

SUMMARY AUDIT REPORT

Transportes Zetramsa S.A.C.

Cyanide Transport Operation

***For The
International Cyanide Management Code***

December 2021



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Information on the audited operation

Name of the Transport Operation: Transportes Zetramsa S.A.C.
Name of the Company Ownership: Transportes Zetramsa S.A.C.
Name of Operating Company: Transportes Zetramsa S.A.C.
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Location detail and description of operation

Transportes Zetramsa S.A.C. (Zetramsa) is a Peruvian trucking company specialized in transporting hazardous materials through the national territory to mining operations, among other industries. Zetramsa headquarters are located at Santa Anita, Lima, Peru.

Zetramsa was formed with the aim of providing general freight service. Over the years, the company focused its activities in "specialized load" covering transportation of explosives, hazardous materials, delicate loads, machinery of all types and loads that exceeds the weights and standard measures transported. It provides heavy duty low-bed and oversized packages service, carrying from 15 to 100 tons per unit.

Zetramsa has a variety of platforms that conform to the different paths of Peru. They use units specially designed for the transport of explosives and cyanide to enter the country's major mining centers. They consider freight services with escort service nationwide for convoys or for route surveys. Zetramsa transports cyanide in convoys of at least three trucks escorted by one pickup vehicle. Transport is performed only during daylight hours. Each truck transports a 20-foot-long sea container containing 20 wooden boxes or IBC (Intermediate Bulk Container) with approximately one ton of solid sodium cyanide per IBC. The cyanide transported is mostly from Orica, AGR and Hebei Chengxin producers. This audit comprises the transport operations. No interim storage is considered in this transport operation.

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Auditor's Finding

This operation is

- in full compliance with with the International Cyanide Management Code
- in substantial compliance with
- not in compliance with


This operation has maintained full compliance with the International Cyanide Management Code (ICMC) throughout the previous three-year audit cycle.


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

Audit Company:	BP Cyanide Auditors SAC
Audit Team Leader and Technical Auditor	Bruno Pizzorni
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Dates of Audit:	December 16, 17, 2021

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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Transport Verification Protocol

1. **TRANSPORT:**

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

Transport Practice 1.1

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

- The operation is
- in full compliance with Transport Practice 1.1
 - in substantial compliance with
 - not in compliance with

Zetramsa has evaluated several cyanide transportation routes to the mining operations, routes that currently uses for its cyanide transportation operation on behalf of the cyanide consignors. Potential impacts due to spill accidents has taken into account. The evaluation and selection of routes is limited on the one hand to the routes authorized by the Peruvian ministry of transportation and communications to transport dangerous goods through roads and cities and it is also limited because by the route authorized by the cyanide consignors (clients) and the mining companies.

The auditor reviewed the preliminary inspection of the transport routes where the main hazards and risks have been identified. The routes selection and evaluation study reports include a map of the evaluated route and identified the population density, any road construction, driving in the road infrastructure, inclination, slope and fog zones and has identified the existence of proximity of water bodies. Also identifies road segments describing the distances, travel time and maximum speed allowed. It includes a list of the telephone contact the numbers for emergencies, the segment conclusions, general recommendations and safe places to stop. Also includes a detailed risk assessment where, by means of photographs and symbols, identify the hazards of the route and the controls necessary to minimize them

Zetramsa has developed and implemented the procedure P-TRA-009 Elaboration of roadmaps, which establishes to perform a risk analysis and the steps to follow for the preparation of roadmaps for all routes covered by the organization during the execution of the transport service. Once identified the risks, they establish the necessary control measures necessary to manage these risks.

The Head of Operations verifies the route assessment of the previous service, this is documented in a roadmap, according to the guidelines indicated in the procedure P-TRA-009 Elaboration of roadmaps. The escort supervisor updates the roadmap when there are relevant changes or conditions that may pose a risk during transport in the subsequent services assigned to said route. These changes or conditions can also be recorded in the travel reports (F-TRA-001). Additionally, the

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Head of Operations and the Head of Health and Safety (H&S) carry out a quarterly review and update of the roadmap.

The auditor reviewed the road maps for several mining operations, confirming controls are established to manage the risks identified.

The procedure for elaboration of roadmaps states to periodically reevaluate routes used for cyanide deliveries. In accordance with this procedure the roadmap is continuously re-evaluated. Zetramsa periodically reevaluates their routes used for cyanide deliveries, the drivers provide feedback on the route conditions. The Contingency Plan refers an annual renewal. Also, the roadmap procedure states that changes will be done when road conditions require an update.

The auditor reviewed the example of the cyanide transport route from Lima to Orcopampa mine with a 5 days round trip of the convoy. The roadmap is delivered to each supervisor in each transport, they are required to record the daily controls. They officially establish a travel plan indicating departure and arrival times, indicating the urban areas during the trip and through WhatsApp networks, there is one for each client, the news on the route are indicated, the technical stops, talks and past controls among others. All this information feeds into the roadmap resulting in reports including photos, driving hours and the compliance of receipt of the load by the mine. The reports are shared with the cyanide consignee, the mine and Zetramsa.

Zetramsa management members and drivers were interviewed and confirmation was made that feedback regarding routes is discussed between them for the current transport operations.

The transporter documents the risk analysis where they have identified the risk and measures taken to control them. Road characteristic's as sharp curves, areas near to waterbodies and high density population are having special precautions to transit through.

Zetramsa personnel were interviewed, and confirmation was made that risks and risk mitigation measures are detailed for the route. They meet to discuss risks and risk mitigation measures before departing in each trip. Route evaluations for the transportation routes used for shipments were complete and records were available for review. Routes are also evaluated for security issues and for cell phone coverage.

Zetramsa interacts with governmental agencies en emergency responders in the development of risk management measures. In most cases there is only one route to access to the mine sites. Zetramsa has the authorization of the Ministry of Transport and Communications of Peru (MTC) to use the routes that currently runs to the different mining operations and as such, the authorities had reviewed routes assessments.

Interaction with the communities is in charge of the mining operations as is a sensible issue, according to their request. The cyanide consignor, has also reviewed the route and authorizes its use to Zetramsa.

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During this recertification period has been interacting with these stakeholders as needed. The auditor reviewed meeting minutes between Zetramsa, the cyanide consignor and the mines to share incidents, learned lessons, and action plans. Also reviewed the resolution of the Ministry of Transport that approves the different transportation routes. Also reviewed the auditor evidence of communications of Zetramsa to hospitals and firefighters in Lima. Letters sent to firefighters and medical centers were reviewed to communicate their roles in case of any emergency and to open communication channels between Zetramsa centers and emergency support.

Zetramsa transports sodium cyanide in convoys with a pickup vehicle as escort every 2 or 3 trucks, depending on the mine operation request. The escort is from Zetramsa, the pickup travels with the escort supervisor and the emergency response equipment. Unless national regulations do not require escorts, it is at the request of the mines and the cyanide consignor that are used.

An additional safety measure from Zetramsa is to transport cyanide only in daytime schedules and only allowed to stop at previously authorized places due to their ample capacity for parking and availability of food and security. Another control is on the part of the cyanide consignee, Orica, who supervise the convoy route to ensure that the road map is being fulfilled as planned and that they comply with the breaks and feeding, among other controls.

The auditor reviewed transport procedure, the road maps, the convoys checklist controls and interview drivers and management personnel confirming all the controls mentioned above are in place to transport sodium cyanide.

Zetramsa does not contact other entities to transport the cyanide. All trucks are from the transporter and the drivers are employees of the company. This is also a requirement of the cyanide consignor, the transporter cannot contract thirds to transport cyanide. Requirements pertaining to subcontractors are, therefore, not applicable to this organization.

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Transport Practice 1.2

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

The operation is in full compliance with Transport Practice 1.2
 in substantial compliance with
 not in compliance with

Zetramsa only uses trained, qualified and licensed drivers to operate the transport vehicles. The drivers have a driver's license that enables them to transport hazardous materials according to the tractor and trailer configuration, this in accordance with local regulations DS 0-21-2008 MTC Hazardous Materials Transportation Regulations. The Transport area of Zetramsa is responsible for monitoring the authorization and validity of driver's licenses and travel insurance.

Zetramsa has about twenty conductors enabled to transport sodium cyanide and also explosives. All of them meet the requirements of the customer (the cyanide consignee). Zetramsa has a procedure for the drivers selection. All its drivers have a professional driver's license type a 3B for the vehicle and A4 which is a license for transportation of hazardous materials. The carrier requires as previous experience a minimum of 3 years with A4 license so that they can transport cyanide. They are also requested for criminal and driving records.

All drivers have to go through a starting occupational medical examination and an annual one, they must take HAZMAT I and II, go through a psychological examination and report their financial or banking status to ensure their rest.

In accordance with the procedure of selection and recruitment of personnel, the manager of the company and owner of the same, personally makes the driving test to the applicants for driving. It also asks them to have experience in driving vehicles brand Scania and Mack.

All these records appear in the driver's personal file. They also make home visits to validate their residency. The auditor reviewed with the human resources area examples of files of enabled drivers. Reviewed the induction records with evaluation and results of driving practice, reviewed drivers' resumes, driver's licenses, police records, medical and psychological examinations as well as certificates of previous work.

Zetramsa tracks the validity of its drivers licenses and permits through an Excel worksheet called Document Expiration Matrix to track licenses validity and communicates about their next expiration in a timely manner. The human resources area informs one month in advance that includes dates for medical examinations, update the driving requirements and their validity.

The auditor reviewed training records and operator documents finding everything compliant.

All personnel operating transport vehicles at Zetramsa are trained to perform their tasks safely and

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environmentally responsible. There is no personnel operating cyanide handling equipment.

Drivers are trained in the loading and unloading procedures of their trucks, in defensive driving, first aids, emergency response plan, and in the cyanide transport procedure among others. Zetramsa holds ISO 31001 Road Safety certification.

The auditor reviewed the personal files of the drivers where he verified the certificates and training records, all in accordance with the 2021 Training Plan. Courses in defensive driving, first aids, firefighting, hazardous materials I, II and II are also taught. The drivers are also trained in Orica's emergency response plan, the cyanide consignor. They have a cyanide safety program that includes training requirements for drivers.

The auditor verified that such training has been provided and that it has included elements appropriate to the nature of the transport and the responsibilities of the operator. The auditor reviewed training material including the cyanide transportation work procedure, the attendance records made up of signature sheets. Training is refreshed periodically and testing is performed to confirm competency.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is in full compliance with Transport Practice 1.3
 in substantial compliance with
 not in compliance with

The trucks used by the carrier are configured in accordance with the traffic regulations of the Ministry of Transport and Communications (MTC) of Peru with a configuration T3S3 that refers to the 3-axle tract and respective trailer with capacity to transport a gross weight of 48 T, as it is identified on the respective authorization card of the vehicle. The auditor reviewed the technical specifications of the manufacturer of the Scania and Mack trucks that confirms this load capacity. Fleet specification files were available for review during the verification audit. The tractors and trailers were found to be capable of carrying the loads for which they were being used. Tractor and loaded trailer weights are carefully monitored to ensure that trucks are not overweight.

Zetramsa trucks and trailers were reviewed during the audit. All available tractors and trailers have been checked and were rated for weights that exceed maximum loaded weights. The load capacity of the platforms used is larger than the gross weight of an isotank or a maritime container fully loaded with cyanide which is approximately 22 t.

The maintenance of the vehicles is carried out in the authorized workshop. Preventive maintenance is performed according to the manufacturers recommendations. Zetramsa planner reviews the vehicles mileage weekly and informs to the operations staff about upcoming maintenance. The

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transporter has formal preventive maintenance program to ensure that its tractors and trailers are safe for transport.

As for the trailers, before each trip the drivers make a visual inspection by means of the form " Pre-trip Report". In case of finding any defect the trailer will not go out to the service. Every 6 months Zetramsa sends the trailers to formal inspections performed by third parties who are trusted suppliers.

The auditor reviewed the trailers' manufacturing quality certificates as well as the maintenance records. Also reviewed the annual maintenance plan for trucks, trailers and escort vehicles. Reviewed the work orders of the authorized mechanical workshops detailing replaced components including a detailed report of the work carried out on the vehicle.

In addition to ensuring that the load capacity of their transport equipment indicated by the manufacturer is adequate, the carrier also verifies that the capacity of that equipment is adequate by inspecting and testing their equipment to identify signs of stress or overload. For this purpose it uses a routine preventive maintenance inspection program.

Zetramsa inspects and performs regularly preventive maintenance actions. The maintenance program is well organized, defined checklists showing all necessary maintenance activities are used and records were available. Inspections are scheduled, tracked and documented. Each tractor and trailer has its own file that is maintained. The file shows all preventive maintenance activities, repair activities, and inspection activities that were performed on the truck and/or trailer over time.

Prior to loading and use, trucks are inspected by Zetramsa personnel to ensure there are no deviations that could affect the operation. Inspection is logged in the P-TRA-001 form. They are guided by the load capacity of the equipment, also, the load weights are recorded before and during the trip. Zetramsa is responsible to verify the adequacy of the equipment for the load it must bear according to their procedure Preventive or Corrective Maintenance of Units, performing inspections regularly before departing the cyanide convoy. Zetramsa H&S Supervisor and the escort driver are present to ensure the transporter operates according to recognized H&S standards and are experienced in the handling of hazardous goods.

The auditor reviewed documentation of the inspections and through interviews with maintenance personnel and equipment operators confirmed compliance with this provision.

To prevent overloading of the transport vehicle, Zetramsa has established that each platform will be loaded with only one cyanide container and that each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklist and was confirmed during the interviews.

The carrier has the procedures I-TRA-011 Sodium cyanide load, I-TRA-030 Cyanide discharge and P-TRA-007 Transport of Sodium Cyanide V06 which indicate that they must check the vehicle to prevent overload and indicates the following: when excessive loads are identified, they should not start the trip. The supervisor in coordination with the escort must verify and ensure that the quantity of

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products to be transported must be in accordance with the payload capacity of the unit, as well as the capacity established by the legal norms of the MTC, which must be recorded in the format of weights and measures.

The loads being hauled are standard loads that do not vary in weight. Records were checked against weight capacities and weight limit regulatory information. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. Office personnel and driver showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed. The load is recorded in the shipping papers, allowing Zetramsa to ensure the weight of the shipment.

Shipping paperwork and Zetramsa policies and procedures were reviewed and the transporter personnel interviewed to confirm that appropriate practices are used. Shipping records showed that cargo amounts and weights were within the normal weight capacity of the equipment in use.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is in full compliance with Transport Practice 1.4
 in substantial compliance with
 not in compliance with

Zetramsa has developed and implemented procedures for cyanide load and unload as we for cyanide transportation for its safety operation of solid sodium cyanide. Procedures and formal checklists were available to demonstrate that the transporter manages several these requirements. Zetramsa drivers perform pre-trip inspections validated by the escort leader to ensure that trailers are locked and secured and that placards are on all four sides of the trailers. The procedures describes the administrative, operational and safety measures for the proper transportation of sodium cyanide. The procedures was found to be compliant with the International Cyanide Management Code (ICMC) requirements.

The transport procedures establishes that the load cannot be altered during the transportation process. To ensure this, tags are placed in the sea container’s locks at the manufacturing facility. These tags can only be removed at the mine. Zetramsa also shackle the container using chains to secure the container to the trailer, two at the front side and other two chains crossing the door of the container for which is no possible to open the door due to these chains.

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Shipments of cyanide are identified with the plates and signage required by the Peruvian authority. The auditor inspected the plates and signs used to identify the presence of cyanide in transport vehicles and concludes that this provision is complied. Zetramsa requires all sea containers to have appropriate placards showing UN 1689 (solid cyanide) are displayed on all four sides of the sea containers. Also, it is required drivers visually inspect the containers prior to each movement.

The transport procedure establishes that placards with cyanide's UN number and poison signs must be placed in the container; this is verified through the vehicle inspection checklist. Per the reviewed operation files, the presence of the placards was verified through the checklist.

Zetramsa's personnel and drivers regularly inspect the cyanide convoys departing to the mine sites. Pre-trip checklists performed were reviewed and found to be complete. Pre-trip checklists showed that escort and transport vehicles are in optimal condition, that load capacity is reviewed, that weights to be transported conform to the vehicular configuration, and that characteristics of the transport unit (lights, brakes, chassis, container among others) are without cracks or flaws.


Confirmation was made during the interviews with the trucking company management that perform pre-trip inspections to ensure that trailers are locked and secured and that placards are on all four sides of the trailers, that they perform preventive maintenance to their vehicles according to a stablished schedule. Also, was confirmed that the transporter maintains drug and alcohol abuse prevention policies, which were reviewed during the audit.

The carrier has safety programs that address the various elements required for safe cyanide transportation. The programs reasonably consider each of the topics identified by the ICMI as necessary to ensure the safety of cyanide transport and considering the specific circumstances presented by the transport routes. The preventive maintenance of the vehicles, which includes trucks and trailers transporting cyanide, is done at the manufacturer's authorized workshops. Preventive maintenance for units that are within the manufacturer's warranty period is carried out in the authorized Scania brands workshop and for Mack brand trucks is performed in the authorized Volvo brand workshop, both in Lima. For vehicles out of warranty maintenance is carried out in Zetramsa's own workshop.

The preventive maintenance program does not include maritime containers, since Zetramsa is limited to moving them from the point of origin, where they are loaded by third parties, to the end user, the mine, who is responsible for unloading the containers. Zetramsa reviews through a checklist the state of conservation of the maritime containers before accepting the cyanide shipment.

The frequency of maintenance activities is as specified by the manufacturer of the vehicles and as scheduled, and reports weekly to the various areas to make available the vehicles for maintenance. The auditor reviewed the maintenance records and interviewed employees determining that this provision is complied with.

According to the transport procedure, the transport will only be carried out during daytime hours. In

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the same way, drivers must rest at least eight hours before departing on the trip. The drivers working day traveling with sodium cyanide may not exceed ten hours a day discontinuous, allowing stoppings every two hours at least for fifteen minutes for equipment review, feeding and active stops.

To prevent the load from shifting, Zetramsa has developed and implemented procedures for cyanide loading and unloading. The sea container is shacked with four chains, all containers are filled with 20 IBCs and block and brace is applied at the cyanide production plant to prevent load movement. At the same time, trailers have pins where the container is embedded preventing it from shifting. Cyanide travels in sealed containers, which are secured to the platform safely, minimizing the possibility of displacement during transport.

Zetramsa has provisions to ensure the correct fitting of the pins in the container to prevent the cargo from moving. The procedure for cyanide loading (I-TRA-011) states it is necessary to check the embedding, adjustment and correct placement of the pins as well of tensioning of chains in the container. It includes descriptive photos and included in the Check List F-MAN 001 V3.

The transport procedure allows workers to refuse performing an unsafe work. The procedure states the convoy leader, who continuously reports the state of progress of the operation, in any unsafe event can stop the convoy. Transport can continue only if the leader of the convoy has provided the relevant conditions.

Before each trip, the employee must undergo alcohol testing and periodically discard evidence of drug use. Violation of this policy has resulted in the separation of the worker from the organization.

The Alcohol and Drug Policy, indicates as serious misconduct the consumption of alcohol and drugs during the development of its functions. The auditor reviewed records of alcohol tests.

Transport Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

- The operation is
- in full compliance with Transport Practice 1.5
 - in substantial compliance with
 - not in compliance with

Zetramsa does not ships cyanide by sea. Transport Practice 1.5 does not apply to the operation.

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Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

- The operation is
- in full compliance with Transport Practice 1.6
 - in substantial compliance with
 - not in compliance with

According to Zetramsa's Contingency Plan for Sodium Cyanide transport, all vehicles carrying hazardous materials must have: GPS system to provide their exact location and information, cellphones assigned to the drivers and escorts of the cyanide convoy and also satellite phones when required. The trucks have radios to communicate inside the convoy, they have a list of emergency contacts where the numbers of the control center are indicated and as it appears in the contingency plan.

The auditor verified that the transport vehicles have radios to communicate inside the convoy, GPS, and drivers have means of communications such as radio and cell phone. They carry written procedures and a checklist where the necessary equipment for each shipment is reviewed. Vehicle operators have the contact information for emergency notification to appropriate individuals and organizations and entities along the route as needed to mobilize appropriate response capabilities.

Zetramsa weekly schedules the transport of cargo in general and the Control Center validates the state of operation of the GPS in advance. As for the satellite phone, they do random tests to see if the phone works. Zetramsa's procedure for cyanide transportation includes the requirement that communications equipment must be tested for proper operation before starting the driving journey, also it includes in the equipment check list the correct operation of the cell phone and the radio as well as include in the checklist the satellite phone. The auditor reviewed completed pre-trip inspection records checking that these fields were reviewed to ensure the correct operation of the communications equipment.

Communication blackout areas along the planned transport route have been identified during the routes risk assessments performed. Zetramsa has identified these areas by means of geofencing in the cargo tracking control system. A check box is shown to ensure communication during the transport process, in places where there is no permanent access to communication signals. A communications protocol has been established before entering and on exit from blackout areas.

Before entering these areas the Team Leader of the convoy calls the control center and records the entrance to this area. The auditor reviewed these geofencing in the control center. In the places where there is signal, it indicates the kilometer and the number of the route. Zetramsa has a GPS monitoring procedure, the operation monitors all cell phone coverages for all routes.

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The carrier has a procedure for tracking the load by means of GPS controlled from its control center. The escort supervisor reports several times a day the progress status of the convoy to the mine sites. Trucks are monitored along the route in real time, and any delay will be immediately notice at the control board. GPS tracking system allows continuously monitoring of the location of the convoy. The cyanide transporter communicates to its base, to the mine and the cyanide consignor upon dispatch, upon passing through principal cities and town along the route, on arriving to the mine site, and after unloading is complete.

Personnel responsible for tracking shipment status were interviewed, the GPS system was demonstrated, and logs showing that shipment status, other than cyanide, was being recorded were reviewed and were found to be complete.

Zetramsa has inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The transport documents shows the amount of cyanide delivered.

Additionally, the containers are locked are tagged at the consignor facilities and these tags are only removed at the mine. Shipping paperwork is conformant to ICMC requirements, including chain of custody requirements. The auditor reviewed the trucks cyanide shipment bill of ladings matching the port scale reports, coinciding the weights always.

A waybill will accompany the transportation which includes chain of custody data such as container numbers, the amount of cyanide delivered, waybill number, shipping documentation, Safety Data Sheets (SDS), packing list, bill of lading, customs declarations and producer invoice, among others.

The transport document, the SDS, and emergency response information are carried by each driver. The drivers have an on-board file that includes copies of its, licenses, and the cyanide SDS.

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2. **INTERIM STORAGE**

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

Transport Practice 2.1

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

The operation is in full compliance with Transport Practice 2.1
 in substantial compliance with
 not in compliance with

Zetramsa do not has interim storage of sodium cyanide, therefore Transport Practice 2.1 does not apply to Zetramsa.

3. **EMERGENCY RESPONSE:**

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with Transport Practice 3.1
 in substantial compliance with
 not in compliance with

Zetramsa has the written plan PL-SSO-007 Emergency Plan for the Transportation of Sodium Cyanide v1 to respond to emergencies that may occur during its cyanide transport activities.

Zetramsa' s emergency response plan reflect the risks assessed on the transport route to the mine sites. The plan describes the route and method of transportation by trucks. The emergency scenarios described in the plans are specific to the delivery route taken, the state of the road, the physical form of sodium cyanide – solid in briquettes – the chemistry of the cyanide transported and the transport vehicles used 3-axle trucks with and trailers and one sea container per trailer. The auditor reviewed

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the plans verifying that they are adequate in identifying potential emergency scenarios and necessary response actions.

The latest version of the emergency response plan describes the nature of the response actions to be taken for the types of emergency situations identified. The level of detail is appropriate to the nature of the potential emergencies identified in the plans and the response capabilities available. In all cases, the immediate response – first response – will be carried out by transport personnel: drivers and escort.

The carrier has included any details that may be presented in the event of leaks at locations on the route that have been identified as being of greatest risk. The response to a spill that occurs during the transport of cyanide to open water such as a river establishes notifying the authorities of the lower part of the river to alert the surrounding populations to refrain from using the water of the river.

The auditor reviewed the plans verifying that, to the extent possible, it outlines the specific response actions to be taken for the types of potential spill scenarios identified.

Zetramsa considers in its emergency response plan, the participation of external response personnel to participate in the emergency response to spills that occur during the transport of cyanide for large-scale response cases along the transport route. The emergency plan includes entities such as Ecomarine external hazardous materials responder, police, firefighters, and medical facilities located along the route.

The police will provide support and safety to the transport units and will take control of traffic routes in case of an accident. The firefighters on arrival, will take control of the emergency. The main medical facilities to assist any victims are identified along the routes.

Ecomarine is the contractor designated to provide assistance in the larger-scale second emergency response. The auditor reviewed the carrier's emergency response plans verifying that Ecomarine's functions are identified, as well as the contractual documentation with the contractor.

Transport Practice 3.2

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

The operation is in full compliance with Transport Practice 3.2
 in substantial compliance with
 not in compliance with

Zetramsa provides emergency response training to drivers, convoy leaders and supervisors. Training on emergency response is given periodically according to an Annual Training Program. Personnel is trained in appropriate emergency response in safe cyanide management (spill and intoxication),

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firefighting, first aid, hazardous materials. Training is provided by internal staff and external companies as workouts which are renewed annually complying with the training plan and verifying compliance with specific skills.

The auditor reviewed several training records in hard copies, which include the persons trained, the nature and dates of the training. Administrative personnel, drivers and escorts were interviewed, and awareness of emergency procedures and documentation was confirmed.

The emergency response plan describes the emergency response duties and responsibilities of the consignor and the transport personnel involved in this supply chain. The plan has detailed descriptions of the specific emergency response duties and responsibilities before, during and after an incident / accident or an emergency of situation for the managers, transport coordinator and the Convoy Leader, among others. The roles and responsibilities of relevant internal and external personnel are clearly described. The information in the Plan was found to be acceptable.

Zetramsa' s emergency response plan describe all the equipment and materials required for emergency response during transportation along the route and temporal storage, including spill response equipment. The emergency equipment and Personal Protection Equipment (PPE) includes Tyvek suits, leather and impermeable gloves, PVC boots, safety goggles, isolating tape rolls, HCN detector, cyanide antidotes (sodium nitrite and sodium thiosulfate), disposable respirators, oxygen, shovels, sweeps, polyethylene bags, and empty containers. The auditor considers that the equipment and materials are suitable for the activities required in the emergency response plans.

The auditor reviewed records of the HCN monitors calibration performed during this recertification period by the authorized MSA's dealer in Lima, according to the manufacturer's recommendations. Also, during the site visit the auditor confirmed the antidotes sodium nitrite and sodium thiosulfate were stored following the manufacturer's recommendations and expiration dates were November 2022 and April 2025 respectively, each kit. In an emergency, the victim will be taken along with the antidote to be administered by external medical personnel in the nearest hospital identified in the route, where medical professionals are prepared to administer the antidote if needed.

The Plan defines what equipment must be available in each truck and extra personal protective equipment available. Equipment is checked as part of the pre- trip inspection process. The auditor reviewed the completed emergency equipment checklists and although at the time of the audit there were no cyanide shipments, he observed the storage and availability of the equipment at the carrier's facility. It also interviewed appropriate personnel to verify compliance with this provision. The emergency response equipment for the temporary storage is kept safe near the medical centre.

Zetramsa' s escort pickup trucks carry complete emergency response equipment, including personal protective equipment, spills containment kit, and cyanide antidote. A checklist is used to verify that it is available, these were reviewed and found to be appropriate.

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Zetramsa has written provisions in its emergency response plans establishing that the emergency response equipment identified must be inspected and tested regularly so that they are available in good working order when needed for use. There pass through monthly inspections and also before the departure of each convoy. The carrier has implemented this provision by doing inspections and tests as planned and maintains the records. The auditor reviewed these records and verified on site that the equipment is in good working order for the transport of cyanide.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting

The operation is in full compliance with Transport Practice 3.3
 in substantial compliance with
 not in compliance with

The carrier has in its plans procedures and flowcharts of communications for emergencies, as well as updated contact information for the necessary internal notification and external notifications in case of a cyanide emergency during transport.

The auditor reviewed the notification procedures and the carrier's contact information telephone list verifying compliance with this provision. It is listed current emergency numbers for local hospitals, and for ambulance, police, fire, and environmental responders. Phone lists also included up-to-date contact information for the mine sites and cyanide consignors, among others.

The carrier developed written provisions in its emergency response plans and implemented them to ensure that emergency contact information is kept up to date. These are provisions for the annual or more frequent review of the entire plan, a procedure focused specifically on the periodic updating of contact information that includes testing each contact number on a regular basis. The auditor reviewed the procedure and verified its application by reviewing the documentation and interviews.

Zetramsa has provisions to notify the International Cyanide Management Institute in the event of a spill or cyanide poisoning or exposure. In the Sodium Cyanide Emergency Plan is included this requirement to report any significant accident with cyanide to the ICMI.

No reports have been done to the ICMI as such significant cyanide incidents do not have occurred during this recertification period.

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Transport Practice 3.4

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

- The operation is
- in full compliance with Transport Practice 3.4
 - in substantial compliance with
 - not in compliance with

Zetramsa will carry out its own remediation actions at the first response level for which it has cleaning and decontamination procedures that detail how the recovery and neutralization activities of solutions and solids will be carried out, the decontamination of soils or other contaminated media and the management and disposal of the remains of the spill cleanup, in accordance with the provisions of Zetramsa's emergency response plan.

The second respond for larger spills and the final cleaning of spills that occur during transport will be carried out by Ecomarine, a commercial chemical remediation contractor. Ecomarine is identified as such in the carrier's emergency response plan. The auditor verified the company is available and active to carry out remediation activities.

The auditor reviewed the remediation elements included in the emergency response plan. It also verified that the Ecomarine remediation contractor has procedures in place to provide safe and environmentally appropriate remediation and handling and disposal of cyanide waste materials.

The use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide once it has entered surface waters is specifically prohibited in the carrier's Emergency Response Plan. Ecomarine emergency response contractor includes in its procedures this same prohibition.

The auditor reviewed the carrier's emergency response plan, as well as the procedures of the commercial response contractors, and interviewed vehicle operators, to determine knowledge of this provision.

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Transport Practice 3.5

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

- The operation is
- in full compliance with Transport Practice 3.5
 - in substantial compliance with
 - not in compliance with

Zetramsa has provisions in the emergency response plan to ensure that it is reviewed, evaluated, and updated as needed to account for changes in potential spill scenarios and necessary response actions that may vary over time such as transport routes, the form of cyanide transported and the types of transport equipment used.

The auditor reviewed these provisions contained in the emergency response plans, assessing the process and its implementation by reviewing the documentation of the various versions of the Plan and through interviews with staff. The plan reviewed was maintained as latest versions and under formal document control. Records were available to show that this is done.

The carrier has provisions to conduct cyanide emergency drills as hands-on response training to familiarize personnel with the necessary procedures. The provisions contained in the emergency response plans state that the carrier must perform emergency drills that simulate transport-related cyanide exposures and releases, in order to be better prepared in the event of actual exposures and releases. The drills have been evaluated to determine if the response procedures are adequate, the response team is appropriate, and the staff is properly trained. The written documentation of these assessments is used as a basis for any changes in procedures, equipment or training that may be required. The auditor reviewed the drills reports performed during the recertification period and interviewed the relevant staff confirming compliance with this provision.

In March 2019 they performed a cyanide emergency mock drill with ten participants simulating a cyanide spill and exposure due to a fall of a box (Intermediate Bulk Container or IBC). The drill report identified several improvement opportunities, all required actions were closed.

In 2020 no mock drill was performed due to local prohibitions during the COVID-19 pandemic.

In July 21, 2021 Zetramsa performed another emergency mock drill with five participants simulating a cyanide spill, again due to a fall of an IBC from the truck. The drill report identified the improvement opportunities and all actions were closed.

Zetramsa's emergency response plan states the plan will be evaluated on its performance after its implementation and revise it as needed. Such reviews have not been conducted during this recertification period as no emergency occurred needing to activate the emergency response plan.

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