SUMMARY AUDIT REPORT

FOR THE

INTERNATIONAL CYANIDE MANAGEMENT CODE

QUIMTIA S.A.

Eucaliptus Warehouse Lurin, Lima, Peru

January 2026

BP Cyanide Auditors

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Operation General Information

Name of Production Facility:	Quimtia Warehouse Lurín
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Name of Facility Operator:	Quimtia S.A.
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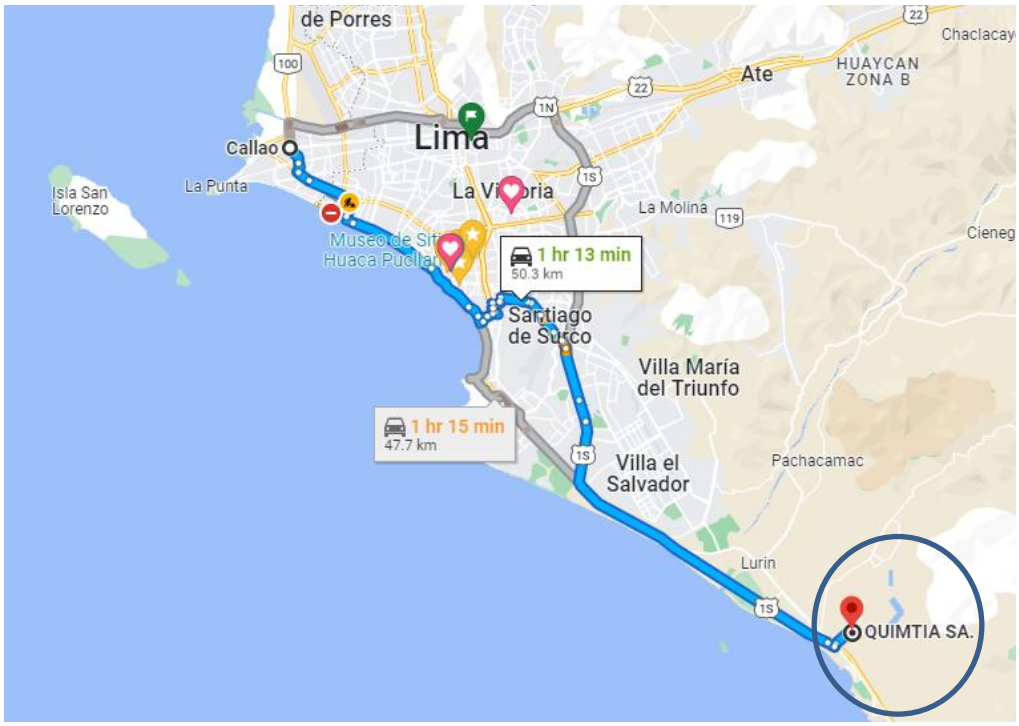
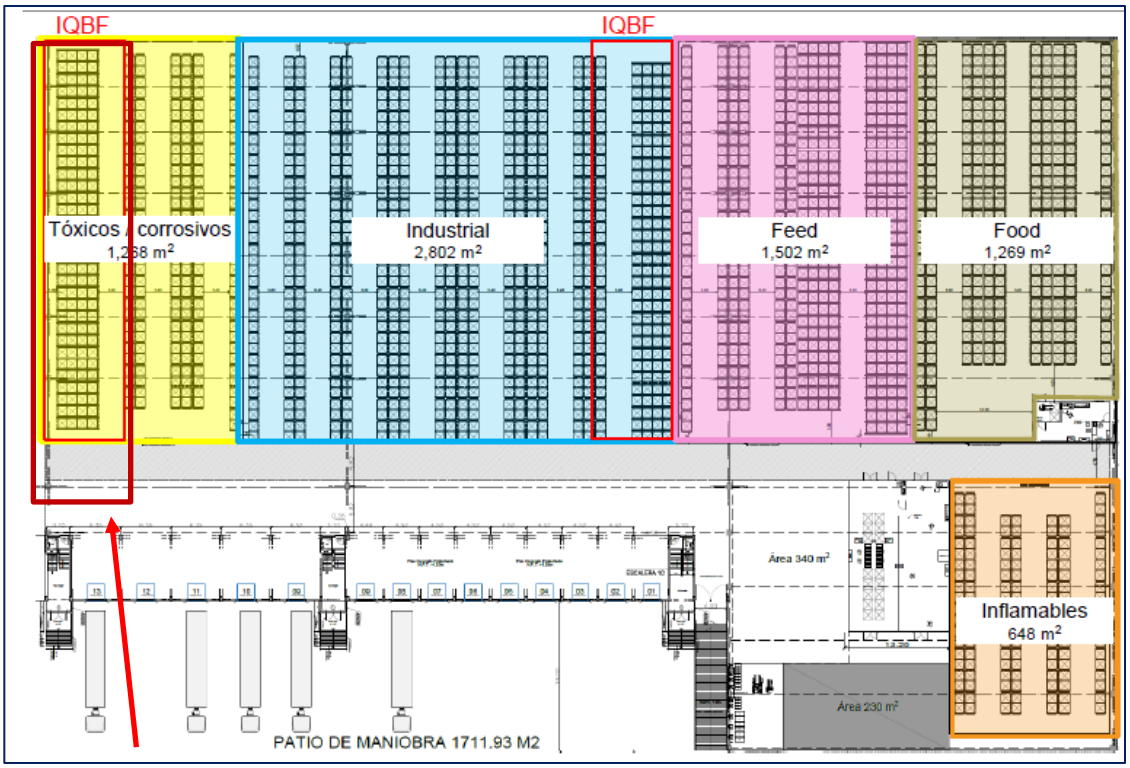
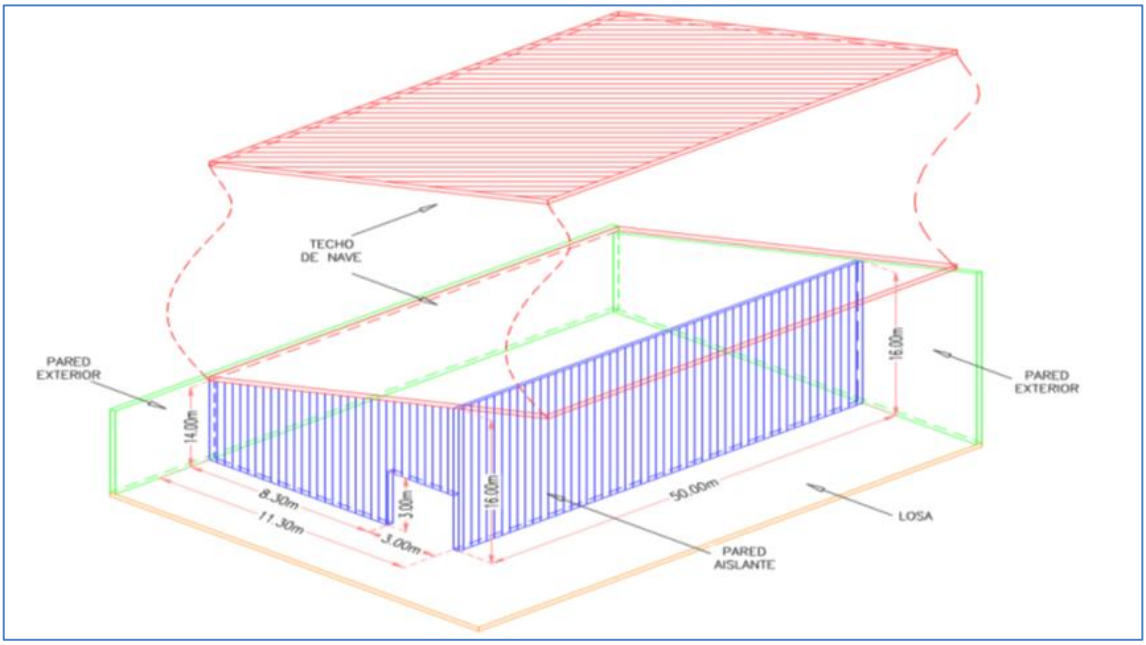
Operation Location Detail and Description



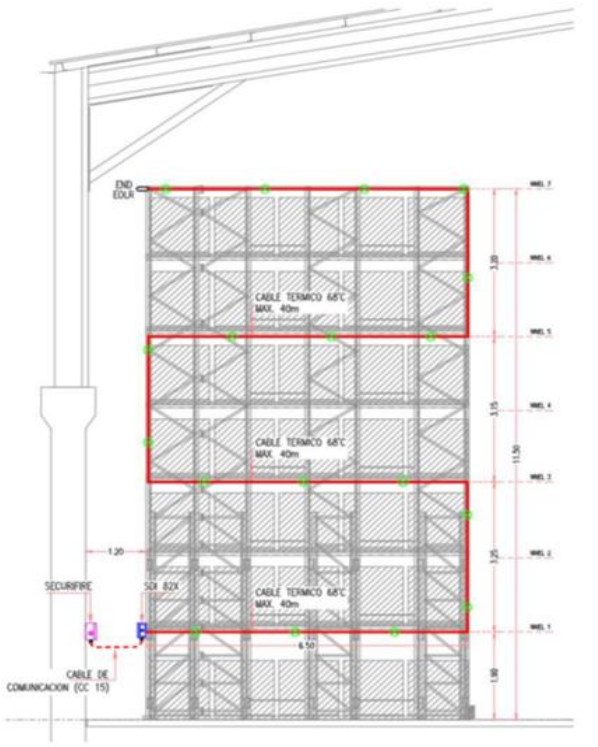
Quimtia - Lurín Warehouse Location from Callao Port



Cyanide Warehouse area



Cyanide Warehouse Isometric



Cyanide Racks

Quimtia is a company specializing in chemical distribution across Latin America, with operations in Brazil, Peru, Colombia, and Argentina. With over 55 years of expertise, Quimtia offers a diverse portfolio of products, services, and industry knowledge. Among its various offerings, the company supplies chemical products, including sodium cyanide.

Since August 2018, Quimtia's Eucaliptos Warehouse has been handling sodium cyanide. The facility was first ICMI certificated on November 15, 2022, Quimtia S.A. The facility is situated within an industrial zone in the Lurín district of Lima, Peru, approximately 50 km south of the Callao port. Previously, sodium cyanide was stored in the company's ICMI-certified warehouse in Callao, but all cyanide operations have since been centralized at the Eucaliptos Warehouse in Lurín.

The activities that take place within the warehouse or Distribution Center (CD due to its acronyms in Spanish) are:

- Reception of chemicals and hazardous materials.
- Storage of chemicals and hazardous materials.
- Dispatch of chemicals and hazardous materials.
- Transportation of chemicals and hazardous materials.
- Reception, storage and dispatch of sodium cyanide.
- Conditioning of chemical products.

The warehouse is strategically located in an industrial area away from urban zones, minimizing the risk of product contamination, and outside flood-prone areas. It spans a total area of 12,241 m². Specifically designated for cyanide storage, the cyanide rack area measures 50 m in length by 11.30 m in width, covering a total of 565 m². The structure is constructed with reinforced concrete columns, complemented by metal columns, beams, and joists, while the roof is made of sheet metal plates. The perimeter is enclosed with metal panels, and internal divisions are built using drywall.

Quimtia handles the receipt of trucks carrying solid sodium cyanide in Intermediate Bulk Containers (IBC) shipped in maritime containers from Callao Port. Upon arrival at the warehouse ramp, the IBCs are unloaded using forklifts and placed in a covered reception area inside the facility. From there, another forklift transfers the containers to the designated cyanide storage racks. For dispatch to clients, the process is reversed: forklifts retrieve the boxes from the storage racks and place them in a nearby covered area. Subsequently, another forklift moves the boxes into truck transporters' maritime containers for delivery.

Storage within the cyanide racks area is organized on open racks arranged in multiple rows, reaching up to 11.5 meters in height. The area is equipped with fire insulation provided by a fire wall with at least three hours of resistance, separating it from the exterior walls of the General Warehouse. A fireproof door measuring 3 meters in height and 3 meters in width facilitates forklift operations through the entrance and exit corridor. The fire wall stands approximately 16 meters high, extending up to the main building's ceiling, with the entrance

located on the front-facing side. The rear and side walls are integrated into the warehouse's structural framework.

Bollards have been installed to safeguard the fire wall from potential collisions involving forklifts or other mobile equipment. The cyanide rack area is equipped with mechanical ventilation, supported by an air injection and extraction system designed to meet the necessary operational requirements. The extractors are positioned on the roof of the enclosure, while fans are mounted along the side walls. To allow for continuity in case of power disruptions, a 30 kW generator set has been provided, which is sufficient to maintain the extraction system's functionality as per engineering calculations.

The cyanide warehouse is equipped with a state-of-the-art fire detection system, alongside a manual firefighting system that uses dry chemical powder (PQS). This includes four high-capacity (100 kg) wheeled fire extinguishers capable of reaching up to 18 meters in height. These extinguishers are strategically distributed to cover the entire cyanide rack area effectively.

Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

This facility was determined to be in FULL COMPLIANCE with the International Cyanide Management Code.

Compliance Statement

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

Auditor Information

Audit Company:	BP Cyanide Auditors S.A.C.
Lead and Technical Auditor:	Bruno A. Pizzorni
Dates of Audit:	October 23 and 24, 2025

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Cyanide Code 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 Production Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

The Quimtia cyanide warehouse has been designed and constructed with a focus on safety and risk mitigation, ensuring that the potential for cyanide release is minimized. The building incorporates impermeable floors and walls to contain potential spills, while the forklifts and racking systems employed are specifically suited for the handling and storage of cyanide Intermediate Bulk Containers (IBC).

Records confirming the implementation of quality control and assurance programs during the construction phase were presented to auditors during the initial certification audit; they maintain these records as the auditor confirmed in occasion of this audit. These include QC/QA documentation for the racking systems and as-built drawings verified by a certified professional engineer. Construction records also provide evidence that the facilities were built according to design specifications and approved by a construction engineer. Additional compliance documentation includes building permits and certifications issued by Peruvian regulatory authorities (declaration of manufacture), underscoring adherence to prescribed production practices.

This provision does not apply to the warehouse operations because they exclusively handle cyanide in closed packages Intermediate Bulk Containers and no reagents are used or processing takes place.

This provision does not apply to the warehouse operations because they exclusively handle cyanide in Intermediate Bulk Containers and no containers are opened.

Cyanide is managed on a concrete, impermeable surface designed to prevent any seepage into the subsurface. The floors are made with a concrete slab that is waterproof, non-absorbent, washable, and slip-resistant, featuring crack-free finishes for easy cleaning and disinfection. Floor drains are adequately secured with grids as protective measures. The storage and

handling of IBC-packaged solid cyanide at the warehouse is carried out exclusively on this impermeable concrete surface. For cleaning purposes, the operation utilizes machines capable of washing the pavement with minimal water usage while simultaneously collecting the used water to avoid surface water runoff. Additionally, the facility has a gutter system in place to channel any contaminated water into an underground tank, where it is later collected by a specialized company for proper disposal. Workers do not use water to decontaminate clothing, as disposable Tyvek suits are employed during operations.

The auditor inspected the Quimtia warehouse and confirmed that the concrete surfaces remain intact and free of cracks, ensuring their effectiveness in containing potential cyanide releases.

The facility does not employ or maintain systems -- such as level indicators and high-level alarms -- to prevent the overfilling of cyanide process and storage vessels. Thy only manage solid sodium cyanide pellets enclosed in IBCs (Intermediate Bulk Containers) without opening the boxes.

The warehouse floor provides adequate secondary containment for the stored IBCs. The facility is equipped with a gutter system designed to channel contaminated water into a septic tank. Compliance with this requirement was confirmed during the auditor's inspection of the site, along with a review of construction and maintenance records.

There are no cyanide solution pipelines in the warehouse.

Solid cyanide is stored within a covered, fully enclosed structure to avoid any exposure to precipitation. A safety shower is strategically situated near the cyanide storage area, designed in such a way that potential leaks will not come into contact with the cyanide containers. The storage area is equipped with ventilation systems that effectively prevent the accumulation of cyanide dust and hydrogen cyanide gas. The adequacy of this ventilation has been confirmed through visual inspections, ensuring that the warehouse remains ventilated in the unlikely event of cyanide release or contact with water.

The ventilation system is also structured to prevent steam condensation, remove heat, and eliminate odors typical of the processes. There are 35 wind extractors distributed across the storage sections, complemented by forced mechanical ventilation in the cyanide storage area. This system, designed based on detailed engineering calculations, ensures proper air circulation and full air renewal within specific timeframes. Meanwhile, office and administrative areas are ventilated through a combination of air conditioning and natural airflow.

Cyanide storage prioritizes stringent security measures to prevent unauthorized access. It is housed within a secure, fully enclosed section of the general Quimtia product storage building. This specific area is resolute solely to cyanide storage, featuring a locked access gate that can only be accessed by authorized personnel. Furthermore, Quimtia’s warehouse is situated

within a guarded industrial park where entry is restricted to authorized individuals only. The facility operates under 24/7 surveillance, supported by closed-circuit television cameras managed by a private security company.

Cyanide is securely separated from incompatible substances such as acids and strong oxidizers; no explosives are present in the area. Observations made by the auditor confirmed that in the event of material release, the flow path design ensures that emissions from different areas cannot mix under any circumstance.

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 ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 1.2

Summarize the basis for this Finding/Deficiencies Identified:

The warehouse has established written procedures for the unloading, loading, and handling of cyanide containers, as well as for managing any contaminated materials. These procedures ensure that cyanide-related materials are handled in a safe and environmentally responsible manner, effectively preventing releases and minimizing exposures.

Additionally, the warehouse is certified under ISO 14001 for environmental management, ISO 9001 for quality management, and ISO 45001 for worker safety management systems.

To verify the facility's adherence to proper cyanide management, the auditor reviewed the warehouse's written operating plans and procedures, among other documents, to confirm they address the safe handling of cyanide.

The procedure Safe Solid Cyanide Handling Procedure outlines how products should be stored in rack positions according to the designated order, ensuring the prevention of cross-contamination risks. The storage areas are correctly identified and labeled for proper organization.

The quality assurance department oversees the general verification of good storage practices, documenting the process monthly. In cases where non-conformities are identified, corrective actions are promptly implemented by the responsible parties to address the issues.

The application of these plans and procedures was verified during the site visit. Additionally,

the auditor conducted interviews with staff responsible for these operations and reviewed corresponding documentation, which was found to comply with the established requirements.

The operation procedures and practices incorporates contingency measures for handling non-standard operational scenarios, such as damage to cyanide boxes during delivery in dented or beaten sea containers, or during handling, without the release of cyanide briquettes. This particular situation is addressed in the Safe Solid Cyanide Handling, covering the reception of non-compliant sodium cyanide boxes.

The procedure specifies that if a forklift operator observes a box in poor condition, they must halt activities and inform the warehouse and distribution supervisor. For instances of minor damage, such as scrapes, minor impacts, or breakage that does not compromise the integrity of the inner big bag, the forklift operator is instructed to remove the box from the vehicle, isolate it in a designated area within the facility, and report its condition. In cases of severe damage—where boxes are significantly impacted (e.g., embedding between boxes or damage that prevents normal handling or threatens the integrity of the inner big bag)—the Health, Safety and Environment (SSMA due to its acronymous in Spanish), will assess and determine appropriate steps for withdrawing or securing the product. This may involve using girdles or slings to stabilize the affected boxes while being carefully removed using forklifts or stacker equipment and then placed at ground level. The supervisor will guide and monitor the process alongside the warehouse and distribution team. Following this, the forklift operator will encase damaged boxes in red film, label them accordingly, and store them at floor level. Additionally, the warehouse and distribution supervisor must notify the mining division about the quantity of stored non-compliant cyanide boxes.

Non-conforming products are clearly marked with a red rejection label and promptly blocked within the SAP (Systems, Applications, Products in Data Processing) system, which automatically assigns a specific storage location. SAP is a computer system that allows companies to manage their human, financial-accounting, productive, logistical resources and more. Subsequent actions depend on the nature of the defect—either raising a claim with the supplier or addressing the issue based on the Safe Solid Cyanide Handling Procedure.

Another identified contingency involves handling potential entrapment of cyanide boxes within rack structures, as outlined in the emergency response plan. If a forklift operator storing or unloading sodium cyanide boxes in Rack No. 1 observes one or more boxes tilted or trapped within the rack structure—or if personnel working in that area detect such an issue—they must immediately report it to the Warehouse Supervisor. The supervisor will then follow established procedures detailed in the emergency response plan to resolve the situation efficiently and safely.

The warehouse operation facility follows a formalized procedure for managing changes related to the site, documented as PE-RD-P-005 Change Management-V06. This procedure emphasizes identifying any modifications to the facility or its operational practices that could

potentially increase the risk of cyanide releases or negatively impact worker health and safety. Such evaluation is mandated before implementing changes to ensure any risks are appropriately addressed. The process also requires written notification to environmental, health, and safety personnel and their formal approval before changes can proceed, ensuring proper oversight and risk mitigation.

Verification of compliance involved reviewing the documented system itself and analyzing completed forms. These forms were signed off by environmental and health and safety personnel to confirm proper authorization.

The warehouse operation maintains a preventive maintenance program for equipment such as forklifts, rack stackers, racking systems, and mechanical ramps utilized in loading, unloading, and managing cyanide. This program is designed to prevent equipment failures that could lead to cyanide releases or exposures. It also includes maintenance for the tank and piping used to manage potentially contaminated wash water. However, maintenance of sea containers is not the responsibility of the warehouse.

The Maintenance Schedule outlines all planned maintenance activities, from devising the maintenance program to creating corresponding work orders. This procedure applies to all equipment, machinery, facilities, and infrastructure within Quimtia. The various preventive maintenance tasks are scheduled in the Annual Maintenance Program and documented in the Maintenance Order. These records include the basis for maintenance intervals, such as hours of operation or specific time schedules. Different types of maintenance are aligned with the respective requirements of the facility's equipment and machinery. P1M refers to monthly inspections related to mechanical and electrical operations. Longer-term schedules include P3M, P4M, and PM6 for 3-, 4-, and 6-month intervals, respectively. Annual maintenance tasks are labeled as P1A. Dock levelers in the warehouse undergo inspection and maintenance every six months.

Preventive maintenance for the four forklifts and two rack stackers is performed based on usage hours. Triton, an external contractor that rents this equipment to Quimtia, manages their preventive maintenance activities according to operational hours. Forklifts receive preventive maintenance every 3 months or after 300 hours of use, and rack stackers every 250 hours. During the audit process, auditors inspected the cyanide facility, reviewed the maintenance records, interviewed employees, and verified compliance with requirements. They also examined the annual operating certificates for the forklifts and rack stackers; these certifications are renewed every 2 to 3 years.

The warehouse does not have process parameters needing monitoring with instrumentation.

The cyanide storage facility is equipped with impermeable floors and walls to ensure secondary containment in case of a cyanide spill. The operation follows a documented procedure outlined in its Emergency Response Plan (ERP). This plan details how any water

collected within the building is managed, the process for identifying cyanide presence in the water, and the methods for treating or disposing of water contaminated with cyanide. The facility does not have any external storage areas. There is a drainage system that directs any contaminated water into a septic tank. The collected waste is then handled by the specialist company Hepar and transported to the Huaycoloro hazardous materials landfill, which is managed by the external contractor Petramas.

The Emergency Contingency Plan (ERP) details environmentally responsible methods for managing, transporting, and disposing of cyanide waste and materials contaminated with cyanide in landfills, along with the contractor's specific procedures. Additionally, training records related to the updated ERP were shared, ensuring the protocol question complied fully.

Quimtia provided details on the handling and disposal process for Tyvek suits potentially contaminated with cyanide. The Tyvek suits must be discarded after working with cyanide.

The Handbook for Good Storage Practices mandates in Section 6.3 that warehouse personnel change into clean uniforms prior to entering storage areas. These uniforms are exclusively designated for use within those areas.

Solid waste management involves storing waste in capped plastic containers lined with inner bags for easier removal. Once containers reach 75% capacity, the bags are sealed and evacuated by operators to a designated collection center within the maneuvering yard. This process follows guidelines outlined in procedure Solid Waste Management. Tyvek suits designated for disposal are kept in the Hazardous Waste Warehouse, a segregated area designed for temporary storage of hazardous waste from various company departments. These waste materials are then collected by an authorized contractor responsible for transporting them to a landfill specifically equipped for hazardous waste, accompanied by certification of proper disposal.

Quimtia stores solid sodium cyanide in Intermediate Bulk Containers (IBCs) and occasionally in drums. The warehouse has procedures to ensure that the cyanide is packaged and labeled as required by the political jurisdictions through which the packaged cyanide will, including international standards. This includes requirements for the container itself as well as for signage on containers identifying the presence of cyanide and its risks to health and the environment.

The Safe Solid Cyanide Handling Procedure requires the reception assistant to print the labels of the downloaded product according to corresponds, then proceeds the labeling considering the main data: SAP Process Control code, material description, expiration date, lot and quantity. The labeling must be done by product and presentation (drums, IBCS and boxes). UN 1689 and maritime contaminant signaling is required for each package. The procedure is in place to confirm that labeling and packaging has not been compromised when it is shipped to

customers.

Production Practice 1.3

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Quimtia submitted the format identified as CD-PE-ALM-F-002 - Cyanide Warehouse Enclosure Inspection Checklist. This document included fields designed to minimize the risk of contact between solid cyanide and external factors such as water or soil, while also ensuring that walls and floors act as impermeable barriers against potential releases. Adequate ventilation was also contemplated to prevent the accumulation of hydrogen cyanide gas, restricted access through a key locking system and verification of the condition of the warehouse cover. The format incorporated a specific revision to ensure that the safety shower located in the area did not come into contact with the cyanide containers. Procedures were also included to ensure proper separation of incompatible materials. Finally, all areas related to loading and unloading, storage areas and secondary containments were covered, aimed at identifying possible releases of solid cyanide or situations that could represent a risk of release.

The facility does not possess tanks, pipelines, pumps, or valves containing cyanide solutions. As part of secondary containment measures, the warehouse floor undergoes regular inspections to assess its integrity and ensure the gutter remains clean and functional. While Quimtia does not own the sea containers used for transportation, they inspect these containers and report any substandard conditions to the shipper when identified.

The warehouse routinely inspects loading, unloading, and storage areas, as well as secondary containment systems, to detect any release of solid cyanide or risks that could lead to such incidents, including cracks in impermeable surfaces or issues with the structural integrity of racks. The Quality Department conducts monthly inspections of the racks, warehouse infrastructure, floors, and walls to detect cracks or damages. Furthermore, the Health, Safety, and Environment (SSMA) team also performs monthly inspections with a focus on safety aspects. The auditor reviewed detailed reports documenting inspections of loading and unloading zones and cyanide storage, emphasizing the physical state of racks. Additionally, night patrols are conducted by security personnel to monitor and address any substandard conditions.

Documentation reviewed by the auditor confirmed that inspections are being carried out as

required. When deficiencies are found, appropriate clean-up measures, maintenance, and repairs are implemented promptly. Inspection forms provide clear and detailed guidance on what conditions to check and acceptable standards to maintain. The auditor's on-site inspection corroborated that the facility's inspection processes effectively identify potentially hazardous conditions.

Facility inspections are carried out regularly to detect potential issues before they pose a risk of cyanide release or exposure. Based on the auditor's assessment, the inspection frequency is adequate to ensure and document that the equipment operates within its designed parameters.

Facility inspection and maintenance records are systematically documented, covering the inspection date, the inspector's name, and any identified deficiencies. Details regarding corrective actions, including their nature and completion dates, are recorded within the SAP platform — a business process management software designed to streamline data processing and information flow. The auditor evaluated this information and confirmed its accurate documentation.

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 ☐ not in compliance with	Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

The management system outlined in Production Practice 1.2 covers all critical aspects of the operation, including the reception, storage, and dispatch of cyanide, ensuring worker safety. It incorporates inspection programs for the cyanide warehouse and preventive maintenance schedules for essential equipment. These measures are applied during routine operations, non-routine activities, emergencies, and maintenance tasks. The corresponding procedures, manuals, plans, and programs specifically address related safety considerations by detailing safe practices. The level of detail in these documents is aligned with the risks associated with each task. They also include clear guidance on the required use of personal protective equipment and the importance of conducting pre-work inspections where necessary. Pre-work inspections are mandatory for cyanide reception and dispatch activities. Additionally, the use of personal protective equipment is emphasized in procedural guidelines, safety training programs, and through signage placed in designated work areas involving cyanide.

Pre-work inspections mainly emphasize safety and operational concerns, with documentation recorded in inspection checklists, such as the CD-PE-ALM-F-002 - Enclosure Inspection Checklist. Additionally, the operation includes procedures within its emergency response plan, outlining the specific steps required to decontaminate emergency response equipment that may have come into contact with cyanide. The auditor reviewed these procedures, confirming they detail safe work practices and are effectively implemented through employee interviews and direct observation.

The operation employs a variety of methods to gather employee input on its health and safety procedures, actively considering this feedback when developing and assessing its methods. These initiatives include formal monthly safety meetings with the Health and Safety Committee, an annual safety week, suggestion boxes, and brief daily meetings. This final activity follows the Communication, Participation and Consultation Procedure, which aims to facilitate daily communication on Health, Safety, and Environmental matters. It involves all personnel, including contractors, and establishes guidelines for its implementation within

Quimtia's operations. The goal is to raise awareness among employees about preventing accidents and incidents. Topics discussed during these sessions include work procedures, risk assessments for instructions, applicable regulations, identification of substandard acts or conditions during operations, incident and accident investigation reports, and operational controls specific to the day's tasks. The auditor reviewed the written procedure, observation of meetings and suggestion boxes, documentation of formal safety meetings and interviews with personnel.

The operation has identified areas and identified activities that could expose workers to harmful concentrations of cyanide. To ensure safety, all personnel entering these production areas are required to wear appropriate personal protective equipment (PPE). Exposure to cyanide levels exceeding 4.7 ppm of hydrogen cyanide gas is not aloud as established in the work procedures and by local regulations. The areas where cyanide is present is clearly defined and outline the necessary PPE to be used. Additionally, warning signs have been placed in the warehouse where cyanide is stored to enhance safety awareness.

Quimtia was tasked with aligning the alarm thresholds of the HCN gas monitor with those listed on the safety cards worn by workers, as well as ensuring consistency with operational plans, training sessions, and official publications. Initially, the documents specified that alarms would activate at 1 and 5 ppm; however, these values needed adjustment to 1.9 and 3.8 ppm. Additionally, they were required to define the actions to be taken once each alarm level is triggered. As an improvement opportunity, it was recommended to calibrate the HCN gas sensors to 4.7 and 10 ppm, as stipulated in the Cyanide Code, even though the operation opted to maintain more conservative values.

Following the audit, Quimtia submitted updated management documents that detailed the alarm thresholds based on the calibrations of the HCN gas monitors, specifying actions for each alarm level. When the first alarm is triggered at 1.9 ppm of HCN gas, workers are to vacate the work area while monitoring gas levels. If the second alarm activates at 3.8 ppm, evacuation of the premises is required, along with the activation of the general alarm button in the storage area.

Additionally, Quimtia provided informational materials installed within the cyanide storage area and updated employee identification badges to display the revised HCN gas monitor alarm thresholds.

Warehouse operators assigned to areas where cyanide is stored are required to wear portable hydrogen cyanide (HCN) gas monitors to ensure they are not exposed to harmful levels of cyanide gas or dust. Alarms are in place to signal when HCN concentrations surpass 1.9 and 3.8 ppm of HCN gas. When the first alarm is activated at 1.9, workers must move away from the area and call the supervisor. When the second alarm sounds at 3.8, it is established that workers have to evacuate. Peruvian regulations require workers to evacuate when HCN gas levels reach the established limit of 4.7 ppm. Compliance with this requirement was confirmed

through the observation of three portable monitoring devices, specifically the Drager PAC 6000 units, being first alarm calibrated at 1.9 ppm and the second one at 3.8 ppm.

Cyanide monitoring equipment is regularly maintained, tested, and calibrated every six months following the manufacturer's recommendations. Documentation of these activities is kept on record and was accessible for the auditor's review. The calibration of HCN monitors is carried out by the external contractor IMARK, a contractor specialized in equipment verification, calibration, and certification. The calibration records provided detailed information confirming that the equipment calibration was successfully performed.

The Safe Solid Cyanide Handling Procedure requires that a buddy system is used, which is done in practice. The cyanide operators carry out their work in an accompanied way and with means of communications as two way radios and cellphones. There are also provision prohibiting an employee from entering the cyanide warehouse area or performing cyanide work alone such as loading, storage, and unloading, unless accompanied by a second employee who can immediately call for help in the event of exposure to harmful concentrations of cyanide. Also it is established that means of communication must be available to call for help in storage areas or other places that present a risk.

The Safe Solid Cyanide Handling Procedure requires for unloading, storage and subsequent dispatch of cyanide to customers, always be carried out by three people. Since the operation requires two forklift operators, one with the rack lift car, and the other with the forklift for unloading/ loading the truck, the procedure also requires the Warehouse Supervisor always to be present before and during the operation to enforce this procedure and verify the operational controls. These operators can notify and communicate with other personnel for assistance, if necessary, as all are equipped with radio. The auditor confirmed compliance with this provision through review of the cyanide operational manual, interviews and observation of employees during cyanide IBC´s reception and storage operations.

Quimtia has established procedures to evaluate the health of their employees both at the time of hiring and on a recurring basis to confirm their continued fitness for their roles. Upon hiring, employees undergo health evaluations that include examinations of hearing, vision, pulmonary function, and respirator usage capability. Subsequently, annual occupational medical analyses are conducted to monitor employees' health. The results are recorded in the Medical Surveillance Occupational Medical Examinations register and through the renewal of health cards. This ensures employees maintain good health and do not pose a contamination risk to the food products they handle. The Health and Safety Supervisor is responsible for tracking the schedule and status of medical examinations using an Excel spreadsheet. These assessments are carried out by MEPSO, the designated medical center. Documentation confirming the implementation of these health evaluations was made available for the auditor's review.

Quimtia has implemented the Manual of Good Practices to ensure that no individual working at the facility leaves the premises with cyanide contamination on their clothing. All warehouse

operators are required to change into designated attire before entering warehouse areas. This clothing remains on-site after their shift to be properly laundered. In areas where there is potential exposure to cyanide, operators are mandated to wear disposable Tyvek overalls for added protection.

The standard required work attire consists of a long-sleeved t-shirt, pants, a helmet, steel-toe shoes, a dust mask, and gloves, as appropriate to the specific task. Warehouse operators are required to change into their designated uniforms before entering the facility. These uniforms must be clean and reserved exclusively for activities within the designated area. Uniforms are cleaned through a third-party laundry service provided by Quimtia, and it is the responsibility of employees to place their soiled uniforms in the designated bins for collection. Compliance with uniform usage is verified using the Inspection of Good Storage Practices of the Distribution Center register format. Quimtia considers that during normal working conditions with cyanide, there is no risk of cyanide dust contamination on clothing handled by the third-party laundry service “Lavandería Econo Lava SAC” . According to the Emergency Response, in case of a cyanide spill emergency, all clothes of workers participating in the emergency will be discarded. This confidence is based on the fact that in normal working conditions, workers dealing with cyanide wear disposable Tyvek suits, and cyanide containers are never opened. The laundry service is fully aware that they are washing work attire from a facility that handles various chemicals, including hazardous materials, and they have put measures in place to prevent any potential exposure.

Quimtia has installed clear and easily readable signage across the cyanide operation area to ensure all workers potentially exposed to cyanide are informed of the associated risks and adhere to necessary safety precautions. These signs emphasize the presence of cyanide and the importance of using appropriate personal protective equipment. Compliance with these measures was confirmed by the auditor through on-site observations of the signage, interviews with personnel, and an evaluation of the facility's overall safety and cyanide-related training programs.

Quimtia enforces a strict prohibition on smoking, eating, drinking, and open flames in all areas of its warehouse storage facility, particularly in locations where cyanide is present. This policy is incorporated into the operation's safety training program and reinforced through the use of clear signage in these designated areas. The auditor examined the training plans and attendance records, conducted employee interviews, and inspected on-site signage throughout the facility, confirming that these measures are in full compliance with the established provision.

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 ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 2.2

Summarize the basis for this Finding/Deficiencies Identified:

The operation maintains a documented Emergency Response Plan (ERP), identified as PE-SSMA-PL-007- Emergency Response Preparedness Plan with Solid Sodium Cyanide, which outlines the required actions in response to cyanide gas inhalation or skin contact with cyanide. This plan includes a Medical Response Flowchart, and a poster providing instructions for managing cyanide exposure is displayed in the cyanide storage area.

Safety showers, eye wash stations, and fire extinguishers are readily available in areas of the warehouse where workers might face cyanide exposure. The facility is equipped with multiple showers and low-pressure eye wash stations strategically positioned throughout the warehouse due to the presence of various chemicals. One particular station, designed and maintained to minimize the risk of water contacting cyanide containers or spilled cyanide during handling, is situated outside the confined cyanide storage racks. The eye wash stations operate at low pressure to prevent contaminants from being forced deeper into the eyes.

During the audit, the operation was reviewed to confirm the availability and function of emergency showers, low-pressure eye wash stations, and non-acidic dry powder fire extinguishers in relevant areas. The auditor tested the emergency showers, verifying their functionality, and inspected the eye wash stations to ensure they were operational and maintained appropriate water pressure. Maintenance and inspection records were also reviewed, confirming that these safety measures undergo regular evaluations to ensure readiness in case of emergencies.

The cyanide storage area is equipped with a specially designed firefighting system tailored to its unique requirements. This system incorporates an enclosure with at least three hours of fire-resistant insulation, as stipulated by the National Building Regulations (RNE), Article 169 - RNE A130, due to the high risk associated with storing over 70 kg/m² of wood from cyanide boxes. To ensure this area remains separate from the rest of the warehouse, forced ventilation is in place, and the water sprinkler meshes om the general warehouse have been removed from within the insulated enclosure. This setup is designed to eliminate the risk of accidental water intrusion, even during an earthquake.

Dry chemical powder (PQS) serves as the extinguishing agent in this system, working alongside a VESDA-type smoke suction detection system. This detection system is designed to issue a pre-alarm signal and an alarm signal based on the detected smoke concentration levels. Upon a pre-alarm signal, a notification is transmitted to the fire control panel in the Security and Control office. Field personnel are then dispatched immediately to investigate and determine the cause of the pre-alarm within the sodium cyanide area.

If an alarm signal is triggered, the area is promptly sealed off to further assess and address the source of the alarm. In such scenarios, portable PQS extinguishers are employed to suppress any fires that may have started. To summarize, the protective measures implemented for the cyanide storage area include the coordinated use of PQS extinguishing systems, advanced smoke detection technology, and swift response protocols:

- The area is secured with a fire-resistant wall designed to provide at least three hours of protection, constructed using 20 mm magnesium oxide boards (MGO) carrying European CE Certification. The wall stands approximately 16 meters high, extending to the ceiling of the main building. It includes an entrance door on the front side, while the back and side faces are integrated into the building's structure.

- To protect the fire wall from potential impacts caused by forklifts or other moving equipment, bollards are installed as an added layer of defense.

- The enclosure features a motorized roller fire door integrated with a control system designed to respond to signals from the fire panel. In case of a fire alarm, the door will automatically close to help contain the fire.

- The space utilizes a ventilation and mechanical extraction system capable of renewing the interior air volume at a rate of nine cycles per hour. This system consists of five ventilators in the exterior-facing side wall and five extractors located on the roof. Controlled by a central panel, this system will shut down automatically during a fire alarm to prevent oxygen supply and limit the release of cyanide in case of combustion.

- The fire detection system relies on both suction and temperature monitoring. A cable-based temperature detection component, preset to activate at 68°C, will send an alarm signal once temperatures around it exceed the factory-calibrated threshold.

- For manual firefighting, the site is equipped with four high-capacity wheeled extinguishers containing 100 kg of chemical dry powder (PQS). These extinguishers have a spray range of up to 18 meters and are strategically placed to cover the cyanide storage area. In scenarios where either a pre-alarm or full alarm is triggered within the cyanide storage rack, or in the event of an evident emergency, security personnel will

verify the situation and respond by using the extinguishers to suppress the fire effectively.

All equipment undergoes regular maintenance and testing to ensure optimal functionality in case of an emergency.

The warehouse operation is equipped with the necessary tools to respond effectively to potential worker exposure to cyanide stored at the medical center. Their resources include a medical-grade oxygen bottle with a 3,200-liter capacity, fitted with a valved mouthpiece that doubles as a resuscitator. Additionally, they maintain three cyanide antidote kits containing amyl nitrite, sodium thiosulfate, and sodium nitrite. During the audit, it was verified that the antidotes were within their expiration dates and stored at temperatures recommended by the manufacturer to ensure their effectiveness when needed.

The facility conducts monthly inspections of its cyanide first aid equipment; inspection records were available at the time of the audit covering inspections of both the oxygen supply and cyanide antidote kits.

For emergency communication purposes, the facility is equipped with two way radios, cell phones, telephones and an alarm system, which are readily accessible. Auditors confirmed adherence to this provision by inspecting the site and consulting with employees.

The warehouse operation inspects their cyanide first aid equipment monthly; inspection records were reviewed in occasion of the audit.

Quimtia submitted the updated comprehensive checklist for first aid equipment under the inspection form F-PE-SSMA-C-004-005, titled First Aid Accessory Inspection. They also included examples of inspections performed using the revised format.

The auditor confirmed the dates on antidotes have not expired and also that they are stored at the temperature specified by their manufacturer to ensure it will be effective when used.

Employees have access to the Safety Data Sheets (SDS) and information on cyanide first aid in areas where cyanide is manipulated. All safety information provided by the operation is in Spanish, the language of the workforce. The auditor observed that safety and warning signs, SDS and first aid procedures are available within the context of the operation’s overall safety and training programs. The auditor found the SDS corresponded to the manufacturer's brand. In addition, Quimtia reviewed the purchasing procedure to include as a necessity, the request to the cyanide suppliers, the mandatory shipment of the SDS in Spanish and other technical documents with each cyanide dispatch.

The warehouse handles cyanide exclusively in its solid form. All IBC containers of cyanide within the warehouse area are clearly labeled for identification. Compliance with this requirement was confirmed by the auditor following an inspection of the cyanide containers

stored on-site.

Quimtia has established procedures for handwashing or showering for individuals who have been in areas of the facility that may pose a risk of skin exposure to cyanide. The Manual of Good Storage Practices outlines the necessary controls for employee decontamination, supplemented by the Hand Cleaning and Disinfection Instructions. Personnel hygiene controls are monitored and recorded using the checklist Inspection of Good Practices of Storage at the Distribution Center. The auditor reviewed these procedures and confirmed their implementation through both employee interviews and direct observations.

The warehouse employs operations personnel trained in on-site cyanide first-aid, prepared to respond to cyanide exposure incidents by administering oxygen and amyl nitrite. Intravenous antidotes, however, will be administered by external medical professionals. Staff responsible for transferring contaminated patients to the emergency department will ensure the antidote kit is carried during transport. The auditor assessed the training records, confirming that these personnel have received first-aid training specifically for workers exposed to cyanide, including the proper use of oxygen. The auditor interviewed a first aid brigade member who was qualified to administer oxygen for cyanide exposure emergencies.

Quimtia has established a written procedure in the ERP to address situations where an exposed worker needs transportation to an off-site medical facility for treatment. According to the ERP, the Health and Safety department is responsible for coordinating with Healthy World, an external medical contractor hired by Quimtia, to arrange the transfer of the injured individual either by ambulance or private transportation to the nearest appropriate medical facility.

Quimtia issued an updated version of the Emergency Response Plan (ERP), specifying that the injured individual will be accompanied by either the area manager, a member of the first aid brigade, or medical personnel. The plan also includes the use of a Quimtia vehicle if the ambulance is delayed, ensuring that both the oxygen tank and cyanide antidote are transported to the hospital with the victim. These actions are subject to confirmation by medical professionals based on the specific circumstances and condition of the affected individual.

Quimtia has established a formal arrangement with Healthy Word to coordinate the transport of a cyanide exposure victim to an off-site medical facility for treatment. The designated facility, Clinic San Pablo – Surco, has been identified as having qualified staff, appropriate equipment, and the necessary expertise to manage such cases. Since the clinic does not maintain its own supply of cyanide antidotes on-site, Quimtia will ensure the antidotes are carried in the ambulance accompanying the patient. These antidotes will then be administered by the clinic's medical personnel. The auditor has reviewed the operation's documentation regarding this coordination to confirm that proper measures are in place to provide adequate care for affected individuals.

Quimtia has established a documented procedure for investigating and evaluating incidents, such as cyanide exposure, to assess whether the operation's policies and prevention programs are sufficient or require revisions. The auditor reviewed the documented procedure titled Accident and Incident Investigation PE-SSMA-P-004, along with records of previous investigations. This procedure features a flowchart outlining the required actions following the initial accident report and provides a detailed step-by-step guide for completing the process, culminating in corrective actions and communication with all personnel.

There have been no cyanide-related incidents; however, a review of records for other accidents and incidents confirms that the general investigation program for such events is effectively implemented.

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
- ☐ not in compliance with

Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

The warehouse operations do not release potentially contaminated water, such as wash water or rainwater, into streams, rivers, or other surface water bodies. Local regulations do not require Quimtia to monitor surface or groundwater quality. The warehouse facilities are strategically located away from areas prone to flooding or close to watercourses. Since the cyanide warehouse exclusively handles cyanide in solid form, the risk of indirect discharge is primarily limited to leakage or spills coming from wash water systems or secondary containment that might infiltrate into subsurface water before reaching a surface water body. To mitigate these risks, the warehouse floors are sealed to prevent any leaks into the subsoil. Additionally, water generated from cleaning activities or emergencies is directed through gutters into a septic tank, which is completely isolated from any external sewer networks.

The facility does not release any direct or indirect discharge into surface water.

The facility has no direct or indirect discharge to surface water. The warehouse facility that exclusively manages unopened packages of solid cyanide.

Apart from utilizing portable HCN monitors to ensure safe operations, the operation does not engage in additional monitoring. Local authorities do not require Quimtia to monitor emissions, due to its activities.

Quimtia does not carry out environmental monitoring. Local authorities do not mandate Quimtia to monitor emissions.

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 ☐ not in compliance with	Standard of Practice 4.1

Summarize the basis for this Finding/Deficiencies Identified:

The facility trains its workers to understand the dangers of cyanide during initial training (induction) which includes the necessary training elements in cyanide recognitions, its effects in human health and in recognizing cyanide intoxication symptoms, and procedures to follow in case of exposure to all personnel who may encounter cyanide. Also, conducts periodic refresher training annually.

Quimtia has developed comprehensive training programs and materials designed to equip all personnel who may come into contact with cyanide with essential knowledge. These programs cover identifying cyanide materials present on-site, understanding the health impacts of cyanide, recognizing symptoms of cyanide exposure, and following proper procedures in case of an exposure incident. To ensure this critical information is retained, periodic refresher training sessions are conducted.

The auditor examined the Health, Safety, and Environment Program, which incorporates cyanide-related training within its Induction and Training Program and mandates regular refresher courses. Additionally, the review included the presentation titled "Safety Induction in the Handling of Sodium Cyanide," attendance records from training sessions, and interviews with employees. These steps confirmed that cyanide hazards are thoroughly addressed and that personnel who may be exposed receive both initial and ongoing training.

Quimtia provides training to its workers on the correct use of personal protective equipment (PPE), ensuring they understand the specific PPE requirements for various tasks and designated areas within the facility. Guidelines regarding PPE usage are incorporated into the operating procedures, safety training programs, and reinforced through signage in relevant work areas.

The auditor reviewed documentation related to the facility's annual training included in the

Induction and Training Program: Correct and Safe Use of Personal Protective Equipment. This program is overseen by the Health, Safety, and Environmental (HSE) supervisor, who is responsible for training operational personnel. Additionally, the auditor observed employees actively using PPE at the facility and conducted interviews to verify their training. The findings confirmed compliance with established standards.

All staff involved in cyanide management are trained to carry out their responsibilities safely and in an environmentally responsible way. Task-specific training ensures employees understand how to perform their duties safely, following the established procedures designed to prevent exposure and releases. Compliance was verified through interviews with personnel engaged in cyanide-related activities and by reviewing the operation's training materials, such as the Safety Induction for Sodium Cyanide Handling and recorded training support documents.

Employees receive task-specific training before being permitted to work unsupervised with cyanide. This requirement is outlined in the organization's work procedures as well as in the Induction and Training Program. The auditor confirmed compliance by examining training materials and records and conducting interviews with both operational and supervisory staff. Additionally, the auditor reviewed the Excel spreadsheet titled "Registration of Personnel Authorized for the Activity of Handling Sodium Cyanide." According to this document, only five forklift operators are authorized to handle cyanide, having completed training in operational safe work practices related to cyanide, the sodium cyanide safety data sheet, and HAZMAT III courses.

Annual refresher training on standard tasks involving cyanide is conducted to ensure employees maintain safe practices and uphold environmental protection standards. This training is tailored to their specific responsibilities and focuses on cyanide safety. A personnel register documents the dates of each individual's annual refresher training for cyanide-related work. Formal evaluations are confirmed through a review of the corresponding evaluation records.

The Warehouse Induction and Training Program outlines the specific aspects of cyanide management that each job role must be trained on to effectively carry out the required tasks. Training aligned with the operating procedures detailed in the Sodium Cyanide Handling Booklet fulfills this requirement, as do the procedures outlined in the Reception of Materials and Supplies and the Chemicals Reception Booklet. These resources identify the critical elements that need to be communicated to new employees about performing cyanide-related tasks. The auditor reviewed the training materials and conducted interviews with both workers and trainers, concluding that this requirement is being met.

Employee task training is carried out by both internal staff, such as SSMA supervisors with extensive training experience and skilled operators who are well-versed in the specific tasks, as well as external contractors who specialize in effective communication strategies. The

verification process involved conducting interviews with the internal trainers to assess their expertise in facility operations and training methodologies, confirming that these meet the required standards.

Quimtia assesses the effectiveness of its cyanide task training by conducting employee tests at the conclusion of the training and observing employees as they perform their tasks following the initial instruction. The auditor examined records of formally documented evaluations and confirmed that they were in compliance.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

Employees in areas where cyanide is present receive training on how to respond if they detect a cyanide release or exposure. They are instructed to contact the designated Emergency Response Team (ERT), which is responsible for administering cyanide first aid.

All workers undergo a Safety Induction on the Handling of Sodium Cyanide, covering topics such as first aid, medical treatment, spill management, and decontamination. The auditor assessed this training by reviewing materials, attendance records, and comprehension tests, confirming compliance with requirements.

Additionally, the auditor evaluated the training program tailored for the Emergency Response Team. This included a review of procedures and plans to ensure the operation's response structure is well-defined and that appropriate training is delivered to site personnel. Verification involved examining response plans, training records, and conducting interviews with facility staff.

The Emergency Response Team (ERT) is trained to handle cyanide exposure incidents and execute release response measures in accordance with the protocols outlined in the operation's Emergency Response Plan (ERP). The operation's employee training requirements, along with detailed records of the training provided, are incorporated into its training program and ERP. These records, reviewed by the auditor, also include training on hazardous materials (HAZMAT).

Emergency response training records are maintained for the duration of each employee's tenure. Auditors examined these records and conducted interviews with trained staff to verify

compliance with this requirement. The documentation includes details of the training received, such as the names of both the employee and the trainer, the training date, the topics addressed, and the methods used by employees to demonstrate comprehension of the material.

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 ☐ not in compliance with	Standard of Practice 5.1

Summarize the basis for this Finding/Deficiencies Identified:

Quimtia has implemented an emergency response system consisting of a coordinated network of members working interactively and systematically to manage any emergencies that may occur during the reception, storage, or dispatch of sodium cyanide, chemicals, and other hazardous materials in the warehouse.

The operation has developed the PE-SSMA-PL-007- Emergency Response Preparedness Plan with Solid Sodium Cyanide (the ERP or the Plan) to address incidents related to cyanide release emergencies. This plan serves as a comprehensive guide specifically tailored to cyanide-related emergency response protocols. Additionally, it includes key publications such as the Cyanide Exposure First Aid Instruction manual and a detailed Medical Care Flowchart, which also lists emergency contact numbers. Both documents are prominently displayed in the warehouse for accessible reference.

The Plan accounts for emergency scenarios related to cyanide exposure. It outline actions for handling a cyanide spill on wet soil and details response procedures for the identified emergency situations.

The Plan comprehensively addresses potential release scenarios at the site in a practical and detailed manner, tailored to the specific circumstances of the operation. The Plan and associated documentation focus on site-specific conditions, particularly regarding cyanide, and outline responses to mitigate risks effectively. The auditor reviewed these documents and confirmed they sufficiently address potential release scenarios that could cause significant impacts to workers, the surrounding community, and the environment, based on the operational and environmental context of the site.

The Plan accounts for both minor and major cyanide spills, outlining emergency response procedures to contain and control releases at their source. During cyanide reception, storage, and handling of IBCs (Intermediate Bulk Containers), the warehouse limits operations to one

box at a time. This ensures that any potential release would be restricted to a maximum of 1.1 tons of solid cyanide, which can be effectively contained within the warehouse premises. To eliminate the risk of a large-scale or catastrophic hydrogen cyanide release caused by contact with water, the automatic fire water sprinkler system which the rest of the warehouse has, was removed from the roof of the cyanide storage area. Additionally, the warehouse is located in an arid region without flood risks.

The ERP also considers potential releases of solid cyanide during storage, loading, and unloading activities but does not include scenarios involving pipe, valve, or tank ruptures as none of these components are present in or near the cyanide storage area.

In the event of power outages or equipment failures, warehouse operations would cease immediately, avoiding any escalation into an emergency scenario. Furthermore, there are no ponds, tanks, or waste treatment facilities on-site. If necessary, the mechanical ventilation system can operate via a backup generator. A 30 kW generator has been allocated for this purpose, providing sufficient power to maintain the extraction system as per engineering specifications.

The Plan outlines the types of incidents and response measures that may occur at the facility. It details the necessary actions required for individuals managing the emergency, including evacuating personnel from the work area and the warehouse. There are no nearby communities potentially at risk from exposure in the area. The emergency scenarios covered in the Plan are related to the risks involved in handling boxes and cylinders containing sodium cyanide. These include incidents such as solid cyanide spillage during reception, storage, or dispatch—both with and without the release of HCN gas—worker intoxication from HCN, fires in the cyanide storage area, and spills involving incompatible chemical products.

The Plan specifies the use of cyanide antidotes such as amyl nitrite, sodium nitrite, and sodium thiosulfate. Injectable antidotes should only be administered by certified external medical professionals, as Quimtia personnel are not trained for this task. First aid measures outlined in the Plan include the administration of oxygen among other immediate responses for managing cyanide exposure.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has engaged its on-site personnel in the development of the emergency planning process. Additionally, stakeholders, such as the tenant of the facility complex housing the warehouse, are included in sharing the emergency response strategy. As the warehouse is situated in an industrial area with no nearby residential communities, the potential impact on these stakeholders has not been considered in the plan, nor has their involvement been required for emergency response planning.

In the event of a major cyanide spill, the external contractor IFSEC Group, a company specializing in risk prevention, emergency response, and environmental management, will provide assistance. For tasks related to the collection, destruction, and final disposal of solid waste from the spill, Hepar will collaborate with the external contractor Petramas. Furthermore, Civil Defense units and firefighters review the emergency plan as part of the evaluation process necessary for granting and renewing the operating license of the chemical products warehouse.

Community engagement has involved collaboration with local municipal authorities, meetings with Civil Defense and firefighters, and thorough inspections. A review of potential releases from the warehouse facility and the surrounding distances concluded that no community is at risk of being affected. The warehouse is situated in an industrial area, and the worst case scenario would involve an IBC being dropped during cyanide handling, leading to a maximum spill of 1.1 tons of solid cyanide. It was assessed that the impact of such an incident would be confined to the transfer facility building. The Plan's immediate response and cleanup measures effectively minimize hydrogen cyanide generation and restrict the area of influence.

External emergency response organizations such as firefighting units and medical assistance services play specific roles in the emergency response framework and are duly identified within the Plan. Healthy World has been contracted externally to support the Plan by offering ambulance services and immediate medical attention during emergencies. In cases of cyanide exposure, the contractor is responsible for transporting affected workers to Clinic San Pablo – Surco, the closest medical facility equipped to handle such incidents.

Regular collaboration occurs with Healthy World, IFSEC Group, and firefighters, as they hold

specific responsibilities outlined in the Plan. However, the Plan does not assign any responsibilities to communities. The auditor's observations are based on interviews conducted with on-site staff. Quimtia remains actively involved in supporting the continuous improvement of the Plan.

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 ☐ not in compliance with	Standard of Practice 5.3

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan designates the Vice President of Administration and Finance as the primary emergency response coordinator. This individual is granted explicit authority to allocate the resources necessary to implement the Plan. An alternate coordinator is also designated, with the Administration and Finance Section being responsible for ensuring the availability of resources required to address emergencies. The equipment list in the Emergency Response Plan includes all essential items such as the oxygen bottle, HCN sensor, cyanide antidotes, and the HCN detector.

The Plan also identifies the Emergency Response Team, and states the required training for emergency responders, such as HAZMAT and first aid training. Additionally, the Plan provides call-out procedures and 24-hour contact details for coordinators and team members, along with their specific roles and responsibilities. The Plan includes a list of all emergency response equipment that must be readily available. It mandates routine inspections of this equipment to ensure its availability when needed. Furthermore, external responders, such as firefighting units, Healthy World for medical assistance, and IFSEC Group, are assigned specific roles in the emergency response process. Through warehouse inspections and employee interviews, the auditor verified that all identified measures and provisions are being actively implemented at the site.

Quimtia provided records confirming that external emergency response organizations had been contacted and provided them with the updated version of the emergency response plan. Quimtia has invited the firefighters to participate in the next emergency mock drill to be conducted in the warehouse. Regarding the medical services contractor Healthy World, they have measure the time it takes the ambulance to arrive to the warehouse.

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 ☐ not in compliance with	Standard of Practice 5.4

Summarize the basis for this Finding/Deficiencies Identified:

Quimtia's Emergency Response Plan outlines essential procedures and contact details for notifying relevant parties during an emergency. These include the company's management, regulatory agencies, firefighting teams, external response contractors, and medical facilities, based on the situation. The plan mandates notification to the International Cyanide Management Institute in cases of cyanide emergencies classified as a "significant cyanide incident," as defined in the Code's Definitions and Acronyms.

The plan also features flowcharts detailing the emergency call-out procedures, encompassing management, contractors, emergency response teams, external response providers, and medical facilities. Responsibilities for all roles and entities mentioned in the plan are clearly outlined. Additionally, it includes updated contact information for notifying the appropriate regulatory agencies. The auditor has reviewed the Emergency Response Plan to confirm its accuracy and ensure all details remain current and complete.

The warehouse is situated in an industrial area, isolated from any nearby residential communities. Quimtia's hazard evaluation identified the worst-case scenario within warehouse operations as the accidental dropping of an IBC, potentially resulting in a maximum spillage of 1.1 tons of solid cyanide. It was concluded that the impact of such an incident would be confined to the warehouse premises. The immediate response and cleanup measures outlined in the Plan help minimize the generation of HCN and restrict its influence on the affected area.

Additionally, the Plan details procedures for notifying external support to enhance the effectiveness of emergency response efforts. It also incorporates strategies for engaging and communicating with media outlets in case of an emergency. This information was reviewed by the auditor as part of the Emergency Response Plan.

The Emergency Response Plan includes a requirement and details to notify ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such communications have been done as there was no significant incident in the operation.

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 ☐ not in compliance with	Standard of Practice 5.5

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan for the warehouse focuses on the recovery of solid materials, decontamination of affected media, and the management and disposal of debris resulting from spill clean-up. It does not include provisions for alternate drinking water supplies as the operation handles solid cyanide exclusively on impermeable surfaces, minimizing the likelihood of contaminating any drinking water sources. Despite receiving its drinking water from the public network, warehouse staff consumes bottled water exclusively.

Protocols for managing released sodium cyanide solids indicate these will be collected by a specialized company, Hepar, for final disposal via external contractor Petramas at the Huaycoloro landfill. The cyanide neutralization and spill decontamination procedures specify the chemical agents required and their storage locations. For cyanide neutralization they will use caulk and for decontamination will use with 5% sodium hypochlorite (common chlorine, commercial bleach). Soil remediation is not part of the plan since all warehouse operations are conducted on impermeable concrete and asphalt surfaces.

There is no surface water in the surroundings of the warehouse. Closest surface water bodies to the property are the Pacific Ocean 4,000 m to the west and the Lurín river 8,500 m north of the site. According to the Auditor Guidance for Gold Mines of the ICMI, the auditor considers this prohibition does not apply as the warehouse also does not have drainages that connect to surface water gradient below. All drainages in the plant are collected into an internal tank. In the area where the plant is located annual precipitation rate is extremely low, being 9.3 mm /year as average of the last 10 years according to data from INEI (National Institute of Statistics and Informatics).

However, the ERP and the contractor´s (IFSEC) procedures prohibits the use of chemicals on surface waters, such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide, finding this in conformance.

The Plan does not account for the potential requirement of environmental monitoring to determine the extent and impact of a release. This is because all activities within the warehouse take place under a roof on waterproofed surfaces comprised of concrete and

asphalt flooring, and there are no surface water bodies in the vicinity of the warehouse.

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 ☐ not in compliance with	Standard of Practice 5.6

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan outlines the requirement for an annual assessment or post-emergency evaluation of the plan's adequacy. This includes verifying the emergency telephone contact list, as well as ensuring the accuracy of the names and contact details for Emergency Response coordinators and Response Team members.

The operation's Emergency Response Plan mandates conducting annual mock emergency drills to assess the organization's strategies, training, resources, and overall readiness to handle scenarios involving cyanide releases and worker exposures.

In October 2023 Quimtia conducted an emergency drill simulating a cyanide spill with worker exposure with participation of 44 workers. In September 2025 Quimtia conducted another emergency drill simulating a cyanide spill with worker exposure with participation of 18 workers. The auditor reviewed the drill reports and verified compliance with established requirements. The operation meticulously documented the emergency scenarios, listed participating personnel, outlined the response actions undertaken, and evaluated the effectiveness of procedures as well as the adequacy of training for response teams.

Quimtia added a directive to its Emergency Response Plan (ERP), specifying that an evaluation should be conducted after any emergency necessitating its implementation. However, during the three-year recertification period, no such reviews were conducted, as no cyanide-related emergencies occurred.