

ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

Quality Carriers

2023 Recertification Audit



Submitted to:

The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

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Operation General Information

Name and address of Headquarters:	QC Carriers Inc. 1208 East Kennedy Blvd. Suite 132 Tampa, FL 33602
Address of Channelview Terminal (Texas, USA)	QC Carriers Inc. Channelview Terminal 1910 Sheldon Rd. Channelview, TX 77530
Address of Anjou Office (Quebec, Canada)	QC Carriers Inc. 7887 Grenache, suite # 101 Anjou, Quebec, Canada H1J 1C4 (Shipments dispatched out of Cyanco Cadillac Terminal)
Name and contact information for QC Carriers:	Cynthia Harvey, CSP Quality Carriers, Inc. Director of Safety/Responsible Care Coordinator charvey@qualitycarriers.com

Operational Overview

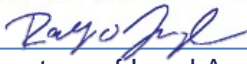
Quality Carriers (QC) is a subsidiary of the CSX Corporation, one of the nation's leading transportation suppliers. Quality Carriers is made up of a network of more than 100 company-owned and affiliate terminals and facilities in locations throughout the U.S., Canada, and Mexico. QC has operated in the US since 1932.

QC headquarters is in Tampa, Florida. HQ operations include the central management of all documentation, records, training, driver qualification, equipment management, and emergency response planning. QC headquarters also maintains a separate Cyanide Code certification for headquarters operations and other terminals.

At the time of the audit, cyanide shipments were being dispatched from the Channelview, Texas Terminal, directly from the Cyanco Cadillac Terminal, and from the Carlin, Nevada terminal. The Carlin Terminal was most recently recertified under a separate recertification audit effort in 2022 and was not included in the scope of this re-certification activity.

Shipments within the scope of this audit include the solid sodium cyanide shipped from the Cyanco Houston area production facility using the Channelview, Texas USA terminal and sodium cyanide solution shipments made from the Cyanco Cadillac location using the Anjou, Quebec Canada-based Anjou driver. At the time of the audit, shipments managed by the Channelview Terminal were containerized loads (intermodal / sea containers) of solid sodium cyanide packaged in a bag-in-box

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configuration and solid sodium cyanide briquettes transported in ISO tanks. Canadian shipments from the Cyanco Cadillac Terminal in Canada are of sodium cyanide solution delivered in tank trailers.

QC is an American Chemistry Council (ACC) Responsible Care Partner® and maintains a formal environmental, health, safety, and security management system that is RCMS® certified. QC leverages its standard policies and procedures to ensure that cyanide is transported safely. Cyanide Code-specific processes have been integrated into the overall management system, as necessary.

The tank trailers used in the Canada operation are owned by the cyanide producer. Although tank trailers are inspected and maintained by the cyanide producer, QC ensures that all equipment that it uses is safe and suitable for transportation activities.

QC is responsible for route determination, shipment scheduling and tracking, inventory control, truck inspections, preventive maintenance for its equipment, training, safety program management, and emergency response planning.


Audit Implementation

This report contains information regarding the International Cyanide Management Code (Cyanide Code) recertification audit of the QC Carriers Headquarters and trucking operations in Channelview and Canada.

Interviews were conducted with QC Management, Staff, Dispatchers, and Drivers from HQ, Channelview, and Canadian operations. Policies and procedures were reviewed, and records were evaluated from all three locations. Loading operations and equipment were observed and maintenance records were reviewed. Records from the recertification period (2020-2023) were evaluated.

The audit was conducted according to the ICMI Cyanide Transportation Verification Protocol. The audit was performed by an independent third-party auditor who fulfills all ICMI auditor requirements including Lead Auditor and Transportation Technical Auditor requirements for Cyanide Code audits.

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Auditor's Finding

Cyanide management practices for QC Carriers were evaluated for Cyanide Code compliance using the ICMI Cyanide Transportation Protocol. QC internal policies, standards, and procedures regarding the management of the Cyanide Transportation were reviewed. Records from the recertification period were also evaluated and found to be acceptable during this audit.

QC Carriers did not have any cyanide-related spill, compliance, or exposure events during the recertification period.


The audit was conducted through discussions and interviews with QC personnel. Equipment was physically evaluated. Records regarding shipment tracking, security measures, shipping documentation, community involvement, operational procedures, training, maintenance, and emergency response records were randomly sampled during the audit and were also found to be acceptable. All personnel were very well prepared for the audit. The audit team found that the overall level of preparedness and understanding of Cyanide Code requirements was excellent.

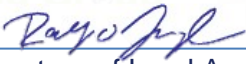
The QC Carriers sodium cyanide transportation operations were found to be in FULL COMPLIANCE with the ICMI International Cyanide Management Code requirements.

Audit Company:	CN Auditing Group, LLC. www.cnauditing.com
Lead / Technical Auditor:	Ralf Jurczyk E-mail: rj@cnauditing.com
Auditor:	Ralf Jurczyk
Date(s) of Audit:	December 11-13, 2023

I attest that I meet the criteria for knowledge, experience, and conflict of interest for Code Certification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that the Audit Reports accurately describe the findings of the recertification audit. I further attest that the recertification 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.

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Principles and Standards of Practice - Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

Quality Carrier's (QC's) management system has extensive and established documentation. The Route Risk Assessment procedure and current routes, including the risk assessment information, were reviewed. Routes are assessed annually. The Corporate Director of Security and teams local to each terminal review the routes as necessary due to route changes or changing conditions. All cyanide delivery routes are reviewed and updated at least annually. This process is described in the procedure which was last updated in April 2023. The Corporate Director of Security confirmed that the routes were last reassessed in 2023. No changes were made to routes during the recertification period.

The documented route selection procedure considers population density, infrastructure, pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather and resulting poor driving conditions. Additionally, landmarks, high value targets, stadiums, dense populations, water bodies, and areas of security concern are avoided in route planning. Responsibilities and procedural steps are clearly defined in the route selection process.

The records were found to be very complete for all documented routes. A risk assessment methodology is used to determine the best truck route. In many situations there is only one truck route possible. The risk assessment is done with input from Drivers, road information available through the internet and personal knowledge of the routes. When options exist, the route with a lower risk is chosen to minimize the potential for accidents and/or releases.

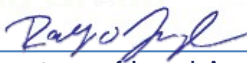
A route risk assessment is done when a new rate is set up in the computer for a new destination. Designated routes were available for all destinations.

Many of the destinations to which QC needs to deliver cyanide have limited options for which roadways can be used. Risk mitigation measures focus primarily on the avoidance of high traffic times of day and the avoidance of roads that are dangerous in poor weather conditions.

In Canada, one of the risks identified was the risk of poor communication coverage in the northern parts of the country. The risk mitigation measure was to equip the driver with a satellite telephone to ensure that there are no black out areas. Risk mitigation measures were found to be suitable for the routes driven. Evidence was available that this phone is in use.

Routes are reviewed with Driver input as necessary if there is an event or changes to the roads or infrastructure. Routes are also re-evaluated for adequacy and for any changes in conditions

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that would result in a modified risk ranking.

The Channelview Dispatcher has direct daily contact and interaction with the drivers regarding road and driving conditions.

The Canadian Driver reported that he communicates directly with the cyanide producer regarding road and weather conditions. Driver feedback is integrated into the review process. Drivers are encouraged to bring feedback regarding operations and routes to leadership at any time. This information was confirmed through interviews with the QC personnel, including several Drivers.

QC's Cyanide Security Plan addresses measures to be taken for route risk mitigation. Risk mitigation measures focus primarily on the avoidance of high traffic times of day, the avoidance of roads that are dangerous in poor weather conditions, and the communication capabilities in northern Canada. Notes within the route risk assessment documents indicate what risk mitigation measures are taken for specific routes. Risk mitigation actions were found to be appropriate for the routes driven.

QC Carriers seeks input from communities near its operations in the selection of routes and development of risk management measures. QC is a Responsible Care certified company, and as such it maintains formal communication processes with external stakeholders and communities. The route planning procedure shows what community and government considerations are made when planning a route. A web site showing routes that have been restricted by local authorities is used to confirm that there are no route restrictions through which the trucks are traveling.

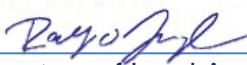
Additional interaction occurs with the cyanide producers and stakeholders near terminal operations. QC incorporates government regulations and restrictions into its route planning. The Safety Director showed a high level of awareness of the U.S. Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations regarding the safe shipping and transportation standards for hazardous materials (49CFR106.50-106.130).

Based on interviews and the review of the risk assessments, there are no security concerns that require special security measures at this time.

QC does not use subcontractors for the fulfillment of Cyanide Code Transport Practice 1.1 requirements.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.1
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Transport Practice 1.2

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

QC has developed a formal and extensive driver training program. The company employs several master trainers, and each driver receives four days of training at one of the locations. Driver training topics include QC Policy, hazardous communication, DOT Hazmat, placarding, stop work authority, defensive driving, and fatigue management.

All cyanide drivers must have a U.S. DOT Class A Commercial Driver's License (CDL) or Canadian Class 1 commercial driver license, be 22 years of age and have at least one year of Class A driving experience (in the U.S.) or Class 1 (Canada). If they don't already have a Hazardous Materials / Tanker endorsement (in the U.S.) when they start working with QC they have 90 days to get the hazmat endorsement.

Additional training is provided at the terminal. All cyanide drivers in the U.S. must have the Hazardous Materials / Tanker endorsement. Canadian Drivers must have experience working with dangerous goods (there is no equivalent endorsement in Canada for Dangerous Goods). The DOT Compliance Team ensures that drivers with expired qualifications cannot be dispatched.

Records were readily available and were found to be complete for all cyanide drivers.

Drivers were interviewed and were found to have an appropriate level of knowledge and safety awareness.

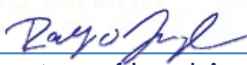
All drivers complete a four-day training program at one of the company's schools and then receive additional training at the terminal. Compliance is managed on-line. A weekly report is generated that reviews driver credentials for the coming 30 days. The automated dispatch system can lock out a driver or lock out a truck if there is a compliance issue.

The driver in Canada who delivers cyanide solution receives additional operational training on written unloading procedures from Cyanco, the owner of the tank trailers. Records were found to be complete and driver awareness of requirements, risks, and procedures was confirmed through interview.

The cyanide producer also provides computer-based cyanide safety training on an annual basis for all drivers. All drivers have access to the company LMS. Training records were reviewed for the recertification period and were found to be complete. Drivers were interviewed and were found to have a high level of technical knowledge and safety awareness.

QC does not use subcontractors for the fulfillment of Cyanide Code Transport Practice 1.2 requirements. QC does utilize owner operators, but QC maintains all trucks (company owned and owner-operator trucks). Owner-operators are subject to all QC requirements and must follow all policies and procedures. Training and qualification records were readily available for all owner-operators.

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The operation is:

- In full compliance with
- In substantial compliance with
- Not in compliance with

Standard of Practice 1.2

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

Equipment is designed by US manufacturer engineers to meet U.S. DOT weight rating standards. Gross Vehicle Weight Rating (GVWR) is certified by the manufacturer and documented on each vehicle with an equipment plate.

All QC tractors and trailers have been checked and all are rated for weights that exceed maximum loaded weights. Drivers go over a certified scale to check axle and gross weights. Confirmation is made that the axle and gross weights were compliant with requirements and that the equipment can safely transport the loads. ISO tanks are maintained by the shipper (Cyanco). They are loaded with standard amounts of solid sodium cyanide briquettes that are under the weight limits for the equipment and the road allowances.

Truck inspections and preventive maintenance actions are performed regularly to ensure that the equipment is safe to operate and that it can continue to carry the loads for which it is designated. The terminal maintains a formal and centrally managed fleet maintenance program that incorporates standardized shop work practices. Defined checklists showing all necessary maintenance activities are used and records were available to demonstrate that tractors are typically checked at least every 90 days.

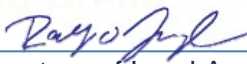
Regulatory-required inspections are scheduled, tracked, and documented. Each tractor and trailer have its own file that is maintained. A sampling of active tractor and trailer maintenance records for equipment used to transport cyanide during the recertification period was reviewed during this audit. The files showed that all preventive maintenance activities, repair activities, and inspection activities performed on the trucks and/or trailers over time were performed on time and in accordance with procedure for U.S. and Canadian operations.

Trailers are loaded using calibrated scales to confirm that equipment is not being overloaded. QC drives trailers over scales at both loading locations to ensure that the trailers are not overloaded.

Records were available for review during the audit and confirmation was made that loads have not exceeded regulatory weight limitations or equipment loading capacities. The loads being hauled are standard loads that do not vary greatly in weight. Records were checked against weight capacities and weight limit regulatory information.

The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. Office personnel and drivers all showed excellent awareness

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of weight capacities and regulatory requirements pertaining to the maximum truck weight allowed in each region. Drivers reported that they take personal responsibility for ensuring weights are checked and that they are appropriate and safe.

QC does not use subcontractors for the fulfillment of Cyanide Code Transport Practice 1.3 requirements. QC does not subcontract any portion of their cyanide transportation operations. QC does use owner operators, but all equipment (company owned and owner-operator) is maintained by QC. Records were sampled for owner-operator tractors and was found to be complete.

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Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

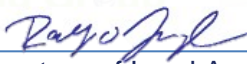
In Texas, the driver picks up the intermodal container at the port. The container is inspected at the port and is then brought to the cyanide producer's plant. Cyanco inspects all containers and ISO tanks prior to loading. This was confirmed during the audits of the Cyanco production operations. In Canada, Cyanco loaded tank trailers are picked up from the Cadillac plant. Cyanide producers are responsible for loading ISO tanks and bracing and blocking solid sodium cyanide bag-in-box sea container loads. Tank trailers are also loaded, placarded, and secured by the cyanide producer.

For solid sodium cyanide in intermodal containers, the driver confirms the blocking and bracing and then closes the intermodal container and seals it. The seal number is recorded on the Bill of Lading and the driver leaves the cyanide producer plant. All containers are secured with four corner lock pins. Tank trailer openings / connection points are secured with seals. This information was confirmed during the audit and was found to be appropriate.

Appropriate placards showing either UN 1689 (solid sodium cyanide) or UN 3414 (cyanide solution) are displayed on all four sides of the transport vehicles. This was confirmed during the audit. Additionally, International Maritime Organization (IMO) required marine pollutant placards were on all containers headed for ports. A sampling of vehicles was reviewed. Drivers visually inspect the trailers prior to each movement. This was observed and confirmed through interviews with drivers. Equipment markings were found to be adequate and conformant.

Drivers conduct a pre-trip inspection prior to departure and a post-trip inspection upon return to the terminal. Mechanical defects are called to the attention of the on-site mechanic. Issues that would affect safety and/or legal compliance are resolved prior to moving off-site. Records showing that pre-trip inspections are performed were reviewed and found to be acceptable.

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QC maintains a centralized formal preventive maintenance program for all equipment as part of its certified RCMS management system. Records were complete and demonstrated that planned maintenance activities are occurring for both the Texas, USA and Quebec, Canada locations.

Trailer and Tractor Annual / Systemic Preventive Maintenance Procedure TSD-011 was reviewed. Staff were interviewed and records from the recertification period maintained electronically were readily retrievable. ISO tanks are owned and maintained by the shipper. There were none in transit at the time of the audit.

The Safety Program includes limitations on drivers' hours in accordance with Federal Motor Carrier Safety Regulations (FMCSR). Driver's hours are recorded and tracked electronically. The electronic logging system enables QC dispatchers, safety, and compliance personnel to stay informed at all times. There are multiple alerts built into the system to identify potential driver time limit exceedances.

Through the Driver Fatigue Management Program, drivers are informed of legal requirements, encouraged to stop driving if they become too fatigued (empowerment), provided with fatigue training, and monitored for adherence to driving hour limitations.

Cyanide producers are responsible for bracing and blocking solid sodium cyanide loads. ISO tanks and tank trailers are also loaded, placarded, and secured by the cyanide producer.

For solid sodium cyanide in sea containers, the driver confirms the blocking and bracing and then closes the sea container and seals it. The seal number is recorded on the Bill of Lading when the driver leaves the cyanide producer plant. All containers are secured with 4 corner lock pins. In Canada, seals are put on the openings/connection points.

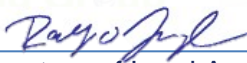
Formal policies and procedures detail how drivers are empowered and directed to pull over whenever weather, fatigue, or other conditions (such as civil unrest) make it unsafe to continue a trip. In such instances the driver is to call into the office. Driver awareness was confirmed through interview.

QC's formal Drug and Alcohol Policy (SOP SAF-1.3) is a zero-tolerance policy and was reviewed. QC randomly selects drivers from its driver pool for testing each month. An independent certified service provider is used to perform laboratory testing and chain of custody processing for samples.

Records for the recertification period were available and were reviewed to confirm that the Cyanide Code Transport Protocol 1.4 requirements had been fulfilled for both terminals.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.4
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Transport Practice 1.5

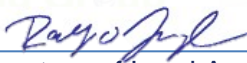
Follow international standards for transportation of cyanide by sea.

Cyanco transports shipments of cyanide by sea in compliance with the Dangerous Goods Code of the International Maritime Organization. Cyanco demonstrates fulfillment of Cyanide Code requirements for sea transport during its Global Ocean Supply Chain certification audit. This supply chain certification is current, as confirmed through the ICMI cyanidecode.org website. The most recent recertification was in July 2022. Cyanco ships its sodium cyanide on barges and ocean carriers that have demonstrated safety programs and safe performance. QC only transports Cyanco-produced cyanide within the scope of this recertification audit. The following information was evaluated during the Ocean Supply Chain audit:

- a) The Cyanco packaging specifications are conformant to the packaging requirements of the IMDG Code.
- b) Packages and shipping containers are appropriately marked and compliant with Chapter 5.2 of the IMDG Code requirements.
- c) Packages and shipping containers are appropriately marked and compliant with Chapter 5.2 of the IMDG Code requirements.
- d) Loaded intermodal and ISO tank shipping containers are marked and placarded in accordance with the IMDG Code.
- e) Shipping documents were reviewed for a sample of cyanide shipments from the recertification period. Information required by the IMDG Code is required as standard practice on Cyanco shipping paperwork.
- f) The container packing certificates were reviewed. All information was found to be conformant to IMDG Code requirements.
- g) Ocean carriers use detailed stowage plans for the placement and safe transportation of all hazardous materials, including sodium cyanide shipments.
- h) Ocean carriers have cyanide emergency response information available on board each vessel, as required by Section 5.4.3.2 of the IMDG Code.
- i) Ocean carriers comply with applicable stowage and separation requirements of Part 7 of the IMDG Code. This includes the requirement that sodium cyanide be stored separately from acids, strong oxidizers, and explosives.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.5
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Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

QC has installed and implemented a satellite-based communication and tracking system on all its transport vehicles. The system provides constant real-time tracking and communication of information between drivers and the terminals. All drivers have been trained to use the on-board messaging and locator system. Drivers were interviewed and were able to explain the use of the communication / tracking system.

According to training/testing records reviewed, all drivers understand, and are required to use, this system to maintain communication with the terminals. Additionally, each driver has a cell phone for communication with the terminal, the mine, and/or emergency responders. The driver in Quebec also has a satellite phone to ensure that communication services are uninterrupted. QC has a hand-free policy. This is strictly enforced.

The Dispatcher tracks trucks to confirm that the shipments are moving according to plan. Drivers always have a call list with them and there are always supervisors and cyanide producer emergency contact personnel on-call. The mining telephone numbers are also on the shipping documents in Canada.

The functionality of the communication equipment is confirmed during the pre-trip inspections. This was found to be acceptable by the auditor.

The satellite-based communication and tracking system is in constant use and problems with equipment would be readily apparent to an on-shift driver as well as the dispatchers. Additionally, the communication equipment is "pinged" every 15 minutes and would provide immediate identification of faulty equipment. A demonstration of real-time tracking capability was observed during the audit.

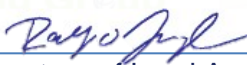
There are no black-out areas for communication services in Texas. During the evaluation of routes, it was determined that the Canadian driver does encounter black out areas in northern Canada on the way to the mines where the standard communications system does not have signal. As a risk countermeasure, the driver was equipped with a satellite phone. This resolved the issue of black-out areas. The satellite phone is maintained and tested periodically by the driver to ensure functionality. This was confirmed through interview.

QC has installed and implemented a satellite-based communication and tracking system on all its transport vehicles. The system provides continuous tracking and communication of information between drivers and the terminals. All drivers have been trained to use this on-board recording, messaging, and locator system. The auditor observed the system in use during the audit.

The dispatchers use the communication system to regularly check on the current location / progress of the cyanide shipment. Interviews and observations confirmed this during the audit.

Chain of custody documentation is maintained. If the product is delivered to a mine customer, the

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Bill of Lading (BOL) is signed by the receiving party. If the product is dropped off at the port, the in-gate paperwork serves as the evidence that the cyanide was safely delivered to its destination. Records were available for review and were found to be acceptable.

The primary chain of custody documentation used by the operation is the Bill of Lading (BOL). This document shows the gross, tare, and net weights of the shipment. The weight of the product is clearly noted, as is the type of packaging. In the case of bag-in-box shipments, the number of boxes is also noted.

Safety Data Sheets for solid sodium cyanide and cyanide solution are always maintained by the drivers in the trucks. Drivers were interviewed and paperwork in trucks was inspected to confirm the practice.

QC does not use subcontractors for the fulfillment of Cyanide Code Transport Practice 1.6 requirements.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.6
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Principle 2 | INTERIM STORAGE

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

Transport Practice 2.1

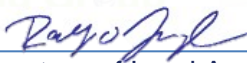
Store cyanide in a manner that minimizes the potential for accidental releases.

QC does not provide interim storage within the scope of this recertification audit. All loaded trailers are stored by the shipper, are dropped off at a port for loading onto a ship or are brought to a designated interim storage location that is part of Cyanco's certified North American Rail & Truck Supply Chain.

QC only provides interim storage at the Carlin terminal. That location was most recently audited and found to be in Cyanide Code compliance in 2022.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 2.1
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Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

QC maintains a Cyanco-Specific Emergency Response Plan (ERP) that applies to all Cyanco-related cyanide deliveries. The ERP was last updated in 2023. For the Canadian routes Cyanco also maintains the Canadian required Emergency Response Assistance Plan (ERP2-1008-139). The details of the ERAP are audited as part of the Cyanco certification audits that include transportation through Canada. The QC ERP and the Cyanco ERAP are collectively referred to in this section of the report as the “ERPs”.

The ERPs were deemed appropriate for the defined routes. Drivers were interviewed and confirmed awareness of the ERP details. The terminal specific ERP and the Canadian ERAP are suitable for the physical forms of the cyanide. The Houston-area Cyanco production facility ships only solid sodium cyanide briquettes. The Cyanco Cadillac Terminal in Canada ships only sodium cyanide solution. The more detailed information regarding the chemical and physical forms is on safety data sheets (SDSs) that are always kept in the truck. The only mode of transportation is truck.

The ERPs were found to be suitable for the method of transportation. The differences in infrastructure for the defined routes are addressed in the risk assessments and the ERPs. As there are not multiple modes of transportation, the different road types such as highway, public, private, and rugged mine site were considered.

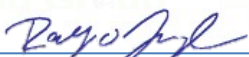
The ERPs consider the design of the transport vehicle. The design of the transport equipment is most relevant for the sodium cyanide solution transport in Canada. Emergency shut off procedures are included in the operational procedures used to deliver product with the tank trailers.

The ERPs include a description of response actions if there is an emergency. The role of the driver is described in the ERPs. The driver is responsible for securing the scene and making necessary notifications. QC maintains an emergency response management team at Headquarters. This group, called SKYTANK, coordinates emergency response actions for the entire company. The ERPs detail that the driver is to notify SKYTANK for all emergencies. SKYTANK coordinates the emergency response and ensures that all necessary notifications are made.

The roles and responsibilities of the driver, the dispatcher, mine personnel, SKYTANK, QC personnel, QC’s emergency service provider, and the local response authorities are described in the ERPs.

The ERPs explain that the driver is to notify the SKYTANK and that SKYTANK coordinates the notifications and response. The roles of the driver, the cyanide producer, SKYTANK and local responders (police and fire) are defined. As a registered PHMSA hazardous materials transporter,

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QC relies on the national network of trained emergency responders from the communities through which they travel to assist in the event of an emergency.

The operation is: In full compliance with Standard of Practice 3.1
 In substantial compliance with
 Not in compliance with

Transport Practice 3.2

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

Training on the relevant emergency response plan(s) was given to all terminal personnel, including drivers, at orientation and is then refreshed every three years. Records from the recertification period were available and reviewed. Drivers were interviewed and awareness of emergency procedures and reference documentation was confirmed.

The roles and responsibilities of the driver, the dispatcher, mine personnel, SKYTANK (QC staff), QC's emergency service provider, and the local response authorities are described in the ERPs.

The emergency response equipment carried on trucks in the Houston area is limited because drivers are transporting solid sodium cyanide and are expected to have a notification role only in the event of an emergency. A fire extinguisher is included in the pre- and post-trip checklist. Drivers also always have personal protective equipment (PPE) such as steel toed shoes, hard hat, and gloves with them.

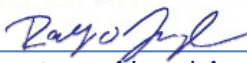
In Canada, where the sodium cyanide solution is delivered, the driver always has the following PPE: goggles, face shield, chemical suit, gloves, and boots. This list of required equipment is included in the operational procedures for the unloading of the product at the mines. The confirmation that this equipment is in good working condition and always onboard is part of the pre-trip inspection process.

Records, auditor observations, and driver interviews were used to confirm that emergency equipment (fire extinguisher) and required PPE are available in the trucks during transport.

Pre-trip checklists include confirmation that the emergency equipment and PPE are on the vehicle. Records of the pre-trip inspections are maintained electronically in the onboard communication GPS system. In addition to the pre-trip inspections, a full review of emergency response equipment is done every 90 days during vehicle maintenance. Records were available for review and interviews with drivers confirmed awareness of the process and availability of equipment.

The pre-trip inspection process includes confirmation that the emergency equipment and PPE are in the truck. Records of the pre-trip inspections are maintained electronically in the onboard

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communication / GPS system. In addition to the pre-trip inspections, a review of emergency response equipment is done during vehicle maintenance. Interviews with drivers confirmed this practice.

QC does not use subcontractors for the fulfillment of Cyanide Code Transport Practice 3.2 requirements.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.2
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Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

Notification procedures are described in detail within the ERPs. SKYTANK makes all necessary notifications. The customer-specific notification process document used by the SKYTANK team was reviewed during the audit. Confirmation was made that telephone numbers and instructions are in place for the notification of the shipper, regulatory agencies, outside response providers, medical facilities, and potentially affected communities. Records were available to show telephone numbers were last checked in 2023.

Current telephone numbers for medical facilities are listed in the Route Risk Assessments.

Procedures for notification of appropriate parties in the event of a cyanide release or exposure during transport are kept in the transport vehicles.

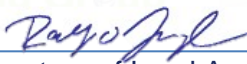
The ERPs are reviewed and tested (by means of a drill and/or tabletop exercise) once each year. During this activity, the phone numbers are checked for accuracy. Internal and external emergency notification and reporting procedures are also checked regularly during the Responsible Care internal audit process at QC. Records were available to demonstrate that the information was last confirmed to be up-to-date and accurate in August 2023.

QC has expanded its emergency notification procedures to include the requirement to notify ICMI if there is a significant cyanide incident. There were no cyanide spills or exposures during the recertification period.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.3
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Transport Practice 3.4

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Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

In the event of a spill, QC follows its defined emergency response procedures and would coordinate with the cyanide producer (Cyanco) and their designated emergency response service provider to ensure appropriate clean up and remediation of contaminated solids or soils.

QC Drivers will immediately activate SKYTANK (QC emergency by calling the QC emergency response and notification telephone number to ensure appropriate clean up and remediation of contaminated solids or soils. Once the transport truck driver calls SKYTANK, SKYTANK ensures that all necessary parties are notified, and that Cyanco’s Global Transportation Emergency Response Plan (GTERP) is properly activated. Cyanco ensures that its emergency response and remediation contractors are aware of Cyanide Code requirements and that the requirements are fulfilled. Cyanco most recently recertified its North American Rail and Truck Supply Chain in 2022.

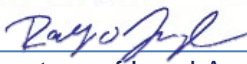
Confirmation was made with the shipper that this is the process.

Soil and water remediation is not addressed specifically in the QC documentation, but this was found to be acceptable by the auditor because Cyanco would lead this type of response with its contractors.

As noted above, QC would not be directly involved in the remediation of a cyanide spill. The ERP, does however, address the requirement that none of the chemicals such as sodium hypochlorite, ferrous sulfate, or hydrogen peroxide be used to treat a release to surface water. The ban on the use of these chemicals is also in the Global Transportation Emergency Response Plan (GTERP) maintained by Cyanco.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.4
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Transport Practice 3.5

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

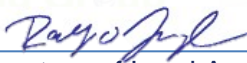
The QC Emergency Response Plan (ERP) is reviewed at least annually for adequacy. Records were available to show that the ERP was updated regularly and that it was last updated 2023. Cyanco maintains the Canadian ERAP and its GTERP which are included in its North American Rail & Truck Supply Chain Cyanide Code recertification audits.

A combination of hands-on emergency response practice drills and tabletop drills are used to train personnel and confirm that emergency plans are appropriate and up to date. At least one physical emergency response drill was conducted each year for the recertification period. Personell from both operations and headquarters were involved in the drills. One drill in Canada was done together with a gold mining customer. The QC emergency response team SKYTANK was also involved in all drills.

The QC Emergency Response Plan calls for a review of performance after actual emergencies and after the annual drill. Changes are to be made to the plan, as needed. There were no actual cyanide emergencies during this recertification period. Drill critique records were available for the recertification period. Minor actions were noted during the Canada drill related to calling internationally between the U.S. and Canada. These actions were identified, tracked to closure, and confirmed to be effectively resolved. No changes to the ERP were deemed to be necessary. This was found to be acceptable by the auditor.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.5
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