



# INTERNATIONAL CYANIDE MANAGEMENT CODE

BASE TRANSPORTATION, LIMA, LIMA, PERU

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## INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

## Cyanide Transportation Operations Summary Audit Report



# For the International Cyanide Management Code and MUR WY S.A.C. – Lima – Lima – Peru Verification protocol

www.cyanidecode.org
July 2025

MUR-WY S.A.C.

INTERNATIONAL CYANIDE MANAGEMENT

LEAD AUDITOR
JUAN A. CRUZADO LOPEZ

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## **AUDIT SUMMARY REPORT**

#### FOR CYANIDE TRANSPORT OPERATIONS

#### Introduction

This document provides the framework for the information that an auditor must include in the Summary Audit Report prepared for a Cyanide Code Certification Audit conducted for a cyanide transportation operation and serves as a general template for presenting the required information.

The International Cyanide Management Institute ("ICMI" or "the Institute") reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audit is complete, it posts the Summary Audit Report on the Cyanide Code website.

#### Instructions

- The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in this Summary Audit Report. The Summary Audit Report is intended to provide a summary of the information included in the Detailed Audit Findings Report prepared for the certification audit; and therefore, should include only information that is presented in the Detailed Audit Findings Report.
- 2. The name of the cyanide transportation operation, the Lead Auditor's signature, and the submittal date of the final report must be included at the bottom of each page of the Summary Audit Report.
- 3. An operation found in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
- 4. The Summary Audit Report, the Detailed Audit Findings Report, and any necessary Corrective Action Plan with all required signatures must be submitted in electronic format to ICMI within 90 days of completion of the site inspection portion of the audit. An electronic copy of a letter from the owner or authorized representative of the audited operation granting ICMI permission to post the Summary Audit Report and Corrective Action Plan (if one is necessary) on the Cyanide Code website must also be submitted, along with both an electronic copy and a hard copy of a completed Auditor Credentials Form. The Lead Auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent. Electronic documents should be submitted to the Institute via email at:

#### audits@cyanidecode.org

The hard copy of the notarized Auditor Credentials Form should be sent to:

International Cyanide Management Institute (ICMI)

1400 I Street, NW, Suite 550

#### Washington, DC 20005, United States

5. The Summary Audit Report should include a description of the transport operation indicating key operational components that provide context to the reader ahead of the audit findings. For Transport Supply Chains, the report should include an overall description of the supply chain, and listing of entities participating in the supply chain and included within the scope of the audit, such as the consigner, trucking companies, ports, shipping lines, rail operations, and warehouses (any changes to a certified supply chain made since its previous audit should also be noted, such as additions or removals of ports, marine carriers, or trucking companies, along with the date the change was made).

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The description of the operation should include sufficient information to describe the scope and complexity of the transportation operation.

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#### INTRODUCTION

#### Information about the audited operation

- Name of cyanide transport facility: MUR-WY S.A.C. (MUR-WY) Campoy III
- Name of facility owner: MUR-WY S.A.C. (MUR-WY)
- Name of facility operator: MUR-WY S.A.C. (MUR-WY)
- · Name of Responsible Manager: Everth Rojas
- Address: Av. Malecón Checa Nº 3777, Urbanización Campoy, San Juan de Lurigancho
- State/ Province: San Juan de Lurigancho, Lima, Peru
- Country: Peru
- Telephones: (511) 7007062 / (511) 7007337
- Emails: ninoska.ledesma@mur.com.pe / everth.rojas@mur.com.pe

MUR-WY S.A.C. (MUR-WY) has a large fleet of tractor trucks for the transport of loose cargo and containers.

All its vehicles are monitored with radio frequency systems and reserved GPS in real time.

MUR-WY was certified in 2013 by the International Cyanide Management Institute, for cyanide transport operations. MUR-WY receives the cyanide directly from port facilities or other storage sites. It can be transported in containers. MUR-WY has no storage facilities and does not remove product from containers.

The scope of this audit includes the land transport operation from the Port Authority in Callao, where the cyanide is released, to delivery to the customer's facility. Cyanide is received from the manufacturer or consignor in any of the following packaging presentations:

- Polypropylene inner bag filled up to 1 ton and placed inside a polyethylene bag and a wooden box.

No less than 20 boxes are placed in standard 20ft shipping containers; The boxes are positioned in a way that prevents lateral movement inside the container. In addition to the normal anchoring of the container to the chassis of the trucks, the containers are secured with chains, for a double safety tie-down. Containers are received locked and tagged.

These tags are only removed on the user's site.

MUR-WY obtained Cyanide Code certification in 2013, making this the 1st. Recertification. See <a href="https://www.cyanidecode.org">www.cyanidecode.org</a>. These activities have been carried out for 3 years with ZERO (0) accidents.

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## **Auditor's conclusion**

This operation is:

X in full compliance

☐ in substantial compliance

The International Cyanide Management Code

□ does not comply

with the International Cyanide Management Code.

No significant cyanide incidents or exposures and releases were observed during the audit period.

Audit Company: MOBER OPERACIONES

Lead Auditor: Juan Cruzado Lopez

Lead Auditor Email: jacruzado8@gmail.com

Names and Signatures of Other Auditor

Name	Position	Signature	Date
María del Pilar Arrese	Transportation Technician	yourf	July 25, 2025

Ih.

#### 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.

Name of Operation	Name	Position	Signature	Date
MUR-WY S.A.C.	Juan Adolfo Cruzado Lopez	Lead Auditor	Herme for I	July 25, 2025

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#### Verification protocol

#### 1. **TRANSPORT**

Transports cyanide in a way that minimizes the potential for accidents and releases.

#### 1.1 **TRANSPORT PRACTICE 1.1**

SELECT CYANIDE TRANSPORT ROUTES TO MINIMIZE THE POTENTIAL FOR ACCIDENTS AND RELEASES.

X in full compliance with the

The operation is ☐ in substantial compliance with the Transport practice 1.1

☐ does not comply with

#### Summarize the basis for this finding/identified shortcomings:

The operation is FULLY compliant with Standard of Practice 1.1 which requires an operation to select cyanide transport routes to minimize the potential for accidents and releases.

MUR-WY implemented the route evaluation process identified as "Route Selection and Hazard Identification." for the Transport of Sodium Cyanide", Cyanide Transport that describes the elements to be evaluated during the route analysis in accordance with those outlined in the International Cyanide Management Code.

The "Emergency Response Plan" has been implemented for the route related to the transport of cyanide.

The route is evaluated:

Lima - Arequipa - Cusco

The records evidenced are as follows

- Roadmap
- Risks of Cyanide Transport

The evaluated routes have been approved by the Ministry of Transport of Peru:

The service has been approved by the National Superintendence of Taxation:

In the procedure "Route Selection and Hazard Identification, for the Transport of Sodium Cyanide", the account executive, if it is a new customer, confirms to the customer the merchandise to be transported, informing the customer of the need for the MSDS product, after receiving the information it is sent to the Risk Assessment Supervisor for the route and the implementation of controls.

MUR-WY implemented the "Selection and identification of route hazards, for the transport of sodium cyanide", in the route evaluation report the main risks were identified such as urban areas, population density, road infrastructure, proximity to bodies of water, presence of fog, probability of free fall.

The risks associated with these characteristics include: vehicular crash, vehicle rollover, vehicular skidding, loading, loss, pedestrian accidents, product spillage in a body of water and water pollution, among others.

For each specific route, a risk assessment with a photographic record was developed in 2025. Risk management measures are listed for each part of the routes based on the characteristics and level of risk.

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According to the "Route Selection and Hazard Identification for Sodium Cyanide Transport", routes are fully verified once a year or until the first transport to a customer by the MUR-WY Control and Analysis team. In addition, for all cyanide transport operations, the driver must submit a trip log, in which the driver must note if there were any changes to the route. If changes are identified, they are reviewed and evaluated; and, where appropriate, the risk assessment of the route is updated. Temporary changes, such as route deviations, are verbally reported to the driver prior to the departure of the train.

MUR-WY identified fire stations, police stations, technical support, and hospitals and medical centers in the area, as well as phone numbers and contacts.

As noted above, the risk assessment for each route describes the risks identified along them and the specific measures that need to be taken to address the risks.

MUR-WY identified the main bridges, tolls, fuel stops and technical stop points.

MUR-WY includes comments from stakeholders (communities, other stakeholders, government agencies) in compliance with the "Route Selection and Hazard Identification, for Sodium Cyanide Transport" procedure. These comments, if applicable, depending on their usefulness in route selection and risk management, are reflected in the registry's Roadmap.

The centers are included in the MUR-WY Emergency Response Plan and the consultation centers were evident during the audit.

For the transport of hazardous materials (including sodium cyanide), MUR-WY has a control room at the base in SAN JUAN DE LURIGANCHO, Peru, where the GPS system provides continuous positioning of each of the vehicles at all times, as well as continuous speed monitoring at each point of the route from the start point to the end point.

MUR-WY also established through a Procedure for the Transportation of Sodium Cyanide, the specifications for the use of escort trucks during the transportation of sodium cyanide, which must be ONE (01) escort truck for every THREE (03) or less cargo transport units. A security specialist and a driver ride in the escort vehicle. This requirement applies to all MUR-WY customers.

Only ONE (01) CONTAINER can be loaded per platform and each wagon can only tow one chassis. The convoy may include one or more escort vehicles at the customer's request. The journey of the convoy will depend on weather conditions; the Convoy Leader will evaluate the safety of the route in each case, and may stop the convoy if he considers that the conditions do not allow safe transit.

MUR-WY does not outsource any of these cyanide transportation operations.

#### 1.2 TRANSPORT PRACTICE 1.2

ENSURE THAT PERSONNEL OPERATING CYANIDE HANDLING AND TRANSPORTATION EQUIPMENT CAN PERFORM THEIR JOBS WITH MINIMAL RISK TO COMMUNITIES AND THE ENVIRONMENT.

	X in full compliance with the	
The operation is	☐ in substantial compliance with the	Transport practice 1.2
	☐ does not comply with	

Summarize the basis for this finding/identified shortcomings:

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The operation is in FULL COMPLIANCE with Standard of Practice 1.2 which requires an operation to ensure that personnel operating cyanide handling and transport equipment are able to perform their work with minimal risk to communities and the environment.

The MUR-WY procedure establishes minimum requirements for the "job profile" of drivers: health, defensive driving training, and sodium cyanide emergency response training (prevention of spills and poisonings).

Drivers are legally required to have an A4 license. To obtain this license, you must have completed high school, undergo a psychological evaluation and a psychotechnical evaluation, and have a certificate from Professional Driver School.

The auditor reviews the documentation of the 03 drivers

- Augusto Acuña Huamani
- Jesús Chamorro Melgarejo
- José Isla Ramon

As a result of the audit, it was found that MUR-WY only uses trained, qualified, and licensed operators to operate its vehicles.

Records were checked and all personnel operating the transport equipment were ready to perform their jobs in a manner that minimizes the possibility of cyanide releases and exposures, these trainings include the safe handling of cyanide as both emergency and poisoning, firefighting, first aid, defensive driving.

MUR-WY, has been working on an Occupational Health and Safety Program Management System.

This program provides training related to leadership activities and management engagement, and training, hazard analysis work procedures, use of personal protective equipment, incident investigation, safety inspections, emergency response, drills, environmental protection, safety, and health program.

MUR-WY selects the most specialized conductors to transport sodium cyanide.

In accordance with transportation procedures, drivers drive up to FOUR (04) continuously, with breaks of ONE (1) hours. Sleep at least SEVEN (07) hours before each trip, and you must not drive for more than TWELVE (12) hours per day.

In its Cyanide Emergency Response Plan, MUR-WY includes a training program that must be supplemented by all drivers, consisting of the following:

- Company Introduction
- Basic Ricks Prevention and Use of Personal Protective Equipment (PPE)
- Hazardous Materials Handling and Transportation
- Emergency response
- Defensive Driving

In addition, the following training courses are specific to drivers transporting cyanide shipments:

- Cyanide Emergency Response
- Cyanide Product Overview

Under the Plan, cyanide-related training is updated once a year. During the audit, the files of three drivers were reviewed and all relevant training certificates were available.

MUR-WY does not outsource any of these cyanide transportation operations.

#### 1.3 Transport practice 1.3

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#### ENSURE THE TRANSPORT EQUIPMENT IS SUITABLE FOR CYANIDE SHIPPING.

# X in full compliance with the The operation is ☐ in substantial compliance with the ☐ Transport practice 1.3 ☐ does not comply with

#### Summarize the basis for this finding/identified shortcomings:

The operation is in FULL COMPLIANCE with Standard of Practice 1.3 which requires an operation to ensure that the conveying equipment is suitable for the shipment of cyanide.

MUR-WY establishes requirements for the maintenance of units that transport cyanide in the transport process, which comply with the provisions of Peruvian law. In addition, MUR-WY is registered with the Government of Peru for the transport of hazardous materials.

#### Trailer:

- Category / Class: N3 / Trailer.
- Body: Trailer.
- Fuel: Oil.
- Age: no more than 5 years old.
- The axles, as seen in DS 058-2003-MTC, Standard Vehicle Weights and Measures (Legal International Standard) for Cyanide Transport Units are designated as configuration, T3S3, T3SE3 and T3S2.

#### Semitrailer:

04 have fastening systems, which can be fixed and/or mobile pine cones, as well as pins.

#### Overload

• MUR-WY states that the load must not exceed the load capacity of the road as indicated in the item load capacity, and this control is done using the "Pre-Unit Verification" format.

The maintenance of the units is carried out by the supplier "DIVEMOTORS", the parts are original and the technicians are specialized for the type of vehicle.

According to the "Sodium Cyanide Transport", the head of security along with a driver must check the trucks and trailers by completing a checklist per vehicle before the departure of the convoy. The checklist requires reviewing:

- Cargo Origin and Destination
- Driver and supervisor names
- Boarding documentation (insurance, current technical inspection, registration certificate, among others)
- Driver documentation (license and ID card, and appropriate training certificates)
- PPE (safety cap, goggles, safety boots, vest, gloves, harness and thermal clothing)
- Vehicle safety equipment (cell phone and radio, seat belts, first aid kit, reflective triangles, cones, flashlight, horn, fire extinguishers, jack, snow chains, mirrors, alarms, wheel wrench, wedges, windshield, among others)
- Lights (flashing, turning, big, stop, among others)
- Cabinets
- Tires (trucks and spare tires)

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JULY 25, 2025



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Load verification (tie rods and turns of the semi-trailer. Reportedly, this is verified again after loading the container, although it is not registered

During the audit, three (03) packages of trip logs that complied with the provisions of the "Transport of sodium cyanide" are evidenced.

According to the Procedure for the Transportation of Sodium Cyanide, MUR-WY has procedures in place to prevent overloading of transport vehicles, a cyanide CONTAINER can be loaded into the vehicle. As seen in "DS 058-2003-MTC, Standard Vehicle Weights and Measures" (Law of Peru).

MUR-WY does not outsource any of these cyanide transportation operations.

#### 1.4 TRANSPORT PRACTICE 1.4

DEVELOP AND IMPLEMENT A SAFETY PROGRAM FOR THE TRANSPORTATION OF CYANIDE.

X in full compliance with the The operation is ☐ in substantial compliance with the Transport practice 1.4 □ does not comply with

#### Summarize the basis for this finding/identified shortcomings:

The operation is in FULL COMPLIANCE with Standard of Practice 1.4 which requires an operation to develop and implement a safety program for the transportation of cyanide.

MUR-WY established a method of transport that avoids disturbances during movement.

For the transport of hazardous materials (including sodium cyanide), MUR-WY has a control room at the SAN JUAN DE LURIGANCHO base, Peru, where the GPS system provides continuous positioning of each of the vehicles at all times.

Finally, taking into account the information contained in the Orange Book Transport of Dangerous Goods -Model Regulation, Part 3, Chapter 3.5, in relation to dangerous goods packed/packed in excepted quantities.

MUR-WY requires inspection of cartel load information (DOT, UN, and NFPA) verification of the truck's "preuse units." Signage is provided to comply with local regulations, which are based on the UN Recommendations on the Transport of Dangerous Goods. Copies of the posters are included in the Emergency Response Plan.

MUR-WY indicates the customer's need for compliance, to ensure that escort vehicles and transport vehicles are in optimal condition.

MUR-WY performs vehicle inspections prior to each departure/shipment

During the audit process, records of inspections prior to each outbound shipment are evidence.

MUR-WY has a maintenance plan. Maintenance records were reviewed and practice was confirmed during vehicle observation and interview with maintenance supervisor and drivers.

Drivers must rest at least 08 hours before a trip and must not drive more than 10 hours a day and driving time is during the day only, 8 hours per day per MUR-WY procedures. It should be noted that Peru's Regulations establish the same schedule for the transport of hazardous substances. And according to the Procedure for

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the Transport of Sodium Cyanide, drivers can drive up to 8 hours and stops are designated before the departure of the convoy. The facilities where the convoys stop are fenced and have 24-hour security guards.

MUR-WY states that the cyanide cargo must travel in a 20-foot CONTAINER, developing mechanisms to prevent its movement.

In accordance with the Procedure for the Transport of Sodium Cyanide, MUR-WY has anchoring mechanisms for the container and a tie-down system for cyanide in the container.

The trip will be made in convoy mode; The convoy leader is responsible for assessing weather conditions and has the power to suspend the transport convoy.

At the end of the trip, the operation leader and drivers must present a report detailing the same road incidents, advance information, sensitive areas and find relevant information to ensure safety on future trips.

"Alcohol and Drug Policy" The consumption of alcohol, drugs or any other substance that may impair or reduce the function of the driver or a member of the convoy is prohibited, in which prior to the start of each trip everyone must go through an alcohol test and periodic drug tests; Violation of this policy results in the separation of the worker from the operation.

Plans and procedures for compliance with the Code are reviewed annually and annual surveillance audits are conducted to verify compliance with MUR-WY standards.

MUR-WY keeps records of the transport and inspection activity of the cargo units, evidenced by the reports of the year 2025.

MUR-WY does not outsource any of these cyanide transportation operations.

#### 1.5 TRANSPORT PRACTICE 1.5:

FOLLOW INTERNATIONAL STANDARDS FOR THE TRANSPORT OF CYANIDE BY SEA.

X in full compliance with the

The operation is 
in substantial compliance with the Transport practice 1.5

□ does not comply with

#### Summarize the basis for this finding/identified shortcomings:

The operation is NOT APPLICABLE with Standard of Practice 1.5 which requires an operation to follow international standards for the transport of cyanide by sea and air.

MUR-WY is not transported by sea freight and air freight within the territory of Peru.

#### 1.6 TRANSPORT PRACTICE 1.6:

TRACK CYANIDE SHIPMENTS TO PREVENT LOSSES DURING TRANSPORTATION.

X in full compliance with the

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The operation is	☐ in substantial compliance with the	Transport practice 1.6
	☐ does not comply with	

#### Summarize the basis for this finding/identified shortcomings:

The operation is FULLY compliant with Standard of Practice 1.6 which requires a Track Cyanide shipments operation to prevent losses during transportation.

MUR-WY uses a GPS system. They also have telephone service, UHF radio and cell phones that ensure full coverage during movement and are fully connected to the control room at their base in SAN JUAN DE LURIGANCHO, Peru. In addition to providing this system, they continuously know the positioning of each of the vehicles all the time and the security escort vehicle carries a satellite phone. During the audit, the operability of the equipment was verified.

The telephone lines were operating at the time of the audit; and an inspection was also made to verify the operation of the mobile equipment and the payment of the phone, GPS, satellite phone and UHF radio services was found.

In addition, MUR-WY regularly tests communication equipment to ensure it is working properly. "Pre-Use Verification Units" contains the inspection criteria for communication equipment.

MUR-WY has identified areas without UHF radio and cellular coverage; In such areas, the convoy makes use of satellite equipment.

The GPS system has real-time location updates, in areas without GPS coverage it saves the information transmitted after the passage of vehicles.

The bill of lading and the shipment reference are part of the shipment records of the amount transported; The material safety data sheet is checked before each trip and is available throughout transport.

The shipper's shipping reference indicates the name of the product, the United Nations (UN) number, the number of packages carried and the weight of the cargo, and it is also necessary to indicate the safety considerations of the product. Upon delivery of the shipper's shipping reference, the supplier delivers the material safety data sheet to the carrier. Failure to submit the shipper's reference guide and Material Safety Data Sheet during transport is punishable by the confiscation of the cargo by the government of Peru. It is worth mentioning that the sender's shipping reference must be kept and stored by the carrier for a period of not less than FIVE (05) years.

MUR-WY does not outsource any of these cyanide transportation operations.

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#### 2. INTERMEDIATE STORAGE

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

#### 2.1 TRANSPORT PRACTICE 2.1

STORE CYANIDE IN A MANNER THAT MINIMIZES THE CHANCE OF ACCIDENTAL RELEASES.

X in full compliance with the

The operation is 
in substantial compliance with the Transport Practice 2.1

☐ does not comply with

#### Summarize the basis for this finding/identified shortcomings:

The operation is NOT APPLICABLE with Standard of Practice 2.1 which requires an operation to store cyanide in a manner that minimizes the potential for accidental releases.

MUR-WY has no stores or warehouses in the territory of Peru.

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#### **EMERGENCY RESPONSE:**

Protect communities and the environment by developing emergency response strategies and capabilities.

#### 3.1 TRANSPORT PRACTICE 3.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with the

The operation is ☐ in substantial compliance with the ☐ Transport practice 3.1
☐ does not comply with

#### Summarize the basis for this finding/identified shortcomings:

The operation is FULLY compliant with Standard of Practice 3.1 which requires a detailed emergency response plan for possible cyanide releases.

MUR-WY has an emergency response plan. Information on road conditions is defined in the roadmap document. The Emergency Plan outlines response actions for anticipated emergency situations. These were verified during the audit. The emergency response plan is approved by the Ministry of Transport and Communications by the Peruvian government (R.D. No. 2412-2024-MTC/17.02).

It covers the strategic and tactical response to emergencies that may occur during the transportation process on the following routes.

The validity of the emergency response plan for the government of Peru is 05 years

The Emergency Response Plan for transport is suitable for the selected transport route, based on hazards and risk assessment after the completion of the Roadmap.

The Emergency Response Plan has the following information:

- General Information Carrier
- MUR-WY Organizational Transportation
- Functions of personnel in emergencies en route Incident Command
- Communication System
- Characteristics of the units installed in the vehicle
- General and specific characteristics of sodium cyanide
- Identification of risks along the route
- Response planning
- Communication processes
- Emergency Care Procedures
- Review and update the contingency plan

Main risks identified during transport:

- Falling or spilling material or debris
- Car accident
- Vehicle breakdown
- Collision object and/or people or animals

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- Rollovers
- Fires
- Explosions
- Social conflicts
- Criminal acts, sabotage and/or terrorism
- Disease Team
- Air, soil and/or water pollution
- Natural phenomena
- Stole

#### Procedures for emergency care:

- Non-injury incident/continuous travel
- Mechanical Issues / Non-Continuous Travel
- Spill / non-spill tipper
- Fire Truck
- Tipping over with rain and cargo fire
- Collision with injuries
- Dry Spill Cleaning and Decontamination
- Fire Charge
- Water Spill: Cleanup and Decontamination
- Social conflicts
- Adverse weather conditions
- Traffic congestion
- First Aid for Cyanide Poisoning

The Emergency Response Plan is suitable for the selected transport route, taking into account the physical and chemical form of the cyanide clearly based on the Product Safety Data Sheet "Sodium Cyanide". MUR-WY is a solid-state sodium cyanide delivery carrier (briquettes).

MUR-WY indicates the use of trucks to transport sodium cyanide taking into account the characteristics of the equipment and assesses the structural condition of the road where the transport of sodium cyanide takes place.

UN number: 1689UN Classification: Toxic

Class Number: 6.1

Transport Type: Truck plus Railcar TractorContainer Type: 20ft Shipping Container

Quantity per container: 20 tons
 Product Shape: Solid Briquettes

Information on road conditions is defined in the Roadmap and Risks in Cyanide Transport. The Emergency Response Plan outlines response actions for anticipated emergency situations. These were verified during the audit.

It also sets out the logical course of action to be followed by the convoy leader and drivers in the event of irregularities arising during the transport of sodium cyanide.

MUR-WY uses trucks; in addition, all shipments are dispatched inside purchased low-bed trailers with a maximum load capacity of 30 tons that are certified to transport sodium cyanide by the government of Peru.

Trailer:

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- Category / Class: N3 / Trailer.
- Body: Trailer.
- Fuel: Oil.
- Age: no more than 5 years old.
- The axles, as seen in DS 058-2003-MTC, Standard Vehicle Weights and Measures (Legal International Standard) for Cyanide Transport Units are designated as configuration, T3S3, T3SE3 and T3S2.

#### Semitrailer:

04 have fastening systems, which can be fixed and/or mobile pine cones, as well as pins.

MUR-WY sets actions if incidents occur on the path described below.

- Non-injury incident/continuous travel
- Mechanical Issues / Non-Continuous Travel
- Spill / non-spill tipper
- Fire Truck
- Tipping over with rain and cargo fire
- Collision with injuries
- Dry Spill Cleaning and Decontamination
- Fire Charge
- Water Spill: Cleanup and Decontamination
- Social conflicts
- Adverse weather conditions
- Traffic congestion
- First Aid for Cyanide Poisoning

The awareness on the part of the drivers and supervisors of the actions in each case was evidenced after the interview with the staff.

MUR-WY has defined three levels of emergency response. The Emergency Response Plan identifies the roles of external first responders, medical facilities, or communities in emergency response procedures.

Section 2.4 of the plan indicates the functions of the external media involved in the management of the contingencies that arise, for example:

- Solid Waste Service Provider (EPS-RS) Second Response
- National Police of Peru
- Volunteer Fire Department of Peru (specify the role and responsibility of firefighters)
- Medical centers.

MUR-WY includes information about hospitals, police stations, fire company along the route.

#### 3.2 Transport Practice 3.2:

DESIGNATE APPROPRIATE RESPONDERS AND COMMIT THE NECESSARY RESOURCES FOR EMERGENCY RESPONSE.

X in full compliance with the

The operation is ☐ in substantial compliance with the ☐ Transport Practice 3.2
☐ does not comply with

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#### Summarize the basis for this finding/identified shortcomings:

The operation is in FULL COMPLIANCE with Standard of Practice 3.2 which requires an operation to designate appropriate response personnel and commit the necessary resources for the emergency response.

MUR-WY during the audit has shown that drivers and supervisors receive emergency response training from appropriate personnel on the safe handling of cyanide (spill and poisoning) and others receive training courses in defensive driving, firefighting, first aid. These trainings are renewed annually in compliance with the 2025 training plan.

Training given to the personnel - operator:

- Defensive Driving
- Hazardous Material HAZMAT Warning Level 1
- Hazardous Materials Basic HAZMAT 2 Operations
- Hazardous Material HAZMAT 3 Technical
- First aid
- Use fire extinguishers and fire feints
- Use of personal protective equipment
- Hazard Identification and Risk Assessment
- Safe written work procedures
- Product Transported MSDS Sheets
- Handling and disposal
- Contingency Plan and Emergency Response

Training given to the escort supervisor:

- Hazardous Material HAZMAT Warning Level 1
- Hazardous Materials Basic HAZMAT 2 Operations
- Hazardous Materials HAZMAT Technical Level 3
- First aid
- Use fire extinguishers and fire feints
- Use of personal protective equipment
- Hazard Identification and Risk Assessment
- Safe written work procedures
- Product Transported MSDS Sheets
- Handling and disposal
- Contingency Plan and Emergency Response

Training: Staff are trained in emergency response actions by participating in the workshops taught in the courses:

- Hazardous Material HAZMAT Warning Level 1
- Hazardous Materials Basic HAZMAT 2 Operations
- Hazardous Materials HAZMAT Technical Level 3
- First aid
- Use fire extinguishers and fire feints
- Use of personal protective equipment

The Emergency Response Plan, Drivers, Supervisors, Chief of Safety, Operations Manager, Central Monitoring Coordinator, Head of Maintenance, and General Manager are responsible for responding in the event of an emergency; They undergo medical tests to verify their good physical condition to perform these activities and have received the necessary training for efficient emergency response. (SEG-I-003 Instructional Claim)

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According to the Emergency Response Plan, each truck has the necessary amount of emergency response equipment and the safety escort also has a Spill and Poison Response Kit, and personal protective equipment that must be checked prior to travel, as well as verification of pre-trip courses and periodic emergency response training.

The Emergency Response Plan, communication equipment to respond to emergencies.

The Emergency Response Plan indicates the equipment and materials available on each trip, controlling them through the Emergency Kit – Truck and Emergency Kit – Escort.

MUR-WY has the necessary equipment for emergency response in the event of a major spill.

- Emergency Kit Truck
- Emergency Kit Escort
- Pre-use verification units

Emergency response records and equipment inspection were checked. The presence of this equipment in the convoy was verified. The Emergency Plan indicates the roles of personnel in the event of an emergency, as well as the emergency equipment to be used in both the first and second responses. The Emergency Plan outlines the specific roles of emergency response and the responsibilities of staff.

In the Procedure for the Transport of Sodium Cyanide, the criteria for verifying the units before each trip are specified.

- Emergency Kit Truck
- Emergency Kit Escort
- Pre-use verification units

During the audit, inspection records were evident.

The Chief of Security is responsible for ensuring the timely change of the equipment necessary for the emergency response, and proceeded to inform the Logistics area of any requirements in this regard.

MUR-WY does not outsource any of these cyanide transportation operations.

#### 3.3 TRANSPORT PRACTICE 3.3:

DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with the

The operation is ☐ in substantial compliance with the ☐ Transport practice 3.3

☐ does not comply with

#### Summarize the basis for this finding/identified shortcomings:

The operation is in FULL COMPLIANCE with Standard of Practice 3.3 which requires an operation: Develop procedures for notification and reporting of internal and external emergencies.

The Emergency Response Plan indicates the current contact list, which is reviewed and updated through each revision of the Emergency Response Plan.

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The Emergency Response Plan details program communications, taking into account:

- Emergency levels.
- Communication of an emergency.
- Emergency communication flow on the road.
- Information during an emergency call.
- Communication to the Ministry of Energy and Mines / National Police of Peru / Osinergmin / Competent Authority / Support to Other Institutions / Community.

The Emergency Response Plan includes internal communication and an external outline that specifies call flow by security personnel, receivers, regulatory agencies, external response providers, medical facilities, fire departments, and communities potentially impacted by an emergency.

#### 3.4 Transport Practice 3.4:

DEVELOP PROCEDURES FOR REMEDIATION OF RELEASES THAT RECOGNIZE THE ADDITIONAL HAZARDS OF CYANIDE TREATMENT CHEMICALS.

	X in full compliance with the		
The operation is	☐ in substantial compliance with the	Transport practice 3.4	
	□ does not comply with		

#### Summarize the basis for this finding/identified shortcomings:

The operation is in FULL COMPLIANCE with Standard of Practice 3.4 which requires an operation to develop procedures for release remediation that recognize the additional hazards of cyanide treatment chemicals.

It was noted in the Emergency Response Plan, the description of how to recover or neutralize solids, the procedure for decontaminating soils or other contaminated media and how to handle this waste.

The Emergency Response Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide that has been released into surface waters.

#### 3.5 TRANSPORT PRACTICE 3.5:

PERIODICALLY ASSESS RESPONSE PROCEDURES AND CAPABILITIES AND REVISE THEM AS NEEDED.

	X in full compliance with the		
The operation is	☐ in substantial compliance with the	Transport practice 3.5	
	☐ does not comply with		

#### Summarize the basis for this finding/identified shortcomings:

The operation is in FULL COMPLIANCE with Standard of Practice 3.5 which requires an operation to periodically evaluate the procedures and response capabilities and revise them as necessary.

The review and evaluation period for this Emergency Response Plan is at least once a year.

TLI's Chief Security Officer is responsible for requesting immediate changes to this Plan, in the event of major incidents, through simulation results, results of audits or inspections for process improvement, etc.

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During the audit, the Emergency Response Plan has been updated to date.

When the route changes, an updated contingency plan is generated and sent to the Ministry of Transport and Communications for review and final approval.

They also scheduled drills periodically to evaluate the adequacy of the plan and the level of compliance with the planned emergency actions.

During the audit, records of spill drills were evidenced, in 2025.

The Emergency Response Plan and Training Plan define the frequency of emergency drills. The document presents the schedule of emergency drills.

The drills are carried out by the Chief of Security who has an ANNUAL DRILL PROGRAM that indicates the performance of TWO (02) practical drills, with the purpose of evaluating the effectiveness of the Emergency Plan and correcting what is indicated therein.

The purpose is to measure the efficiency of the response procedure to ensure that personnel involved in an emergency act in accordance with the Emergency Response Plan.

The Chief of Security takes into account the rapid preliminary compilation of the situation, gathering the basic facts as they are known, such as the time, who, what, where, when, how, and why of the situation, contacts the responsible person and relays the information obtained, and continuously communicates with the Convoy Leader and will comply with the requirements of the authorities.

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