

INTERNATIONAL CYANIDE TRANSPORTATION
VERIFICATION PROTOCOL
SUMMARY AUDIT REPORT

TRANSPORTES MERIDIAN S.A.C.

Cyanide Transport Operation

July, 2026

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

Collaborated with
MINGROUP INVESTMENTS S.A.C.

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INTERNATIONAL CYANIDE TRANSPORTATION VERIFICATION PROTOCOL

DETAILED AUDIT FINDING REPORT

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1. Operation General Information

Name of Facility:	Transportes Meridian S.A.C.
Name of Facility Owner:	Transportes Meridian S.A.C.
Name of Facility Operator:	Transportes Meridian S.A.C.
Dates of the audit:	25 – 26, May 2026
Name of Responsible Manager:	Javier Espinoza Sarmiento – Integrated Management System Manager
Address:	Av. Oquendo Mza. H-L, Ex Fundo, Oquendo, Callao
State / Province:	Callao
Country:	PERU
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2. Operation Location Detail and Description:

Transportes Meridian S.A.C. (Meridian) is a trucking company with BASC Certification (Business Alliance for Secure Commerce) dedicated to the provision of transport and land distribution services of containers, loose cargo, heavy, oversized and extra-long machinery, covering all types of services such as dangerous cargo, cyanide, chemical inputs, controlled goods and explosive. They are responsible for the transport from ports to extra-port terminals and vice versa, as well as transport to the warehouses of various clients with traceability of their merchandise online locally and nationally through their transport website.

Meridian was first certified under the Cyanide Code in 2016 and was subsequently recertified in 2020 and 2023. The scope of this audit covers the transportation of solid sodium cyanide in shipping containers between the ports of Chancay and Callao and extra-port and satellite terminals located in Callao, as well as the transportation of solid sodium cyanide in shipping containers from warehouses in Callao to mining operations throughout Peru.

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Solid sodium cyanide is transported in Intermediate Bulk Containers (IBCs) consisting of polypropylene supersacks containing up to 1.0 or 1.1 tonnes of sodium cyanide, which are placed inside polyethylene liners and wooden boxes. Sodium cyanide is also transported in 50-kg metal drums. Approximately 19 to 22 tonnes of sodium cyanide are transported in standard 40-foot shipping containers from warehouses in Callao to mining operations. Shipments transported from the ports to temporary storage facilities (extra-port and satellite terminals in Callao) are carried in standard 20-foot shipping containers.

The scope of this audit is limited to the transportation of solid sodium cyanide. Loading and unloading activities are performed by Meridian's clients and are therefore outside the scope of this audit.

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3. Auditor Information

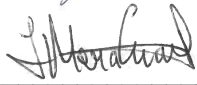
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Lead Auditor: Álvaro Fuentes Huanqui
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Name and signature of the audit team.

Lead Auditor: Álvaro Fuentes Huanqui
Name


Signature

Technical Auditor: Marcos Mera Escala
Name


Signature

Dates of Audit: 25 , 26 May 2026.

4. Auditor's Finding

This operation is

- ☒ in full compliance with the International Cyanide Management Code
- ☐ in substantial compliance *(see below)
- ☐ not in compliance

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

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5. 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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Signature of Lead Auditor

25 – 26 May, 2026

Date of submittal

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Cyanide Transportation Verification Protocol

6. 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.

☒ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 1.1

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Meridian carries out safe cargo transport through routes proposed by the client and are reviewed and supervised by the internal safety team and Integrated Management System team, taking into account the population density, infrastructure condition, pitch and grade and prevalence and proximity of water bodies and fog, that minimizes the potential for accidents and releases and the potential impacts of such accidents and releases if they do occur.

Meridian has the **procedure P-TRA-009 Sodium Cyanide Transport**, in Section 6.1.2. mentions the procedure for the route evaluation and in Section 6.1.3 mentions the elaboration and update of the route assessment. It requires an assessment of the route before transporting cyanide to a new location, using the procedure Annex I, register **F-TRA-008 Route Risk Assessment**. The record includes evaluation of the route, crossing populated places, population density, GPS signals, communication signals by cell phones, transit through environmentally sensitive areas, as well as evaluating the resources of assistance on the route, controls by the state agencies and any other

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mechanism that contributes to the safety of the trip. The characteristics of the route are analyzed, such as its condition, signage, existing police controls, permitted and reasonable traffic speeds for the type of road and environmental condition.

The auditors reviewed route evaluations made both for local routes as from the Port of Callao to Contrans Warehouse in Callao and for distant mining operations.

The template used is the same as the one suggested by the Peruvian Ministry of Transport for route evaluation.

The Route Risk Assessment Procedure (P-TRA-008) requires the evaluation of transport routes using Route Sheet Form F-TRA-009. Route assessments are conducted whenever a new route is introduced, route connections are modified, or a client requests the use of a new transport route.

Route evaluations are performed through field inspections using an escort pick-up truck equipped with communication equipment, GPS, and a vehicle-mounted camera. The condition of the escort vehicle is verified using Checklist F-TRA-011.

Route risk assessments are documented and include the evaluation of factors such as unsafe road conditions, speed limits by route section, road signage, availability of alternate routes, water bodies, population centers, fog-prone areas, road gradients and slopes, bridge height restrictions, and areas with loss of GPS or cellular communication coverage. The procedure requires route assessments to be reviewed and updated annually or whenever significant geographical changes occur due to natural events.

Areas presenting elevated risks, including locations susceptible to theft, civil unrest, or social disturbances, have been identified and are subject to additional control measures. These measures include mandatory communications with the monitoring and control center prior to entering such areas and the establishment of pre-planned alternative routes.

The procedure also requires that route hazards and control measures be incorporated into driver training programs.

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The auditors reviewed Procedure P-TRA-008 and associated route risk assessment records and confirmed that the transporter evaluates the risks associated with selected transport routes, documents appropriate risk management measures, and provides drivers with training regarding route-specific hazards and controls.

The Sodium Cyanide Transport Procedure (P-TRA-009) includes Section 6.1.3 regarding the preparation and updating of route assessments. The procedure states that the Route Risk Assessment Form (F-TRA-008) shall be reviewed and updated whenever relevant changes or conditions arise that may represent a transportation risk. Such changes are documented in trip reports. In addition, a comprehensive route survey is conducted annually by designated personnel to update Form F-TRA-008 and verify current route conditions and associated risks.

The auditors reviewed recent route evaluations and, through interviews with drivers and management personnel, confirmed that feedback regarding route and driving conditions is systematically communicated and incorporated into route assessments. Special conditions identified by clients are documented and communicated to all drivers assigned to the affected routes.

The monitoring center and route supervisors continuously update route risk information through the company's Google Earth-based monitoring platform. Drivers provide information to the monitoring center, which is incorporated into route risk management activities. In addition, the company maintains ongoing communication with mining clients regarding road conditions, particularly in cases of road blockades, social unrest, or other disruptions that could affect transportation activities.

As an additional source of information, the company uses road condition reports published by the Peruvian Ministry of Transport and Communications (MTC) and the Superintendence of Land Transportation of Persons, Cargo and Freight (SUTRAN). When road closures or access restrictions occur, the company also coordinates with the National Police and the relevant road concessionaires to obtain updated information and determine safe alternative routes when necessary.

Based on document review and personnel interviews, the auditors confirmed that the transporter has established and implemented a process to periodically reevaluate cyanide transport routes and to incorporate operational feedback into route risk assessments.

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In the document **Risk Assessment of route F-TRA-008**, the risks and control measures for each route developed are given. In the samples taken, risk control measures identified for the selected transport routes include defensive driving practices, compliance with traffic signs and regulations, driving with headlights on at all times, reducing speed in high-risk areas, adherence to established speed limits, sounding the horn when passing or approaching other vehicles on narrow roads, maintaining a wide field of vision, and the use of fatigue-monitoring cameras, proximity cameras, and rear-view cameras. These controls are intended to reduce the likelihood of traffic accidents and enhance the safety of cyanide transportation operations.

The effectiveness of the controls is evidenced in the field with the visit and inspection of transport units, escort pickup trucks and interviews with drivers and route supervisors.

The mining company defines the approved transport routes, loading points, and unloading locations for cyanide deliveries. Route conditions are continuously monitored through the company's GPS tracking system and communication with drivers. In the event of route changes resulting from adverse weather conditions, social unrest, road closures, or other contingencies, alternative routes are proposed and coordinated with the mining client.

As part of the route selection and risk management process, the transporter obtains information from external stakeholders, including mining clients, road concessionaires, governmental agencies. The road concessionaire is consulted regarding road conditions, traffic restrictions, and bridge load capacities. In addition, information published by governmental transportation authorities is reviewed to identify road closures, maintenance activities, or other conditions that may affect the safe transport of cyanide.

The auditors verified through interviews and review of route assessment documentation that input from relevant stakeholders is considered, as necessary, in the selection of transport routes and the development of risk management measures.

Meridian uses convoy operations with escort vehicles on mine delivery routes where road conditions are poor, security concerns may exist, and the remote location of the destination increases the need for immediate emergency response capabilities.

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All cyanide convoys include one escort pickup truck operated by a Route Supervisor. The escort vehicle is equipped with first aid supplies, emergency response equipment, and materials for the containment and recovery of cyanide spills. The Route Supervisor is responsible for conducting safety briefings, verifying the condition of transport units, ensuring the proper use of personal protective equipment, maintaining communication with the Monitoring Center, and scheduling rest stops approximately every two hours for driver active breaks and vehicle inspections. The Route Supervisor also has the authority to suspend or modify transport activities when adverse weather conditions, road hazards, social unrest, or other unsafe conditions are identified.

All transport units are equipped with Global Positioning System (GPS) devices and are monitored continuously through Meridian's 24-hour Monitoring Center in accordance with Procedure D-TRA-001, Sodium Cyanide Transport Emergency Response Procedure.

Cyanide shipments from Chancay Port or Callao Port to the extra-port and satellite terminals located in Callao (Contrans and Alconsa) are conducted by individual transport units without escort vehicles due to the short transport distance, urban road conditions, and the continuous GPS monitoring and communication systems in place.

Prior to departure, drivers report their departure to the Monitoring Center and to the cyanide consignor. Shipment tracking is maintained through continuous GPS monitoring and regular cellular communications between route supervisor and monitoring personnel.

For deliveries from the extra-port warehouses (Alconsa and Contrans) to mining operations, convoy transportation with escort vehicles is utilized.

Escort Supervisors receive emergency response training, including HAZWOPER (Hazardous Waste Operations and Emergency Response) Level 3 training, and have experience in transport supervision and route monitoring. For certain mining clients, additional requirements apply, including the assignment of two HAZWOPER Level 3-trained supervisors per convoy.

Based on document review, field observations, and interviews with transport personnel, the auditors confirmed that the transporter implements additional safety and security measures, including convoy

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operations, escort vehicles, continuous GPS monitoring, and enhanced emergency response capabilities, to address special safety and security concerns associated with cyanide transport routes.

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.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.2

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Meridian has established qualification requirements for drivers and escort supervisors within its Organization and Functions Manual (M-SIG-001). The manual defines the responsibilities, minimum qualifications, training requirements, and competency criteria for personnel involved in cyanide transportation operations.

The Escort Supervisor position is responsible for supervising convoy safety, identifying route hazards, communicating risks to drivers, coordinating emergency response activities, and maintaining communications with the Monitoring Center. Minimum qualifications include completion of secondary education, knowledge of cargo transportation and port operations, and HAZWOPER Level III certification.

The Driver position is responsible for the safe transportation of customer cargo while maintaining vehicle integrity and compliance with company safety requirements. Minimum qualifications include a valid AIIIB or AIIIC driver's license, completion of required port security and dangerous goods training, Special Category A4 License when transporting hazardous materials, registration in the IQBF (Spanish acronym for Controlled Chemical Inputs and Regulated Goods) system when applicable,

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HAZWOPER Level I and II training for hazardous materials transportation, and a minimum of two years of relevant driving experience.

The auditors reviewed personnel qualification records, including driver's licenses, hazardous materials licenses, medical fitness certificates, training records, and work experience documentation.

The International Ship and Port Facility Security (ISPS) Basic Course, Port Security Training, and Dangerous Goods Basic Course are mandatory for personnel requiring access to the Ports of Chancay and Callao (DP World and APM Terminals). These courses are delivered by training providers authorized by the National Port Authority (APN, by its Spanish acronym), a governmental entity under the Ministry of Transport and Communications (MTC, by its Spanish acronym).

The HAZWOPER levels I, II and III training are delivered by training providers authorized by the MTC.

Based on document review and personnel interviews, the auditors confirmed that Meridian uses trained, qualified, medically fit, and appropriately licensed personnel to operate cyanide transport vehicles and escort units.

Meridian provides periodic training to personnel involved in cyanide transportation operations through its Annual Occupational Safety and Health Training Program, which is developed in accordance with national regulatory requirements and approved by the Occupational Safety and Health Committee. The implementation of the training program is monitored monthly.

The audit team reviewed training records demonstrating that drivers, escort supervisors, and other personnel involved in cyanide transportation receive training related to the safe handling and transportation of sodium cyanide, emergency response, spill prevention, and exposure control.

Training materials reviewed by the auditors included topics such as:

- Sodium cyanide hazards and properties.
- Safe handling and transportation practices.
- Prevention of cyanide releases during transport.

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- Emergency response procedures for cyanide spills.
- Use of personal protective equipment.
- Cyanide exposure recognition and response.
- Communication and notification procedures during emergencies.

Meridian provides both classroom-based and online training through its internal training platform to ensure that personnel maintain the competencies required to perform their duties safely and in a manner that minimizes the potential for cyanide releases and exposures.

Based on training records, interviews with personnel, and review of training materials, the auditors confirmed that personnel operating cyanide handling and transport equipment have been trained to perform their duties in a manner that minimizes the potential for cyanide releases and exposures.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.3

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Meridian uses transport equipment specifically designed and authorized for the transport of hazardous materials, including sodium cyanide. Transport units comply with Peruvian regulatory requirements, which establish age limits, operating permits, technical inspections, and maintenance requirements for hazardous materials transportation.

Procedure P-TRA-009 Sodium Cyanide Transport establishes the requirements for transport equipment. Section 6.2 specifies that only company-owned trucks may be used for sodium cyanide transport and that all vehicles must possess the permits, insurance, and authorizations required by Supreme Decree No. 021-2008-MTC and other applicable regulations governing the transport of

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hazardous materials. The procedure also requires the use of trucks, chassis, and trailers specifically designed and authorized for container transportation on public roads.

The procedure further establishes that:

- Platforms may be conventional or low-bed types, depending on operational requirements.
- Vehicle technical inspections must be conducted at least every six months.
- Trucks and trailers must be included in the company's preventive maintenance program.
- Only one 20-foot or 40-foot container may be loaded onto each trailer.
- Each truck unit may tow only one semi-trailer in accordance with the rated load capacity of the equipment.

The auditors verified that the cargo transported was within the rated capacity of the equipment.

Meridian maintains a computerized fleet maintenance management system that records preventive maintenance activities, fuel consumption, tire management, vehicle mileage, work orders, and maintenance history for all vehicles. Preventive maintenance frequencies are established according to vehicle type and manufacturer recommendations.

Maintenance activities include inspection and servicing of the chassis, braking system, tires, electrical systems, and other critical components.

The company also maintains fleet tracking records through its Integrated Management System, which monitors vehicle mileage and automatically schedules maintenance activities based on distance traveled. Drivers report fuel purchases and mileage data, allowing maintenance intervals to be tracked and updated continuously.

The auditors reviewed maintenance records and verified that the vehicles used for sodium cyanide transport are appropriately designed, inspected, maintained, and operated within their rated load capacities.

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Meridian has established procedures to verify that transport equipment is suitable for the loads being transported. Procedure P-TRA-009 Sodium Cyanide Transport specifies the vehicle and trailer configurations authorized for sodium cyanide transportation and requires compliance with the weight and dimension limits established by Peruvian transportation regulations. The procedure references Annex IV – Maximum Permitted Weights and Dimensions, based on Supreme Decree No. 058-2003-MTC and its amendments, which defines maximum allowable axle loads, gross vehicle weights, vehicle dimensions, and approved vehicle configurations.

The procedure includes tables and diagrams identifying the permitted truck and trailer configurations according to the number of axles and load distribution. Vehicles used by Meridian for sodium cyanide transport are classified as T3S3 configuration, with a maximum gross vehicle weight not exceeding 48 metric tons, in accordance with national regulations.

Prior to dispatch, transport personnel verify that the cargo weight is compatible with the rated load capacity of the truck unit, trailer, and vehicle configuration. The verification is conducted using cargo documentation, container weight information, and vehicle specifications.

The auditors reviewed transport records and equipment documentation for the shipment conducted on May 8, 2026, and confirmed that the weight of the sodium cyanide shipment was within the authorized load capacity of the transport equipment. The auditors also verified that the truck and trailer configuration complied with the applicable regulatory requirements and the company's transport procedures.

Based on document review and interviews with operations personnel, the audit team confirmed that Meridian has implemented procedures to verify the adequacy of transport equipment for the loads being transported and that these procedures are being applied in practice.

Meridian has implemented procedures to prevent overloading of vehicles used for sodium cyanide transportation.

Customer transport requests include detailed information regarding cargo type, quantity and total weight. Prior to dispatch, the Meridian Transport Analyst reviews the cargo weight and verifies its

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compatibility with the authorized load capacity of the assigned truck and trailer configuration. If the requested load exceeds the legal or operational limits of the transport equipment, Meridian informs the customer and the shipment is not authorized until the load is adjusted.

As part of the dispatch process, cargo weights are verified through the customer's delivery guide and weighbridge records. Weighing controls are conducted at the entrance and exit of the extra-port terminals (Alconsa and Contrans), and the driver registers the electronic delivery guide based on the verified cargo weight.

Additional controls are provided by mandatory weigh stations and mobile weighing units operated by SUTRAN (Superintendence of Land Transportation of Passengers, Cargo and Freight) along national highways. Cyanide transport routes commonly pass through permanent weighing stations located in Pucusana, Chilca, and Ancon.

For shipments originating from the Ports of Callao (DP World and APM Terminals) and Chancay Port, the official port weighbridge ticket is used as a control document prior to transport to the authorized extra-port terminals.

The audit team reviewed transport documentation and confirmed that cargo weights are verified prior to dispatch and compared against vehicle load capacities. Interviews with operational personnel confirmed that loads exceeding authorized limits are not accepted for transport.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

☒ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 1.4

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

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Meridian has implemented procedures to ensure that sodium cyanide is transported in a manner that maintains the integrity of the producer's packaging throughout the transportation process.

Procedure Sodium Cyanide Transport P-TRA-009, Section 6.4.1 (Transport Preparation), and the procedure for cargo securing and lashing in containers establish inspection and verification requirements before departure and during transportation. These procedures require verification that containers are properly positioned on the trailer, secured using the trailer locking mechanisms, and protected against unauthorized access.

Meridian transports sodium cyanide exclusively in sealed maritime containers received directly from the port or authorized warehouses. The company does not open, repackage, subdivide, transfer, or otherwise alter the cyanide packaging during transportation. According to company procedures and interviews conducted during the audit, the cargo remains inside the original shipping container until it reaches the designated warehouse or mining customer.

Container integrity is verified through inspections of container doors, seals, locking devices, and container condition. Seal verification is performed at key control points, including:

- Receipt of the container at the Port
- Arrival at extra-port warehouses
- Departure from warehouses to mining operations;
- During scheduled stops along the route; and
- Upon arrival at the customer's site.

The containers are secured to the trailer using fixed locking clamp mechanisms designed specifically for container transport. Additional security measures include:

- Container lashing using chains;
- Installation of a "ducktail" metal locking plate preventing door opening while mounted on the trailer;
- Security bars and padlocks securing both container doors; and
- Tarpaulin protection when required on the roof of containers.

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The procedures also establish that the cargo shall not be altered during transportation.

The audit team reviewed transport procedures, inspected transport units in the field, and examined transportation records and photographs transmitted by convoy supervisors and drivers through customer-specific communication WhatsApp groups prior to departure. These records demonstrated that containers were properly secured and that the integrity of the producer's packaging was maintained throughout transport operations.

Based on document review, field observations, and personnel interviews, the audit team confirmed that Meridian has implemented procedures and operational controls to ensure that sodium cyanide is transported without compromising the integrity of the producer's packaging.

Meridian uses placards and warning signs to identify sodium cyanide shipments in accordance with applicable Peruvian regulations and international standards for the transport of dangerous goods.

Procedure Sodium Cyanide Transport P-TRA-009, Section 6.4.1 (Transport Preparation), requires verification of the hazardous materials identification signs prior to dispatch, including the United Nations (UN) identification number, hazard class labels, Marine Pollutant marking, and NFPA hazard diamonds.

As part of the pre-trip inspection process, drivers complete Form F-MAN-007 Daily Vehicle Inspection, which includes verification of the required safety signage and markings on the transport units.

The audit team verified that sodium cyanide shipments are identified with:

- United Nations Number UN 1689;
- Class 6.1 Toxic Substance placards (skull and crossbones symbol);
- Marine Pollutant marking;
- NFPA hazard diamond.

The required placards are displayed on the transport containers and vehicles as follows:

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- Rear of the container;
- Both sides of the container;
- Both sides of the semi-trailer;
- Rear of the semi-trailer; and
- Front of the transport unit.

The audit team reviewed photographic records of recent cyanide shipments and verified during field inspections that the required placards and hazard markings were properly displayed on the transport equipment. The photographs confirmed the presence of the UN 1689 identification, Class 6.1 toxic substance placards, Marine Pollutant marking, and NFPA hazard diamonds.

Based on document review, field observations, and interviews with personnel, the audit team confirmed that Meridian uses appropriate placards and signage to identify sodium cyanide shipments in accordance with regulatory and international transport requirements.

Meridian implements a vehicle inspection program to ensure that all transport equipment used for sodium cyanide shipments is inspected prior to departure.

Drivers conduct pre-trip inspections using Form F-MAN-007 Daily Vehicle Inspection, which verifies the operational condition of both the truck and trailer before each shipment. The inspection includes, among other items:

- Tire condition;
- Breaking and safety systems;
- Seat belts;
- First aid kits;
- Safety cones and warning triangles;
- Tools and emergency equipment;
- Vehicle mileage;

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- Required transport documentation, including the contingency plan, Ministry of Transport authorizations, insurance policies, and other applicable permits.

The completed inspection is reviewed and validated by the Convoy Supervisor prior to departure.

Escort vehicles are also inspected before each working shift using Form F-TRA-011 Escort Pick-up Truck Checklist, completed by the Convoy Supervisor and reviewed by the Integrated Management System Department.

This inspection includes verification of:

- Driver qualifications and licenses;
- Vehicle documentation (Insurances, permits, identification credentials, certificates);
- Personal protective equipment;
- Emergency response equipment, including first aid kits, Cyanokit, HCN gas monitor, satellite communication equipment, shovel, pickaxe, collection brush, and spill response materials;
- Mechanical condition of the vehicle.

Completed checklists are submitted to the Integrated Management System Department, where they are archived electronically and shared with clients as required.

In addition to pre-trip inspections, Meridian conducts periodic unannounced vehicle inspections jointly with representatives from Contrans, Meridian's Occupational Safety and Health Department, and the Maintenance Department. These inspections are conducted at least monthly and include verification of vehicle condition, safety equipment, and compliance with transport requirements.

Based on document review, field observations, and interviews with personnel, the audit team confirmed that Meridian implements and documents vehicle inspections prior to each cyanide shipment and maintains an ongoing vehicle safety inspection program.

Meridian maintains a computerized fleet maintenance management system that records preventive maintenance activities, fuel consumption, tire management, vehicle mileage, work orders, and

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maintenance history for all vehicles in its fleet. Preventive maintenance frequencies are established according to vehicle type, operating conditions, and manufacturer recommendations.

The company maintains an Integrated Management System database that continuously tracks vehicle mileage and automatically identifies upcoming maintenance requirements. Drivers report fuel purchases and mileage data, allowing maintenance intervals to be tracked and updated continuously in real time.

The audit team reviewed maintenance records and verified implementation of the preventive maintenance program.

The auditors verified that vehicles used for sodium cyanide transport are maintained in accordance with the established preventive maintenance program and are operated within their design specifications and rated load capacities.

Meridian is responsible for shipping container maintenance. There are maintenance activities—such as painting and/or applying protective coatings to prevent corrosion—are performed. Operators conduct inspections to identify potential dents or damage to the containers. Tarpaulins are placed on the roofs to protect the units and prevent water from leaking inside. Container inspections are included in the "F-MAN-007 Daily Unit Inspection" checklist.

The Transportes Meridian S.A.C. has established and implemented a robust journey management and fatigue prevention system formalized under Procedure P-TRA-009: Sodium Cyanide Transport, specifically, Section 6.8 (Trip Development) mandates strict controls over driver working hours and rest periods to mitigate risks associated with fatigue during sodium cyanide transport operations:

- **Maximum Driving Hours:** The daily driving shifts for sodium cyanide transport operators are strictly limited to a maximum of 8 hours of non-continuous driving.
- **Rest Breaks:** Drivers are required to make scheduled stops every 2 hours for at least 10 minutes (or more) to perform equipment inspections, meals, and active rest breaks.
- **Rest Periods:** Upon completion of the 8-hour driving limit, a mandatory 8-hour continuous rest period is strictly required before the driver can resume the journey.

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- Daytime Driving Restriction: To minimize transit risks, transport operations are restricted exclusively to daytime hours, specifically from 6:00 AM to 6:00 PM.

Compliance with Procedure P-TRA-009 is monitored in real-time through dedicated communication channels. The auditor verified that dedicated WhatsApp communication groups are established for each client, including the client's representatives and key project stakeholders.

During the journey, the Escort or Convoy Supervisor continuously transmits real-time telemetry, location tracking, and operational milestones, including:

- Trip start and arrival times.
- Execution of scheduled active breaks.
- Equipment inspection confirmations.
- Overnight stay checkpoints.

Also, the cabin of the truck has anti-fatigue camera sensors.

This digital log, cross-referenced with GPS tracking and driver logs during the audit, confirms that the fatigue management procedures are actively implemented and monitored in the field.

Transportes Meridian S.A.C. has implemented comprehensive procedures and physical controls to ensure that sodium cyanide is transported in a manner that prevents load shifting and maintains the integrity of the producer's packaging throughout the entire transportation process.

As a core operational definition, Meridian transports sodium cyanide exclusively in sealed maritime containers received directly from the Port of Callao, Chancay Port, or authorized extra-port customs warehouses (such as Contrans or Alconsa). In compliance with company policies and verification during interviews, Meridian does not open, repackage, subdivide, transfer, or alter the cargo or its containment inside the container. The cargo remains sealed from the point of origin until final delivery to the mining customer.

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To address the prevention of load shifting and protection of cargo integrity, Procedure P-TRA-009 (Sodium Cyanide Transport, Section 6.4.1 "Transport Preparation") and the specific Cargo Securing and Lashing Procedure establish strict inspection protocols before departure and during transit:

Chassis Securing (External Shifting Prevention): Containers are positioned precisely on the trailer and locked using standard twist-lock mechanisms (fixed locking clamps) designed specifically for maritime containers. To prevent any micro-movement or chassis displacement on rough mining routes, additional structural securing is applied, including container lashing using heavy-duty chains.

Security and Tamper-Prevention: To ensure the doors cannot move, shift, or be opened during transit, Meridian installs a metal "ducktail" locking plate that mechanically blocks the container doors while mounted on the trailer. Additionally, heavy-duty security bars and padlocks are fitted to both doors.

Weather Protection: When required by specific risk assessments or container roof conditions, tarpaulin protection is installed to shield the roof of the container structure from environmental factors.

Chain of Custody and Seal Integrity: Since the internal load cannot be visually inspected due to security seals, preventing shifting relies on verifying container integrity. Seal and lock inspections are conducted and recorded at five critical milestones:

- Receipt at the Port of Callao or Chancay Port.
- Arrival at extra-port warehouses (Contrans / Alconsa).
- Departure from warehouses toward the mining operations.
- During scheduled route stops.
- Upon final delivery at the customer's mining site.

The audit team verified compliance through a review of procedure P-TRA-009 and lashing guidelines. Also, the audit team did Field inspection of transport units, verifying the condition of twist-locks, chains, and "ducktail" plates. Also, the auditors reviewed the digital transport logs and photographic evidence transmitted in real-time by Convoy Supervisors via customer-specific WhatsApp groups.

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These records consistently demonstrated that the transport configurations effectively prevent any shifting of the load and successfully preserve the producer's packaging integrity from port to mine.

Transportes Meridian S.A.C. has documented and implemented clear procedures to modify, suspend, or divert transport operations when encountering adverse conditions such as severe weather, road blocks, or civil unrest.

Procedure P-TRA-009 (Sodium Cyanide Transport) specifically outlines the protocols for emergency suspension and route modification:

Suspension of Operations If an unforeseen event prevents the convoy from safely reaching its scheduled destination, the procedure mandates the immediate suspension of the journey. The convoy must be parked in a pre-approved, safe location. Eligible locations include designated service stations, secure truck stops, or adjacent to police stations, which must be actively contacted and coordinated by the Escort Supervisor.

Unplanned Stop Location Criteria The procedure defines strict safety and environmental parameters that the Escort Supervisor must verify when selecting an unplanned parking or staging area due to bad weather or civil disturbances. The location must provide:

- Sufficient physical space to safely accommodate all cargo trucks and escort vehicles without obstructing public traffic.
- Safe distance away from population centers and environmentally sensitive areas.
- Access to basic food and sanitation facilities for drivers and escort personnel.
- Obstacle-free entrance and exit routes to ensure rapid evacuation if necessary.
- Chemical Compatibility Validation: Absolute absence of incompatible materials in the immediate vicinity (such as flammables, hazardous liquids, or exposed food products).
- Continuous Security: Requirement for permanent custody and monitoring of the parked convoy by the escort team.

Regulatory Compliance & Route Modification:

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In the event of a mandatory route change, diversion, or a return-to-base order, the operation triggers a formal regulatory tracking protocol. Because sodium cyanide is a highly regulated substance in Peru, Meridian's dispatch center generates a complementary electronic delivery guide. This document updates the transport manifest in real-time, maintaining full communication, transparency, and compliance with the competent national authority, SUNAT (National Superintendency of Customs and Tax Administration).

Evidence Reviewed:

The audit team confirmed compliance by reviewing Procedure P-TRA-009, verifying the integrated risk assessment criteria for safe havens, and reviewing historical digital transport logs. Interviews with Escort Supervisors and dispatch personnel confirmed they are fully empowered to suspend journeys based on real-time weather alerts or civil unrest data communicated via their tracking networks.

Transportes Meridian S.A.C. has established and actively maintains a comprehensive drug and alcohol abuse prevention and control program applicable to all personnel involved in the transport of sodium cyanide.

The program is formally governed by the "No Alcohol and No Drugs Policy", which is personally endorsed and signed by the General Manager, Miguel Monteverde Herrada. This policy establishes a strict zero-tolerance threshold for alcohol and controlled substances in the workplace and reserves the company's right to conduct unannounced inspections and random biological testing (blood or urine) at any time.

Implementation and Testing Protocol:

The program is operationalized through a multi-layered screening framework:

Annual Medical Screening: Drug and substance abuse testing is mandatory and integrated into the annual Occupational Medical Examination required for every drive and escort supervisor.

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Random & Target Testing: The Occupational Health Physician conducts unannounced, random toxicological evaluations utilizing reactive urine test strips. To guarantee legal and medical validity, any reactive/presumptive positive result triggers an immediate secondary confirmation test handled by an independent, third-party certified laboratory.

Daily Pre-Dispatch Screening: Prior to entering the dispatch facilities and before starting any sodium cyanide convoy, all drivers and escort supervisors must undergo mandatory breathalyzer testing to verify a 0.0 g/l alcohol level.

In-Route Controls: Every convoy Escort Supervisor is equipped with a calibrated portable breathalyzer. Daily alcohol testing is conducted in the field before restarting driving shifts each morning or during journey checkpoints.

Policy Communication and Disciplinary Actions:

The policy is thoroughly communicated to all personnel through the Human Resources induction program, formalized via the Induction and reinforced through informational leaflets distributed to and signed by the workers during their onboarding.

Regarding disciplinary actions, Policy D-SIG-002 outlines corporate sanctions that include a 3-day unpaid suspension for a first offense and contract termination upon recurrence. However, specifically for high-risk operations involving hazardous materials such as sodium cyanide, any single positive drug or alcohol result triggers the immediate and permanent removal of the driver from the cyanide transport roster, independently of the general labor disciplinary process, thereby ensuring absolute risk mitigation in transit.

The audit team verified compliance by reviewing Policy D-SIG-002, Induction Forms (F-RRHH-006), annual occupational medical records, and field logs of daily pre-shift breathalyzer checks recorded by the escort supervisors during transport operations.

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Transportes Meridian S.A.C. maintains a well-defined and secure record retention system to document that all journey management, fatigue prevention, drug and alcohol testing, and cargo integrity activities have been systematically conducted.

The company utilizes a dual-archiving strategy to ensure data integrity, backup redundancy, and long-term availability:

Digital Records (Cloud Storage): All daily operational logs, real-time tracking reports, checklist summaries, and photographic evidence generated during sodium cyanide convoys are digitized. These electronic files are securely stored and managed via the company's enterprise cloud platform, Microsoft SharePoint. This system features access control restrictions to ensure data confidentiality and prevents unauthorized modifications. Additionally, key electronic transport documentation and delivery milestones are shared directly with the customers.

Physical Records (Secure Offsite Archiving): Hardcopy operational documents—including signed driver induction forms (F-RRHH-006), original pre-dispatch checklists, breathalyzer field logs, and physical delivery guides—are managed through a formal commercial agreement with Iron Mountain, a specialized third-party records management provider.

Both storage mechanisms guarantee that records are kept in a legible, identifiable, and readily retrievable manner, meeting and exceeding the retention period requirements established by the International Cyanide Management Code and local Peruvian regulations.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

☒ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 1.5

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

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This Transport Practice does not apply to this transport operation. Transportation is by land in trucks.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

✓ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 1.6

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. has equipped all transport vehicles and escort units with highly reliable, redundant communication systems that guarantee continuous contact among the convoy, the monitoring and geolocation department, the client, and emergency responders throughout the entire supply chain.

The communication framework is active from the initial product loading at extra-port warehouses (Contrans or Alconsa) through transit and final mine delivery. While commercial mobile networks in Peru generally provide stable coverage along the designated routes—with any potential cellular shadow zones limited to negligible intervals of only 1 to 2 minutes—Meridian effectively mitigates any communication risk by implementing a triple-redundancy framework:

Mobile Cellular Networks (Primary Voice/Data): Escort supervisors and drivers maintain active communication via commercial mobile phones. Dedicated customer-specific WhatsApp groups and voice calls are utilized for real-time reporting at established checkpoints.

Satellite Telephone System (Critical Emergency Backup): To bridge any temporary cellular coverage gaps and ensure absolute connectivity during an emergency, the convoy is equipped with an active, functional satellite telephone. The audit team verified that the satellite service is maintained under an active annual plan providing 450 minutes of operational airtime, ensuring immediate outreach capabilities regardless of geographic barriers.

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Real-Time GPS Tracking Platform: Every transport unit is equipped with a GPS tracking system monitored 24/7 by Transportes Meridian's specialized Monitoring and Geolocation Department at their main base, providing constant telemetry and location data.

Inter-Convoy Radio Communication: For close-range, immediate operational coordination during movement, drivers and the escort vehicle utilize an integrated VHF/UHF radio system.

The audit team confirmed compliance through live demonstration of the centralized GPS tracking platform at Meridian's base and review of real-time communication logs within client WhatsApp groups.

Transportes Meridian S.A.C. periodically tests all communication and tracking equipment to ensure it functions properly prior to vehicle dispatch and throughout the transport operation.

During the site visit to the 24/7 Monitoring Center, the audit team interviewed the Head of Security and Monitoring, Luis Mosquera Guerra, and verified the testing and operational protocols for the communication technologies deployed.

Pre-Convoy Communication Testing: Before any sodium cyanide convoy departs the warehouse facilities, the Escort Supervisor conducts functional radio check-tests with all transport unit drivers to ensure clear VHF/UHF inter-convoy communication. Concurrently, cellular phone functionality and signal connectivity are verified for all designated operators and escort personnel.

GPS (Global Positioning System) and Telemetry Validation: Fleet tracking utilizes advanced platforms, specifically GPS and Smart Satellite. Before departure, the Monitoring Center confirms that each truck's fixed GPS is transmitting live telemetry data accurately. In line with strict contingency procedures, if a vehicle's fixed GPS is found to be non-operational at the time of dispatch, a functional portable backup GPS unit is immediately deployed.

Critical Security Features Testing: The Monitoring Center routinely verifies the operational status of integrated security features, including driver-accessible panic buttons and automated anti-jammer systems designed to detect and alert against signal-blocking attempts.

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Satellite Phone Testing: In alignment with safety protocols, the operability of the convoy's critical backup satellite telephone is verified before departure to ensure immediate functionality during the journey.

Transportes Meridian S.A.C. has systematically identified the communication blackout areas along its designated transport routes through comprehensive route risk assessments and has implemented specific operational procedures to mitigate risks within these zones.

The route risk assessments identify minor communication "blackout zones" where commercial cellular signals are temporarily lost. However, these blackout areas are limited to very short intervals lasting only 1 to 2 minutes. To ensure continuous management and safety control during these gaps, Procedure P-TRA-009 (Sodium Cyanide Transport) establishes the following mandatory protocols:

Pre- and Post-Zone Reporting: The Escort Supervisor is required to notify the 24/7 Monitoring Center immediately before the convoy enters any pre-identified cellular blackout zone and must report back instantly upon exiting the zone and regaining commercial signal.

Permanent Satellite Backup: To eliminate any period of absolute silence, the convoy carries a fully operational satellite telephone (maintained with an active annual plan of 450 minutes). This serves as the primary communication channel for emergencies while traversing blackout areas, fulfilling the highest safety requirements of Meridian's mining clients.

Continuous Inter-Convoy Radio Frequency: Throughout the entire journey—from warehouse departure to final mine delivery—all transport units and escort vehicles maintain an uninterrupted convoy formation. Communication within these blackout zones relies on their programmed VHF/UHF radio base network, ensuring that drivers and the Escort Supervisor remain in constant, real-time contact with one another.

The audit team verified through a physical inspection of the convoy units, confirming the successful installation and operability of both the inter-convoy radio frequency system and the active satellite telephone hardware.

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Transportes Meridian S.A.C. has implemented robust, multi-layered systems and procedures to track the progress of sodium cyanide shipments in real-time throughout the entire transportation process, from port/warehouse dispatch to final delivery at the mine site.

As verified during the audit of Meridian's headquarters and route operations, the shipment tracking framework consists of the following integrated systems and operational controls:

24/7 Dedicated Geolocation Monitoring: Meridian operates a centralized Monitoring Center active 24 hours a day, 7 days a week, managed by a specialized team led by the Head of Security and Monitoring. This center utilizes advanced fleet tracking platforms—specifically GPS to monitor the exact coordinates, transit speed, and trajectory of the sodium cyanide transport units.

Real-Time Journey Management & Supervisor Reporting: In accordance with Procedure P-TRA-009, the Escort Supervisor acts as the field link for shipment tracking. Dedicated communication groups (via WhatsApp) are established for each client, involving the mining customer, distributor (Meridian's client). The supervisor continuously transmits live operational milestones, including:

- Exact departure and arrival times.
- Execution of mandatory active rest breaks every 2 hours.
- Verification of overnight stays at pre-approved safe havens.

Redundant Communication Fail-Safes: To ensure shipment tracking is never compromised by geographic barriers, any short cellular blackout areas (lasting 1 to 2 minutes) are mitigated by the convoy's permanent satellite telephone system (equipped with an active 450-minute annual plan) and continuous inter-convoy VHF/UHF (Ultra High Frequency and Very High Frequency) radio communication. Furthermore, the Monitoring Center's GPS platform features anti-jammer alerts and panic buttons to prevent and detect any unauthorized tracking interruptions.

Data Archiving and Historical Records: To guarantee long-term auditability and verification, all telemetry, tracking data, and speed logs for sodium cyanide shipments are systematically archived for a minimum of one year, with historical fleet tracking databases maintained continuously since 2013.

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Transportes Meridian S.A.C. implements strict inventory controls and chain of custody documentation to prevent any diversion or loss of sodium cyanide during shipment, ensuring the material remains fully accounted for from the port of entry to final mine delivery.

The chain of custody and weight verification framework consists of the following interconnected controls:

Tamper-Evident Seal Controls: The official dispatch documentation, including the Electronic Delivery Guide, lists the unique serial numbers of the high-security seals affixed to the maritime containers. The Escort Supervisor and drivers physically inspect and verify that these seals remain intact and match the documentation at every scheduled route checkpoint and during handover milestones.

Independent Institutional Oversight (SUTRAN & SUNAT): Additional structural controls are provided along national highways by SUTRAN (Superintendence of Land Transportation of Passengers, Cargo, and Freight) and SUNAT (National Superintendency of Customs and Tax Administration). Convoys commonly pass through permanent government-operated weigh stations located at critical highway nodes. These authorities verify gross vehicle weights, cross-reference dispatch delivery guides, to ensure zero cargo discrepancies or unauthorized access during transit.

Transportes Meridian S.A.C. ensures that comprehensive material safety information and exact shipment quantity documentation are carried aboard every transport vehicle and escort unit, remaining readily available to drivers and supervisors throughout the journey.

The operational flow for document control and availability is structured through the following verifiable steps:

Pre-Dispatch Documentation Package: One day prior to any sodium cyanide shipment, the mining client or distributor transmits the complete documentation package to Transportes Meridian's dispatch department. This package includes the Material Safety Data Sheet (MSDS), the localized Safety Summary Sheet and the Sender's Electronic Delivery Guide, which specifies the exact number of product units, type of packaging, and total net cargo weight.

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On-Board Availability (Cab Dossier): Prior to convoy departure, physical copies of this entire documentation package (MSDS, Safety Summary Sheet, and matching Delivery Guides indicating cargo quantities) are compiled into a dedicated transport dossier. A complete dossier is placed inside the cabin of each cargo truck and within the escort supervisor's vehicle. Drivers and supervisors are trained to maintain these documents in an accessible location within the cabin for immediate presentation to emergency responders or regulatory authorities (such as SUTRAN or SUNAT) if required.

Delivery and Chain of Custody Closure: Upon safe arrival at the mining customer's designated warehouse, the delivered quantities and container seals are physically verified against the on-board documentation. The customer formally signs the delivery guides, signaling full conformity and successfully closing the transport tracking cycle.

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.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 2.1

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Not applicable. Meridian does not have interim storage.

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Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

✓ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 3.1

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. has a comprehensive, documented, and legally approved Emergency Response Plan (referred to locally as a Contingency Plan) specifically designed to address incidents during the land transportation of hazardous materials, including sodium cyanide.

The plan is formalized under the document code D-TRA-001, and is titled "Contingency Plan for the Land Transport of Hazardous Materials and/or Waste".

In strict compliance with Peruvian national regulations, this emergency plan has been formally reviewed and approved by the competent authority, the Ministry of Transport and Communications (MTC) of Peru, through Approval Resolution No. 1107-2022-MTC/16.

The Emergency Response Plan is fully appropriate and specifically adapted for the designated transportation routes utilized for sodium cyanide shipments.

Transportes Meridian S.A.C. ensures route-specific appropriateness through a tiered risk management and contingency framework:

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Comprehensive Material and Route Matrix: The master Contingency Plan for the Land Transport of Hazardous Materials and/or Waste covers distinct chemical products, explicitly including sodium cyanide. This master plan incorporates the primary national transport corridors and was legally validated by the Peruvian Ministry of Transport and Communications (MTC) under Technical Legal Report No. 063-2022-MTC/16.02, which served as the basis for its formal approval.

Route-Specific Contingency Extensions: To address the unique geographic, climatic, and social risks of specific mining destinations, Meridian develops formal extensions to the master plan. The audit team verified the implementation of the "Contingency Plan Extension for Land Transport of Hazardous.

Operational Route Risk Assessments (Form F-TRA-008): Meridian utilizes Form F-TRA-008 (Risk Assessment on Route) to dynamically evaluate risks along each specific transport segment. This document identifies critical hazard points (e.g., steep descents, sharp curves, high-density areas) and mandates specific operational control measures, including strict defensive driving protocols, mandatory compliance with traffic signage, and conservative speed reductions below the national limits.

Active Route Sheets (Form F-TRA-009): Complementing the risk assessment, each convoy operates under a formalized Route Sheet that serves as the tactical guide for the drivers and Escort Supervisors, mapping out safe havens, communication checkpoints, and emergency contact locations along the specific route.

Transportes Meridian's Contingency Plan includes the MSDS for sodium cyanide, which contains the chemical and physical properties of the product. These properties are considered in the risk and hazard assessment of the Contingency Plan.

Transportes Meridian's Contingency Plan consider the land transport of sodium cyanide to mines in Peru by truck and trailers. The risk and hazard assessment of the Contingency Plan is based on this method of transport. The Contingency Plan for the Land Transport of Hazardous Materials and/or

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Waste under code D-TRA-001 has the approval resolution from the Ministry of Transport and Communications of Peru, Number 1107-2022-MTC/16 dated November 11, 2022.

Transportes Meridian's Contingency Plan includes the infrastructure assessment in form F-TRA-008 – Risk Assessment on Route. This document analyzes the infrastructure and conditions of the roads used to transport sodium cyanide from the warehouse to the mining units, considering whether the road is paved or not, the presence of sharp curves, the load capacity of the bridges, the steepness of the slopes, and the population density. Additionally, the Contingency Plan contains maps of the routes from the warehouses to the mining units.

Transportes Meridian S.A.C.'s Emergency Response Plan fully considers and integrates the specific technical design and structural characteristics of the transport vehicles utilized for sodium cyanide shipments.

The Contingency Plan for the Land Transport of Hazardous Materials and/or Waste accounts for vehicle design through the following operational and regulatory controls:

Detailed Fleet Technical Description: Plan D-TRA-001 includes an exhaustive, technical inventory of all authorized tractor units and semi-trailers configured for hazardous material transport. This roster explicitly covers only those units formally registered and permitted by the DGTT (General Directorate of Land Transport) under the Ministry of Transport and Communications (MTC).

Chassis and Trailer Specifications: The plan defines the exact engineering standards for trailers used in heavy mining corridors, mandating the use of conventional heavy-duty container chassis or specialized low-bed trailers. These configurations optimize the cargo's center of gravity and provide superior structural stability on rough Andean mountain roads, reducing rollover risks.

Intermodal Container Interfacing: The emergency protocols are tailored specifically for sodium cyanide transported inside standard, sealed maritime shipping containers. The plan explicitly accounts for the physical containment provided by these heavy steel containers and integrates

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response procedures (such as uprighting operations, container lifting, or specialized structural stabilization) that are appropriate for this specific type of transport unit.

Transportes Meridian's Contingency Plan includes the Risk Assessment and Control Matrix by Route, encompassing various risks (chemical spill, adverse weather conditions, load falling off, assaults, thefts, rollovers, natural disasters), their potential causes, and control measures, which can include elimination, substitution, engineering, administrative controls, and personal protective equipment. (defensive driving, use of spill kits, vehicle inspection, use of PPE, adherence to speed limits).

The Contingency Plan considers the following emergency levels:

LEVEL I (Minor)

A minor emergency that can be controlled by the TRANSPORTES MERIDIAN SAC driver(s), who can respond to the event and take the necessary actions to address the emergency. At this Level I, the emergency is controlled with internal resources.

LEVEL II (Medium)

A medium emergency that involves the driver, the transport unit, and the goods. At this Level II, the emergency is controlled with the resources of the company, the sender, and the recipient. It may or may not involve the intervention of support organizations (Police, firefighters, health services) and local authorities.

LEVEL III (Major)

An emergency that requires external support; the presence of the emergency team and/or external support institutions is necessary. The scope of the accident may extend inside or outside the company.

Transportes Meridian S.A.C. explicitly identifies the roles of external emergency responders, medical services, and regulatory authorities within its Emergency Response Plan, and has formally notified

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these entities regarding their specific roles in the event of a sodium cyanide incident. The Contingency Plan for the Land Transport of Hazardous Materials and/or Waste (Code: D-TRA-001, Version 03) classifies incidents into three severity tiers. For Level II (incidents exceeding local convoy containment capabilities) and Level III (major emergencies requiring massive external support) events, the plan incorporates a dedicated communication flowchart. This chart delineates the coordination lines and response roles for external support entities, including the National Police, Volunteer Fire Departments, Regional Support Hospitals, Civil Defense, and the General Directorate of Socio-Environmental Affairs of the Ministry of Transport and Communications (MTC). To ensure these entities are fully aware of their roles and the chemical hazards associated with sodium cyanide transport, Meridian systematically delivers formal notification letters to the primary medical centers and fire stations along its national transport corridors. The audit team verified formal, stamped, and signed acknowledgment letters confirming delivery and notification to the following external responders.

Transport Practice 3.2

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

☒ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 3.2

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. provides comprehensive initial and annual refresher emergency response training to all appropriate personnel, including convoy drivers, escort supervisors, and monitoring operators.

The training framework is formalized within the company's 2026 Annual Occupational Safety and Health Program, which is actively monitored and reported monthly to the Joint Health and Safety

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Committee. The training program guarantees that all personnel handling sodium cyanide shipments possess the necessary skills to prevent and respond to emergencies.

Training Matrix for Drivers and Supervisors:

The audit team verified that transport operators and escort supervisors undergo a rigorous training curriculum that includes the following core courses:

OSHA HAZWOPER Level I: First Responder Awareness Level.

OSHA HAZWOPER Level II: First Responder Operations.

Safety in the Transport of Sodium Cyanide: Product-specific chemical hazards, first aid, and emergency controls.

- Defensive Driving: Tailored for heavy vehicles operating in complex Andean routes.
- Contingency Plan Deployment: Specific execution of Plan D-TRA-001 v03.

The audit team reviewed current attendance records. Specifically, on May 7, 2026, a comprehensive session titled "Contingency Plan for Sodium Cyanide Transport: Induction, Training, and Emergency Mock Drill" was conducted using a hybrid approach (virtual and face-to-face modalities), registering 30 participants between drivers and supervisors. Additionally, a remote Hazard Identification and Risk Assessment (IPERC) Course was verified, capturing 171 participants via Google Forms attendance tracking, complete with reviewed multimedia training materials.

Trainer Competence Verification:

In alignment with the ICMI's requirements for trainer qualification, the Safety in the Transport of Sodium Cyanide and Contingency Plan courses are designed and delivered internally by Javier Espinoza, Head of the Integrated Management System (IMS).

This ensures that the internal trainer possesses high-level international and local credentials to effectively train field personnel.

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Evidence Reviewed: The audit team confirmed compliance by:

Reviewing the 2026 Annual Occupational Safety and Health Program and the monthly progress reports submitted to the safety committee.

Examining signed copies of the Training Attendance Form F-RRHH-004, for the sodium cyanide transport and contingency plan session.

Reviewing digital logs, Google Forms metadata, presentation slides, and training material.

Inspecting the original physical certificates and qualification dossiers of the internal trainer, Javier Espinoza, validating that his background fulfills the ICMI criteria for qualified instructors.

Transportes Meridian S.A.C.'s Emergency Response Plan provides detailed, clear, and specific descriptions of the emergency response duties and responsibilities for all key personnel involved in the supply chain, governing actions required before, during, and after an incident.

The Contingency Plan for the Land Transport of Hazardous Materials and/or Waste (Code: D-TRA) aligns roles and functions based on a three-tier emergency classification system:

Level I (Minor): Localized incidents that can be resolved immediately by the convoy's on-scene resources.

Level II (Medium): Incidents requiring localized internal support or regional company deployment.

Level III (High): Major emergencies requiring the full activation of the corporate crisis committee, deployment of specialized emergency teams, and direct intervention of external mutual aid entities (Hospitals, Fire Departments, and Civil Defense).

Within this framework, the plan establishes a structured command hierarchy and explicitly defines the operational duties for the following eight key roles:

- General Manager / Head of the Crisis Committee.

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- Operations Manager.
- Head of Security / Safety Supervisor.
- Monitoring Center.
- Convoy Escort Supervisor / On-Scene Coordinator.
- Convoy Drivers.
- Coordinator I of the Emergency Response Committee.
- Coordinator II of the Emergency Response Committee.

The audit team confirmed compliance by reviewing the organizational charts and specific duty chapters within Contingency Plan D-TRA-001. The auditor verified that the document explicitly details actionable checklists for each of the eight roles listed above across the timeline of an emergency (before departure, during an active crisis, and post-incident cleanup). Compliance was further validated through personnel interviews during the late May 2026 site visit, where drivers, monitoring operators, and the Head of Security successfully demonstrated clear knowledge of their assigned roles and communication flows within the command hierarchy.

Transportes Meridian S.A.C. maintains an exhaustive, documented inventory of emergency response equipment, personal protective equipment (PPE), spill containment materials, and specialized medical kits that must be available on board the safety escort vehicle and transport units during transit along the route. The equipment requirements are codified across two complementary operational documents: the master Contingency Plan (D-TRA-001) and the specific Sodium Cyanide Transportation Procedure (P-TRA-009). The complete Emergency Response Kit is structured into three specialized tactical categories deployed inside the safety escort pick-up truck and transport units:

Personal Protective Equipment (PPE) & Detection: Full-face respirators equipped with multi-gas/vapor protective cartridges and particulate filters. HCN (Hydrogen Cyanide) portable monitors for real-time atmospheric safety verification. Chemical-resistant disposable Tyvek suits, high-waterproof rubber boots, heavy-duty leather gloves, long chemical-resistant nitrile gloves, and safety goggles.

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Spill Containment, Material Isolation & Neutralization: Chemical Neutralizer used for pH adjustment and stabilization to prevent HCN gas evolution in liquid contact scenarios. Spark-Proof Tools: Non-sparking shovels and non-sparking picks designed safely for hazardous chemical environments. Containment Media: Absorbent pads, absorbent booms, heavy-duty plastic chemical bags, plastic buckets, brooms, rubber mallets, and plastic dustpans.

Scene Isolation: High-visibility traffic cones, reflective safety vests, caution barricade tape, and signaling chemical glow sticks.

Specialized First Aid & Medical Emergency Equipment: A dedicated Medical Oxygen Cylinder equipped with a pressure regulator and a standard positive-pressure or demand-valve resuscitation assembly, Manual resuscitation bag (AMBU respirator) and corresponding reservoir oxygen masks. A specialized Sodium Cyanide Antidote Kit. General trauma first aid supplies, surgical gloves, and a rigid cervical neck brace.

Inspection and Maintenance Verification: To ensure absolute operability, the complete presence, calibration, expiration dates, and physical integrity of the emergency response kit are systematically inspected prior to every single convoy departure. This control is executed and recorded utilizing the formal Escort Vehicle Checklist (Form F-TRA-011), which must be signed off by the Escort Supervisor.

Transportes Meridian S.A.C. ensures the continuous and immediate availability of all necessary emergency response, health, and safety equipment, including highly specialized personal protective equipment (PPE) and advanced medical antidotes, during transit along the transport routes.

The physical availability, operational readiness, and regulatory compliance of these specialized assets were thoroughly verified during the field phase of the audit:

Advanced Chemical Detection Instrumentation: To guarantee real-time atmospheric safety and the immediate detection of Hydrogen Cyanide (HCN) gas, Meridian deploys a professional-grade MSA Altair portable HCN monitoring device inside the safety escort unit. The audit team verified the

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metrological traceability and operational validity of this device through its current Certificate of Calibration No. 97532. The instrument is certified as fully operational and calibrated.

State-of-the-Art Medical Antidote Availability: For critical emergency medical response, Meridian maintains a specialized, ready-to-use Cyanokit (Hydroxocobalamin injectable) antidote presentation on board the safety escort vehicle. The auditor physically inspected the kit, confirming that the solution was stored under appropriate environmental parameters and was fully active.

Escort Fleet Emergency Kit Deployment: The comprehensive emergency response kits (detailed under Practice 3.2.3, including full-face respirators, non-sparking tools, lime stabilization sacks, and trauma response gear) are physically assigned and continuously available within the dedicated safety escort pick-up trucks assigned to each sodium cyanide convoy.

Transportes Meridian defined that the cyanokit antidote will be administered by qualified external personnel doctors and trained medical technicians corresponding on the medical centers (clinicals and hospitals) included on the Contingency Plan.

Transportes Meridian S.A.C. has established and strictly implements clear, documented procedures to inspect all emergency response equipment, guaranteeing its absolute operational readiness and availability prior to the dispatch of any sodium cyanide shipment.

The inspection protocols are systematically governed and executed through the following controls:

Pre-Dispatch Mandatory Inspection Protocol: In accordance with the Contingency Plan (D-TRA-001, Section 6.3-D), a comprehensive pre-trip inspection of all emergency response kits, personal protective equipment (PPE), and respiratory protection assets is mandatory. No convoy is authorized to leave the dispatch terminals until this verification is successfully completed.

Shared Driver and Supervisor Responsibility: The inspection process relies on active field verification. Drivers utilize the official Escort and Transport Vehicle Checklist (Form F-TRA-011) to inspect their assigned units prior to departure. Concurrently, the Escort Safety Supervisor performs a rigorous, parallel inspection of the safety escort pick-up truck using the same framework, ensuring a dual-

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verification mechanism. Inspections of the medical oxygen includes verifying that the gauges are functional and the tanks are full.

To verify continuous and historical compliance throughout the certification period, the audit team randomly sampled both current and historical transport records. The auditors thoroughly examined the following evidence:

Active Records (2026): Cross-reference verification with current pre-trip checklists executed during the late May 2026 transport operations, confirming that the inspection procedure has been maintained continuously, systematically, and without interruption.

Transportes Meridian S.A.C. clearly delineates the roles and responsibilities of external contractors and specialized entities designated to assist in Level III emergency response activities, including chemical containment, environmental remediation, and financial indemnity.

While standard public emergency responders (such as the National Police and Volunteer Fire Departments) operate under their own institutional jurisdictions, Meridian has formalized specific agreements and protective structures with private specialized entities to manage large-scale cyanide incidents:

Specialized Emergency Response and Remediation Contractor: Meridian has contracted SPILL TECH – ESSAC, a leading international specialist company in hazardous materials emergency response, hazardous waste management, soil rehabilitation, and water-body remediation services. SPILL TECH – ESSAC is designated to assume operational control over specialized recovery, neutralizing, and environmental cleanup actions during a Level III crisis. To ensure rapid response times across Peruvian transport corridors, the contractor maintains fully equipped emergency staging bases at strategic geographic nodes: Central Highway corridor, Barranca (Northern Pan-American Highway), Piura (Northern region) and Talara (Far northern coast).

Financial Redundancy and Environmental Liability Coverage: To guarantee immediate funding for remediation and third-party liabilities, Meridian maintains a current Civil Liability Insurance Policy. This specialized policy explicitly covers manufacturing, storage, transshipment, loading, unloading,

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and the land transport of hazardous materials, including sodium cyanide. It guarantees coverage for material damage, heritage impact, and features a dedicated environmental remediation aggregate limit defined.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

☒ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 3.3

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

- 1. Are there procedures and current contact information for notifying appropriate entities such as the cyanide producer, the customer, regulatory agencies, external response providers, medical facilities and potentially affected communities of an emergency?**

Transportes Meridian S.A.C. has established documented procedures, updated communication flowcharts, and verified directory records to notify the clients, regulatory agencies, external emergency responders, medical facilities, and potentially affected communities in the event of an emergency.

The notification architecture is governed under the master Contingency Plan (Code: D-TRA-001) through the following synchronized mechanisms:

Emergency Communication Flowchart (Section 6.2.1): The plan integrates an active Communications Flow mapping out the chain of custody for alerts during a crisis. This flowchart specifies the exact contact numbers, operational roles, and reporting timelines for the internal command structure, including the on-scene Safety Escort Supervisor, the Monitoring Center, the Coordinator of the Emergency Response Committee, and the Head of the Crisis Committee.

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Dynamic Support Institution Directory (Section 6.4): To prevent obsolete data along active transport corridors, Section 6.4 mandates that the telephone directory of support institutions must be dynamically updated according to the specific final destination of each sodium cyanide cargo. This directory encompasses localized contact data for regional medical centers, police delegations, volunteer fire stations, and civil defense units.

Route-Specific Data Maintenance: In strict alignment with operational reality, Meridian updates these communication records every time a new Route Risk Assessment (Form F-TRA-008) is compiled or when physical notification letters are delivered to local authorities, ensuring that the field teams carry localized, live contact matrices for the specific northern or southern Andean routes being traversed.

Regulatory Agency Notifications: The communication flowchart explicitly details the mandatory protocols and contact channels to notify national regulatory bodies within required timeframes, specifically the National Police, Volunteer Fire Departments, and the DGASA-MTC (General Directorate of Socio-Environmental Affairs of the Ministry of Transport and Communications).

Transportes Meridian S.A.C. has established formal systems and cross-departmental procedures to ensure that both internal and external emergency notification and reporting procedures are kept strictly current.

The management system guarantees directory and flowchart currency through two specialized internal triggers:

Internal Personnel Contact Maintenance: The Human Resources (HR) Department is formally responsible for tracking and documenting any modifications to the personal or corporate communication lines of company employees. In the event of an update affecting key crisis management personnel—such as the general manager, operations manager, escort supervisors, or emergency committee coordinators, HR immediately issues an official internal notification to the Integrated Management System (IMS) Department. The IMS team then updates the formal Emergency Response Plan text and its associated flowcharts.

External Responder and Regulatory Directory Verification: As detailed under Section 6.2.1 (Communications Flow), the notification protocol accounts for the three distinct emergency severity tiers (Levels I, II, and III). To maintain the validity of external lines, the operational team cross-checks contact numbers during the mandatory route risk assessments and the aid letter delivery cycles (as

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verified in Practice 3.1.4). This ensures the real-time accuracy of emergency numbers for specialized response providers, regional support hospitals, volunteer fire companies, civil defense units, the National Police, and the DGASA-MTC (General Directorate of Socio-Environmental Affairs of the Ministry of Transport and Communications).

Transportes Meridian S.A.C. has established a formal, documented procedure to notify the International Cyanide Management Institute (ICMI) of any significant cyanide incidents within the strictly mandated timeframes.

This protocol is explicitly integrated into the Contingency Plan for the Land Transport of Hazardous Materials and/or Waste (Code: D-TRA-001). Specifically, under Section 6.3 ("Cyanide Spill Procedure"), Numeral K, the document establishes the mandatory requirement to notify the ICMI in the event of any significant cyanide incident, as defined in the ICMI's Definitions and Acronyms document.

The documented procedure details the following compliance parameters:

Notification Timeframe: Meridian must formally notify the ICMI within 24 hours of the occurrence of any significant sodium cyanide incident.

Responsible Role: The Head of the Integrated Management System (IMS) designated as the sole corporate representative responsible for executing and transmitting the notification.

Official Communication Channel: The notification must be directed electronically to the ICMI's official reporting inbox: info@cyanidecode.org

Incident History Declaration:

No significant sodium cyanide incidents have occurred during Transportes Meridian S.A.C.'s transport operations throughout the current three-year certification period. Consequently, no notifications or reports have been required or submitted to the ICMI under this protocol.

Transport Practice 3.4

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

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☒ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 3.4

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. has documented and implemented clear, structured procedures for remediation following a sodium cyanide incident, including the mechanical recovery of solids, soil decontamination, environmental monitoring parameters, and the secure management and disposal of spill clean-up debris. The remediation and decontamination architecture is split into immediate first-response containment and advanced professional remediation, governed by Emergency Response Plan for Sodium Cyanide Transport D-TRA-001 (Section 6.3-A "Initial Response Actions for Spills on Dry Soil"): Immediate Field Recovery and Stabilization (Dry Soil Protocol): In the event of a solid sodium cyanide spill, the protocol strictly mandates that no material is to be left exposed on the ground. The immediate response team utilizes calcium oxide/hydroxide (lime) to treat the affected area, ensuring the pH remains elevated above safety thresholds to inhibit the volatilization of Hydrogen Cyanide (HCN) gas. Mechanical Containment and Debris Management: Personnel equipped with mandatory full-face respiratory protection and chemical suits recover the spilled chemical and the immediate layer of contaminated soil utilizing spark-proof shovels, brooms, and plastic dustpans. All recovered chemical debris and contaminated media are placed inside high-density red plastic bags, securely sealed with heavy-duty duct tape, and labeled for strict hazardous waste chain-of-custody tracking and ultimate disposal through authorized channels. Specialized Remediation Contractor Activation (Section 6.3-J): For advanced decontamination, neutralization of residual ions, and full ecological rehabilitation, Meridian formally triggers its agreement with SPILL TECH – ESSAC, a certified tier-one emergency response firm specializing in hazardous waste management, contaminated land rehabilitation, and water-body/coastal remediation services. SPILL TECH dispatches specialized personnel and remediation chemistry from its strategic response bases located at Carretera Central, Barranca, Piura, and Talara. Post-Cleanup Verification Limits: To validate the success of the decontamination and remediation efforts, the plan establishes strict verification parameters based on official regulatory thresholds: Soil Media: Residual validation requires core sampling to verify that free cyanide levels conform to the specific national standards

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defined in mg/kg of dry weight based on land-use categories (agricultural, residential, or extractive/industrial). Surface Water Interfacing: If the spill contacts surface water bodies, immediate sampling is executed to intercept and remediate any plume exceeding the strict environmental baseline threshold of 0.02 mg/L of free cyanide, triggering immediate regulatory and localized mitigation actions.

Transportes Meridian S.A.C.'s Emergency Response Plan D-TRA-001, specifically under the mandatory chapter titled "MANDATORY CONSIDERATIONS", the procedure explicitly states that under no circumstance shall response personnel or third-party contractors apply sodium hypochlorite, ferrous sulfate, or hydrogen peroxide to surface affected by a cyanide spill.

Transport Practice 3.5

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

✓ in full compliance with

The operation is

☐ in substantial compliance with Standard of Practice 3.5

☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Transportes Meridian S.A.C. has established and implemented formal provisions to periodically review, evaluate, and update the adequacy of its Emergency Response Plan, ensuring the document remains effective and aligned with current operational realities.

Under Section 6.1.6 ("Review") of the master Integrated Management System procedure P-SIG-001 (Control of Documents and Records), it is mandated that all critical safety, health, and environmental documentation must undergo a formal review at least annually. Additionally, non-scheduled reviews can be triggered at any time upon the formal request of the designated Process Owner to capture immediate operational changes.

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Section 6.3 (L) "Contingency Plan Update" of Plan D-TRA-001 codifies explicit operational triggers that mandate an immediate evaluation of the plan's adequacy. The plan must be reviewed and updated under the following scenarios: Following the occurrence of any real transport incident or near-miss. Following the execution of scheduled emergency mock drills, to incorporate lessons learned and address identified gaps. In the absence of incidents or drills requiring changes, a mandatory comprehensive review is executed annually.

The Contingency Plan dated August 2022 has also a yearly revision and the latest update done was on 04-Dec-2025. Resolution of the Ministry of Transport and Communications No. 1383-2025-MTC/16.

Transportes Meridian S.A.C. has established formal provisions for periodically conducting emergency mock drills and actively implements them. The company maintains a structured annual drill program managed by the Safety, Health, Environment, and Quality (SHEQ) Department, which includes specific, product-focused sodium cyanide emergency scenarios.

The systematic execution and implementation of the drill program were verified through a comprehensive historical review spanning the current certification cycle:

2026 Annual Drill Program Framework: Meridian operates under the active 2026 Annual Schedule of Drills (Form F-SIG-011 v01, updated on January 3, 2026). The scheduled timeline for the current year includes localized Fire drills (February), First Aid response (April), and a specialized Hazardous Materials/Sodium Cyanide spill simulation (May).

Operational Drill History and Continuous Improvement Evaluation:

2026 Joint Cyanide Drill (Executed May 14, 2026): The audit team reviewed the comprehensive execution report for a joint sodium cyanide spill drill conducted by Transportes Meridian in coordination with the extra-port terminal Contrans. The documentation includes extensive photographic evidence detailing tactical maneuvers such as wind direction measurement, initial site entry utilizing calibrated gas detectors, step-by-step containment, soil remediation, and a detailed chronological timeline evaluation. The post-exercise evaluation identified critical opportunities for

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improvement, specifically the recommendation to transition future drills directly to open national highways (on-the-road simulation) and to guarantee the direct physical participation of specialized medical personnel.

2025 Hazardous Materials Spill Drill (Executed April 17, 2025): Review of this historical emergency report confirmed the execution of a chemical spill response. The post-drill evaluation identified an operational bottleneck, generating a formal corrective action mandating that the hazardous materials warehouse access routes must remain completely cleared to optimize the emergency entry and exit radius of response trucks.

Sodium Cyanide Spill Drill, Held at the Meridian Transport Garage, this exercise simulated a major solid sodium cyanide spill. The evaluation report detailed organizational strengths and explicitly documented a critical weakness: a localized lack of training regarding the correct administration protocol for medical oxygen. A formal corrective action was logged, triggering immediate targeted training delivered by the company's occupational physician.

Tracking and Closure of Action Items: All opportunities for improvement, weaknesses, and recommendations derived from these exercises are systematically integrated into a centralized Corporate Improvement Matrix. The SHEQ department tracks these entries against physical completion evidence and surveys to ensure that lessons learned are effectively institutionalized into enhanced field safety.

Under Section 6.1.6 ("Review") of the master Integrated Management System procedure P-SIG-001 (Control of Documents and Records), it is mandated that all critical safety, health, and environmental documentation must undergo a formal review at least annually. Additionally, non-scheduled reviews can be triggered at any time upon the formal request of the designated Process Owner to capture immediate operational changes.

Section 6.3 (L) "Contingency Plan Update" of Plan D-TRA-001 codifies explicit operational triggers that mandate an immediate evaluation of the plan's adequacy. The plan must be reviewed and updated under the following scenarios: Following the occurrence of any real transport incident or near-miss. Following the execution of scheduled emergency mock drills, to incorporate lessons

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