to the truck until the incident commander arrives, who will take charge of the situation.

The Sodium Cyanide Transportation Emergency Plan Instructions - IT-SIG-10, September 18, 2025 version, states in section 4.5.2, b. Work Performed, ordinal xi., that any spilled material collected must be taken to the mine for treatment after being properly packaged.

Section 4.9.15 b. of the Plan addresses the use of detoxifying agents in the event of a spill into a body of water. It includes the following guidance:

Note 2: The use of detoxifying agents (such as sodium hypochlorite, hydrogen peroxide, or ferrous sulfate) is permitted only if the spill is confined to a limited body of water—such as puddles or small pools—and only at the discretion of the client's representative.

Note 3: Detoxifying agents must never be applied to active, flowing, or biodiverse watercourses.

Standard of Practice 3.5

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 3.5

Summarize the basis for this Finding Identified:

Section 4.12 of the Plan states that it must be updated following any incident that triggers the implementation of the emergency response plan. Updates must also be made whenever there are substantive or procedural changes—such as modifications to personnel, contact numbers, routes, equipment, methods, or any other factor that could improve the plan's effectiveness and efficiency.

Responsibility for identifying and implementing these changes lies with the involved parties. MARDOM is responsible for updating the Plan and distributing the revised version to all relevant stakeholders.

Section 4.11.5 of the Plan requires that emergency drills be conducted at least once per year. These drills may be theoretical or practical and are intended to evaluate the effectiveness of the emergency response plan and identify areas for improvement.

The drills aim to ensure that personnel receiving the initial emergency notification can:

i. Quickly assess the situation and gather basic facts (who, what, where, when, how, and why).
ii. Notify the responsible person at the subsidiary and relay the information collected.

On-site evaluations focus on:

i. Proper parking and positioning of the convoy.
ii. Whether operators and drivers are appropriately equipped to respond.
iii. Timeliness and effectiveness of requests for public emergency assistance.
iv. Air and water quality monitoring around the drill site.
v. Securing the affected area.
vi. Requesting additional resources if needed.

In-office evaluations assess whether each participant fulfills their assigned role as outlined in the emergency plan.

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Additional requirements include:

i. Notifying all involved parties before and after the drill.
ii. Preparing a post-drill report that identifies strengths, weaknesses, and a corrective action plan.
iii. Including in the report: the date, objective, scope, expected actions, responsible personnel, coordination efforts, response time, improvement opportunities, implementation plan, and responsible parties.
iv. Conducting a critical performance review of the plan after each drill or real emergency response.

Drills Conducted:

July 27, 2022: A forklift fire drill was conducted at the Haina port facilities in coordination with the fire department. The main objective was to evaluate communication flow and emergency response effectiveness.

March 18, 2023: A cyanide spill drill was conducted during the loading process at a former intermediate storage facility. The scenario involved a crane dropping a container, causing the doors to open and sodium cyanide briquettes to spill. The convoy leader initiated emergency response actions. As a result, the need for two additional HCN detectors was identified and fulfilled by December 15, 2023.

February 23 and June 24, 2024: Drills were conducted simulating product spill scenarios.

April 6, 2024: A drill was conducted in the presence of a representative from the cyanide manufacturer, Australian Gold Reagents Pty Ltd (AGR). The scenario involved a vehicle collision during transport, resulting in a spill of solid sodium cyanide briquettes. The objective was to test the convoy's emergency response and cleanup procedures.

July 4, 2025: Drills were conducted simulating cyanide exposure or poisoning scenarios.

Section 4.12 of the Plan states that it must be reviewed and updated after any incident that results in the activation of the emergency response plan. It must also be revised whenever there are changes in procedures, personnel, contact numbers, routes, equipment, methods, or any other factor that could improve the plan's effectiveness and efficiency.

The parties involved are responsible for identifying and implementing these changes. MARDOM is responsible for updating the Plan and distributing the revised version to all relevant stakeholders.

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