INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT REPORT

Orica Mining Services Perú S.A.

Box to Sparge Tank Transfer Facility

Ventanilla, Peru

2024

Orica Mining Services Perú S.A. - Box to Sparge Tank Transfer Facility Name of Facility	 Signature of Lead Auditor	06th and 07th February 2024 Date of submittal

MINGROUP INVESTMENTS S.A.C.

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INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT REPORT

Submitted by:
E QUELLE E.I.R.L.

Collaborated with
MINGROUP INVESTMENTS S.A.C.

Álvaro Fuentes – Lead Auditor
Marcos Mera – Technical Auditor
Av. Lima 309 Yanahuara – Arequipa -PERÚ
+51.959227719
Alvaro.fuentes@e-quelle.net

Orica Mining Services Perú S.A. - Box to Sparge Tank Transfer Facility Name of Facility	Signature of Lead Auditor	06th and 07th February 2024 Date of submittal

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1. Operation General Information

Name of Production Facility:	Orica Mining Services Perú S.A. - Box to Sparge Tank Transfer Facility, Ventanilla, Callao - Peru
Name of Facility Owner:	Orica Australia Pty Ltd.
Name of Facility Operator:	Orica Australia Pty Ltd.
Dates of the audit:	06th and 07th February 2024
Name of Responsible Manager:	Frank Valverde - Manufacturing Plant Lead Sparge
Address:	Operational Plant: Av. Néstor Gambeta KM 14.6 Callao, Peru Administrative office: Av. Dionisio Derteano 144, P.19, San Isidro, Lima, Peru
State / Province:	Lima
Country:	PERU
Telephone:	+51 993517634
Fax:	.-.
Email:	Frank.valverde@orica.com

2. Operation Location Detail and Description:

Orica is a global leader in the manufacture and distribution of sodium cyanide to the mining industry. It´s manufacturing facility in Yarwun, Queensland, supplies sodium cyanide to key mining regions in Latin America, Africa and Oceania.

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Orica Mining Services Peru S.A. operates a Box to Sparge Transfer Facility (transfer plant) within the APM Terminals Inland Services S.A. (APM) containers warehouse located at Ventanilla Callao, Perú. This is a new sparge plant built in 2019 with state-of-the-art technology. Orica's box to sparge tank facility was pre-operationally audited on October 29, 2019 and began operations on December 23, 2019.

Previous certification placed 2020 and printed certificate on March 03th 2021 under Orica Mining Services Peru S.A. – Sodium Cyanide Transfer Plant, since last audit no major changes under infrastructure and operation identify.

Orica´s transfer plant is located in an area of 2,126 m2 within the property of APM. The closest homes to the plant are located 600 m away with the urbanization Las Brisas. Closest surface water bodies to the property are the Pacific Ocean 1,500 m to the west and the Chillón River 2,000 m north of the site.

The transfer plant was constructed to supply mine site customers in Peru with cyanide transported within sparge isotanks. The transfer facility comprises a purpose-built structure that houses material handling equipment and there are associated facilities (a partly open warehouse protecting sea containers containing boxed cyanide, change rooms, equipment storage, office, ablutions, guard house and yard area).

After the import process to the Callao Port, sea containers are transported by land to APMs warehouse, a certified warehouse in the Cyanide Code. Containers will be moved to the transfer plant according to need and / or request of the plant. The scope of this certification audit is the cyanide transfer operations within the limits of the plant. Cyanide transport operations outside the plant limits (sea containers arrival and isotanks departure transport operations are not in the scope of this audit).

On the arrival of the vehicle transporting the container with reach stacker, up to the transfer plant, the container will be removed from the vehicle by a reach stacker of 40 tons capacity. From this location the sodium cyanide will be distributed by Orica in isotanks to their using sparge technology.

The facility transfers solid sodium cyanide from Intermediate Bulk Containers (IBC) to sparge tank (isotanks). Cyanide briquettes in IBC are packed in double bags, one of polyethylene and the other of polypropylene. Each big bag has 1,135 kilograms of sodium cyanide that

are contained in wooden box which arrive to Callao port in 20' sea containers with 20 boxes each.

The transfer plant allows the transfer of sodium cyanide 98% (+/-1%), from IBC type containers of 1.135 tons of capacity, to isotanks - sparge containers of 28 m3 capacity.
Currently the plant is only working day shifts, 5 days a week, and 50 weeks a year; which equates to a maximum of 20,000 ton., of annual production, filling an average of six isotanks per week.
IBC are detachable wooden boxes, containing a polyethylene bag with handles to attach to the electric elevator. Inside this bag is a polypropylene bag in direct contact with sodium cyanide briquettes.
Isotanks are cylindrical metal containers, which are mounted on a platform to fit a truck for transport to the mine. Isotanks have valves, through which hoses are connected that allow water to enter to dissolve concentrated sodium cyanide and, in this way, facilitate the safe discharge into the cyanide reception tanks in the mine.

The transfer plant has the following components among others, to allow cyanide transference from IBC to isotanks:
• Structural rails and electric lift: to lift and move to the shipping hopper the woven polypropylene bags that come inside the IBCs.
• Shipping hopper: in an enclosed space consisting of doors with automatic closing system designed to receive and discharge sodium cyanide from polypropylene bags to isotanks. The shipping hopper has negative internal pressure, generated by a fan, which will control the emissions of cyanide particles into the environment.
• Filter system: aims to control the particles emission into the air. It is composed of a separator cyclone, a 2 micron diameter filter and an escape duct into the atmosphere.
• Hydraulic system for container tilt: metal structure designed to receive and secure 28 m3 isotanks, so that they can be placed upright (90° angle), optimal for product shipping operation. Isotanks in this position are attached to the shipping hopper with a hose.
• Maneuvering platform is a metal structure with stairs and railings, suitable to support the weight of equipment and allow the safe work of the personnel of the sodium cyanide shipping plant.
• Weight scale.

All the activities necessary for the operation of the plant are currently carried out by ORICA's own staff.

The isotank is placed and secured in the hydraulic system by means of a Taylor type charger.

An operator activates the hydraulic system to tilt the isotank up to 90°, placing it upright. At the same time, the operator-activated maneuvering platform and shipping hopper slide to the isotank and become tightly closed.

An IBC box is placed by means of a forklift. An operator opens the IBC box and connects the electric elevator to the handles of the polyethylene bag. The structural rail system is activated and the bag is raised and moved to the shipping hopper, which has the doors open. The bag enters the shipping hopper and the doors close. The filter system is immediately activated. The bag falls on a wedge and opens starting the transfer of the briquettes from the bag to the isotank. This process takes 30 seconds and is the time of maximum sodium cyanide (NaCN) emission that becomes hydrogen cyanide gas (HCN) at the output of the filter system.

Once the bag is completely empty, the shipping hopper doors open and the bag is directed through the railing system to the box to deposit the empty bag. After filling, closing and removing the isotank from the hydraulic system, the empty bags are manually compacted. This procedure is repeated until the isotank is filled – with 20 IBC's. The full shipping cycle of a bag takes 6 minutes. Filling an isotank takes 1.40 to 2 hours. In an 8-hour shift (Monday to Friday 07.00 to 17:00).

Once the isotank is full, the maneuvering platform slides to the starting position, the isotank is tightly closed and lowered with the hydraulic system to the upright position. The full isotank is ready to receive the final inspection. If all control is implemented, the isotank it´s ready to be transported.

Throughout the shipping process, properly trained operators take all safety and control measures and verify that the procedure is performed step by step. The automatic and mechanical control system has safety switches that allow the next step to be performed.

3. Auditor´s Finding

This operation is

✓ in full compliance

☐ in substantial compliance *(see below)

☐ not in compliance

with the International Cyanide Management Code.

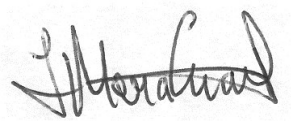
3.1 Compliance Statement

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

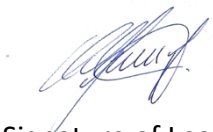
3.2 Auditor Information

Audit Company:	Mingroup Investments S.A.C. and -e QUELLE E.I.R.L.
Lead Auditor:	Álvaro Fuentes Huanqui
Email Lead Auditor:	alvaro.fuentes@e-quelle.net

Name and signature of the audit team.

Technical Auditor: Marcos Mera 
Name (Print/ Type) Signature

Dates of Audit: 06th and 07th February 2024.

Orica Mining Services Perú S.A. - Box to Sparge Tank Transfer Facility		06th and 07th February 2024
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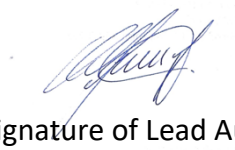
3.3 Auditor Attestation

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.

Orica Mining Services Perú S.A. - Box to Sparge Tank Transfer Facility		12th February, 2024
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4 Principles and Standards of Practice

Principle 1 | OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1

Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

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

Finding/Deficiencies Identified:

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The facility maintains the quality control and quality assurance (QA/QC) construction records of the transfer plant. QA/QC programs have been implemented during the construction of the Orica´s sparge plant in 2019. The quality assurance plan was carried out by the company River Com Peru S.A. and includes the procedures, methods, records and practices to ensure that the project execution will be carried out under control and in accordance with the standards and quality requirements applicable to the project. The plan includes procedures and inspection plans and instructions for the execution of the quality assurance plan, supplemented with quality records to leave objective evidence of compliance with said control.

Appropriately qualified personnel reviewed facility construction and provided documentation that the facility has been built as proposed and approved. The auditor reviewed QA/QC documents plans for inspections and tests, as-built plans, raw material control - quality certificates, quality control reports, welding discipline, non-destructive testing, touch up, construction procedures, packing lists. Also reviewed quality control records for manufacturing as: material verification, dimensional control records, weld control and welder qualification records.

As-built plans of CCTV, Detection and Alarm, Electrical, electrical feeders, electrical grounding, electrical outlets, laser barrier, control diagrams, P & ID.

The materials used for construction of the plant are compatible for the transfer process of solid sodium cyanide briquettes from IBC boxes to sparge tanks. Stainless steel is used for process equipment that meets cyanides during box to bulk transfer operations. The isotank into which cyanides will be transferred are constructed in carbon steel.

The area around where cyanide is being transferred is sealed with concrete and asphalt that is in good condition. The cyanide solution pump and associated hoses and pipework are fabricated from a range of materials including poly vinyl chloride, mild steel and rubber.

Automatic systems, visual controls and safety features are installed to prevent releases due to power outages or equipment failures. Key features are:

• A platform for removing the isotank access hatch whilst the vessel is at around 30° to the horizontal. This enables a visual inspection of the isotank for available capacity before the transfer commences.

• The transfer hopper is aligned directly to the isotank during transfer. This provides good visibility of any issues that may develop during filling. Because the hopper is large enough to hold an entire bag of cyanides the operator can readily see if the hopper has enough capacity to hold a bag of cyanides before introducing it to the hopper. There is also a programmable logic controller (PLC), which helps control lateral movement of bags of product and vertical movement of the hoppers.

• The hydraulic systems that control the movement of the tilt frame and the transfer hopper and the powered system that controls the bag hoist are configured so that on power failure they simply "stay put" which is a failsafe mode for the transfer facility.

• In case of power outages, the electrical board have a button for emergency stops. The transfer board enables the generator set and vice versa, disconnects it as soon as the power returns. In case of failure of both systems, the operators would return the boxes with cyanide to their original position and close the isotank. If it is in an inclined position, it can be plugged manually. The operation manipulates a bag of cyanide at a time. Air filters will block quickly due to lack of air due to power outages.

• As improvement in the system, Orica conducted a Hazard Study with stages 1, 2 and 3 to evaluate the safety system of the tilt frame for the isotank. This study included the participation of Orica personnel such as local and regional managers, operators and the plant manager. Improvements to the system, among others, are:

• Installed eight surveillance cameras controlled from the plant manager's office. One is in front of the isotank hutch to see how it is sealed and allows to check the state of the O-ring, the nuts and ensure that the protocol established in the safe work procedure is followed; other cameras are, among others, for the stacker operation, hoist and cyanide discharge zone.

• Optical sensors around the perimeter of the tilt frame pit, allowing to detect any presence of people by interfering with the beam of light. The system will trigger an alarm stopping the entire operation as it was detected an infraction of the environment of the tilt frame.

• Red and green lights as traffic light system so that the reach stacker operator can know if the isotank fixing elements are connected to the tilt platform. The fasteners can only be operated from the control panel located on the first level.

• They installed an orange light to indicate that there is a moving load in the hoist.

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• Four push buttons to trigger the fire alarm, that would stop the entire operation.

• One fixed HCN gas detector with 3 sensors installed at critical areas.

Inside the plant, there are 3 emergency buttons to push and stop the operation in case of any incident. In the plant supervisor's office, there is 1 emergency button to push and stop the operation in case of any incident.

Operators may readily see whether the transfer hopper has enough capacity to hold a bag of cyanides before introducing it to the hopper for discharge. The isotank capacity is 28 m3 and maximum quantity of sodium cyanide transferred is around 22.7 m3.

The building area where cyanide is transferred has a geomembrane layer under the concrete surface to provide a surface that minimize seepage to the subsurface. The transfer operation area and the reach stacker ramp are managed on a concrete surface that can minimize seepage to the subsurface. Asphalt surfaces protect the ground throughout in the warehouse areas where boxes of cyanide and boxes of used packaging materials will be handled.

To prevent overfilling of the isotanks during the transfer process, the access hatch to the isotank is opened after the vessel had been placed on the tilt frame and it had been elevated around 30° to the horizontal. At this point, the operator inspects the interior of the isotank to verify that liquids or solids remaining are less than approximately 100 - 200 liters in volume. This step is prompted by the Box to Sparge Checklist, and the volume identified is required to be reported to the Supervisor. There has been implemented high-level alarms when activated emergency showers, fire and general emergencies. Under construction dossier there is a Certificate of operation of emergency buttons made by Vital Ingenieros Consulrtores SAC and signed by Electrical Engineer Esteban Ugaldes Moraga Reg. CIP 965-T

The isotank loading bay is a secondary containment protected with a geomembrane layer under the concrete surface that provides a competent barrier to any leakage. It is sealed with concrete and curbs to increase its effectiveness in containing any cyanides spilled during filling.

This is mainly a dry operation; only solid sodium cyanide is transferred from the IBCs to the isotanks. The only solution pipeline is a little one that conducts any water contaminated with cyanide drained into a containment pit, from the facility cleaning activities or remaining from the isotank.

The only solution pipeline is the one from conducting any water contaminated with cyanide drained into a containment pit, from the facility cleaning activities or remaining from the isotank. A suction pump is used to remove the liquid from the pit to a storage tank. The contents of the storage tank are pumped into an isotank (maximum 100 liters per isotank) while the isotank is filled with solid cyanide. All the area of the transfer facility building acts as a secondary containment provided with concrete floor built over a geomembrane layer which provides a competent barrier to leakage.

Orica has a dry operation, it does not work with solutions during the loading of cyanide to the isotank. In cleaning activities, water with 1:2 sodium hypochlorite is used, which is stored in a solution tank that are entered into the isotanks, which due to the quality of the solution compared to the quantity of cyanide within the isotank does not represent a risk to the environment, not even for the worker.

Sodium cyanide is not stored in the plant, when the IBCs are to be transferred to the isotank, the container with IBCs, which is stored in APM Terminal Services, are moved to the plant with a stacker, the IBCs are unloaded, one IBC is opened, which will be transferred, once the transfer of that IBC is finished , the next IBC is opened to repeat the process. The full isotank is stored at APM Terminal Services, so that they can be transported to the customer. The plant and the area where the IBCs are opened, have a roof to prevent the contact of the sodium cyanide with rain.

Prior to the transfer operation, there are closed containers that contain the Cyanide boxes. At the beginning of the operation, once the container containing the 20 boxes has been opened, they are taken to the transfer area where the box is opened and taken to the unloading platform. The operation is carried out in an open and ventilated space. The activity of opening the isotanks is carried out with personnel protection equipment and personal hydrogen cyanide detectors. It is allowed to ventilate once opened to reduce the probability of poisoning in case there is an emission of hydrogen cyanide inside the isotank.

The plant is located in an outdoor and fenced area, the plant itself is under a roof, but it has 3 large open entrances with no gates that allows the ventilation in the plant. The open entrances with no gates are restricted to only authorized personnel.

Access control is controlled and prevented from external personnel. There are two different access controls before reaching the transfer area. There are CCTV camera controls and a peripheral fence around the Box to Sparge Tank Transfer Facility.

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The plant is fenced, has restricted access signage and unauthorized persons do not enter the plant.

There is no use and manipulation of other products within the cyanide handling area that may react with the product is prevented. No additional product other than solid sodium cyanide is stored at the site, even solid sodium cyanide is not stored at this site, it is only a transfer plant.

Production Practice 1.2

Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

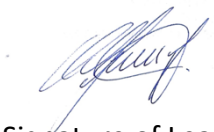
The operation is
- ✓ in full compliance with Standard of Practice 1.2
- ☐ in substantial compliance with Standard of Practice 1.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

The facility has the Standard Operational Procedure (SOP) MAN-PTV-004 Isotank Transfer Operation describing the operational necessary for its safe and environmentally sound operation. Activities are described step by step from the arrival of the sea container with IBC´s to the area, until the end of the operation with the isotank filled with cyanide and removed from the facility area to APM´s yard for subsequent shipment to the mine. In regular operation the procedures performed are:

- *Pre-fill inspection*
- *Preparation for transfer operations*
- *Transfer Operation - Transfer of IBC to the isotank*
- *Isotank hatch closure*
- *Maintenance*
- *Periodic inspections*

The procedure address such matters as process description, the use of personal protective equipment (PPE) and other preparations by the operating team and detailed instruction for the transfer operation, including cautions and notes regarding hazardous aspects. The activities included in this SOP have been subjected separately, to a formal risk analysis called Job Safety and Environmental Risks Analysis (JSERA).

Orica Mining Services Perú S.A. - Box to Sparge Tank Transfer Facility Name of Facility	 Signature of Lead Auditor	06th and 07th February 2024 Date of submittal

Procedures for contingencies during upsets in its job activities that may result in cyanide exposures or releases are addressed in the Plant Operational Contingency Plan for Sodium Cyanide Shipping and also in the JSERA´s. In this last, activities are divided into work stages to assess the risks and potential effects of the stage, including upset conditions. Control measures are applied and additional controls if required, are assessed.
The auditor reviewed JSERA´s for activities such as forklift operation; opening and closing of lid in hatch, cleaning and washing isotanks; transfer boxes of sodium cyanide to the lifting area; transfer operations of sodium cyanide, among others, finding they include controls for contingencies during upset conditions.

The transfer facility has a corporative management of changes procedure to identify when site operating practices have or will be changed from those on which the initial design and operating practices. Orica Mining Services, including the transfer facility, has adopted the Orica Model Procedure for Modifications. The management of change procedure requires review by environmental and safety personnel of any process change or modification, prior to sign-off and implementation of proposed changes and modifications.

The operation manages this corporate database accessed through its intranet that allows to register and control any changes to operating practices regarding the original design. It is a system to which all employees have access and different areas (those required depending on the case) approve the change after evaluating them through a series of questions that include health, safety and environmental considerations. The auditor reviewed several records of management of change procedures conducted.

The transference plant has developed and implemented the SUPCH-RTV-015 Sparge Plant Equipment Annual Maintenance Plan. There is a continual follow up under this plan that includes all critical components. The Plant Supervisor complements with monthly inspections to all items included in the Maintenance Program.

By other side, the facility has redundant systems for example for the hoist, the compressors and for the hydraulic unit that elevates the isotank to its filling position. The auditor reviewed maintenance records and monthly inspections performed to the plant critical components, according to scheduled. The reach stackers and forklifts used to move cyanide containers are the responsibility of APM.

HCN gas levels are monitored both with fixed and portable gas detectors. The plant has one fixed HCN monitor – MSA TRIGARD® Gas Monitoring System - with 3 sensors distributed strategically through the areas where HCN gas is more probably to occur: on the isotank

hatch opening platform, in the area of placement of handles for lifting the bags with NaCN and the third sensor at the area of the hopper for cyanide discharge. Plant operators wear portable HCN gas monitors. The low-level alarm activated at 4.7 ppm of HCN gas, personnel should retreat about 10 meters, returning to the job site when HCN levels are below 4.7. When the high-level alarm set at 10 ppm is activated, all personnel must evacuate the area. All monitors are planned to be calibrated periodically, according to the manufacturer's specifications.

The auditor reviewed the Calibration Program for 2023. HCN gas monitors are calibrated every 6 months to 4.7 and 10 ppm by the monitors provider.

In addition, in the operation of closing the isotank hatch, a calibrated tochymeter NS 0719115699, calibrated date 2023-02-01, yearly calibration, is used.

The transfer facility procedures and infrastructure prevent any discharge to the environment of any cyanide solution or cyanide-contaminated water that is collected in a secondary containment area. All the floor under the concrete slab at the cyanide transfer building has an HDPE geomembrane layer to provide a competent barrier to any leakage.
Any water from cleaning activities is collected to a polyethylene tank of 1,100 l. Once the tank is filled at 500 l capacity, water is pumped with a submergible pump to the isotank and goes back to isotank. All water collected in the transfer facility secondary containment will be pumped into the tank where it will be temporarily stored prior to being pumped into the sparge isotank as part of the sparge isotank filling process. The hopper will be wiped down rather than washed at the end of each transfer limiting the production of wastewater.
Although the area where the plant is installed is very arid and with minimal annual rainfall, the rainwater collection system from the roof is collected in 2 polyethylene tanks of 750 liters each one.

There is the Solid waste management plan for the cyanide transfer plant updated 2024. There is a current contract with Greencare to collect and final disposal of cyanide waste or cyanide-contaminated materials. The procedure details that cyanide packing and all hazardous solid wastes including the used bags, personal protection equipment (PPE) and other contaminated waste arising from housekeeping (cleaning cloths and sweepings) are to be placed in used cyanide boxes (sealed when full) pending disposal by the licensed contractor Green Care, an authorized contractor for the management of hazardous waste according the Peruvian relevant legislation for hazardous solid waste, including the transport of solid hazardous waste from industrial premises and the treatment of hazardous solid waste.

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Cyanide stocks maintained at the facility are minimum. Major storage of sodium cyanide is conducted at other area, out of the limits of the transfer plant, but in the same site managed by APM Terminals, an ICMI certified warehouse. On demand, APM warehouse sends by mean of a reach stacker the sea containers with sodium cyanide to the transfer plant for daily operations. Sea containers are a placed in an open area very well ventilated.
The transfer facility includes a roof covered yard where they place the cyanide boxes for the transfer operation. This is an open space with good ventilation, where public access is prohibited. To avoid or minimize the potential for exposure of cyanide to moisture, the boxes to transfer to isotanks and empty boxes are kept under this roofed area.

The opening of sea containers is subject to a procedure requiring ventilation and atmospheric testing prior to entry by means of an HCN gas detector.

Sea containers by their design minimize the potential for exposure of cyanide to moisture. It is noted that cyanide is stored in double layers of plastic lining within wooden boxes within shipping containers. It must be noted that annual rainfall is less than 1 cm.

Cyanide is stored in a secure area where public access is prohibited. The transfer facility is a secured compound within the APM´s site at Ventanilla. Security is 24 hours 7 days per week and there is a dedicated security patrol for the cyanide compound within the overall facility. The facility performs a pre-fill check list to isotanks where correct signage check fields are included, to ensure that the cyanide supplied by Orica in Peru is packaged as required by the political jurisdictions through which loads will pass.

Placards and painted signage are used to identify the shipment being dispatched from the transfer facility as cyanide, as required by national and international regulations or standards, which include UN Numbers and Dangerous Goods Class labels, both of which are prescribed in the United Nations Model Regulations and the IMDG Code. Before filling isotanks at Ventanilla, the isotanks area checked to ensure that all signage is in place.

The isotank contains NFPA diamond, UN number, net weight, tare weight, product description, toxicity symbols. Also, there are the certifications and hydrostatic tests of the isotanks. The operators have a check list for the review of the isotank condition before the loading of the same: MAN-RTV-001 transfer process checklist.

Production Practice 1.3

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Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

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

Finding/Deficiencies Identified:

Equipment inspections area routinely performed as stated in the SOP Isotank Transfer Operation, to ensure that the equipment remains in good operating conditions. In each transfer of cyanide, isotank elements are inspected: O-ring, hatch studs (bolts) and isotank valves. Equipment such as transfer hopper, air filters, hoist, emergency showers, compressor and sump pump, PPE should be inspected weekly. Every fortnight they inspect the cone valve.

The sump pump system including secondary containment, hoses, fittings, pipelines and residue tank. Specific inspection items cover integrity and evidence of leaks.

Isotanks inspection frequency is done every transfer operation. For other key equipment such as transfer hopper, air filters, hoist, emergency showers, compressor and sump pump and PPE, inspection are done monthly. Monthly inspections are done to all elements for structural integrity and signs of corrosion and leakage tanks, valves, pipelines and secondary containments other important elements. In addition the plant operators perform prework inspections, which in opinion of the auditor is enough to assure that equipment is functioning within design parameters.

In addition, the Plant Supervisor conducts monthly inspections of all elements for structural integrity and signs of corrosion and leakage tanks, valves, pipelines and secondary containments. Also, pre-use inspections are performed as for isotanks pre- fill inspections, use of the forklift, guardrails and emergency showers, among other.

The major plant items that require inspection are those used in the handling of solid sodium cyanide from boxes through the transfer system to the isotanks. The inspection of these facilities for their integrity and signs of leaks include:
• Inspection of isotanks at the arrival to the transfer plant: valves, seals, bolts and dented surfaces.

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• The hoist system to lift bags from boxes and transfer them into the transfer hopper. Inspections address hoist components including the chain, hook and bag lifter for their correct placement, signs of wear or other damage.
• The transfer hopper used to direct the flow of solids from bags into isotanks. Specific items subject to inspection include the doors that control admission of bags to the hopper, the bag splitter, the cone valve that controls the release of solid cyanide to the isotank, the seal arrangement where the hopper connects temporarily to isotanks and the air filter system that controls dust generated and during the transfer operation. Specific inspection points are raised as appropriate to the known vulnerabilities and of each component.

Inspections are documented though performed inspection checklist records. Inspections reviewed include the date of the inspection, the name of the inspector, and any observed deficiency. The inspection remains after initial certification 2020. Annual maintenance of hydraulic system, pneumatic system, electrical and control panels. Maintenance of the generator set every six months.

There are the certifications and hydrostatic tests of the isotanks. The operators have a check list for the review of the isotank condition before the loading of the same.

They have monthly inspections of the Sparge plant infrastructure (Check List: Internal Safety Inspections: SHES-RSA-015):Stairs, Eyewash, Emergency shower, Emergency lights, Lightning, Machinery and protective guards

The check lists include the date, the information of the operator who filled the check list, the observations, and corrective actions. The company keeps all the check lists in a file.

The inspection records of critical equipment for the last two years were recorded by the client, internal safety inspection case SHES-RSA-015, includes stairs, eyewashes, emergency showers, emergency lights, lighting, control of hazardous substances, machinery, electrical installations, general safety conditions.

The documentation reviewed identify the specific items observed. The checklists incorporate a table detailing identified corrective actions, the status of the corrective actions and the review of the status of the corrective actions raised by previous inspections.

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

Develop and implement procedures to protect facility personnel from exposure to cyanide.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 2.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

To minimize worker exposure during this normal plant operations, the facility has performed Standard Operations procedures (SOPs) and the Job Safety and Environmental Risk Analysis (JSERA) for each activity involved in these SOPs.

The SOP MAN-PTV-004 v02 Isotank Transfer Operation describes the plant operations step by step from the arrival of the sea container with IBC´s to the area, until the end of the operation with the isotank filled with cyanide, which is the finished product.

JSERA´s divide the activity into stages, evaluates potential risks and effects by mean of probability and consequences, establish control measures (existing / proposed / critical) and evaluates any risk level additional control required. The operation has developed and implemented procedures to minimize worker exposure during emergency, abnormal and not-routine plant operations The auditor reviewed several JSERAs both for normal and abnormal plant operations.

For the plant maintenance, the facility has developed and implemented the 2023 Sparge Plant Equipment Annual Maintenance Plan which covers all the elements needing periodic maintenance. The plan includer internal and external maintenance activities. River Com designed and developed the initial maintenance program, now a day for 2023-2024, there is an internal maintenance program SUPCH-RTV-015 v02, detailing the elements and mechanisms involved, the objective, the work description and maintenance staff involved:

- *Preventive Maintenance - Lubrication of Pivoting and Axial Mechanical Components Sparge Orica Plant; and*

• *Verification Plan Maintenance of Hoist*

Also includes bridge crane, generating set, electrical panels, hydraulic systems. There are certificates of operation of the two electric hoists, based on the ASME B30.11 standard by mangroup.

The Contingency Plan includes the main contacts or stakeholders of our facility. It is mentioned in section 9 Annexes such as Public organizations, hospitals and clinics, industrial company in which we are located (Alconsa). We do not interact or have nearby communities, since we are mainly surrounded by hills. Contingency Plan is attached.

Orica Mining Services, including the transfer facility, has adopted the Orica Model Procedure for Modifications for management of changes to review proposed process and operational changes and modifications for their potential impacts on worker health and safety. This online procedure incorporates fields for analysis of the necessary worker protection measures. It is a system to which all employees have access and different areas (those required depending on the case) approve the change after evaluating them through a series of questions that include health, safety, and environmental considerations. The auditor reviewed management of change records, taking as sample the changes from the external lamps under solar ones.

Orica´s mode of operation for the transfer facility includes soliciting workers input in developing and evaluating health and safety procedures, activities risk analysis (JSERA) and change of management procedures. As an example, all six operators designed a HSE supervisor (reelected every 2 years, appointed on 01/26/2024) who meets periodically with the Plant Supervisor and the Head to review safety aspects and general conditions that are communicated to all operators. There is an established dialogue between the Cyanide Operations Team Lead, the Plant Supervisor and workers in the existing operation including external parties (security, clean service). At the beginning of each working day, the workers and the supervisor hold daily 5-minute safety meetings, where, among other issues, workers can give their feedback on the safe work procedures. Workers also have these opportunities during frequent face-to-face training talks with the supervisor.

The transfer facility has identified areas and activities where workers may be exposed to HCN gas and sodium cyanide dust and requires the use of personal protective equipment as necessary in these areas when these activities are being performed.

The areas where there may be some degree of hydrogen cyanide emission are:

- *Forklift operations during the transfer of cyanide boxes from the shipping container in which they are delivered into one of the four dedicated shipping containers in which they are stored pending transfer operations into isotanks;*
- *The platform on which the hatch of the empty isotank is opened, inclined at 30°. Generally the isotank contains small remnants of cyanide solution from the isotank discharge process into the mine storage tank. When opening the isotank hatch, quantities of hydrogen cyanide less than 4.7 ppm may leave from the isotank.*
- *In the discharge hopper of the big bag containing sodium cyanide to the isotank. Operators wear appropriate PPE to prevent cyanide poisoning, and each operator has portable hydrogen cyanide detectors. The plant also has static hydrogen cyanide detectors.*
- *waste bag storage and handling operations.*

Each operator has portable hydrogen cyanide detectors. The plant also has static hydrogen cyanide detectors. There are emergency buttons and alarms buttons.

The transfer facility uses both fixed and portable gas monitoring devices to confirm that controls are adequate to limit workers exposure to HCN gas. The plant has one fixed HCN monitor – MSA TRIGARD® Gas Monitoring System - with 3 sensors installed strategically through the areas where HCN gas is more probably to occur: on the isotank hatch opening platform, in the area of placement of handles for lifting the bags with NaCN and the third sensor at the area of the hopper for cyanide discharge. Plant operators wear portable HCN gas monitors.

The HCN monitoring equipment is maintained, tested and calibrated in a manner consistent with the directions of the manufacturer.

These work provisions ensure that a buddy system is used, or workers can otherwise notify or communicate with other personnel for assistance, help or aid where deemed necessary. Also, as stated by the Plant Supervisor, the CCTV is a useful tool to assess and rescue any improper behavior of operators during the transfer process, as cameras are installed strategically allowing views of the transfer deck, tilt frame, transfer deck structure including hopper, isotank inspection station, electrical room compressors and box disassembly area.

As stated in the SOP Isotank Transfer Operation, a minimum of 3 operators is required to perform this activity. The arrangement consists of one pair of employees on the lower level to open the isotank hatch and preparing bags for transfer and one operator on the upper level controlling the transfer. In addition, one supervisor at the facility administrative office

is controlling the operation by a television closed circuit (CCTV). There is also a security guard who is responsible for ensuring that unauthorized personnel do not gain access to the facility during a transfer. The operation has determined that the handling of waste bags and the dismantling of boxes are low risk activities and so do not require a buddy system to operate.

Orica does assess the health of employees to determine their fitness to perform their specified tasks prior to commencing employment. The health assessment process of the transfer facility workers is tracked in a matrix that indicates the date and provides evidence that the medical test is performed as required by local regulations: before beginning to work with the company and then annually. Workers at the plant are the same ones who worked in the previous Orica´s transference plant. Records include evidence of medical exams performed during the workers period with Orica. Tests taken also assessed the physical suitability of employees to undertake their respective tasks at the transfer facility.

Plant operators rotate positions weekly, alternating forklift work, placing bag handles, and working up on the platform, promoting continuous improvement.

Medical examinations include vision, respiratory, hearing and pulmonary functions tests, the results of the medical evaluations are shared with workers. There is a medical surveillance program that is generated by the occupational doctor and sent to the government authority and Top management. Includes results of medical evaluations, protection programs and training. "Medical Approval" documents are generated and certifies that the operator is able to perform his duties.

The transfer facility has a place to change clothes. The SOP Isotank Transfer Operation procedure clearly states that required personal protective equipment must be fitted before entry to the relevant work areas. It also requires once the operators have completely completed the operation in the corresponding shift, all disposable suits are considered contaminated and should be removed to be placed in the container at the waste storage area. This procedure also applies to contractors and visitors.

Warning signs advising workers that cyanide is present and that, if necessary, suitable PPE must be worn, are located around the site. At locations where exposure to harmful concentrations of cyanide is possible, the operation has demarcated the area with a line. PPE requirements to enter areas within the line are clearly identified through use of signage and are also identified and implemented according stated in the Standard Operating Procedures, training, etc.

The plant has the appropriate warning signages to prevent the workers of the presence of sodium cyanide and signages indicate the appropriate PPE to wear in the plant.

Personnel are prohibited from smoking, eating, drinking und use mobile phone, and having open flames in some areas where there is the potential for cyanide contamination. Signs are displayed at the entrances to the transfer facility building that prohibit open flames, eating, use mobile phone and drinking.

Safety conditions are indicated to staff and visitors in the induction before entering the plant. Operation and emergency situations are included.

Production Practice 2.2

Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The operation is
- ✓ in full compliance with Standard of Practice 2.2
- ☐ in substantial compliance with Standard of Practice 2.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

The facility has developed and implemented the Operational Emergency Plan dated 25th Aug 2023. This is a specific written emergency response plan and procedures to respond to cyanide emergencies and exposures. Also has the Procedure to Treat Cyanide Poisoning addressing specific actions for treatment with oxygen and cyanide antidote therapy.

One emergency shower, two low-pressure eye wash stations and 14 non-acidic fire extinguishers (6kg) are located strategically at the transfer facility. One station is located outside the transfer area on the ground level of the transfer facility. The eyewash and shower stations are supplied by a designated water supply tank with 1,500 liters capacity each.

Dry powder fire extinguishers were observed throughout the transfer facility. The operation inspects monthly its fire extinguishers and send them for maintenance on an annually basis.

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Showers, low-pressure eye wash stations and non-acidic fire extinguishers are maintained and inspected and tested on a regular basis.

The transfer facility has two large size "G" non portable oxygen bottles (10 m3) and 3 carrier bags with portable oxygen bottles (1 m3), located at the Plant Manager office. There is also an Ambu, oxygen masks and fittings, and four antidote kits maintained refrigerated according to at the manufacturer´s temperature specifications.

Size "G" cylinder medical oxygen cylinders with medical valve mouthpiece have an "on demand" valve mouthpiece replacing the need for separate resuscitators.

Water for the showers and low pressure eye stations is available, this is checked before beginning any transfer operation. Communications means are also available as all operators have mobile phones, also they can communicate verbal on any emergency due to the compact size of the plant. Mobile phone system enables emergency assistance to be summoned via the APM's facilities.

The Plant Supervisor performs weekly and fortnight inspections to the facility first aid equipment to assure that it is available when needed. The inspection checklists require to test water pressure, blockages and leaks for the eye washes and showers. This is also included in the pre-work inspection for isotank transfer operation.

Monthly inspections to oxygen equipment include:
- *Oxygen cylinders pressure, valve piece and signs of damage to the flow meter.*
- *Mouthpiece cleanliness, signs of perishing and whether it is connected to the oxygen tube.*
- *Oxygen delivery cleanliness, signs of perishing and whether it is connected to the mask and oxygen bottle.*

The operation stores the cyanide antidotes as directed by their manufacturer and replaces the antidotes on a schedule that ensures they will be effective when used. The antidote kit contents, and first aid equipment are inspected using check sheets. A section in the checklists is also provided to note comments and corrective actions.

Sodium Cyanide Material Safety Data Sheets (MSDS) and first aid instructions copies of the Procedure to Treat Cyanide Poisoning are available at different areas of the transfer facility, both where cyanide is handled and at the administrative office and published in a dashboard in the Plant Manager office, addressing specific actions for treatment with oxygen and

cyanide antidote. All informational materials are in Spanish, the language of the workforce (Spanish) and are available to workers in the transfer facility.

All elements, containers, boxes and equipment containing cyanide, including the cleaning water recovery system piping and tank, are identified to alert workers of their contents. Direction of cyanide flow in pipes is signaled.

Shipping containers packed with cyanide boxes (IBCs) and sparge isotanks delivered for transfer operations are clearly labelled as to their contents through emergency information panels. The container used to store waste bags and liners and used personal protective equipment (within used IBCs) is also clearly identified.

All visitors and transfer facility workers receive induction detailing information about risks at the plant and safety information including cyanide hazards and decontamination procedure.

For the transfer facility workers, there is a place to change clothes. The SOP Isotank Transfer Operation procedure clearly states that required personal protective equipment must be fitted before entry to the relevant work areas. It also requires once the operators have completely completed the operation in the corresponding shift, all disposable suits are considered contaminated and should be removed to be placed in the container at the waste storage area. When staff receive the new PPE, they sign a delivery charge. Each of the 4 workers authorized for the entire operation has their own continuous air breathing mask.

The operation has a policy or procedure for hand washing or showering for workers who have potentially been exposed to cyanide dust or solid cyanide. There is a MAN-PTV-003-SAFETY V03 procedure, which refers to safety guidelines that must be followed by all personnel involved in cyanide transfer activities. Therefore, when there is an emergency of contact with cyanide, the emergency shower or hand washing must be used (section 5.4. Emergency / Cyanide poisoning). Likewise, in our transfer procedure MAN-PTV-004 TRANSFER OPERATION, mention is made of the care and inspection of the operation of the emergency shower by the plant supervisor in section 5.1 Pre-filling Inspection.

The transfer facility has its on-site capability to provide first aid assistance to workers exposed to cyanide as all its personnel is trained in first aids, has oxygen antidotes and mean of communications. The emergency siren is activated and evacuated to a safe area. Personnel with emergency equipment support personnel who are in danger of poisoning.

There is an operational contingency plan August 2023, that includes 3 different levels of emergencies were external authorities are included as firefighters, civil defense and hospitals. The transfer has a procedure developed and tailored for the actual operation, to transport exposed workers to locally available qualified, off-site medical facilities. In the event of any cyanide exposure the Emergency Response Plan (ERP) will be initiated requiring the first person on the scene to notify the Plant Supervisor, APM´s doctor and appropriate emergency aid entities, (hospitals, Callao fire department, Civil Defense) for response. In the event of cyanide exposure an ambulance will be dispatched.
Contact numbers are visibly located on the transfer facility, in the ERP and in the List of Key Contact Personnel Procedure.
All cases of worker exposure to cyanide are required to be transferred to hospital for observation and medical treatment.

The transfer facility has a developed a yearly emergency mock drill schedule where emergency scenarios are tested to test response procedures: tsunami/earth wake, first aids, sodium cyanide spill, sodium cyanide detox.

The transference plant has adopted the application software Enablon Go in use as a corporative system in Orica, to report incidents, investigate and evaluate incidents, including cyanide exposures, to determine if the facility's programs and procedures to protect worker health and safety and to respond to cyanide exposures are adequate or need to be revised.
Orica requires all incidents to be reported to Orica's Off-Site Facilities Manager for investigation and corrective action using the Orica incident reporting and investigation procedure.

The auditor reviewed the incidents report application which allows to assign corrective actions, responsible and due dates. The system allows users to report incidents from the cellphone. No incidents were identified since the last Cyanide Certification Audit.

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

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

Finding/Deficiencies Identified:

The transfer facility is located along the Callao coastal strip approximately 1.5 km from the Pacific Ocean. The transfer facility does not have a direct discharge to the ocean or other surface water. The transfer of solid cyanide from box IBCs to sparge isotanks is a dry process and does not directly generate waste process solution.

Waste liquid is generated indirectly via condensation of atmospheric moisture and by draining residual liquor contained in isotanks returned from mine sites.

During early morning transfer operation, atmospheric humidity condenses on the cool isotanks that have been stored within the open yard overnight. When these isotanks are positioned vertically as part of the filling operation, the condensation runs off the isotank into a sump located within the transfer pit. An automatic pump is located within the sump that transfers liquid within the sump to a 1000-liter tank.

Empty isotanks returned from mine sites often contain residual amounts of cyanide liquor. If excess amounts of liquor within the returned isotanks are detected at the transfer facility, the transfer facility uses a pump to transfer this liquid into the tank used to store liquid from the sump (1,000-liter tank). Liquid from the 1,000-liter tank is pumped into the isotank being filled after the solid cyanide transfer operation has been completed. The isotank containing cyanide and the waste liquid is then transported to the mine site.

Negligible storm water is generated from the transfer facility and it is not discharged off-site. The average annual rainfall for Ventanilla, which is a district within the province of Callao, is approximately 1.8 mm. Early morning condensation draining from the transfer facility roof reports to downpipes that drain directly onto the bitumen surface immediately outside the transfer facility building. This water evaporates during the day. The site has a continuous cover of bitumen and cement.

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The silo cleaning service is included in the warehouse contract, the wells are cleaned weekly with wastewater.

The Plant Supervisor advised that the transfer facility does not have an indirect discharge to surface water. Seepage is unlikely to be generated from the transfer facility for the following reasons:
• The transfer of solid cyanide from box IBCs to sparge isotanks is a dry process and does not directly generate waste process solutions. The indirect generation of liquids are of a minor volume.
• The site has a continuous cover of low permeability bitumen in general areas and concrete over a geomembrane liner in the transfer areas – all in good condition.
• The transfer facility is sheltered from the elements and the site experiences an extremely low rainfall in any case.

Groundwater at the site is 5 m below ground level as stated in the Environmental Impact Assessment (EIA) performed by ERM consultants.

The cyanide transfer operation does not impact the beneficial use of ground water. Therefore, it is not necessary a remedial activity to prevent further degradation.
Orica engaged a consultant to undertake semestral ambient air quality and noise monitoring. Monitoring activities are documented. Surface and groundwater are not required to be monitored because the operation does not impact them.

Orica engaged a consultant to undertake semestral ambient air quality and noise monitoring. Monitoring activities are documented. Surface and groundwater are not required to be monitored. There is evidence of record monitoring 2022, July / December 2022 / carried out by ECO Mapi includes air quality and noise, both results within the maximum permissible limits based on national standards.

The Transfer Facility limits atmospheric process emissions of HCN gas, such that the health of workers and the community are protected.
The following activities have been identified on the site where atmospheric process emissions of HCN have the potential to affect the health of workers:
• Transferring IBCs from warehouse containers to Transfer Facility.
• Box (IBC) to isotank cyanide transfer.
• Waste bag and liner management (packing in boxes and placement in container).
The main controls for minimizing emissions of hydrogen cyanide during the Transfer Facility operations are:

• The transfer facility is designed around solid cyanide only.
• A maximum of four IBCs are positioned at any one time in the facility awaiting immediate transfer to isotanks, limiting the volume of material directly in-process that is capable of generating HCN gas.
• The cyanide hopper has an extraction fan and filter to remove dust before being released to the atmosphere.
• The cyanide transfer operational areas are clearly demarcated. Entry to these areas requires specific PPE to protect persons accessing the area. During transfer operations, the worker within the vicinity of the hopper is connected to a designated air supplies.

The Environmental Impact Assessment (EIA) refers to the American National Institute of Safety and Health (NIOSH) for worker exposure limits.

Exposure limits are for HCN are 10 ppm instantaneously and 4.7 ppm continuously over eight hours. All employees working in areas with the potential for HCN generation are required to wear HCN monitors that are set to alarm at 4.7 ppm. Employees are required to leave the immediate area if the alarm sounds.

Orica engaged a consultant to undertake semestral ambient air quality and noise monitoring. Monitoring activities are documented. Surface and groundwater are not required to be monitored.

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• The transfer facility is designed around solid cyanide only.
• A maximum of four IBCs are positioned at any one time in the facility awaiting immediate transfer to isotanks, limiting the volume of material directly in-process that is capable of generating HCN gas.
• The cyanide hopper has an extraction fan and filter to remove dust before being released to the atmosphere.

Principle 4 | TRAINING

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Production Practice 4.1

Train employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 4.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

The transfer facility has implemented an Annual Training Program 2023-2024 which is being developed providing training and coaching to its employees according to the program, including cyanide hazards and refresher training conducted annually.

The operators and the supervisor hold daily 5-minute safety meetings, where, among other issues, workers can give their feedback on the safe work procedures. Workers also have these opportunities during frequent face-to-face training talks with the supervisor.

Each month, one of the 16 points of the MSDS is disseminated to staff during the 5-minute talks at the beginning of the shift.

The auditor interviewed some operators: Roly Hinostroza, Alex Zanini and Deyvid Soriano, they demonstrated to have knowledge about the safe use and handling of sodium cyanide, the hazards of cyanide and the emergency response of cyanide incidents.

All workers at the transfer facility have been trained in the use of PPE specifying when and where this equipment is required. Training materials introduce to the PPEs required at the transfer facility under all circumstances and locations including Tyvek suits, safety boots,

safety helmet, HCN monitor, full face shield, safety glasses, latex gloves, dust and gas masks. Also, they have been trained in the use of the helmet incorporating air hood with positive air flow from a separate air compressor to work in the second floor at the hooper platform.

Practical training in the correct use of PPEs is covered by Plant Supervisor as part of pre-transfer meetings. The Supervisor monitors the operators for the correct use and condition of PPE before cyanide transfer operation. The auditor reviewed the training records.

Instruction material deals with risks of cyanide, poisoning symptoms, alert and first aids, medical treatment, investigation of facility failures, cyanide emergencies and cyanide recognition. The procedures to follow in the event of exposure are set out.

The auditor reviewed several training records covering the period after certification 2020 till recertification.

Practical training in the correct use of PPEs is covered by Plant Supervisor as part of pre-transfer meetings. The Supervisor monitors the operators for the correct use and condition of PPE before cyanide transfer operation. The auditor reviewed the training records.

All operators of the transference plant had been trained on site to perform their normal production tasks to minimize the risks to workers health and safety and to prevent cyanide releases. Prior on beginning operations, all personnel must complete this training.

Instruction material deals with risks of cyanide, poisoning symptoms, alert and first aids, medical treatment, investigation of facility failures, cyanide emergencies and cyanide recognition. Also, all operators have HAZMAT Level III training.

Employees are trained prior to being allowed to work with cyanide, according to local regulations and Orica standards. The operator is not able to work the task to be conducted until he is previously trained.

Workers receive theoretical training in classroom, then practical training at the transfer facility about the tasks related to cyanide operations: cyanide boxes, cyanide transfer from boxes to sparge tanks, manipulation of dangerous chemical products and MSDS between others.

They are provided with four days of training and assessment under the direction of the Plant Supervisor before starting to work.

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At Orica, the operators are trained on the transfer facility as soon as they are integrated to the operation. In the normal course of events, the Plant Supervisor provides the "classroom" training and then follows up with on-plant training in the operating procedures. The Supervisor gives trainees the job procedures to read through and reviews their progress and understanding with them. When the trainee is confident of the learning, the Supervisor carries out an oral test in the procedures. This is undertaken whilst walking around the plant, so the trainee can demonstrate a practical understanding.

The training elements necessary for each job are identified in the training materials. As all operators at the plant rotate work every week, they are all required to be trained for jobs on: Cyanide Awareness Training, SOP Isotank Transfer Operation. o Facility Induction, Forklift Accreditation, Emergency Response Training, First aids, Work at heights, Confined spaces

A training matrix details the training elements to cover, the level of training, the date of the training, the people trained, and the supporting evidence of the training performed. Maintenance of the plant.

Training is provided by the Plant Supervisor, a very experienced operator with around 12 years working operating Orica´s cyanide transference facilities. The Plant Supervisor gives training to the transfer facility operators. He has extensive experience Orica´s transference plant and in gold mining operations. There is a sound base of technical expertise in the team of people involved in providing training, both in general and to the cyanide operations. Recognized Peruvian training and services companies specialized in firefighting and safety consulting, also provides training services to the workers.

The transfer facility evaluates the effectiveness of cyanide training by testing and job observation. Evaluation quizzes are used to evaluate the effectiveness of Cyanide Awareness Training. The results of the quizzes are filed in connection with the training conducted rather than in individual staff files. Minimum score is required to pass the course. Verbal questioning and on the job observation by the Facility Supervisor are the means of assessment for work procedures.

The auditor reviewed several evaluation quizzes of the personnel to evaluate the Cyanide Awareness Training.

Production Practice 4.2

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Train employees to respond to cyanide exposures and releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 4.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

Under Orica PASSOMA (annual occupational health and safety and environmental plan) for 2023-2024 includes activities such as staff training, in addition to being aligned with monthly monitoring together with the safety supervisor. There is an annual training program that includes cyanide risks, emergency plan, MSDS. Records associated with training are maintained in physical documents, including staff signatures as a sign of attendance.

To assist in the implementation and tracking of the Contingency Plan training requirements, the facility has a training matrix for the Plan. The matrix details the training elements covered, the level of training, the date of the training, the people trained, and the supporting evidence of the training performed.

The current Contingency Plan requires simulation drills in the implementation of the Plan to be carried out to test the procedures, equipment, and resources described in the Plan, and to train personnel in emergency responses.

Emergency drills are being evaluated from a training aspect. The current Contingency Plan requires drills to be conducted periodically covering low level emergencies, medium scale and full emergency response drills. The purpose of the simulation drills is to test the procedures, equipment, and resources described in the Plan and to determine if personnel have the knowledge and skills required for effective response. The operation has revised its training procedures based on deficiencies identified during mock emergency drills.

Training records are retained throughout an individual's employment documenting the training they have received, including the names of the employee and the trainer, the date of training, the topics covered.

The records are maintained in an Excel spreadsheet-style database. The training database identifies all training elements relevant to the facility and for each that has been delivered

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there is a record of: name of employee trained, title of course, topics covered, dates of training events and the trainer name.

Training files retained for Orica-specific training include original assessment records for individual participants, demonstrating how their knowledge was assessed and details of their assessments. Copies of certificates issued to employees are also retained in the record keeping system.

Principle 5 | EMERGENCY RESPONSE

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

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

The transfer facility has developed the document Operational Contingency Plan v10 (Contingency Plan) dated August 2023. The scope of the Contingency Plan covers emergencies like fire, cyanide spill, confined space and natural disasters.

The transfer facility has developed the document Operational Contingency Plan (Contingency Plan) dated August 2023, It includes 3 emergency levels, of which level III is the highest. In addition, the high risk points 5.1 risk activities are specified. The probability of any catastrophic emergency is unlikely considering the conditions of: plant location, retaining walls, low probability of rain, controlled material operations, reduced container work, secondary guarding of boxes and bags.

The Contingency Plan contains enough emergency procedural information and details the persons responsibilities during an emergency. The Plan also outlines response guidelines for the following identified scenarios.

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• Intoxication by HCN or cyanide.

• Fire, including minor and major fires.

• Cyanide spill, including minor and major spills.

• Natural disasters, including earthquakes and sea quakes.

The transfer facility has developed the document Operational Contingency Plan (Contingency Plan) dated August 2023, includes 6.6.2. Fires
Actions to consider:
• Sodium cyanide is a non-combustible substance that does not ignite on its own, but can decompose when heated and produce corrosive and/or toxic vapors.
• The substance reacts with water, (sometimes violently) generating HCN and releasing corrosive and/or toxic gases.
• Contact with metals may release flammable hydrogen gas.
• In the event of a fire, the Contingency Plan will be activated
• Dry chemical powder, dry sand, alcohol-resistant foam will be used. For safety reasons, water and carbon dioxide (CO2) should not be used as extinguishing media.
• Guard will remain at the site until the Incident Command Chief decides to conclude the response actions and deactivate the Contingency Plan.
Large Fires
• In the event of a considerable fire (level II emergency), emergency services will be called immediately to the Callao Fire Department, as specialized external support to control the fire. Always informing that it is a Sodium Cyanide Transfer warehouse/plant.
• Firefighters must respond to the emergency considering the characteristics of the NaCN. Automatic systems, visual controls and safety features are installed to prevent releases due to power outages or equipment failures. Key features are:
• The hydraulic systems that control the movement of the tilt frame and the transfer hopper and the powered system that controls the bag hoist are configured so that on power failure they simply "stay put" which is a failsafe mode for the transfer facility.
• In case of power outages, the electrical board have a button for emergency stops. The transfer board enables the generator set and vice versa, disconnects it as soon as the power returns.

Orica has developed a waste management plan for the Sodium Cyanide Transfer Plant in Callao. During the operations of the transfer plant, the waste generated is of two types: hazardous and non-hazardous. Included as hazardous waste are woven polypropylene and

polyethylene bags contaminated with Sodium Cyanide, Wooden boards from the boxes that store the bags with cyanide that are visually contaminated and/or deteriorated, Obsolete filters that contain particles of Sodium Cyanide. Sodium trapped in the filter medium, Personal protective equipment, such as coveralls, filters, gloves, among others, which must be discarded as a safety measure, Obsolete cleaning utensils, such as brooms, dry cloths, etc., which could potentially contain Cyanide Sodium, Domestic solid waste collected through sweeping, which could potentially contain Sodium Cyanide, Cyanide antidote kits and/or expired medications.

All these materials are disposed of with the EPS company in charge, in this case Green Care, who send said contaminated materials to deposits authorized by the government and responsible entity.

As an exercise, this process is carried out by completing the "Hazardous Waste Management Manifesto" registry.

To prevent overtopping of the isotank, the procedure indicates that:

- *A platform for removing the isotank access hatch whilst the vessel is at around 30° to the horizontal. This enables a visual inspection of the isotank for available capacity before the transfer commences.*
- *The transfer hopper is aligned directly to the isotank during transfer. This provides good visibility of any issues that may develop during filling. Because the hopper is large enough to hold an entire bag of cyanides the operator can readily see if the hopper has enough capacity to hold a bag of cyanides before introducing it to the hopper. There is also a programmable logic controller (PLC), which helps control lateral movement of bags of product and vertical movement of the hoppers.*

The Orica 2024 contingency plan considers risk analysis, including the identification of risk activities, threats and possible scenarios, probability of occurrence and their consequences. It is concluded that 26 hypothetical risk scenarios were identified, qualified in high-risk and medium-risk areas, which must be prevented and mitigated in order to bring the operation to acceptable levels of risk, so the plan recommends promoting safety plans. mutual support in the industrial community and its contractors.

Yes, the contingency plan considers among the treatments for emergency levels II and III the performing of Cardiopulmonary resuscitation (CPR) (if the affected person has stopped

breathing) with the Ambu equipment. It is also specified that only medical personnel should apply the antidote (cyanokit).

After the immediate action, the affected person will be transferred to the designated specialized center (San Gabriel Clinic located on Faucett Avenue)

The Contingency Plan identifies as threats in the operation stage of the Cyanide Transfer plant:

- *Spills and/or leaks of Sodium Cyanide during different processes of the Transfer operation.*
- *Hydrogen cyanide emission product of the oxidation of sodium cyanide residues bags due to humidity in the storage location.*
- *Hydrogen cyanide emission produced by oxidation of sodium cyanide during flooding of the warehouse by storm surge or tsunami.*

The contingency plan has three levels of emergency depending of the Risk to life (staff of the plant/warehouse and neighbors) and Environmental Risk.

The contingency plan and procedures of operation of the Plant consider several controls of releases at their source.

The Plan considers the case of cyanide spills in point 6.6.3, the general process to address any emergency must follow the sequence of 8 main steps, which will be developed by the

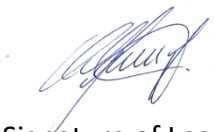
Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

1.Has the facility involved its workforce and stakeholders, including potentially affected communities, in the emergency response planning process?

Orica Mining Services Perú S.A. - Box to Sparge Tank Transfer Facility Name of Facility	 Signature of Lead Auditor	06th and 07th February 2024 Date of submittal

APM, the Fire Department of Callao, the Police and the Ventanilla Hospital have been provided with the Contingency Plan, the NaCN MSDS and a Guide for quick first aids in case of cyanide exposure, along with a letter explaining Orica´s cyanide transfer plant activities in the area. Orica is engaged with these stakeholders to maintain their involvement in ongoing improvement of the Plan. Apart from APM Terminal, the neighboring communities do not have a designated role within the emergency response procedures.

Also, the transfer facility has developed a yearly emergency mock drill schedule where emergency scenarios are tested to test response procedures: tsunami/earth wake, first aids, sodium cyanide spill, sodium cyanide detox.

The auditor reviewed the mock emergency drill reports 27.10.2023 sodium cyanide spill / sodium cyanide detox 27.06.2023. In all cases lessons learned from the drills are analyzed and if necessary, incorporated into response planning.

The Plan has been also shared and coordinated with the site locator APM Terminal and had coordination meetings where the agenda to be addressed was to review the operational risks, the contingency plan, emergency organization, equipment maintenance, communications, plant access and security.

APM, the Fire Department of Callao, the Police and the Ventanilla Hospital have been provided with the Contingency Plan, the NaCN MSDS and a Guide for quick first aids in case of cyanide exposure, along with a letter explaining Orica´s cyanide transfer plant activities in the area. Orica is engaged with these stakeholders to maintain their involvement in ongoing improvement of the Plan. Apart from APM Terminal, the neighboring communities do not have a designated role within the emergency response procedures.

Community or neighboring business has been identified as likely to be affected, based on a review of potential releases from the transfer facility and the distances involved. The transfer facility is in the APM container warehouse which is, in turn, located within an industrial area. The closest residential community is approximately 500 m from the APM gate. The involvement of APM is identified as part of the emergency management rather than as an affected community.
The worst-case scenario at the transfer facility would involve dropping an IBC during a transfer operation resulting in a maximum spillage of 1.1 tons of solid cyanide. It was determined that the zone of influence of such a case was limited to the transfer facility

building. The immediate response and cleanup as described in the Contingency Plan limits the generation of HCN and the zone of influence.
The transfer facility has communicated the local response agencies in the emergency planning and response process. The Contingency Plan clearly describes the role of outside responders. APM, the Fire Department of Callao, the Police and the Ventanilla Hospital have been provided with the Contingency Plan, the NaCN MSDS and a Guide for quick first aids in case of cyanide exposure, along with a letter explaining Orica´s cyanide transfer plant activities in the area.
The transference plant, APM´s warehouse and Orica corporate´s personnel continuously communicate to assure the Plan address current conditions and risks. Orica is engaged to maintain their involvement in ongoing improvement of the Plan. Apart from APM, the neighboring communities do not have a designated role within the emergency response procedures.

The Contingency Plan includes the main contacts or stakeholders of our facility. It is mentioned in section 9 Annexes such as Public organizations, hospitals and clinics, industrial company in which we are located (Alconsa). We do not interact or have nearby communities, since we are mainly surrounded by hills. Contingency Plan is attached.

Production Practice 5.3

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

According to the emergency level, the Plan designates primary and alternate emergency response coordinators with explicit authority to commit resources in order to implement it. According to the Contingency Plan, the Head of Operations will approve any expenditures required to address on any emergency level. Emergencies are classified in terms of their severity and the corresponding control and mitigation methods. The Emergency Coordinator is responsible for controlling and mitigating the emergency event and this person can be one of two people depending on the emergency classification level.

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The emergency response team is identified in the Contingency Plan. There is a list of the emergency response team. Response will be as follows:

- *First person on the scene (First Responder)*
- *Emergency Coordinator*
- *Incident Command System*

The Contingency Plan identifies the transfer facility Plant Supervisor as the head of the Incident Command System. The Incident Command System is based on five functions providing support in the areas of Command, Operations, Planning, Logistics and Administration and Finance.

The Contingency Plan requires appropriate training for emergency responders. Training requirements have been developed for the transfer facility identifying necessary training for specific positions, scheduling the identified training and tracking the implementation of the training. The Plan notes all cyanide transfer facility personnel are to be trained on how to recognize an emergency, notify the emergency response team and practice in implementing the Contingency Plan.

Instruction material deals with risks of cyanide, poisoning symptoms, alert and first aids, medical treatment, investigation of facility failures, cyanide emergencies and cyanide recognition.

Among the training required for emergency response personnel is OSHA HAZMAT Level I – "First Responder Awareness level", OSHA HAZMAT Level II – "First Responder Operations" and OSHA HAZMAT Level III – "Hazardous Materials Technicians." Applicable to all the workers and transfer facility Supervisor and designated personnel of APM's warehouse.

Call-out procedures and 24-hour contact information for the coordinators and response team members are clearly stated in the Contingency Plan. It contains flow charts describing the call out procedures for Level I, Level II and Level III emergencies. Appendix A details 24-hour contact information for all internal and external persons involved in the Emergency Response.

Duties and responsibilities of the coordinators and team members are specified in the Plan. It clearly specifies the duties for all Emergency Response Team (ERT) positions.

The Plan includes a list of the emergency response equipment and its location which is available at the transference plant, including procedures to inspect emergency response

equipment and assure its availability when required. The Plan clearly describes the role of outside responders.

It includes an annual inspection schedule for all emergency equipment in the Plant and one specific inspections schedule for cyanide first aids as oxygen and cyanide antidotes, also for Tyvek suites and HCN detectors.

In addition to the staff of ORICA, external Support from Civil Defense and Callao Firefighters will be required to achieve a more effective emergency response, allowing to coordinate even the evacuation of neighbors, who could potentially be affected by the emergency event. ORICA's Cyanide Operations Manager assumes responsibility for control and mitigation of the emergency event.

Orica has provided documentation of the ERP to the Civil Defense Authority, Fire Brigade, Police, confirming their awareness and engaging them in ongoing development of emergency arrangements. Orica has determined that the role required of these organizations is such that they do not need to be involved in all mock drills, therefore they have not been included as necessary in mock drills and implementation exercises.

Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

The Contingency Plan contains flow charts describing the call out procedures for emergencies. Management, contractors, emergency response team, outside response providers and medical facilities are included within the flow charts. Duties for all positions and entities listed within the Contingency Plan are clearly described.
The Contingency Plan includes contact information for any regulatory agencies required to be notified. Appendix A of the Contingency Plan details 24-hour contact information for all internal and external persons detailed in the Contingency Plan.

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The transfer facility is in the APM container warehouse which is, in turn, located within an industrial area. The closest residential community is approximately 500 m from the APM gate.

The Contingency Plan includes contact information for any regulatory agencies required to be notified. Appendix A of the Contingency Plan details 24-hour contact information for all internal and external persons detailed in the Contingency Plan.
The transfer facility is in the APM container warehouse which is, in turn, located within an industrial area. The closest residential community is approximately 500 m from the APM gate.

Orica has a hazard evaluation undertaken for the transfer facility. The evaluation identified the worst-case scenario at the transfer facility would involve dropping an IBC during a transfer operation resulting in a maximum spillage of 1.1 tons of solid cyanide. It was determined that the zone of influence of such a case was limited to the transfer facility building. The immediate response and cleanup as described in the Contingency Plan limits the generation of HCN and the zone of influence.

The Contingency Plan on article 6.3 - Notification Procedure – is indicated: "In the event of a significant incident with sodium cyanide, such as, to the health of personnel, spill accidents, impact on the environment, others; must be communicated to the ICMI (International Cyanide Management Institute).

Production Practice 5.5

Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

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The Contingency Plan describe specific measures to recovery and to neutralize sodium cyanide spills as the safety equipment level "C" suit, full face mask, rubber boots and neoprene gloves, all of these sealed with adhesive tapes. Use clean, non-sparking tools to scoop up material and place it in plastic lined containers for later disposal. Requires the use of bags with sand or earth, to confine the sodium cyanide (NaCN) preventing it from going to the sewers or water courses that can complicate the problem.

The Contingency Plan indicates the use of calcium carbonate (200 kg), on impermeable material to neutralize sodium cyanide activity

The Contingency Plan describes on 6.4.4 he materials necessary for decontamination, it will be necessary to arrangement of trays with: sodium hypochlorite (40 kg), or calcium carbonate (200 kg), on waterproof material to neutralize the activity of sodium cyanide.

The Contingency Plan describes on 6.5.7. decontamination of personnel, In this activity, personnel who have had contact with NaCN are decontaminated. If necessary, the DECON (Decontamination Corridor) is established in the warm zone and according to:

- *Level of risk of contamination of personnel.*
- *Personal protection level assigned to the decontamination area.*
- *Degree and number of stations and personnel required for the installation of the decontamination corridors.*

Basic equipment for decontamination corridors consists of: marked plastic routes, mechanical or pressure cleaning utensils, containers with soap solution, diluents, waste recovery containers.

Contaminated clothing and equipment should be removed after use and stored in a controlled area (warm zone) until cleaning procedures can be initiated.

In some cases, protective clothing and equipment cannot be decontaminated and must be disposed of properly as hazardous waste. The following figures show the location that the DECON may have.

There is no drinking water network. There is a water container for use in hygienic services and cleaning. Drinking water is brought in bottles for staff.

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The incident ends when the following activities are completed:

1. Stabilization of the area: cleaning the area with lime or sand at the end of collecting the NaCN.

2. Neutralization of the area: after stabilizing the area, the area must be neutralized through Calcium Hypochlorite.

3. Final disposition of the elements used in the emergency (equipment and PPE contaminated).

After completing all the final steps of the emergency closure, it is also necessary, if required, perform environmental remediation or environmental monitoring and evaluation, such as a continuous monitoring of cyanide gas, looking for any presence of cyanide or even taking samples or pits of the subsoil if there was any direct spill to the ground. Monitoring of contaminated materials or waste recovered and disposed of must also be carried out, as contaminated waste. Local legal controls of the site must be followed.

Production Practice 5.6

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

The Contingency Plan contains provisions for periodically reviewing and evaluating its adequacy, and they are being implemented. It states that it must be updated periodically when the conditions or circumstances of the transfer plant and its activities vary significantly. Also states the Plan will be updated according to the results of the drill or when an emergency occurs; in other cases, possibilities for improvement are identified for emergency care.

The transfer facility has a developed a yearly emergency mock drill schedule where emergency scenarios are tested to test response procedures: tsunami/earth wake, first aids, sodium cyanide spill, sodium cyanide detox.

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The Plan also notes simulation drills in the implementation of the Operational Contingency Plan will be carried out with the participation of all the concerned/relevant members of the organization. The purpose of these simulation drills will be to test the procedures, equipment, and resources described in the Plan, and to train personnel in emergency responses. Each simulation drill will be evaluated, and a report will be produced, including a photographic record, chronological record, and final recommendations.

Yes, The Contingency Plan 2023, includes 8. EVALUATION AND UPDATE OF THE CONTINGENCY PLAN, also include that the most effective method to evaluate a Contingency Plan is through a simulation, in which the knowledge that workers have to respond to an emergency is appreciated, if there is coordination between entities, the response capacity, existence of adequate equipment for the emergency, among others.

According to Law 28511 "Law that establishes the obligation to prepare and present Contingency Plans", the Contingency Plan must be updated periodically when the conditions or circumstances of the Transfer Plant and its activities vary significantly.

Likewise, the PDC will be updated according to the results of the drill or when an emergency occurs, in both cases possibilities for improvement for emergency response are identified.