Submitted to:

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

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

TRALEX
SOLUCIONES INTEGRALES DE TRANSPORTE S.A.C.

P.J. Semi Rural Pachacutec Grupo Zonal 3,
MZ. 4, Lote 8, Colorado, Arequipa / Perú
Transportation Company
Three year cicle recertification
Preoperational audit

Submitted by:

Geosoluciones Panamá, S.A.
Jorge Chong, Lead & Technical Auditor
Avenida Héctor Santacoloma, 23 - Verdún
Santiago de Veraguas, Republic of Panama

TRALEX, S.A.C.		August 14th, 2023
Name of Operation	Signature of Lead Auditor	Submittal Date

JUNE 2021

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A- Operation General Information

Name of Transport Operation: TRALEX Soluciones Integrales de Transporte, SAC (TRALEX)
Name of Facility Owner: TRALEX Soluciones Integrales de Transporte, SAC (TRALEX)
Name of Facility Operator: TRALEX Soluciones Integrales de Transporte, SAC (TRALEX)
Name of Responsible Manager: Paul Rodríguez
Address: P.J. Semi Rural Pachacutec Grupo Zonal 3, MZ. 4, Lote 8, Cerro Colorado
State/Province: Arequipa | Country: Peru
Telephone: (+51-54) 607461 | Lima: (+51-1) 6513232
Fax: (+51-54) 607462 | Lima: (+51-1) 651323
Email: prodriguezc@dcrmineriayconstruccion.com

B- Operation Location Detail and Description:

"TRALEX Soluciones Integrales de Transporte, SAC" (TRALEX), located at "P.J. Semi Rural Pachacutec Grupo Zonal 3, MZ. 4, Lote 8, Cerro Colorado, Arequipa - Perú", is a company dedicated to land freight transport with more than 12 years of experience in transportation. It has been associated since its beginnings to the mining sector. Its philosophy is based on commitment, efficiency, and quality of its human resources.

This company develops ground transportation services of hazardous materials and products based on certified and internationally audited experience, for mining and industrial companies aligned to national regulations. It follows national, international and innovation standards, promoting the success of their clients with comprehensive solutions tailored to their needs, facilitating the development of employees, generating sustained profitability for their shareholders, and all-around giving a positive contribution to society.

TRALEX intends to transport solid cyanide using metal containers (drums) weighing 50 kg from the producer HEBEI CHENGXIN CO. LTD. Additionally, they plan to transport cyanide in "interior Poly-propylene super-sack" form, weighing up to 1 ton, from the producer ORICA. Both types of shipments will be transported in sea containers.

The weight of the 20-foot sea containers when loaded with cyanide would be 25 tons, and the maximum allowed payload for the low-bed trailer is 30 tons.

The weight of the 40-foot sea containers loaded with cyanide would be 22 tons, and the maximum allowed payload for the flat-bed platform is 30 tons.

TRALEX also intends to transport cyanide in Isotanks, where the gross weight of the sea containers is 20 tons, consisting of 17 tons of cargo and 3 tons for the weight of the structure.

The first pre-operational certification was granted on June 5, 2020.

Since of the first recertification preoperational audit date, no cyanide transport has been performed. The company has planned to start with two routes: Cerro Óxidos and Pucamarca. Letters have been issued to police stations, health centers, firefighters and municipal authorities on the routes to be traveled.

In the two routes, the risks have been identified based on the route selection procedure.

Auditor's Finding

This operation is

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

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

Auditor Information

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

Auditor 1: **Jorge Efrén Chong Pérez, Lead Auditor** _____
Name Signature

Dates of Audit: May 18th, 2023

Auditor Attestation

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

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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Principles and Standards of Practice

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.

The operation is

- ✓ in full compliance with Standard of Practice 1.1

Summarize the basis for this Finding Identified:

Document TRL-OPEpro008 Rev.03 was updated on October 26, 2023.
In section 6H, the criteria for describing the route were addressed. These criteria include:
- Identifying school zones.
- Marking pedestrian crossings.
- Recognizing agricultural areas.
- Noting the presence of water.
- Managing temporary detours.
- Keeping track of the start of construction, closed roads, and sealed roads.
- Identifying unpaved roads.
- Any unexpected or occasional conditions will be identified in the Hazard Identification and Route Risk Assessment procedure, which is an ongoing process.

In section K, there is information about communication with external response personnel on the route. This activity should be carried out before the first transport along the chosen route and then annually to update the contact information for the relevant institutions.
Additionally, in section L, details about updating the selected routes were included.
Before the first trip, TRALEX will proceed to reevaluate the selected "Active Routes" to confirm that no new dangers, risks and/or route modifications have arisen that alter the degree of safety of the selected route.

-Likewise, whenever a driver observes any changes in the route, they will inform the operations management through the Hazardous Materials Travel Report. This ensures that regular reports from drivers regarding the condition of the roads are available.
TRALEX incorporates likely risk scenarios identified using Procedure, TRL-SEGpro005-v02: Hazard Identification and Route Risk Assessment Procedure (IPERC). Furthermore, in the TRL-Fope004 Route Selection Report and TRL-Fope001 Hazardous Materials Travel Report, any observations,

deviations, and risky anomalies encountered during the transportation of Sodium Cyanide will be reported.

The document considers the following updates.

- Change of those responsible for safety and environmental management
- Change from Operations Manager to Central Manager
- Change from Head of Safety to QHSE Coordinator
- Change of Escort Supervisor to MATPEL Supervisor (Hazardous Materials supervisor)
- Inclusion of Head of Operations/MATPEL in those responsible.
- Inclusion in section 5.2. Abbreviations: QHSE
- Elimination of point K. Route accessibility report in section 6. Development.
- Disabling of the document TRL-Fope005 Route recognition.

Risk controls are documented in the baseline Hazard Identification and Route Risk Assessment matrix, referred to as "matriz de identificación de peligros y evaluación de riesgos en ruta (IPERC)." The identified risks are actively communicated and addressed through training. Furthermore, drivers regularly perform continuous IPERC assessments before commencing their daily cyanide transportation tasks. This ongoing practice ensures that they remain constantly vigilant about route hazards and risks, and they are well-prepared to implement control measures to safeguard their own safety and the safety of others.

During the planning of the transportation process: Before the first trip on the evaluated route, a tour will be made to verify that there have been no changes that could put the transportation process at risk since the initial evaluation.

On subsequent trips, in each trip report, drivers document any findings that could negatively impact transportation safety.

The Hazardous Materials Supervisor (Matpel) must coordinate with the Safety Manager to assess the weather conditions at various destinations through the SENAMHI website and coordinate with the Fire Department.

During the loading process, the Hazardous Materials Supervisor will coordinate the trip scheduling. Drivers must ensure that their documentation is in order and confirm the gross weights using the certificate of weights and measures provided by the supplier.

Once the trucks are loaded, they will depart from Lima and follow the designated transportation routes indicated in the route sheets. For operational control and emergency response, escort

vehicles will be used in accordance with the Route Hazard Identification and Risk Assessment (IPECR). These escort vehicles are tasked with providing assistance in case of any event that requires it.

During the route, the Soluciones Integrales de Transporte S.A.C. (TRALEX) drivers must share status updates of each of their transport units with the Cyanide Supplier companies at the established control points throughout the day. They will indicate their current location and the estimated delivery time of the product.

Before starting each trip, the Matpel Supervisor must provide instructions on the handling of sodium cyanide and inform drivers about the risks, controls and precautions identified in the route assessments.

The topics for the 5-minute briefings will be chosen by the Hazardous Materials Supervisor (Matpel) based on the needs he deems necessary. However, it is essential to always include a discussion of the characteristics of cyanide and the fundamental guidelines for emergencies on the route. Afterward, drivers will sign the record forms for the 5-minute briefings, which will cover aspects of the journey's characteristics and topics related to safe travel on the route.

The possibility of transporting cyanide to the Volcan and Pucamarca mines is being negotiated. For these two routes to these mines, there is a route evaluation.

MATPEL supervisors in trip reports place the findings on page 2 if there was any deviation at a certain mileage or time. All reports are reviewed by ANDY DÁVALOS, head of MATPEL. The escort check list form remains unchanged. This procedure has not been modified.

This process is carried out every time the supervisor identifies any change in the route. He/She will inform operations management in the *Hazardous Materials Travel Report* "Informe de Viaje de Materiales Peligrosos" (form TRL-Fope001) that can be found in the periodic reports from the route supervisor or drivers on the state of the roads.

The measures for risk analysis will be taken into consideration previous travel reports, however, if some time has passed or at least a month before performing the service.

In the 2023 audit, the procedure is maintained.

6.1.2 c of the TRL-SEGpro005 procedure, "Procedimiento de Identificación de Peligros Evaluación de Riesgos y Medidas de Control en Ruta," establishes that the Acceptable Residual Risk condition is maintained over time, only if the controls identified and implemented in the initial formal

evaluation process are also maintained. Specific evaluations must be maintained. The evaluations will be carried out by the person or group of people in charge of a task. If any deviation is found, the task cannot be started until the correct implementation is ensured. The measures adopted are documented in a Risk Analysis register whose methodology is indicated in the same procedure.
The only change is that the path recognition format was unified with the path selection format.

In 2020, communications could not be delivered due to COVID-19. In an interview with Diana Flores, the safety supervisor, evidence was presented showing delivery of letters in 2021, 2022, and 2023 to fire departments, police stations, and healthcare centers located along the convoy routes. The evidence included the respective signatures and stamps confirming receipt.

Section 4 of the TRL-SEGpro007 rev.3 procedure defines the function of the Route Supervisor, who is responsible for the convoy and in charge of attending to any external circumstance that could affect it, for this they have communication and emergency response equipment in case of contingencies.

The Hazardous Materials Supervisor (Matpel) oversees loading, driving the convoy of vehicles to their destination, ensuring optimal travel conditions, enforcing the route sheet, overseeing the transportation process, implementing the contingency plan, and monitoring communication during the journey. The Matpel supervisor is always present in the escort vehicle.

The escort vehicle carries the emergency kit and is under the supervision of the Hazardous Materials Supervisor.

The Matpel supervisor in charge of the escort vehicle must check in with the operations center at designated points to indicate their location and report the weather conditions along the route. In the event of an emergency, the Matpel supervisor is responsible for activating the Emergency Plan and following it step by step.

Upon completing the transportation process, the tractor operator (driver) will submit a maintenance request, which will then be forwarded to the maintenance department for monitoring the unit's operability.

Section 6.5 has not undergone any changes. The procedure **TRL-SEGpro007 Rev. 03**, dated May 10th, 2023, requires the use of escorts.

- It is established that, starting from 7 units, it is recommended to divide into 2 or more convoys based on the configuration or type of units.

- Only one container can be loaded per platform and/or low-bed trailer, and each tractor unit can only tow one chassis. The kingpin must be secured, and steel chains with tensioners will be used to reinforce its fixation on the platform and/or low-bed trailer. The MATPEL Supervisor will approve such fixation.
- The movement of the convoy will depend on weather conditions. The MATPEL Supervisor will assess the route's safety in each case and may halt the convoy if, in their judgment, the conditions do not allow for safe transit.
- The emergency kit is transported in the escort vehicle and is under the responsibility of the MATPEL Supervisor.

"TRALEX" does not subcontract other entities to conduct any of the activities required in Transport Practice 1.1.

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.

The operation is

- ✓ in full compliance with Standard of Practice 1.2

Summarize the basis for this Finding Identified:

The procedure has not changed, it remains the same as the initial pre-operational audit of 2020.

TRL-SEGpro007 procedure, "Procedimiento de Seguridad Operacional en el Transporte de Cianuro" (Operational Safety Procedure in the Transport of Cyanide) section 6.4.2 page 8, establishes that operators must have A2B (supervisores de matpel) and A4 driver's licenses, which are required by the Peruvian State.

TRALEX does not plan to operate any equipment for moving containers or isotanks to or from trailers. Instead, the cargo will be placed at ports by port handling equipment and by the certified company Almacenera Pacífico, S.A.C. (ALPA) Upon arrival at the mine, the mining unit will be responsible for using its own equipment to unload the cargo.

The training certificates of the six drivers were verified.

All personnel handling cyanide and operating the transport equipment have been trained on how to avoid accidental spills, as well as on measures to be taken in case of exposure. This in addition to the required annual training plan.

Spill cleanup training record, neutralization, use of PPE, CAL hypochlorite, under certificate of Hazardous Materials Technician III.

"TRALEX" does not subcontract other entities to conduct any of the activities required in Transport Practice 1.2.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is

- ✓ in full compliance with Standard of Practice 1.3

Summarize the basis for this Finding Identified:

The same procedure remains unchanged TRL-SEGpro007 Rev. 3 procedure section 6.2.1 page 4, establishes the requirements of the trailer specifications. They must be regulated by the T3S3 vehicle configuration which makes them compliant with D.S. 058-2003 of the Ministerio de Transporte y Comunicaciones (Ministry of Transport and Communications).

The trucks will be (up to) 5 years old by TRALEX's quality policy. Their main characteristics are indicated in Table 4 on page 10 of this report.

At this time TRALEX does not use Scania G420 vehicles for cyanide transportation. The fleet was replaced by R480 and R460 trucks, of the Volvo FH6x4 brand and Mack ANS4TX Euro 3.

The VOLVO model gives more power on slopes, the braking system is two-stroke (VOLVO) and more powerful.

There is an agreement with a maintenance service under the line regime, with original spare parts.

The weight of the 20-foot maritime containers, when loaded with cyanide, would be 20 tons, and the low-bed is permitted to carry a payload of up to 25 tons.

Likewise, the weight of the 40-foot maritime containers, when loaded with cyanide, would be 22 tons, and the maximum allowed payload for the flat-bed is 30 tons.

The gross weight of the iso-tanks to be transported is 20 tons, with 17 tons being the weight of the cargo and 3 tons being the weight of the structure.

The **TRL-SEGpro007** procedure has been updated, specifically on page 5. This table outlines the maximum allowable load capacities for trailers.

The procedure TRL-SEG007 Rev. 2 “Procedimiento de Seguridad Operacional en el Transporte de Cianuro” (Operational Safety Procedure in the Transport of Cyanide) remains the same as in the initial pre-operational audit.

6.2.1. Truck Requirements

TRALEX will permanently have adequate transport units prepared for the transport of Sodium Cyanide. The tract with the container is classified within the T3S3 vehicle configuration, which complies with the D.S. 058-2003 MTC.

The platform and low-bed trailers will undergo visual inspection. Non-destructive magnetic testing will be conducted only on the 25-ton payload capacity low-bed.

The weight of the tractor-trailer and its carrying capacity are specified in the vehicle registration document.

The Peruvian state gives them two cards; 1 vehicle identification property, there is the other vehicle authorization certificate. Both contain the load capacity specifications.

Additionally, on the highways in Peru there are weight checkpoints where vehicles must undergo cargo weight verification and vehicle identification cards.

The TRL-SEGpro007 procedure establishes that the configuration of transport vehicles and their axle load capacity must be regulated by the T3S3 vehicle configuration, thereby complying with the Supreme Decree. 058-2003 of the Ministry of Transport and Communications.

“TRALEX” does not subcontract other entities to conduct any of the activities required in Transport Practice 1.3.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is

- ✓ in full compliance with Standard of Practice 1.4

Summarize the basis for this Finding Identified:

The TRL-Fope002-v01 document (Reception and Delivery of Sodium Cyanide) includes evaluations of the physical conditions through visual inspections of the following containers:

- The functionality of pulleys, chains, and tensioners.
- A 40-foot container
- A 20-foot container
- Isotanks.

Within the physical conditions to be inspected, the evaluation includes checking for cuts, holes, fractures, corrosion, dents, scratches, and so on. Additionally, it is ensured that the containers have the appropriate product labeling.

Drivers must ensure that each container number matches the one indicated in the documentation issued by the customs agency, following the chain of custody in accordance with the sender and recipient referral guidelines.

The container will be permanently fixed on the platform or a low-bed (whose center of gravity is favorable to stability) and will be fixed by a system of chains and safety pins to secure the semi-trailer containers, which will be recorded in the Form TRL-Fope001 (this form has remained the same since the 2020 audit): “Hazardous Materials Travel Report”. Any observation is placed in this format.

The TRL-SEGpro007 Rev.3 procedure establishes the labeling requirements in section 6.2.3.

This procedure remains the same since the pre-operational audit of the year 2020.

a. Cyanide transport units must have adequate signage complying with the Peruvian Technical Standard NTP399.015-2001.

b. The containers will have the code UN - 1689 code of the United Nations orange book

c. NFPA 704 is the Standard that explains the "diamond of hazardous materials" established by the National Fire Protection Association, used to communicate the risks of hazardous materials

d. All containers must have a clear and visible identification.

e. Cargo containers should have on each side: 1 NFPA Rhombus sign, a UN code sign, a United Nations classification of hazardous materials sign and a marine pollutant sign. And at each end of the unit, he must have: 1 NFPA Rhombus sign, a UN code sign, and a United Nations classification of hazardous materials sign.

f. According to these rules, the units will be marked.

In the 2023 audit, the procedure TRL-SEGpro007 Rev. 3 section 7.1 b and c that inspections of transport and escort vehicles must be carried out by the drivers and the supervisor of each escort vehicle, both in the front of the convoy as in the back.

TRALEX keeps current the procedure TRL-MANpro001 Rev. 1 “Procedimiento para Mantenimiento Preventivo y Correctivo” (Procedure for Preventive and Corrective Maintenance).

In a new revision of the document, the maintenance assistant was replaced by the "maintenance planner".

Preventive maintenance for the cyanide transportation fleet will be conducted based on a program with intervals at 10,000 km, 20,000 km, and 30,000 km. The maintenance plan is established and overseen by the representative of the Volvo and Mack truck brand.

The platforms and low-bed are assigned to specific mining units and will receive maintenance by DCR every 3 months.

MAINTENANCE PROGRAM FOR SEMI-TRAILERS

TRALEX will carry out platforms and low-bed maintenance activities covering phases T1 and T2, which take place at three-month intervals.

TRALEX maintains the same procedure TRL-SEGpro007 section 6.3 d and e:

d. Trips will be scheduled only during the daytime hours (in daylight), except for modifications due to force majeure events or direct coordination with clients.

e. The maximum daily worktime will be of 12 hours, including a 01-hour breakfast break and a 01-hour lunch break (02 hours break in total). After that time the staff will proceed to rest for 8 hours.

The operation will transport cyanide both in iso-tanks and in sea containers.

It maintains the same audit procedure of 2020.

To prevent load from shifting, the TRL-SEGpro007 procedure section 6.1 b, c and d has been developed:

b. In bulk mode, iso-tanks are used to transport an amount of approximately 17 tons of solid sodium cyanide, fixed by safety pins and chains in the semitrailer.

c. In the 20-foot mode, fixed by safety pins and chains, each 20-foot container will carry 20 boxes stacked on two levels to occupy the entire volume of the container to prevent cargo from shifting. Each box includes a 1-ton big bag of solid sodium cyanide.

d. In the 40-foot container mode, fixed by safety pins and chains, each 40-foot container will carry 20 boxes located at floor level (not stacked) for added stability that occupies the entire area of the container to prevent cargo from shifting. Each box includes a 1-ton big bag of solid sodium cyanide.

TRALEX has established in procedure TRL-SEGpro007 Rev.3 7.5 d that the HazMat supervisor is empowered to stop the convoy of units if the safety standards established in this procedure are not met and/or the conditions for the trip are not adequate (adverse conditions, social conflicts).

This procedure was not modified since the 2020 audit.

TRALEX has established an alcohol and drug policy TRL-pol00, April 2022 Rev. April 2023.

Within TRALEX, the affidavit is made, in which the employee states that he is not consuming or under the influence of alcohol and drugs, due to COVID-19.

The operation is committed to maintaining records documenting the maintenance aspects of the vehicles; limitation in driving hours, meals and breaks; and alcohol and drug tests performed.

In the form Registration of Controls- TRL-Fope001: “Informe de Viaje de Materiales Peligrosos” (Hazardous Materials Travel Report), stops for rest, meals will be recorded; as well as any anomaly or observation on the route.

The TRL-Fmant036 form has been implemented, in which unusual noises, anomalies, deterioration, or signs of malfunction of the units are recorded after each transportation process, for their corrective maintenance.

And for the maintenance records of the trailers, semi-trailers and low beds, the formats will be used. For maintenance, the following formats apply: TRL-Fman-009 (para 5,000 km), TRL-Fman-010 (para 50,000), TRL-Fman-011.

The company DCR Minería y Construcción, SAC, will be in charge of maintaining the TRALEX transport units. Maintenance has been carried out since the 2020 audit.

All drivers and members of the convoy, before leaving for the trip, will pass “declaración jurada” affidavid. The results will be documented on form TRL-Fseg-017 v00.

a) The Matpel supervisor delivers the route sheet, the check list, the control record, waybill “Guía de Remisión del Remitente” (GGR), carrier forwarding guide “Guía de Remisión del Tranportista”, along with the trip report in which any modification in the route is registered, which will be presented to the client upon request.

b) The operator of the tract (driver) upon returning to the base will deliver to the matpel supervisor the sender and carrier referral guides.

c) The tractor operator (driver) makes the maintenance request, which will be referred to the maintenance area to monitor the operation of the Unit.

“TRALEX” does not subcontract other entities to conduct any of the activities required in Transport Practice 1.4.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is

- ✓ in full compliance with Standard of Practice 1.5

Summarize the basis for this Finding Identified:

"TRALEX" does not transport by sea.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is

- ✓ in full compliance with Standard of Practice 1.6

Summarize the basis for this Finding Identified:

TRALEX has established in procedure TRL-SEGpro007 Rev.3 section 6.5 h that the convoy has base radios in its units for communication. The supervisor has a cell phone and a satellite phone. Este procedimiento se mantiene vigente desde la auditoria de 2020.

Any situation encountered is communicated to the base immediately and recorded in the trip report.

Additionally, the network manager maintains GPS communication with all units on routes.

According to the procedure TRL-SEG-pro007 section 7.1 a) iv, the monitoring control supervisor will verify that the GPS of the units is active.

This procedure has been maintained since the 2020 audit.

TRALEX is committed to periodically testing radio and telephone equipment. TRALEX is also committed to test them daily during all transport processes, to ensure their functionality, in the forms TRL-Fope009: "Check List unidad de cianuro" (Check List cyanide unit) made by the operator of the tract (driver). The Check List of the escort van is also carried out, which is documented in form TRL-Fope008: Escort Van Check List.

Intermittent blind areas have been identified on both routes considered, in which the use of cell phones will cover this need.

In the procedure TRL-OPEpro008 Rev. 2, “Procedimiento para la Selección de Rutas en el Transporte de Materiales Peligrosos” (Procedure for the Selection of Routes in the Transport of Dangerous Materials) section 6.1 G page 6 establishes that it will proceed to carry out an identification of the areas where it is impossible to establish communications.

On the TRL-Fope004 Rev.1 “Reporte de Selección de Ruta de Transporte” (Transportation Route Selection Report), these blind areas must be recorded.

In TRL-SEGpro007 Rev. 2 “Procedimiento de Seguridad Operacional en el Transporte de Cianuro” (Operational safety procedure in the transport of cyanide) section 7.5.i p. 12, it is requested that in case of an emergency the HazMat Supervisor activates the Emergency Plan. He must follow step by step what the Emergency Preparedness and Response Plan “Plan de Preparación y Respuesta ante Emergencias” (PPRE) indicates and communicate by phone. In case there is no phone service in the area, the satellite phone will be used.

In TRL-SEGpro007 Rev. 3 “Procedimiento de Seguridad Operacional en el Transporte de Cianuro” (Operational safety procedure in the transport of cyanide) established in section 7.5 g) establishes the requirement to track by GPS.

The GPS supervisor Marco Rios was interviewed. He gave the lead auditor a demonstration of how the transportation process monitoring will be carried out.

The chain of custody procedure is the same since the 2020 audit.

TRALEX will implement the chain of custody system, since departure with the cargo, including a security seal placement. In TRL-SEGpro007 “Procedimiento de Seguridad Operacional en el Transporte de Cianuro” (Operational Safety Procedure in the Transport of Cyanide), section 7.4 c states:

c) The operator of the tract (Driver) verifies that all the data included in the sender's and carrier's Remission Guidelines are correct. He must verify the gross weight in the record of weights and measures and the MSDS issued by the provider. He will carry this throughout the course of the service to its destination.

The driver will only load the maximum amount of 20 boxes of sodium cyanide per container, each of which includes a bag (Big-Bag) of 1 ton each, according to the configuration and design of the unit.

On forms TRL-Fope001Vo - “Informe de Viaje de Materiales Peligrosos” (Dangerous Materials Travel Report) and TRL-Fope002 V0- “Recepcion y Entrega de Cianuro de Sodio” (Receipt and Delivery of Sodium Cyanide), the control of the cyanide charge will be carried out from reception to delivery in the mines.

TRL-SEGpro007 “Procedimiento de seguridad operacional en el transporte de cianuro” (Operational Safety Procedure in the Transport of Cyanide), section 7.4 c, is the same since the 2020 audit:

c) The operator of the tract (Driver) verifies that all the data included in the “Guías de Remisión Remitente y de Transportista” (sender's and carrier's Remission Waybill) are correct. He must verify the gross weight in the record of weights and measures and the SDS issued by the provider. He will carry this throughout the course of the service to its destination.

The SDS of the products that will be transported have the SDS safety sheets.

“TRALEX” does not subcontract other entities to conduct any of the activities required in Transport Practice 1.6.

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.

The operation is

- ✓ in full compliance with Standard of Practice 2.1

Summarize the basis for this Finding Identified:

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

TRALEX has no stores or warehouses in territory of Peru.

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.

The operation is

- ✓ in full compliance with Standard of Practice 3.1

Summarize the basis for this Finding Identified:

TRALEX has the procedures Sodium Cyanide Transport Emergency Preparedness and Response Plan, implemented for six (6) active routes:

TRALEX has updated the procedures: TRL-ppre001.01 Rev. 2 and TRL-ppre001.02 Rev. 2

Two of the six existing emergency response plans were reviewed.

TRL-ppre001.01 Rev. 2 – "Plan de Preparación y Respuesta Para Emergencias en el Transporte de Cianuro de Sodio – Cerro Óxidos" (Emergency Preparedness and Response Plan for the Transport of Sodium Cyanide - Cerro Óxidos), prepared on June 10th, 2019, y revised on May 17th, 2023.

TRL-ppre001.02 – "Plan De Preparación y Respuesta Para Emergencias en el Transporte de Cianuro de Sodio – Pucamarca" (Emergency Preparedness and Response Plan for the Transport of Sodium Cyanide – Pucamarca).

These plans have been designed to facilitate the general guidelines, functions, responsibilities and strategic planning aimed at responding appropriately to emergency situations that may occur on the route to Cerro Óxidos, as well as on the route of Pucamarca and the Interior mentioned. The purpose is to have adequate coordination with the Cerro Óxidos (and Pucamarca) Emergency Response System area.

There are emergency planes for each of the 6 active routes.

The Emergency Plan has considered various scenarios to comply with legal requirements regarding emergency response. These scenarios include actions to be taken in incidents related to solid, liquid, and gaseous cyanide.

The emergency plans have been updated in the following sections:
- Section 4.1: Hazard identification and risk assessment for Transportation Routes.

- Section 4.2: General Occupational Health and Safety Aspects.
- Table of HCN gas exposure limits.
- Section 6.1: Emergency Organizational Chart.
- Section 7.1: Notification Procedure.
- Section 7.2: Internal Communication Handbook.
- Section 8.1.6: Initial Isolation Distances.
- Annex 11.6: Emergency Handbook.

7.1.D.e. Communication to ICMI of significant incidents within 24 hours of their occurrence.
8.3. Procedure for Neutralization of spilled product solutions or solids.
9. Training and drills, updating the drill program code (TRL-SEGprog008-page 048).
Annex 01: Definitions and abbreviations.
Includes the definition of Significant Cyanide Incident.
Annex 05: SDS sheet (version 04, dated 07/01/2022).

In all Emergency Response Plans of the TRL-ppre001.02 Pucamarca Mine (and others emergency response plans), Section 4.2 - “Características del Cianuro de Sodio” (Characteristics of Sodium Cyanide) explains the general aspects associated with intoxication levels. It lists the lethal doses, risks of cyanide in different states, as well as substance identification.

Exposure limits to cyanide are detailed, including their characteristics based on moisture and presentation type.

In Annex 02 of all Emergency Response Plans for the six (6) active routes, the chemical and physical characteristics of cyanide, exposure limits, and product stability are indicated.

The emergency response plans for the six (6) active routes consider the method of land transportation, fulfilling specific objectives for the activity:

• Complying with legal requirements related to emergency response.

• Identifying potential emergency situations to which the company's operations are exposed, minimizing the probability of emergencies through appropriate inventory and risk assessment.

• Establishing communication procedures with the Emergency Response System department of mining clients in the event or imminent occurrence of an emergency.

• Communicating any emergency quickly and efficiently to the mining client, coordinating and supporting the Emergency Response System department.

• Having a structured and planned organization with clear distribution of responsibilities to effectively handle emergencies and minimize post-emergency losses.

• Implementing preparedness measures to respond to potential emergencies, aiming to reduce impacts on people, property, the environment, and the community.

• Having contingency measures in place to restore operations as quickly as possible once an emergency occurs.

The Plan defines terms, definitions, and abbreviations, classifies response levels according to the severity, and organizes the crisis response system or committee, clearly indicating roles and identifying those responsible. Brigades and functions are established at different stages of an incident and intervention, including external responders.

It outlines the training topics associated with land transportation activities. The plan also considers response actions for the most probable emergency scenarios, the response equipment that must be carried in transport and escort vehicles, including communication means and a contact list in Annex 11.2.

In CHAPTER IV of the Emergency Response Plans for all active routes, the road conditions and traffic on each segment to be traveled by the convoy are considered. This identification of potential hazards on the routes is established hour by hour and day by day, following a detailed evaluation of the road conditions, including when entering the warehouses for cyanide loading.

Presence of livestock, bodies of water, and the risk of criminal activity are also taken into account.

The emergency response plans encompass various emergency scenarios related to the vehicle unit, the environment, and the product. In all these scenarios, the prescribed response is presented as a standard procedure, whether it involves the transportation of cyanide in a container or an isotank.

The identified scenarios are as follows:

- **Directly Related to the Vehicle Unit:**

- Mechanical Failure
- Vehicle Fire
- Vehicle Collision
- Vehicle Run-off and/or Rollover
- Container Damage without Spillage

- **Related to the Environment and Ecosystem:**

- Adverse Environmental Conditions
- Social Disorder
- Road Blockades due to Natural Factors
- Pedestrian Accidents
- Assault and Vandalism
- Police Stop or Detainment
- Operator Illness

- **Related to the Product:**

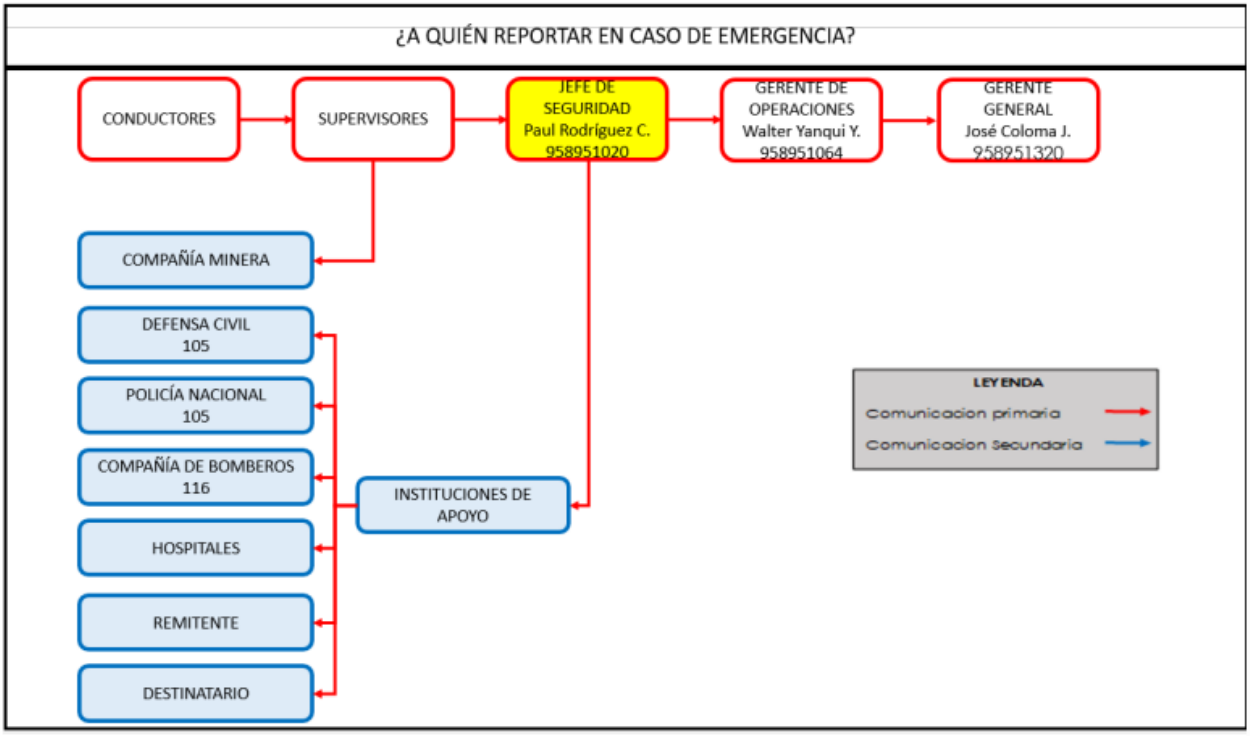
- Spillage on Dry Ground
- Spillage on Wet Ground
- Spillage in Standing or Stagnant Water
- Spillage in Flowing Water

6) Transport Question 3.2.2: Please clarify the duties and responsibilities of the escort and drivers with respect to initial response activities such as notifications and securing the scene.

In the event of an emergency, the duties and responsibilities of the Hazardous Materials Supervisor traveling in the escort vehicle are as follows:

- Activating the Emergency Preparedness and Response Plan, assuming direct control at the initial stage of the emergency.
- Providing technical support and any additional information requested by the relevant authorities in case of an emergency.
- Conducting an investigation of any environmental incidents or accidents that may occur.
- Submitting reports within the established timeframe to the General Directorate of Environmental Affairs (DGASA) of the Ministry of Transport and Communications and other relevant entities.
- Assessing the need for emergency personnel, first response teams, personal protective equipment, or other support equipment.

In this case, the following communication protocol must be followed:



Emergency phone numbers

- Halting the journey in the event of product leakage, mechanical issues, or any situation that poses a risk to human health, the environment, or property, and implement the Emergency Preparedness and Response Plan for Sodium Cyanide Transportation.

Regarding the initial emergency response activities, notifications, and site protection, the drivers are responsible for the following:

- Ensuring the proper functioning, appropriate placement, and training for the use of first response equipment, personal protective gear, and other related equipment.
- Activating the Emergency Preparedness and Response Plan for Sodium Cyanide Transportation in the event of an emergency situation and assuming direct control during the initial stage of the emergency if the Escort Supervisor is incapacitated.

In section 5, titled "Response Levels" of the Emergency Preparedness and Response Plan for Sodium Cyanide Transportation, the severity of potential incidents during the transportation of Sodium Cyanide by TRALEX Soluciones Integrales de Transporte S.A.C. has been categorized into three Response Levels. Response Level 1 is the one where drivers take immediate control (up to 45 minutes) if an emergency occurs.

In the case of Level 1, drivers use their own resources, without affecting people, processes, equipment or any process.

According to section 6.2.1 of the **TRL-SEGpro007 Rev. 03** procedure, updated on May 10th, 2023, it is mandated that appropriate and ready transportation units for Sodium Cyanide transport are to be permanently available.

The truck hauling the container falls under the T3S3 vehicle configuration, complying with Supreme Decree 058-2003 issued by the Ministry of Transportation and Communications (hereinafter MTC).

The trucks will be up to 5 years old due to the quality policy of TRALEX Soluciones Integrales de Transporte S.A.C.

As for trailers, the same specifications as in 2020, the date of the last audit, are maintained:

Container Requirements:

a. TRALEX Soluciones Integrales de Transporte S.A.C. will have 40 and 20-foot containers for the transportation of Sodium Cyanide with their respective labeling.

b. The client will provide 20 and 40-foot containers.

c. The containers are made of corrugated steel, non-refrigerated, and tightly sealed.

d. The container will be permanently attached to the platform and/or low bed and secured using a system of chains and pins to fasten the containers to the semitrailer. This will be documented in the TRL-Fope001 Form: “Informe de Viaje de Materiales Peligrosos” (Hazardous Materials Travel Report). Any observations will be recorded in this format.

e. The tractor with the container is classified within the T3S3 vehicle configuration, which complies with the D.S. 058-2003 MTC.

Suspension: Rocker arm model with spring package with 33-ton capacity. With mechanical lifter on the first axis.
Axles: Three tubular axes.
Coupling: For 6x4 and 4x2 truck tractor with king pin.
Support Jack: Mechanic.
Pneumatic Installation: One outlet to fast discharge valve with 3/8" air pipe.

- **Suspension:** Balancer model with a spring package and a capacity of 33 tons. Equipped with a mechanical lifter on the first axle.
- **Axles:** Three tubular axles.
- **Coupling:** For 6x4 and 4x2 truck tractors with kingpin.
- **Support Jack:** Mechanical.
- **Pneumatic Installation:** One outlet with a quick release valve and a 3/8" air pipe.

The emergency response organizational structure is outlined in Section 6.1 of the Emergency Response Plans for the routes.

Section 6.2 establishes the responsibilities of the individuals and entities involved in responding to emergencies. These include the General Manager, Central Manager, MATPEL Chief, Safety Chief, MATPEL Supervisor, Tractor Operator, Crisis Committee, Clients, Mining Company, National Police of Peru, National Institute of Civil Defense of Peru (INDECI), and Ministry of Health.

In Section 5, response levels are established based on possible scenarios, and it describes actions based on time and degree of impact. It is indicated that a Level 1 incident should be controlled within the first 45 minutes after it occurs using TRALEX's own resources.

A Level 2 incident is considered if it surpasses the 45-minute mark before being controlled. In such cases, firefighters, brigades, and external entities are involved, and there may be impacts on equipment, personnel, the environment, and processes.

A Level 3 incident is characterized by the emergency being out of control and having the potential to affect residential areas and communities. In such cases, external resources and support from government entities are required to manage the situation.

The Emergency Response Plans for the evaluated routes include Annex 2 (11.2), which lists the relevant municipalities and external institutions along with their respective telephone numbers for each specific route to a mine.

Among the external institutions are police stations, hospitals, health posts, and fire departments. In section 7.2 and 7.3, a flowchart identifies the roles of external responders when the severity of the response is Level 2 or Level 3.

All external responders, medical services, and municipalities have been sent more than eighty letters along with the SDS (Safety Data Sheet) of cyanide. During the audit, three (3) letters were reviewed in 2021, three (3) letters in 2022, and three (3) letters in 2023.

Transport Practice 3.2

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

The operation is

- ✓ in full compliance with Standard of Practice 3.2

Summarize the basis for this Finding Identified:

TRALEX provides initial induction to new workers and refresher training in defensive driving, fire prevention and first aids, following an annual training program. The auditor reviewed the training records of group chats conducted by qualified personnel from TRALEX and the company MAPFRE.

In organizational chart 6.1 those that make up the crisis committee and incident command system. 6.2 indicates the responsibilities of the general manager, finance manager, head of operations/HazMat, head of security, HazMat supervisor, truck operator, crisis committee, client, mining company, Peruvian national police, INDECI, Fire Department and Ministry of Health.

Objectives of the Incident Command:

a) Manage the incident efficiently, being the first trained responder to arrive at the emergency zone.

b) Execute vertical coordination tasks during the emergency to concentrate decision-making and prevent confusion due to information overlap.

c) Channel human resources and materials during the emergency through close coordination with the Crisis Committee.

In Annex 4 (11.4), page 55/81 of the Emergency Plans for all routes, a Master List of Personal Protective Equipment (PPE) is provided. This comprehensive list includes various types of

protective gear such as head protection, eye and face protection, respiratory protection, hand protection, hearing protection, foot protection, and chemical protective clothing.

The Emergency Preparedness and Response Plan (PPRE) in the section related to product spills, the use of Calcium Carbonate is considered for spills on dry terrain. Before entering the area, personnel conduct a gas monitoring in the emergency zone. If gas concentrations greater than 4.7 ppm are detected, the area will be evacuated, and isolation zones will be determined. This monitoring must be carried out periodically.

For the retrieval of spilled sodium cyanide on the ground, including soil that may be contaminated, the use of manual tools and high-density polyethylene bags is necessary. Ensure the bag is sealed tightly during the collection process to prevent the ingress of air. It is crucial to prevent contact with water sources, drainage systems, or natural watercourses.

For spills in water, the incident command will only carry out isolation actions for the area, manage communications, and implement protection strategies.

To neutralize spilled product solutions or solids, the spill should be contained to prevent it from reaching any drainage or natural watercourse. Options for neutralization include using calcium hypochlorite or ferrous sulfate, followed by the addition of calcium carbonate to raise the pH. It is necessary to wait for at least 1 hour to achieve neutralization before proceeding with the cleanup.

During the execution of the service, TRALEX will have its trucks and escort vehicle equipped with a response kit, which in addition to personal protective equipment includes:

ESCORT VEHICLE RESPONSE KIT

- 30 Polyethylene Bags with Fasteners
- 1 High Adhesive and Chemical-Resistant Tape
- 1 Red Danger Tape
- 1 Yellow Warning Tape
- 25 Square Meters of Plastic
- 20 kg of Sodium Hypochlorite
- 20 kg of Calcium Carbonate (Lime)
- 17 Empty Containers
- 1 Broom

- 1 Dustpan
- 1 PVC Rain Cover
- 1 MSA Gas Detector
- 1 Breathalyzer
- 1 Satellite Phone
- 10 Pairs of Surgical Nitrile Gloves
- 1 Oxygen Kit

TRUCK RESPONSE KIT

- 30 Polyethylene Bags with Fasteners
- 1 High Adhesive Chemical-Resistant Tape
- 1 Red Danger Tape
- 1 Yellow Warning Tape
- 25 Square Meters of Plastic
- 1 Broom
- 1 Dustpan
- 1 PVC Rain Cover

These tools will be inspected for every shipment of Sodium Cyanide using a CHECKLIST. This task will be carried out by the Route Supervisor, including the inspection of the escort vehicles.

A remote meeting was conducted with the hazardous materials supervisor (MATPEL) and drivers. During the meeting, the drivers were interviewed, and they confirmed that TRALEX company provides and maintains health and safety equipment, including personal protective equipment, in escort vehicles and trucks.

TRALEX implements the **TRL-SECprog005 v 1** program, which includes tasks such as monthly inspections.

A verification of the availability of personal protective equipment in the supply warehouse was conducted.

“TRALEX” does not subcontract other entities to conduct any of the activities required in Transport Practice 3.2.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is

- ✓ in full compliance with Standard of Practice 3.3

Summarize the basis for this Finding Identified:

In the Emergency Response Plans of the different routes, the names and telephone numbers of the contact persons are indicated in the Annex section.

Each of the six (6) TRALEX Emergency Response Plans has a similar structure. However, it is common for each client or specific mine to request the inclusion of certain data, such as contact telephone numbers, aligned with the structure of their particular mine's emergency plans.

Emergency response plan section 7.1 External and internal notification procedure, in different scenarios, the preliminary evaluation of the emergency and its magnitude.

In Annex 6 of each Emergency Plan of each mine, its emergency communication booklet is indicated.

Random phone calls were made to the José Callao Hospital in Lima, the Orolla Health Center and the Junín Support Hospital, which were up to date.

Contact Information updates are performed once a year
In Section 10.1 of the Emergency Response Plans, it is stated that the plans should be reviewed and the emergency numbers (medical centers, fire companies, municipalities, police stations) should be updated if necessary; in cases of:

- any significant alteration or modification to operations
- Modification of the guidelines for preparing the emergency preparedness and response plan and mitigation.
- Changes in the organization of the emergency team.
- Drill Results.
- Emergency evaluations.
- New applicable legislation.
- Evaluation of a new route
- Updating of emergency numbers (medical care centers, fire companies, municipalities, police stations).

During this process, contact numbers are reconfirmed. If there are any changes to a contact, the individual reports it promptly. The plan is then updated, and the organization is informed of the modification.

In the Emergency Response Plans, Section 7.1 D e), it is requested to notify the ICMI (International Cyanide Management Institute) in the event of a Significant Incident with Cyanide and contact them within 24 hours of its occurrence. This communication should include the date and nature of the incident, as well as the name and contact information of a company representative to respond to requests for additional information. Highlighted information will be provided, such as the root cause, impacts on health, safety, and the environment, and any mitigation or remediation efforts within 7 days of the incident.

Phone: +1-202-835-0155.

Email: info@cyanidecode.org

Transport Practice 3.4

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

The operation is

- ✓ in full compliance with Standard of Practice 3.4

Summarize the basis for this Finding Identified:

The remediation procedures for the Emergency Response Plans have remained unchanged since the last audit in 2020.

Do not allow material to get wet. Contain or prevent runoff into drains and waterways. The spill area and contaminated solids should be detoxified by treating with excess dilute sodium hypochlorite, calcium hypochlorite, or ferrous sulfate after adding soda ash or lime to raise the pH above 10.5.

Wait for 1 hour for complete decomposition before cleaning the spill area with ample water to ensure maximum dilution.

Lime is poured over the spilled product to completely cover it and then collected.

Both calcium hypochlorite and lime will be transported in the convoy.

According to the procedure outlined in section 8.4, after implementing the specific emergency response procedures, the following actions are recommended for decontaminating the spill area:

a. Decontaminating all affected areas.
b. Defining the appropriate container for collecting the cleaning material.
c. Removing contaminated soil and debris if necessary.
d. Decontaminating all equipment.
e. Packaging all contaminated material for disposal.
f. Collecting samples for certification: Sampling contaminated water, collecting soil samples, etc.
g. Coordinating the transportation and disposal of the contaminated material with the Carrier and the Receiver of the cargo (mine). This process will be supervised by the Solid Waste Services Provider Companies "Empresas Prestadoras de Servicios de Residuos Sólidos" (EPS-RS) as indicated by the sender or the recipient.

Pursuant to Procedure 8.2.13 (regarding Incidents related to products), TRALEX is responsible for addressing dry cyanide spills, including recovery, for small-scale spills (spills involving a single box). The incident commander must coordinate the arrival of specialists who can certify the soil contamination status, and appropriate corrective measures must be taken.

In the event of major spills involving the rupture of more than one (1) box, support from the 2nd Response Team, managed by the mining company, will be requested. For spills on wet ground, whether small or large, assistance from the 2nd Response Team, managed by the mining company, will also be requested.

In the Emergency Response Plans **TRL-ppre001.01 Revisión 01 section 8.3** "Procedimiento de Neutralización de soluciones o sólidos de producto derramado" (Neutralization Procedure for solutions or solids of spilled product), the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide once it has entered surface waters is prohibited as it is counterproductive and of limited effectiveness.

Transport Practice 3.5

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

The operation is

- ✓ in full compliance with Standard of Practice 3.5

Summarize the basis for this Finding Identified:

In **TRL-ppre001.01 Revisión 01** Section 10.1 of the Emergency Response Plan, it is requested that the plan be reviewed once a year and, if necessary, the section(s) that are considered necessary should be updated, taking into account the following considerations:

• Alteration or modification of operations.
• Modification of guidelines for the preparation of the emergency preparedness and response plan.
• Changes in the organization of the emergency team.
• Results of drills and exercises.
• Emergency evaluations.
• New applicable legislation.
• If it is a corrective measure following an incident/accident.
• Evaluation of a new route.
• Updating of emergency contact numbers (healthcare centers, fire departments, municipalities, police stations).

In Section 9: Training and Drills, it is established that training and drills will be conducted according to the annual general training and development program, with code TRL-SEGprog008.

The execution of drills will follow the Drill Program with code TRL-SEGprog008. The drill report will be presented using the TRL-Fseg018 format, which must be sent to the safety manager within a maximum of 7 business days.

The objective of conducting such evaluations is to identify improvements for the Emergency Preparedness and Response process.

According to the record TRL-Fseg019 v.0, a total of 2 drills were planned to be executed in the year 2021 and 2022, and all of them were successfully conducted.

On May 30, 2023, a poisoning incident took place whose scenario was as follows:

Program and Sequence of Activities:

At approximately 11:32 a.m., while the convoy was heading from the ALPA warehouse facilities in LIMA, to the Pucamarca mine, an incident occurred during the Ocoña - Camaná section, the operator of unit number 1, Efraín Crash, with license plate BCW-809 and container number MSKU 6321585, observed that one of the container doors opened, causing damage to one of the boxes and consequently a product spill of approximately 3 kg.

During the execution of the action plan, a third party (person outside the company), due to ignorance and curiosity, entered the defined area, breaking the established perimeters. This person came into contact with the affected product (sodium cyanide), causing it to vanish and collapse on the spot. The latter presented symptoms of convulsion, suffocation and purple coloration, indicating intoxication via the skin.

Once the person is decontaminated, they are placed in an area far from the decontamination area, to be treated by the paramedic.

12:12 pm The external person is evaluated and attended by the paramedic, administering oxygen through a high-flow mask (mask with a reservoir bag), covering her with a thermal blanket and constantly taking her vital signs.

12:22 pm the C.I. communicates by telephone to the nearest health center (Ocoña Health Center) in order to request a doctor to approach to administer the antidote, which will be delivered by the paramedic to the emergency doctor who approaches the event.

12:25 PM Second responders blanket spilled product so they continually pick up spilled product in polythene bags. Then these were sealed and properly labeled in buckets labeled for proper disposal.

At 12:36 p.m. The TRALEX Paramedic proceeded to carry out the exit triage of the personnel of Responders No. 2, who entered the hot zone.

At 12:46 p.m. It culminates with emergency care (drill).

At 12:48 p.m., the TRALEX Incident Commander was notified; the end of the emergency.

No weaknesses reported, only strengths.

According to section 10.1 of the Emergency Response Plan, it is requested to review the Plan after an emergency has occurred for its implementation.

TRALEX, S.A.C.		August 14th, 2023
Name of Operation	Signature of Lead Auditor	Submittal Date