2025

INTERNATIONAL CYANIDE TRANSPORTATION VERIFICATION PROTOCOL

SUMMARY AUDIT REPORT

TRANSPORTES ZETRAMSA S.A.C.

Cyanide Transport Operation

25 August , 2025

Submitted by:
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Name of Facility	Signature of Lead Auditor	Date of submittal

INTERNATIONAL CYANIDE TRANSPORTATION VERIFICATION PROTOCOL

SUMMARY AUDIT REPORT

1. Operation General Information

Name of Facility:	Transportes Zetramsa S.A.C.
Name of Facility Owner:	Transportes Zetramsa S.A.C.
Name of Facility Operator:	Transportes Zetramsa S.A.C.
Dates of the audit:	21ST, 22ND April 2025
Name of Responsible Manager:	Clinton Plummer – Manager QHSE
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2. Operation Location Detail and Description:

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.

Zetramsa has a variety of trailers that conform to the different routes' conditions of Peru. They use units specially designed for the transport of sodium cyanide to deliver to the country's major mining centers.

They consider freight services with escort service nationwide for convoys or for route surveys. Zetramsa transports sodium cyanide in convoys of two trucks or three tucks escorted by one pickup vehicle. Transport is performed only during daylight hours. Each truck transports a 40-foot-long sea container containing 20 wooden boxes or IBC (Intermediate Bulk Container) with 1.1 ton of solid sodium cyanide per IBC. At the client's request, transportation can be arranged in a 20-foot-long container.

The sodium cyanide transported is primarily sourced from HEBEI CHENGXIN CO., LTD, which is currently certified under the Cyanide Code (last certification dated 18-Apr-2023), and is delivered to the Buenaventura Group mines:

- COMPAÑIA MINERA COIMOLACHE S.A.
- MINERA LA ZANJA S.R.L.
- COMPAÑIA DE MINAS BUENAVENTURA S.A.A.
- SOCIEDAD MINERA EL BROCAL S.A.A.

MAC Transport S.A.C. contracts Zetramsa to carry out the transportation of sodium cyanide to the Buenaventura Group's mining units. The transport is carried out from the sodium cyanide warehouse located at the facilities of Contrans S.A.C. in Callao (Peru) to the various mining units.
Contrans S.A.C. is responsible for loading the cyanide onto the transport units, while unloading at the mine sites is carried out by personnel from each mining operation.

MAC Transport S.A.C. is currently certified under the Cyanide Code (last certification dated 19-Mar-2024).

Contrans S.A.C. is currently certified under the Cyanide Code (last certification dated 02-Aug-2023). This audit covers the transport operations from the sodium cyanide warehouse located at Contrans S.A.C. facilities in Callao (Peru) to the various mining units. No interim storage is involved in this transportation process.

3. 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¨.

4. Auditor Information

Audit Company:	Mingroup Investments S.A.C. and -e QUELLE E.I.R.L.
Lead Auditor:	Álvaro Fuentes Huanqui
Email Lead Auditor:	alvaro.fuentes@e-quelle.net

Name and signature of the audit team.

Lead Auditor:	Álvaro Fuentes Huanqui Name	Signature
Technical Auditor:	Marcos Mera Escala Name	Signature

Dates of Audit: 21ST, 22ND April 2025.

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.

Transportes Zetramsa S.A.C.		13th and 14th Jan, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

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:

ZETRAMSA has the Procedure for Preparing a road map and evaluating it P-TRA-009, v06 rev01, 15-Jan-2025, which considers population density, Infrastructure (roadway, rail, port), construction and condition, pitch and grade, prevalence and proximity of water bodies and fog, protected natural areas, and vehicle type through information provided by drivers. The safety chief validates the road map, and the escort supervisor oversees compliance with the road map (F-TRA-007) and evaluation of the road map (F-TRA-005), which assesses risks and control measures. The safety chief receives reports (F-TRA-010) from drivers who help update the road maps. The road maps are re-evaluated every 5 years or in case of road modifications.

The road risk assessment is carried out through document F-TRA-005. Samples are taken from the Contingency Plan approved on August 8, 2024, by the Ministry of Transport and Communications under Resolution 0621-2024-MTC/16. The assessment takes into account mileage, maximum permitted speed, road characteristics, hazards associated with the area, associated risk, and photographs of the areas.

The assessment includes risk assessments through potential causes and probability control (1), exposure (2), probability (3) Consequence (4) and risk levels Tolerable, Medium, Critical. There is a hierarchy of controls: Eliminate, replace, engineering control, administrative and PPE.

The case of the section is taken Lima-La Zanja, Huarmey -Casma sector, Km 83: Maximum velocity 50 km/hr. Recommended maximum velocity 45 km/hr. in flat terrain: Highway, Associated hazards: in transit of heavy and light vehicles in need of speed, fatigue due to high temperatures and associated risks such as crashes, collision, rollover, mechanical failures and diseases.

Road Map Preparation and Route Assessment Procedure P-TRA-009, Clause 65 on revaluation indicates that road maps are reevaluated every five years at most, or in the event of road modifications or road events or accidents.

The status of roads is periodically verified through GPS monitoring or through the Superintendency of Land Transport for Passengers, Freight, and Goods (SUTRAN is the acronym in Spanish) website https://gis.sutran.gob.pe/alerta_sutran/

The assessment of risks on route is carried out through document F-TRA-005, it includes risk assessments through potential causes and probability control (1), exposure (2), probability (3) Consequence (4) and risk levels Tolerable, Medium, Critical. There is a hierarchy of controls: Eliminate, replace, engineering control, administrative and PPE.

The mining company defines the routes, loading and unloading points, and MAC Transport communicates these to Zetramsa. The Ministry of Transport and Communications (MTC is the acronym in Spanish) provides the route characteristics and regulates and authorizes the service to the carrier, in addition to approving the Carrier's Contingency Plan. Route status is periodically verified through GPS monitoring or through the SUTRAN website https://gis.sutran.gob.pe/alerta_sutran/. In cases of route changes due to weather contingencies, social events, among others, the routes to be followed for transport are suggested by the Mine and MAC Transport.

All convoys consist of three trucks plus one pickup escort. Except for the Sociedad Minera El Brocal (Route: Lima – Cerro de Pasco), which uses two trucks plus one pickup escort. The escort pickup truck is staffed by one Hazmat Level III escort supervisor, and it carries the emergency response kit. The truck driver is trained with Hazmat Level II.

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
☐ in substantial compliance with Standard of Practice 1.2
☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

The job profiles are defined in document PP-GTH-021, for the escort supervisor, minimum HAZMAT level I, II training, at least 03 years of experience and an AIIB driver's license with 03 years of seniority is required. Internally, HAZMAT level III is provided by Zetramsa. For drivers, PP-GTH-022, HAZMAT Level I training, AIIIB license with 02 years of seniority (rigid truck greater than 12 Tn), and A4 special license for transport of hazardous materials is required. HAZMAT level II is provided by Zetramsa.

There is an internal staff training program, Annual Training Program F-SSO-045 v03, which includes training sessions for 2025. HAZMAT I , Contingency Plan, HAZMAT II, Emergency Brigades, HAZMAT III . The following samples were taken: Dispatch code B3501, client code (SLI250008).

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is

✓ in full compliance with
☐ in substantial compliance with Standard of Practice 1.3
☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Yes, the transport units have been defined within the Written Work procedure (herenafter PETS Spanish acronym for Specific Safe Work Procedure) Annex 10 Sodium Cyanide Load I-TRA-011, in the client surveillance area, the scale area is approached to verify the status of the load as well as the transit route of the delivery guide, proof of weights and measures and weighing ticket.

According to the Ministry of Transport and Communications (MTC), for a 3-axle truck with a 3-axle trailer, the payload capacity is 30,000 kg.

A 40-foot container is loaded with 20 IBCs, each containing 1.1 tons of cyanide, resulting in a total net weight of 22 tons. The gross weight of the entire cargo, including the container, is approximately 24 tons. This total weight is below the payload capacity.

The PETS Written Work Procedure, Annex 10, Sodium Cyanide Loading I-TRA-01, in the client's surveillance area, includes verification of the load status near the scale area, as well as review of the transit route, the delivery guide, proof of weights and measures, and the weighing ticket.

Procedures are described, such as the Requirement for the Approval of Drivers and Units for Each Mine F-SGI-0016, which includes the type of operation and the age of the unit. For the transport of sodium cyanide, the maximum age is 10 years for trucks and trailers, and 5 years for pickup trucks.

The transporter verifies that the load bearing capacity of the equipment is adequate by inspecting and testing its equipment to identify signs of stress or overloading, Inspection and testing are underway to identify any infrastructure failures. A pre-use inspection is being conducted before the convoy's departure. Inspection record code F-MAN-001 v07was verified, for unit license plate BXQ-712 and trailer BJU-972 of the Contrans-La Zanja Mining Unit route of 09-Aug-2025, In addition to unit BLL-735 and trailer C3Q-988, unit BVQ-812 and Trailer AKG-982 from the same convoy, route and date.

Preventive maintenance is also provided by SCANIA's parent company, and every six months the units undergo a technical inspection at a company authorized by the Peruvian Ministry of Transportation, There is evidence of a vehicle technical inspection certificate carried out by Grupo J&J Technical Inspection Certificate C-2025-138-393-005434 dated June 17, 2025, for unit BLL-735 Scania. The technical inspection certificates of the other units in the convoy are also identified and are valid.

There is a Convoy Transport Procedure (P-TRA-016) that outlines the required documentation for transit. This includes the sender's delivery guides for controlled products, sealed under the supervision of the National Superintendency of Customs and Tax Administration (SUNAT), proof of verification of weights and measures, a transit guide, the scale weighing ticket, and the carrier's delivery guide.

The procedure establishes that the weights and measures must be verified to ensure they do not exceed the legal limits, in accordance with regulations enforced by SUNAT and SUTRAN. Weighing is carried out by SUNAT at a designated control scale, as sodium cyanide is a controlled product. The weight of the cargo is verified to confirm compliance with applicable regulations.

For the sampled route from Lima to La Zanja, the SUNAT control point is located in Ancón. Since sodium cyanide is a regulated substance in Peru, the carrier’s electronic delivery guide must be sealed. This seal confirms that the cargo weight complies with legal standards and the vehicle's load capacity.

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:

Within the Written Work Procedure PETS Annex 10 Sodium Cyanide Loading I-TRA-011, which includes safety aspects in the loading area such as placing security seals on the rear doors of the Container after the loading of the IBCs of sodium cyanide and taking photos of these to notify the client of the condition of each seal. The procedure also includes safety to preserve the cargo from entering the facilities with a checklist of the units, entering the scale for the untacking of the unit. In the loading area, where the driver secures the tires with wedges, marks the cone area, activates the Break brake and places a fire extinguisher. Instructions in the parking area, scale area, including the delivery of delivery guides. Actions to be taken at exit from the facilities are indicated, including the placement and tensioning of chains on the front and rear of the container. The packaging is the original one sent by the producer. There is also a container safety inspection checklist F-MAN-039 v00 that includes external and internal inspection of containers.

The Written Work Procedure PETS, Annex 10, Sodium Cyanide Loading I-TRA-011, includes control measures at the facility entrance to ensure the minimum required signage is present on the transport units. This includes the National Fire Protection Association (hereinafter NFPA) diamond, the hazard class diamond, and the United Nations identification number 1689.

Additionally, there is a checklist titled Unit Inspection (F-MAN-001), which includes verification of the required signage on both the truck and the trailer.

All units leaving the base are inspected by the Inspector and Unit Control prior to departure from the base. On Sundays or holidays, inspections are performed directly by the driver or shift supervisor.

Unit Inspection F-MAN-001 is applicable to truck and trailer units, which includes trucks and carts, as well as tires. The spill kit and emergency equipment are included in the checklist.

The client is in communication, sending photos with the unit signs, antidote, hydrogen cyanide detector, first aid kit, and satellite phone. Inspection of the antidote kit on the F-SSO-082 form. There are antidotes kits at the Lima base. They include sodium thiosulfate and sodium nitrate. There is also the MSA cyanide detector model Altair-PRO HCN.

A preventive maintenance program is in place based on mileage traveled, and maintenance work orders are generated. Corrective maintenance is recorded. Preventive and corrective maintenance is performed at the headquarters workshop. Scania includes preventive maintenance for 200,000 km or two years. Maintenance records are kept for each unit. For pickup trucks, the engine comes with a one-year warranty.

There is feedback from the driver regarding fault report F-MAN-013.

In the sodium cyanide transport procedure P-TRA-007 v06, it has been included that drivers must have rested at least 8 hours before the start of the trip and drive up to 12 hours per day at most. The driving schedule for cyanide transport will be from 6 am to 6 pm. Driving outside of established hours will only be carried out upon request by the client. Fatigue monitoring is in place, according to F-TRANS-096. The driver must fill a fatigue questionnaire before each trip.

In the sodium cyanide transport procedure P-TRA-007 v06, the driver must stop approximately every 2 to 3 hours for 10 minutes during the trip to check the condition of their truck and trailer and take active breaks.

Within the Written Work procedure PETS Annex 10 Sodium Cyanide Loading I-TRA-011 includes the placement and tensioning of chains at the front and rear of the container. In the loading area, after the loading of the IBCs of sodium cyanide into the container, security seals on the rear doors of the Container are placed.

In the sodium cyanide transport procedure P-TRA-007, it includes in case of an escort supervisor reporting adverse weather conditions, poor road conditions, public disorder, among others, communicating to the GPS control center reporting the conditions that affect transportation. The GPS control center in coordination with the QHSE manager and operations manager will indicate the modification of the route or, if necessary, suspension of transportation.

There are alcohol and drug policies, D-SGI-002, which include promoting and raising awareness among employees about preventing alcohol and drug use. Disciplinary sanctions, including dismissal, are considered a very serious offense according to the Internal Work Regulations. Breathalyzer tests to drivers before each trip and a 5-minute talk with staff are available (F-SSO-013a). Photos of the staff breathalyzer tests are included on a WhatsApp group which monitors each convoy trip.

Physical and digital records are maintained, including those stored on the WhatsApp groups. All internal safety documents are kept for two years; however, some documents are stored longer, such as medical examinations (10 years) and accidents (5 years). There is an internal network and real-time data backup. There is an Enterprise Resource Planning (ERP) system where administrative documents are stored, which are also backed up by the network. Physical documents are stored in designated folders in two dedicated rooms.

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:

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:

Communication with the client, MAC Transport, is direct via email and WhatsApp group, while internal communications between units are via radio. The Zetramsa staff uses mobile phone, satellite phone, WhatsApp group, and email. The units have GPS (MIO Company) for tracking.

The mobile phones are tested daily by the personnel. The satellite phones are tested before being handed over to the convoy supervisor. The units' radios are continuously tested by convoy personnel during pre-use checks by the monitoring assistant. The GPS has an operational certificate, indicating that all the equipment is in good working condition. The company MIO verifies that the GPS devices installed in the units are functioning properly. Its operation is monitored daily by the GPS Monitoring Department. Based on the Quick Emergency Guide - Mac Transport, it is mentioned that the numbers in the guide will be updated semi-annually by the QHSE Department or the escort supervisor.

The Cyanide Transportation Emergency Plan PL-SSO-007 indicates the sections without coverage and those with partial coverage of the different sections where satellite telephones are used. In the target area, and if there is an accident in an area without coverage, communication must be made via satellite telephone. Communication with the monitoring center in the first emergency response section.

The P-TRA-003 v06 rev01 Unit Monitoring procedure is in place, carried out with the monitoring of MIO Corporation. A monitoring staff is assigned to each client. The Buenaventura sample is taken. Communications between the control center and the convoy are via mobile phone and WhatsApp. The established speed limits are up to 70 km/h with cargo and up to 80 km/h without cargo, speed limits established in the geofence and route map. In the event of an incident on route or at the destination, the D-TRA-001 Hazardous Materials Transportation Contingency Plan is followed. Excessive speeds on winding curves and on route are monitored daily according to the speed established in the geofence.

The Unit Monitoring Operator is responsible for informing the client through tracking reports, based on information of the GPS system and communications from the escort supervisor, considering the following considerations:

- Vehicle location and transit time.
- Brief description of the process (loading, unloading, etc.).
- Table with information about the driver, truck, trailer, origin, destination, and type of cargo.
- Screenshot of the GPS system showing geographic location, speed, and time.

According to internal procedure, 03 daily tracking reports are sent to the client via email and WhatsApp.

A monthly report on speeding incidents is sent to the relevant departments to implement corrective actions related to road safety, such as training sessions.

In the event of an incident or accident, a flash report will be issued to inform the client via email about the situation, including the following information:

- Event severity level (minor, moderate, severe).
- Approximate time and location of the event.
- Vehicle and trailer license plate numbers.
- Client.
- Description of the event.

The driver records daily trip information using the F-TRA-001 Service Control form. This data is consolidated in the F-TRA-003 Operations Report. These records must match the unit monitoring reports.

Auditors verified that monitoring is carried out through WhatsApp groups, email communication, and the GPS monitoring department.

There is an escort pickup truck, GPS tracking, and numbered security seals provided by MAC Transport, the number identification of the seals included in the carrier's delivery guide for controlled goods and the sender's (Mac Transport) delivery guide. Container number, seal number, and driver identification are included in the schedule communicated to the client. The delivery guide includes seals, weight, cargo description, number of packages, destination, receiving client, recipient, and transport company.

En Route Monitoring: Cargo controls, security seals, and weight control points are verified by SUNAT throughout the journey.

Upon arrival at the mining unit, the required cargo documents are handed over as mandated. The mining company checks that the delivered quantity is the correct quantity.

SUNAT, the National Superintendency of Customs and Taxes, oversees regulatory compliance during the transport process.

The Carrier's delivery guide for controlled goods, the Sender's Delivery Guide for controlled goods are issued, which includes the quantity of solid sodium cyanide, destination, seals numbers, product types (UN1689, class 6.1, packaging group I), collection from the Contrans SAC warehouse, the mine of destination and the approved fiscal route. Each driver receives the MSDS (Material safety data sheet) from the warehouse along with the delivery guide. There is a Safety Summary Sheet for the land transportation of hazardous materials and waste RD 2613-2013-MTC / 15. The auditors verified the safety summary sheet based on the MSDS of the dispatch made on 21-Apr-2025, the safety summary sheet includes the quantity of product per truck (20 boxes of 1.1 MT of sodium cyanide contained in high-density polyethylene bags) and the emergency telephone numbers. The drivers have the MSDS within the contingency plan.

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. Zetramsa S.A.C. does not have interim storage.

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:

Contingency plan for the transportation of cyanide approved on August 8, 2024, resolution 0621-2024-MTC/16, required by SUTRAN. Emergency plan for the transportation of sodium cyanide PL-SSO-007.

The Emergency Plan for the transportation of sodium cyanide PL-SSO-007 v09., identifies all transportation routes (06), origin to destination includes:

- Callao – La Zanja.
- Callao – Tambomayo.
- Callao – Orcopampa.
- Callao – Tantahuatay.
- Lima - Brocal.

Emergency plan for the transport of sodium cyanide PL-SSO-007 indicates the physical description of the product and the chemical characteristics.

The procedure of transport of hazardous materials includes land transportation of hazardous materials, including the sodium cyanide. Contingency plan for the transportation of cyanide, it includes the transportation of cyanide, must be carried out in airtight containers secured to the trailer by means of chains. The sodium cyanide container can be metal cylinders containing 50 kg of cyanide or wooden boxes with a reinforced base that have an internal polyurethane and polyethylene lining containing 1,100 kg of sodium cyanide.

Contingency plan for the transport of cyanide, includes the evaluation of the route by sector, mileage, maximum speed allowed, maximum recommended speed, characteristics of the road, associated hazards and associated risks, including photographic evidence of the areas.

Contingency plan for the transport of Cyanide, includes a description of a 450 Horse Power (hereinafter HP) truck with a 06 straight cylinder Diesel engine equipped with Scania's XPI injection equipment with pump injectors. Among other characteristics of the truck. Also included is a description of the 40' container, construction characteristics and description of access doors and ramp floor and a description of the Trailers with a payload of 33,800 kg with axles and 12 wheels, includes the appropriate king pin for correct coupling and fifth wheel of the trailer.

In the Contingency plan for the transportation of cyanide, a description of the emergencies is included, including the before, during, and after events. Ten emergencies have been identified:

- Loss of hazardous material (leak and/or spill) due to collision, crash, or other causes.
- Run-over, collision, crash, rollover.
- Fire.
- Explosion.
- Assault.
- Riots.
- Mechanical failure – travel interruption.
- First aid in case of cyanide poisoning.
- Road out of service due to natural factors.
- Landslides, mudslides, rockfalls.

For each case, the plan includes applications, measures (emergency response actions), and requirements.

The Contingency plan for the transportation of cyanide identifies the responsibilities of those involved in the emergency response procedures. ECOMARINE has been included as a second emergency response to carry out the cleanup and remediation of the affected area and prepare the cleanup and remediation report for the affected area. MAC Transport has been identified with functions such as updating information on material safety data sheets, carrying out the loading procedure according to safety standards, verifying the manufacturer's containers and packaging, and shielding the emergency number for communications. Informing the mining unit of events that have occurred and corrective actions, and sending the final event report to the mining unit. Police, firefighters, and medical centers have been included.

They have been advised of their roles by the Peruvian National Police of San Pablo, the Peruvian National Police Station of Chilete, the Peruvian National Police Station of Salitre, the San Pablo Health Center , the Paijan Health Center, and the Chicama National Police Station.

Zetramsa has a framework service contract with Eco Marine Perú EIRL, for comprehensive response services to environmental incidents involving spills of hazardous materials during land transportation, loading, and unloading at the origin and/or destination warehouse. The contract also covers the overall coordination of remediation, on-site service supervision, technical advice on remediation, legal and social matters related to the incident, waste management, industrial cleaning, environmental monitoring, soil and water remediation, environmental restoration, and revegetation.

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 Zetramsa S.A.C.		25th August, 2025
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Before starting work, new staff are inducted, and a training program is in place that includes the annual emergency response plan. The 2025 training program includes the Contingency Plan scheduled.

The Sodium Cyanide Transportation Emergency Plan includes the responsibilities of the parties involved in the Contingency Plan before, during, and after emergencies:

- General Manager
- Commercial and Planning Manager
- Administration Manager
- Operations Manager / Head of Operations
- QHSE (Quality Health, Safety and Enviroment) Manager / OHS (Occupational Health and Safety) Supervisor
- Unit Monitoring Operator
- Escort Supervisor / Drivers
- Mac Transport
- Ecomarine.

Table 11 of the contingency plan outlines the logistics and equipment related to the Emergency Response Team, specifically detailing the personal protective equipment (PPE), emergency response kits, and the designated locations of said equipment within the transportation trucks and escort pickup truck. The table includes a comprehensive inventory of the required PPE (Personal Protective Equipment), emergency tools, and their corresponding placement to ensure immediate availability in the event of an incident.
The emergency response equipment is appropriate for the operations outlined in the emergency response plan. The Emergency Response Kit, which includes the first aid kit with the antidote, HCNportable detectors, etc., is carried by the escort truck. In the case of tractors, each truck carries a spill kit.

Prior to transport, a checklist is compiled, including Unit Inspection (F-MAN-001), which includes emergency equipment such as fire extinguishers, spill kits, first aid kits. The warehouse area supplies and deploys the units based on the escort van checklist F-TRA-017. This is reviewed by the logistics assistant, who then deploys the emergency response kits for all units, including the escort vans. Monthly monitoring records are kept in the system.

There is a monthly Internal Occupational Health and Safety Inspection form, conducted by the safety department. The form includes photographic evidence, corrective actions, responsible parties, closure dates, and evidence of the lifting of the closure.
There is a Cyanide Kit Inspection Checklist F-SSO-082, and the inspection frequency for each travel convoy has been established. There is a monthly control checklist for the first-aid kit and anti-spill kit F-ALM-006, and a monthly review of the kit contents.

ECOMARINE PERU E.I.R.L. has a framework contract and the roles and responsibilities are in the contingency plan.

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:

The contingency plan includes a clearly defined communication flow for incident response. The Operations Department, through the Operations Assistant, is responsible for notifying the Client (MAC Transport). A communication flow diagram is provided for the activation of the contingency plan for both Lima and Arequipa bases.

The communication procedures are structured according to the level of the emergency:

- Level I – Incident

- Level II – Emergency
- Level III – Crisis

At each level, specific internal and external communication protocols are established. The QHSE Manager is designated as the responsible party for all external communications.

Procedure P-SSO-005: Investigation of Incidents, Accidents, and Occupational Illnesses – 2025 outlines the mandatory notifications to the competent authorities. This includes:

- Notification to the Ministry of Transport and Communications (MTC)
- Reporting to SUTRAN
- Communication with the Directorate of Dangerous Goods of the MTC within 48 hours of the incident

Additionally, the procedure specifies that a final incident report must be prepared by Ecomarine within a maximum of 45 calendar days, and subsequently submitted by Zetramsa to the MTC.

There is an Emergency Notification Directory (Annex 03) listing support entities. The emergency numbers are reviewed semiannually by QHSE personnel or when the escort supervisor indicates a change in the numbers to Mine personnel. The emergency guide includes lists of hospitals and health centers, fire stations, police institutions, and police stations.

Within the emergency response, point (4) notification to ICMI (International Cyanide Management Institute) is included, which will notify ICMI about the emergency and make the final translated report available.

Transport Practice 3.4

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

	✓ 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*

Transportes Zetramsa S.A.C.		25th August, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

MINGROUP INVESTMENTS S.A.C.   -e quelle Consultoría en Sistemas de Gestión

Finding/Deficiencies Identified:

Ecomarine has the sodium cyanide spill response protocol. It is attached to the Emergency Plan for the transport of sodium cyanide of 18-Jan-2024 PL-SSO-007. It includes neutralization of the contaminant and the second response includes remediation and cleanup, in situ environmental remediation of soils and asphalt pavement through pulverized sodium hydroxide.

In the procedure P-TRA-007 Transport of Sodium Cyanide V06, the use of chemicals such as hydrogen peroxide, ferrous sulfate and sodium hypochlorite in open and surface waters is prohibited.

The remediation contractor´s (ECOMARINE) response procedure also include a prohibition regarding the use of chemicals to treat cyanide that has been released into surface waters under the Ecomarine Sodium Cyanide Spill Response Protocol Procedure 2021.

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:

The introduction of the Contingency Plan for the Transportation of Sodium Cyanide indicates that the Contingency Plan must be maintained to remain an effective tool in the successful response to an accident or incident involving Hazardous Materials. The information in the Plan must be updated and kept current at all times. Therefore, whenever any modification occurs, this document will be updated by the General Management, Commercial and Planning Management, and the QHSE Management of Transportes Zetramsa S.A.C.

There is an annual drill program for 2025, F-SSO-044, where cyanide spill drills are scheduled for March 2025. There is a drill report from March 22, 2025. The next drill will be held in Aug-2025. Recommendations are included in the reports; follow-ups with those responsible are provided. The responsible person and the times for implementation are included. Recommendations include implementing a full-face mask for each driver, signage for lime and plaster, and replacing lime bags with new ones.

The operation conducts cyanide emergency drills on an annual basis that simulate cyanide exposures and releases, and evaluates the drills to determine if response procedures are adequate, response equipment is appropriate, and personnel are properly trained, observed on the drill report from March 22, 2025 Report I-SSO-051, which includes drivers and the escort supervisor. The report is prepared by the head of occupational health and safety.

Within the functions of the QHSE Manager and the Head of Operations, after an emergency, they re-evaluate the emergency plan and procedures, arrange for their implementation and corrective measures.
Zetramsa has not had any cyanide-related accidents during this International Cyanide Management Code recertification period.

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