AUCAN LOGISTICS SPA

TRANSPORT OPERATION

SUMMARY AUDIT REPORT

FOR THE

INTERNATIONAL CYANIDE MANAGEMENT CODE

May 2026

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Table of Contents

Operation General Information

Name of Transport Operation:	Aucan Logistic SPA
Name of Facility Owner:	Aucan Logistic SPA
Name of Facility Operator:	Aucan Logistic SPA
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Operation Location Detail and Description

Aucan Logistic SPA (Aucan) is a trucking company based in Chile, with its headquarters situated in Copiapó, Atacama, approximately 807 km south of Santiago via the Pan-American Highway.

Originally established as a logistics operator, Aucan specializes in offering services to mining sectors and industries within the Atacama region. Its operations include the transportation of both hazardous and non-hazardous materials, alongside earthmoving services. On October 25, 2022, Aucan achieved its first certification under the International Cyanide Management Code (ICMC or Cyanide Code).

Throughout the 2022-2025 recertification period, Aucan has significantly expanded its role as a cyanide carrier. This expansion has enabled the company to operate using its own fleet of trucks and maintain a cyanide storage facility located in the port of San Antonio, which is 114 km from Santiago in the Valparaíso Region. Aucan specializes in transporting solid sodium cyanide sealed within sea containers directly from ports such as Mejillones and San Antonio to mining clients, as well as from the San Antonio warehouse to mining sites. The company acts as the consignor in these cyanide transportation operations, ensuring deliveries directly to mine sites without utilizing secondary storage facilities.

The sodium cyanide shipments arrive in Chile by sea, where cargo unloading is managed by the Port Authority. Once the shipping containers are placed on truck platforms, the

operational responsibility for cyanide transportation shifts to Aucan. Ports are selected based on proximity to mining areas to optimize transport routes. The company dispatches convoys equipped with escorts to manage these deliveries securely and efficiently between ports and mining destinations.

Cyanide packaging involves Intermediate Bulk Containers (IBC) weighing approximately one ton each, which are protected with polyethylene and polypropylene materials to shield them against water and humidity before being enclosed in wooden boxes. A minimum of 20 boxes are carefully arranged inside a standard 20-foot container, ensuring stability and preventing lateral displacement during transit. Additional bracing and blocking techniques secure the load within the container. Each container is sealed with a uniquely numbered tag by the manufacturer at the production site to safeguard against tampering or material loss, with seals only removed upon delivery at the mine sites.

This recertification audit focuses solely on transport operations and the warehouse managed by Aucan, encompassing truck deliveries from designated ports and its warehouse in San Antonio to mine sites across Chile. Temporary storage is not part of this transport process.

Auditor's Finding

This operation is

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

with the International Cyanide Management Code**.**

This operation has not experienced any compliance issues or significant cyanide incidents in the past 3 years and since began transporting cyanide.

Compliance Statement

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

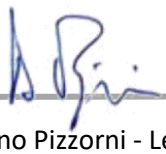
Auditor Information

Audit Company:	Cyanide Auditors S.A.
Lead Auditor:	Bruno Pizzorni
Lead Auditor Email:	bpizzorni@cyanideauditor.com
Transport Technical Auditor:	Bruno Pizzorni
Dates of Audit:	December 3 and 4, 2025

Auditor Attestation

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



Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

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

Aucan Logistics (Aucan) has established and implemented a comprehensive procedure aimed at selecting transport routes that reduce the likelihood of accidents. This written guideline, titled SGC A-P1-01 Procedure for Evaluating the Sodium Cyanide Transport Route v5, outlines a systematic process for assessing alternative routes. Its primary goal is to choose those routes that, as far as feasible, minimize both the risk of accidents and potential releases, as well as mitigate the consequences should such incidents occur.

The evaluation process considers various factors, including natural hazards (such as landslides, flooding, and volcanic activity), security concerns, population density, road infrastructure, slope and grade conditions, proximity to water bodies, and visibility challenges caused by weather conditions. Collaboration between the transporter and the mining customer is a key aspect, ensuring that the safest and most suitable route is identified. Additionally, driver feedback plays a critical role, prompting route reassessments when changes in conditions or feedback indicate a potential need for review.

Before utilizing a new route, Aucan's Operations Manager and Risk Preventionist personally travel along the route in their vehicle, carefully documenting any potential hazards that might contribute to accidents. Route assessments are continuously updated by escort supervisors during each trip to the mine, who provide valuable feedback for maintaining an up-to-date risk profile. Drivers are equipped with "The Road Book," which marks route risks using Google Maps and specifies permitted speed limits.

Documentation confirms that Aucan's current transport routes have undergone thorough assessment and received approval. The auditor reviewed evidence demonstrating the application of this route selection process for various transport paths, including routes from San Antonio Port to the local warehouse, then to Mantos de Oro mine in Copiapó and La Florida mine, and from Angamos Port (Mejillones) to El Peñón mine. These evaluations confirm adherence to the procedure in selecting appropriate routes. However, selection options are sometimes restricted by the actual availability of roads and jurisdictional

designations imposed on the transport of hazardous goods.

The outlined procedure for evaluating cyanide transport routes includes assessing the chosen route to determine if additional safety precautions are required at specific points along the way. High-risk areas are identified, and appropriate measures—such as reducing vehicle speed—are documented to guide driver training. The procedure mandates conducting a risk analysis and outlines the steps needed to prepare detailed road maps for all routes under the organization's transport operations. Upon identifying risks, control measures are implemented to effectively manage them.

The auditor reviewed the transporter's procedure and assessed completed route evaluations to ensure adequate risk analyses were conducted, necessary precautions were documented, and drivers were trained. Control measures are recorded in the logbook (Roadbook). The auditor examined examples, such as the risk evaluation of routes from the port of San Antonio to the La Coipa mine, which are divided into sections based on identified risks..

The procedure for evaluating cyanide transport routes mandates updating the roadmap whenever a new route is introduced, route conditions change, or a client submits a specific request. These updates take into consideration factors such as unsafe conditions (e.g., road quality, weather, traffic), section-specific speed recommendations, road signs and restrictions, bridge and tunnel heights, steep inclines, proximity to water bodies, population density, fog-prone areas, and other transportation safety concerns. Input from mine customers is incorporated into the route planning process.

Additionally, the procedure requires periodic reevaluation of routes used for cyanide transport to ensure no new risks have emerged. This involves formal administrative reviews, reports on route conditions submitted by drivers via a dedicated WhatsApp group, and routine inspections of the routes.

An annual evaluation of all routes is required by the procedure, or sooner if changes are identified by drivers traveling on specific routes. Drivers are also required to provide feedback on current route conditions. If a driver’s feedback indicates a need for route revision, the company updates the route and communicates these changes to all drivers. Records reviewed during the audit confirm that Aucan's shipping routes are consistently kept up to date with accurate and current information.

Interviews with drivers and management staff verified that feedback about driving conditions is effectively communicated. Additionally, any special conditions highlighted by customers are documented and shared with every driver assigned to the relevant route. Records also demonstrate that Aucan conducts regular route risk assessments and actively participates in meetings with mine customers.

The cyanide transport procedure is designed to document the risks identified along the chosen routes and to provide a written reference for both driver training and ongoing use. Specific features such as sharp turns, areas near surface water, and regions with high population density require particular attention and precautions.

Route evaluations have been completed, and corresponding records were available for review in the road map. Each segment of the route is assessed for risks related to population density, infrastructure, slope and incline, proximity to water bodies, and the potential for encountering challenging driving conditions. Additionally, the routes are analyzed for security risks and availability of cell phone coverage.

The procedure outlines requirements for the transporter to collaborate with emergency response providers and local authorities along the route. This ensures a thorough evaluation of potential routes, identification of associated risks, and implementation of appropriate measures to manage these risks. Through the conducted route assessments, the transporter maintained records demonstrating that feedback was actively sought and applied where necessary. During this recertification period, communication with government authorities was carried out through informative letters about cyanide transportation along the route, which were sent to Copiapó firefighters, Atacama police, and the Copiapó Regional Hospital. The primary interaction for obtaining input on route selection and developing risk management measures is carried out in coordination with the mine client.

According to procedure SGC-A-PR-01 on the terrestrial transport of sodium cyanide, Aucan conducts cyanide transportation using convoys. These convoys may include one or more support vehicles staffed with Aucan personnel who serve as escorts to ensure safety and security while managing and mitigating risks identified along the route. This approach is aligned with client requirements from the mining sector. The escort team is equipped with emergency response tools, two way communications radios VHF and materials necessary for addressing potential incidents. Transporting cyanide is restricted to daylight hours, per the transporter's established procedures, and requires daily pre-departure safety briefings conducted by the convoy leader. These briefings cover sodium cyanide handling guidelines and must be attended by all convoy personnel. Parking the convoy is permitted only in designated areas that have been pre-assessed for safety. During the journey, the escort supervisor provided updates on road conditions to the base.

An exception to the daylight transport rule applies to Antofagasta Port, where municipal regulations prohibit the movement of hazardous materials during daylight hours due to traffic congestion. In cases where transport through the city is essential, it must occur between midnight (00:00) and 5:00 am. To comply with these requirements, Aucan ensures that containers loaded at the Antofagasta Port are transported exclusively at night.

Based on interviews with management personnel and photographic evidence, the auditor verified that all cyanide transport operations are performed in escorted convoys carrying essential communication devices, first aid kits, and spill containment equipment. The convoy leader is trained in emergency response and management procedures. Before departure, the leader holds a meeting with all convoy personnel to brief them on the route's specific characteristics and safety considerations. Drivers are instructed to follow only the directions issued by the convoy leader. During the trip, stops may be made at the discretion of the convoy leader or in response to requests from drivers for various needs..

Aucan does not engage any external entities to carry out the activities outlined in this Transport Practice.

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	

Aucan was able to demonstrate that personnel operating its trucks and trailers were trained, qualified and have the specific license to operate the trucks category, as required in its jurisdiction. The transporter does not use handling equipment as forklifts and cranes in his cyanide transport operation.

The auditor reviewed the drivers' database and personal file where, for each driver, information is kept on their driving experience, training, license to drive, and if they are authorized to transport dangerous loads and cargo in general. Through this database they have control over the expiration dates of driver's licenses and training requirements. The auditor verified that all drivers had a professional driver's license type A5, which requires training in defensive driving, vehicle mechanics, cargo loading and off-loading and hazardous material training, among others, according to local regulations.

The procedure for sodium cyanide ground transportation requires drivers must have the respective driver's license that enables them to use the type of truck to use and that will have a pre-trip talk.

The auditor reviewed a couple of folders containing information about the drivers. They held a valid license, had undergone a medical examination as well as occupational health tests, drug and alcohol screening, geographic altitude assessments, and psychotechnical

evaluations. Upon joining, the drivers are trained in work procedures and the emergency response plan, as well as preventive maintenance procedures and equipment inspection. They are also informed about the fatigue and drowsiness management plan, personal protective equipment protocols, and anti-bribery and corruption procedures. Additionally, they receive comprehensive training provided by each mining company.

All truck operators involved in cyanide transportation receive thorough training to carry out their tasks safely and in an environmentally responsible manner. The procedure for the ground transportation of sodium cyanide mandates that drivers undergo training in "Sodium Cyanide Emergencies," facilitated either by Aucan or approved third parties, before being assigned to cyanide-related operations. Additionally, all drivers are trained on procedures for safely loading and unloading their trucks as part of their standard job duties. They also receive Hazardous Materials (HAZMAT) training, which addresses key aspects of handling cyanide transportation, as well as training for general cargo handling. Before undertaking any cyanide transport assignments or shipments, all personnel and drivers directly involved are trained in cyanide safety measures.

The auditor reviewed completed training records related to cyanide emergency procedures and the transportation process, including a route analysis between the port of San Antonio and the La Florida mine. This review verified that the training provided includes all elements necessary for the specific nature of the transport and the operator's responsibilities, as outlined in the standard operating procedures. Documentation, such as training records and sign-off sheets, was also examined.

Interviews conducted with drivers, dispatch personnel and management staff confirmed that they had been trained adequately in cyanide transport operations, ensuring they can perform their roles safely and responsibly.

Aucan does not hire other entities to conduct any of the activities required in this Transport Practice.

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 procedure for sodium cyanide ground transportation requires trucks and trailers assigned to the service of sodium cyanide must be suitable for the transport of containers

and authorized to circulate on public roads, must be under a preventive maintenance program. Aucan has records documenting the load-bearing capacities of its trucks and trailers detailing its maximum cyanide load weight. The transporter performs maintenance activities specifically to ensure that its transport equipment retains a load-bearing capacity adequate for the anticipated load. This include periodically planned maintenance and inspections.

The auditor reviewed the procedure for cyanide transportation, addressing the responsible practices for sodium cyanide transportation to ensure that safety standards are met and maintain the integrity of the packaging throughout the journey. Also reviewed documentation of the load capacities of Aucan´s trucks brand Man, Scania and Renault. The Man truck is 480 horsepower (Hp), Renault truck us 420 Hp and the Scania is 500 Hp.

Aucán has organized his fleet of trucks into two specific groups: one designed for operations across the Andes Mountains and another focused primarily on tasks in the coastal area. For a truck to cross the mountain range, it must have a power output exceeding 440 HP and 6 x 4 traction (with a dual drive axle to ensure greater grip). On the other hand, on coastal roads, trucks with a power output of less than 440 HP and 6 x 2 traction are permitted (where the front axle steers, the central axle transmits the driving force, and the rear axle supports without traction). Aucán keeps an individual record for each vehicle detailing its maintenance history. As for the trailers, they have a load capacity of 30 tons, which is sufficient to transport a shipping container with 20 tons of cyanide.

The auditor conducted interviews with Aucan managers to ensure compliance with this provision. Additionally, shipment records were examined to verify that standard weights, consistent with the capacity limits of tractors, trailers, and containers, were being adhered to. During the audit, weight capacities and adherence to cargo inspection requirements were assessed and confirmed to be in compliance.

The procedure for the ground transportation of sodium cyanide outlines the maximum allowable loads for different types of trucks and trailers and emphasizes the importance of verifying that the equipment is suitable for the load it will carry. This includes weighing the cargo using heavy-duty scales to ensure the total weight does not exceed permissible limits.

Beyond confirming that the manufacturer’s loading capacity rating is appropriate, the transporter also assess the load-bearing capability of their equipment through regular inspections and testing. These steps aim to detect signs of stress or overloading as part of the transporter’s preventive maintenance program. The auditor reviewed evidence of completed inspections conducted prior to each shipment and interviewed truck drivers to confirm compliance with this requirement. The inspections, carried out using a checklist for

vehicles and trailers, cover aspects such as weld conditions, structural integrity, and the functionality of twist locks.

Aucán operates primarily under the regulations of Chilean law concerning road freight, specifically adhering to Law 19.171 of 1992 enacted by the Ministry of Public Works. This law dictates the maximum load allowed on national roads, which is capped at 45 tons, including the weight of the equipment (gross weight). Consequently, the maximum net load permitted is 30 tons. Aucan vehicles typically transport a single maritime container, either 20 or 40 feet in size, loaded with 20 boxes of cyanide. Depending on the product's brand, the cargo may weigh approximately 22.7 tons, in addition to the weight of the container itself. A 20-foot maritime container generally weighs between 1.8 and 2.2 tons, while a 40-foot container weighs approximately between 3.8 and 4.2 tons, which complies with the maximum net load permitted of 30 tons.

The procedure for cyanide ground transportation emphasizes ensuring that equipment is not loaded beyond its design capacity. According to the guidelines, each trailer should transport a single sea container, and each truck may tow only one trailer with the container securely fastened to the trailer's pinlocks. Aucan utilizes standard-sized sea containers, each holding 20 Intermediate Bulk Containers (IBCs) with predetermined weights, to load onto its trailers. The procedure strictly prohibits drivers from accepting loads that exceed the design limits of their equipment under any circumstances.

Records of cyanide shipments were reviewed against weight capacities and regulatory weight limits. The equipment used is capable of transporting loads exceeding the maximum amounts shipped. However, regulatory restrictions on truck weight typically serve as the main factor determining the maximum allowable amount of cyanide transportable. Aucan personnel demonstrated a clear understanding of both weight capacity and regulatory requirements regarding the maximum weight permitted for their trucks.

Aucan does not hire other entities to conduct any of the activities required in this Transport Practice.

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	

Aucan's procedure for cyanide transportation outlines detailed instructions for the receipt, loading, transport, and unloading of solid cyanide within sea containers. This process is supported by a formal pre-trip checklist and aims to ensure the integrity of cyanide packaging throughout the shipment, including loading at the port and unloading at mining sites. However, it is important to note that while maintaining packaging integrity is emphasized in the procedure, opening the sea containers is not the transporter's responsibility. The procedure explicitly states that drivers are not permitted to open the containers. Containers received at the port are securely placed on platform trailers hauled by trucks without being opened.

At the port, a visual inspection of containers is conducted by the transporter’s personnel once authorities release the cargo. After receiving the cargo, a detailed inspection using a checklist is performed by the transporter. This process includes verifying the integrity of tags placed on the ocean container’s locks at the manufacturing facility.

The procedure also mandates that a convoy supervisor inspects each truck, in collaboration with its driver, both prior to loading the container and immediately afterward. These inspections are required to be repeated daily before the journey resumes, ensuring the containers remain in proper condition. This includes verifying that the doors are securely closed, the containers are free from holes, and they are properly labeled with signs for solid sodium cyanide (UN number 1689) and maritime pollutant indicators. Additionally, compliance with local regulation DS-298 signage requirements must be confirmed, which involves checking consignor information, applicable labels, and UN markings.

Cyanide shipments arriving at or departing from Aucan’s San Antonio port warehouse are subject to specific warehouse procedures for unloading, storage, and reloading onto Aucan trucks. Handling of cyanide intermediate bulk containers (IBCs) is managed by the warehouse staff under the supervision of Aucan’s warehouse supervisor. Containers are loaded for transport using standard blocking and bracing configurations to ensure stability.

The auditor conducted a review of relevant procedures, inspection records for cyanide shipments, and interviews with equipment operators. This review confirmed compliance with the outlined provisions.

Aucan ensures compliance with local regulations (DS-298) and international standards by using placards and signage to identify shipments containing cyanide. Chilean regulations specifically mandate visible labeling for hazardous substances, including details such as the recipient product, shipper, carrier, phone number, and an emergency contact number.

For solid sodium cyanide, UN number 1689 placards are prominently displayed on all four sides of containers and trucks, as required by local regulations. Additionally, a pre-trip checklist is implemented to verify that signage is complete and properly placed. During the audit, although no cyanide shipment was in progress, the auditor examined photographs of cyanide convoys to confirm the use of proper placards indicating the presence of cyanide on transport vehicles. The auditor also inspected spare UN 1689 placards stored at the transporter's headquarters and determined that the transporter was in compliance with these regulatory provisions.

The transporter has implemented a robust safety program for cyanide transportation, which includes formal vehicle inspections prior to each shipment. Responsibilities and roles are clearly outlined in these procedures. As stipulated in Section 6.6 of the cyanide transport protocol, the convoy leader and driver must conduct truck inspections before loading and after the container has been secured. The auditor reviewed the completed Vehicle Inspection Forms, which detail checks performed on both the truck and trailer, confirming compliance with the procedure. Aucan is tasked with inspecting sea containers after they are loaded onto truck platforms before departure, although it is not responsible for the maintenance of these containers.

Aucan has established and executed the Vehicle Preventive Maintenance Plan and Equipment Corrections procedures to ensure the reliability of their fleet. During interviews with drivers and management personnel, confirmation was provided that Aucan adheres to a preventative maintenance schedule based on the manufacturer's recommendations and specific road conditions. Using the Truck Kilometers Control worksheet, Aucan meticulously tracks the mileage of each truck and trailer. This data is used to align maintenance activities with their Vehicle Maintenance Plan. Maintenance for trucks is carried out at authorized service centers throughout Chile, while trailers undergo preventive maintenance every six months. The auditor reviewed scheduled maintenance records, confirming adherence to these plans.

As per the sodium cyanide ground transportation regulation, drivers are required to rest before commencing trips. Drivers cannot exceed 12 hours of driving in a single day and must follow local regulations mandating two hours of rest, equipment checks, meals, or active breaks for every five hours of driving. Driving hours are monitored using vehicle GPS data, which is logged and managed on an Excel spreadsheet. This system ensures compliance with safe driving limits. Additionally, in line with municipal regulations in Antofagasta, the transportation of hazardous materials during daylight or peak traffic hours is restricted.

Dangerous goods are transported exclusively between 12:00 AM and 5:00 AM to comply with these restrictions. Containers loaded at the Port of Antofagasta are scheduled for nighttime transport accordingly.

Concerns about load shifting during transportation have been mitigated as all containers are securely packed with 20 boxes that are blocked and braced at the cyanide production facility or at Aucan´s warehouse. The trailers are equipped with pins to firmly anchor the containers to prevent movement. Furthermore, secure seals ensure that the containers remain tightly fastened to the platforms, guaranteeing safe transport. The cyanide transport procedures detail specific measures to secure the containers to trailer anchors effectively, preventing any risk of displacement during transit.

In accordance with cyanide transport regulations, convoy movement is closely tied to real-time weather conditions. The convoy leader evaluates route safety and has the authority to halt a journey should conditions become hazardous. Weather updates are continuously monitored, and deliveries are postponed if any part of the route is deemed unsafe. Drivers are also authorized to suspend delivery operations if they judge conditions to be risky.

Aucan enforces a drug abuse prevention program that includes random alcohol testing for drivers. The cyanide transport procedure specifies that drivers must be medically fit for the job. Obtaining and maintaining a professional driver’s license requires regular medical examinations, as dictated by the expiration timeline specified in their license documentation. Furthermore, alcohol testing is conducted prior to each transport. The auditor reviewed several completed Alcohol Test registers, which documented the test date, driver’s name, results, and verified signatures from both the driver and the convoy leader conducting the test.

Comprehensive records were available to substantiate these activities, including vehicle inspection and maintenance records, spreadsheets monitoring driver hours, pre-trip inspection reports to prevent load shifting, procedures for suspending trips under adverse conditions, and detailed alcohol test logs.

Aucan does not hire other entities to conduct any of the activities required in this Transport Practice.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

No shipments are made by sea on this transportation operation. The transporter receives the cyanide shipments upon release of the cargo by the port authorities and deliver it to its warehouse and the mining sites by truck.

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	

The transport vehicles have two way radios and drivers have their own cellphones as means to communicate with the transport company, the Convoy Leader, and if required with the mining operation, the cyanide producer or distributor and/or emergency responders. The Convoy Leader is provided with a handy two way radio, a cellphone and satellite telephone to communicate with the transport company, the mining operation, and emergency responders, as appropriate. According to the procedure for cyanide transportation, all trucks must have communication equipment, the convoy leader is responsible of communications.

Checking communication equipment, such as two-way radios and cell phones along with their battery charges, is a crucial step in the vehicle inspection checklist before starting a trip. The GPS system is regularly monitored to track the vehicle's location, ensuring it is functioning properly prior to departure.

During interviews with the transporter, it was verified that they are aware of the areas where communication is interrupted due to a lack of cellular signal. However, the auditor was unable to confirm this through the documentation review and therefore requested

that these zones be documented, along with the actions and follow-up measures to be implemented for areas with communication outages. Following the audit, Aucan included in the Procedure for Route Evaluation of Sodium Cyanide Transportation identified the zones without communication coverage for each currently active route. It was established that the transporter must report to the base upon entering and exiting these zones upon an expected time lapse, otherwise, after a reasonable time they would initiate actions to search for the convoy . No additional information was required to comply with this requirement.

Cell phone blackout areas along various routes from the ports to the mine sites were identified by the transporter during the route risk analysis. To address these communication challenges, the Convoy Leader is equipped with cell phone chips from different providers to ensure coverage in blackout zones, as well as a satellite phone for additional connectivity. The Chilean Ministry of Transport web site provides a cell phone coverage map which is useful for the carrier to know what connectivity they need through the route. Through a thorough review of the risk analysis, interviews, and assessment of the equipment used, the auditor verified that this practice is being implemented effectively.

The cyanide transport procedure mandates that the Transport Coordinator must send an email containing the convoy's travel itinerary to the predesignated contacts agreed upon with the mining company once the convoy departs from the port. Additionally, a copy of the itinerary must also be sent to the cyanide supplier. The email must specify the names of the drivers, the convoy leader, and the license plate numbers of all vehicles involved.

The auditor reviewed the Convoy Monitoring and Control worksheet, which details the communications between the Convoy Leader and the Transport Coordinator. These updates are recorded every two hours, with the Convoy Leader providing progress updates on the itinerary via WhatsApp. All this information is stored in the Travel Itinerary Folder, which includes various documents such as the Convoy Monitoring and Control worksheet, vehicle and emergency inspection forms, alcohol test records, attendance logs from pre-trip briefings, route instructions addressing any changes, and dispatch guides..

Cyanide is transported directly from the port to the mine or warehouse without opening the containers, ensuring the integrity of the seals, which are verified during pre-trip inspections and at each stop along the route. Drivers are required to adhere to the cyanide transport procedure by carrying dispatch guides that detail the amount of cyanide being transported, along with shipping documentation that includes chain of custody requirements. This ensures that shipments arrive at their destination securely and without tampering. Each cyanide shipment is also accompanied by a waybill containing key chain of custody details such as container numbers, waybill numbers, shipping documents, bills of lading, customs declarations, and the shipper's guide. The auditor conducted a review of this documentation across multiple shipments and confirmed compliance with Code

requirements through both document evaluation and operator interviews.

The transporter provided complete shipping records detailing the quantity of cyanide transported in each truck. According to the protocol for cyanide transportation, this documentation is mandatory for all shipments. Each shipment includes shipping papers specifying the amount of cyanide being transported, along with Safety Data Sheets outlining the precautions required for handling cyanide. The auditor examined the transporter's procedure to confirm that this information is included with each shipment. Implementation was verified by interviewing operators and reviewing shipping documents from completed cyanide transport operations..

Aucan does not hire other entities to conduct any of the activities required in this Transport Practice.

Principle 2 | INTERIM STORAGE

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

Transport Practice 2.1

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 2.1

Interim storage activities in this transportation operation, as defined by ICMI, do not take place. Cyanide shipments are sent directly from the ports to the mine sites or to Aucan´s warehouse and from there to the mining clients. This Transport Practice does not apply to Aucan cyanide transport operation.

Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

The transporter has developed a detailed Emergency Response Plan (ERP or Plan) titled SGC-A-PR-02 Emergency Procedure During the Transport of Sodium Cyanide v8, dated October 21, 2025. This plan outlines the essential actions required to address emergencies that may arise during the transportation of sodium cyanide. Specifically tailored for cyanide-related incidents, the document provides comprehensive guidance, including an emergency response team organization chart, an emergency contact directory, communication protocols, various emergency scenarios, and both general and scenario-specific response instructions.

The Emergency Response Plan (ERP) accounts for challenges associated with specific transport routes and the chosen method of transport. The outlined emergency scenarios are tailored to the delivery routes used, road conditions, the physical and chemical characteristics of the cyanide being transported, and the specific transport vehicles involved. Upon review, the auditor required Aucan to specify the design of the transport vehicle: tractor with platform and configuration; Include is transported in 20 and 40 foot sea containers. After the audit, Aucan sent the new version of the plan, which included this specific requirement to write the type of transport and additional information to consider this aspect in compliance. The auditor confirmed that the plan appropriately addresses these considerations, identifying potential emergency situations and detailing necessary response measures. The document was deemed current and suitable for overseeing the transportation of solid sodium cyanide.

Emergency scenarios have been identified using a route assessment matrix, and corresponding response actions have been developed. The plan includes comprehensive details on the product's packaging and transportation features, as well as specifications for both its containers and transport units. All established emergency scenarios pertain to ground transportation and include various situations such as incidents without injuries,

mechanical failures, collisions, rollovers with or without spills, fires during transit, load displacement or loss, and collisions resulting in injuries.

The ERP outlines appropriate response actions corresponding to the identified types of emergency situations. The level of detail in the plan aligns well with the potential emergencies acknowledged and the available response resources. Immediate responses are to be carried out by convoy personnel, while larger spills will involve specialized external emergency response contractors in hazardous materials (HAZMAT) as Ambipar for second emergency respond and Volta for adequate final disposal of contaminated materials.

The transporter has also included comprehensive measures addressing potential cyanide releases in high-risk locations along transit routes. This includes protocols for notifying downstream authorities if a release occurs near a river during transportation. The auditor reviewed the ERP and confirmed that it provides specific response actions tailored to the identified release scenarios.

For the emergency scenario involving cyanide exposure, the auditor requested a review of the Emergency Response Plan (ERP) to include that once the convoy personnel administer first aid to the victim, they must immediately contact the nearest hospital, as identified in the plan, to inform them that the victim is being transported for medical attention, along with the cyanide antidotes: sodium thiosulfate and sodium nitrite. The auditor also emphasized the importance of specifying in the ERP that the AMBU (Air-Mask-Bag-Unit) available in the convoy should be used to provide ventilation for patients unable to breathe independently, as its correct usage is critical in emergencies. Furthermore, the plan needed to detail the administration of 100% oxygen to the victim at a flow rate of 10 to 15 liters per minute using the bag mask available with the convoy.

A safety check protocol was also added to the first aid instructions, requiring rescuers to assess the area for safety by measuring HCN gas levels with a portable gas monitor before approaching the victim. Following the audit, Aucán sent the revised ERP, which included all these updates. They also distributed communication records of the updated plan to all personnel. No additional steps were needed to guarantee compliance.

The Emergency Response Plan for cyanide-related accidents primarily focuses on addressing minor incidents that can be managed on-site. However, in the event of more serious accidents that surpass the control of the driver and the Convoy Leader, external support becomes necessary. The auditor required Aucan to clarify the roles of the external emergency responders Ambipar and Volta during an emergency. After the audit, the Plan new version sent clarified specialized responders like Ambipar as a secondary emergency response team and Volta for the management and disposal of contaminated waste, both explicitly outlined within the plan.

Ambipar, offers emergency response services. Ambipar specializes in crisis management

and emergency care, including incidents involving chemical products and pollutants that impact health, the environment, and property. They provide support to client operations in sectors such as mining, highways, and transportation through dedicated teams of professionals equipped to handle specialized services and emergencies. Their expertise includes managing hazardous materials and providing tailored solutions for their containment and control. Ambipar operates in various countries, including Chile, where it has established operational bases.

Volta is a company specializing in waste management in Chile, offering services such as waste collection, treatment, and disposal. According to the correspondence exchanged between Volta and Aucán, the transportation, treatment, and final disposal of waste depend on the location of the waste itself. For waste generated in the Metropolitan Region, it is first delivered to their transfer station located at Américo Vespucio No. 800, where the load is consolidated and then dispatched to their secure disposal site in Chillán (Escobio). In cases where the waste is geographically closer to the secure disposal site, it is sent directly to their facility for treatment and final disposal.

According to the Plan, the Convoy Leader is responsible for contacting Aucan headquarters via telephone. If unable to call personally, the Convoy Leader must delegate this task to the driver. The carrier must notify the supplier about the accident, providing comprehensive details and implementing any recommended preventive measures. Additionally, the police department must be contacted to secure the area and keep it free from unauthorized individuals and vehicles.

The ERP also provides detailed descriptions of the firefighters' roles to ensure clarity in their involvement. In the event of a fire with potential cyanide spillage, firefighters are instructed not to use water. If water is deployed by any means, strict precautions must be taken to ensure it does not flow into sewers, streets, canals, or irrigation ditches. Firefighters are also tasked with constructing containment dams using earth, sand, or absorbent materials to prevent hazardous materials from spreading.

The plan also highlights the critical role of medical responders in swiftly transporting individuals injured or affected by cyanide exposure to a hospital. It requires documentation of essential details, including the sequence in which individuals are transported, the names of medical facilities located along the routes, the person supervising the transfer, the type of transport utilized (such as an ambulance or private vehicle), and the identity of the nearest hospital.

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	

The procedure for transporting cyanide mandates that all drivers and the Convoy Leader receive training in handling Sodium Cyanide Emergencies. This training must be conducted by Aucan or authorized third-party providers before these individuals are assigned to cyanide operations. In addition to this specialized training, they are also required to complete training on the cyanide transport procedure. All personnel involved in the transport of cyanide must undergo training within the calendar year.

The Emergency Response Plan emphasizes that sodium cyanide requires meticulous handling. Therefore, anyone managing this substance must be thoroughly instructed and familiarized with safety and operational procedures. Due to its hazardous nature and the tendency for complacency over time when no incidents occur, the plan stipulates that yearly refresher training is essential.

The transporter ensures periodic refresher training for all staff with responsibilities involved to emergency response during cyanide transport. This includes drivers, Convoy Leaders, personnel escorting convoys, Supervisors, and any individuals designated as the first line of emergency response. The initial training covers Occupational Risk Information (IRC) in compliance with Chilean regulations. Additionally, Aucan is tasked with providing emergency response training to secondary response groups such as firefighters and relevant authorities, depending on the needs of the mining company.

The auditor reviewed completed training records documenting the recertification period, within the Emergency Response Plan and cyanide transport procedures. These records confirm that personnel received comprehensive training addressing all anticipated response activities. Topics included protocols for requesting assistance, proper use of personal protective equipment, and administering first aid for cyanide exposure including administration of amyl nitrite and medical oxygen. The training materials thoroughly outlined these elements, while corresponding records documented the individuals trained, as well as the dates and focus areas of the sessions. Upon review of this documentation and interviews conducted with designated response personnel, the auditor confirmed full compliance with the outlined requirements. Training records were found to be adequately maintained and complete.

The Emergency Response Plan outlines the specific duties and responsibilities assigned to all personnel and external entities involved in the emergency response. It provides clear expectations and serves as the foundation for training its personnel. In the event of an emergency, accident, or en-route breakdown, Aucan´s personnel is aware of its responsibilities to offer support. The Plan defines the roles of various parties: drivers , convoy escorts, health and safe officer and managers who are tasked with initial communications and emergency response. Ambipar and Volta are explicitly identified in the plan; firefighters act as the secondary responders; police manage traffic control and secure access to the affected area; and cyanide suppliers, along with mining companies, provide specialized assistance and help facilitate communication with relevant stakeholders when required.

The transporter maintains a comprehensive inventory of emergency response equipment detailed in Section 4.3 of the ERP. The portable hydrogen cyanide gas monitor are calibrated every six months in accordance with the manufacturer's recommendations. This list is also provided as a checklist in the Emergency Kit Inspection form outlined in the cyanide transportation procedure. It ensures all required emergency equipment travels with the cyanide shipment throughout the transport route. The auditor requested Aucán to update the emergency equipment list by replacing Cyanokit with Cyanide Antidote Medicine pack as titled in the box containing, among others, amyl nitrite (inhalable) and sodium thiosulfate and sodium nitrite (injectables), as Cyanokit is a different compound, hydroxocobalamin. Amyl nitrite and antidotes are stored and replaced following the manufacturer's recommendations. Following the audit, Aucán made the correction by replacing the information to accurately reflect the proper cyanide antidote.

The transporter ensures that necessary emergency equipment is available and documented for each cyanide shipment through a checklist system. The Emergency Response Plan mandates that all emergency equipment and materials be inspected prior to every cyanide delivery. The auditor reviewed completed emergency equipment checklists, physically inspected the equipment, and interviewed key personnel, including the driver, planning staff, and health and safety officer, confirming compliance with this requirement.

The emergency equipment checklist features items like lime, commercial bleach, a gas detector for hydrogen cyanide (HCN), an oxygen cylinder, a mask, and an AMBU (Artificial Manual Breathing Unit) for rescue breathing. The auditor required the carrier to replace the current oxygen mask with a bag mask designed to provide a 100% oxygen environment for breathing. Following the audit, the carrier provided a photograph and invoice for the newly purchased bag mask, fulfilling the compliance requirements without needing further documentation.

According to the ERP, in case of cyanide exposure during transit, victims are to be treated with oxygen and amyl nitrite therapy while being transported to the nearest medical facility

located near the port or mine carrying the Cyanide Antidote Medicine pack. The application of injectable antidotes will only be done in medical centers by authorized personnel Aucán will not do it.

In addition to the specialized items listed, the transporter also carries Tyvek overalls, leather gloves, rubber boots, goggles or safety glasses, waterproof gloves, hazard tape rolls, lanterns, fabric sealing tape, dust masks, shovels, delimiting tape, safety cones, emergency lights, polyethylene bags, empty buckets, and tarpaulins. The auditor reviewed the transporter's documentation and confirmed compliance with ERP requirements that specify equipment suitable for managing potential emergencies during these operations.

The auditor requested Aucan the establishment of a schedule for inspecting emergency response equipment. Following the audit, Aucán determined in the updated version of the Plan that these inspections should occur monthly, as well as before each cargo departure, as has been done so far. After reviewing this guideline and the records of regular inspections conducted prior to each trip—and acknowledging that a monthly inspection had not yet been performed due to the period not having elapsed—the auditor concluded that compliance with this requirement was being met and did not request further information.

The emergency response equipment is identified in the transporter's ERP and tested regularly so that it will be available in good working order when needed for use. The emergency response procedures require to check emergency equipment as part of the pre-trip inspection process. Among the control measures adopted, the transporter addresses to perform inspections to the emergency equipment before loading the truck. The checklist is used to verify that it is available prior the convoy's departure, and it is kept in the operation file. The auditor reviewed these records verifying that they check the equipment to be in good working order during transport of cyanide.

Aucan does not hire other entities to conduct any of the activities required in this Transport Practice.

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 transporter has established procedures and maintains up-to-date contact information in the ERP to handle both internal and external notifications in the event of a cyanide-related emergency during transportation or interim storage. The contact list includes the names and phone numbers of transporter personnel, the shipper, the receiver (mining

clients), regulatory agencies, medical facilities, ambulances, police, firefighters, and relevant information for potentially affected communities.

In an emergency, the convoy leader or driver will immediately notify the transporter's headquarters, which will then inform the mining company. Additionally, they will provide the contact details of emergency response agencies such as firefighters, hospitals, and police departments. The auditors reviewed the transporter's notification procedures and contact information, confirming compliance with these requirements.

The transporter was required to implement a system designed to ensure that emergency contact information remains up to date. Following the audit, the updated version of Aucan's emergency response plan specified that the emergency contact numbers within the plan should be reviewed every six months. The contacts for private companies will be called to verify their operability, while the numbers for government agencies will be verified through their official website. As part of the ERP, there is a provision for an annual or more frequent review of the entire plan.

The transporter's ERP mandates notifying the ICMI in the event of a cyanide emergency classified as a significant cyanide incident, as outlined in the Definitions and Acronyms document of the Code. Up until the time of the audit, no such notifications had been necessary, as no significant cyanide incidents requiring ICMI notification had occurred.

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	

The Emergency Response Plan (ERP) outlines procedures for dealing with cyanide spills on both dry and wet soil, including recovery or neutralization of solutions and solids, decontamination of affected soils or other contaminated materials, and the management or disposal of debris resulting from cleanup efforts. It also covers emergency actions for cyanide spills in water or snow, focusing on cleaning and decontamination processes. In case of a minor cyanide spill during transport, the truck transporter will lead the cleanup and remediation efforts. For larger spills occurring in transit, cleanup and remediation are delegated to the external emergency responder contractor, Ambipar, as specified in the

ERP. The auditor reviewed correspondence between Aucan and Ambipar regarding the execution of cleanup and remediation activities, confirming Ambipar' s readiness to provide these services along with established procedures from external contractor Volta to ensure safe, environmentally responsible remediation and disposal of cyanide waste.

The carrier's ERP and Ambipar emergency response procedures clearly forbid the use of chemicals like sodium hypochlorite, ferrous sulfate, and hydrogen peroxide for treating cyanide released into surface water. The auditor examined the ERP, interviewed the Convoy Leader, and Ambipar`s procedure, verifying their understanding of this guideline.

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	

The transporter's Emergency Response Plan encompasses measures for regularly reviewing and assessing its adequacy. Aucan has carried out reviews, evaluations, and updates to the Plan as needed during the recertification period. These updates address changes in potential release scenarios and required response actions, which may evolve over time due to a variety of factors such as modifications to transport routes, alterations in the form of cyanide being transported, or changes in the transport equipment used. The auditor assessed this process and its implementation by examining previous versions of the Plan and confirmed through interviews with the Operations Manager. During the site visit, the Emergency Response Plan was on version 8. All changes are documented using a change control sheet at the beginning of the Plan. This sheet records the revision date, modifications made, version number, and the individual responsible for the revision.

The ERP states to perform annually mock emergency drills that may be theoretical or practical, with the purpose of evaluating the effectiveness of the plan and correcting the anomalies found. It requires a report to be issued after each drill describing the exercise itself, who participates, the type of scenario, the basic actions taken, strengths and weaknesses, serving this report as a mean of continuous improvement of the plan.

During this recertification period 2023 to 2025, the transporter performed an emergency mock drill on June 2024 in San Antonio Port with six participants. The drill was performed in conjunction with Minera la Florida, simulating a cyanide spill due to truck collisions. The

drill was evaluated to determine if the communications response procedure was adequate, response equipment was appropriate, and if the personnel trained. The drill report included opportunities for improvements, responsible to implement the correction action and dates for compliance. All actions shows to be completed.

The auditor required Aucan to conduct another emergency mock drill that included a scenario involving human exposure to cyanide. Following the audit, Aucan submitted a mock drill report from December 2025, carried out in collaboration with Minera Fortuna, paramedics, and an ambulance team. The drill began with the Convoy Supervisor contacting Aucan's Logistics Supervisor to report an incident. The simulated scenario involved a truck overturning on the road to Mina Fortuna, resulting in two casualties: one individual was unconscious, seemingly due to exposure to hydrocyanic gas (HCN), while the other, though injured, managed to leave the scene independently. The overturn also caused a minor cyanide spill. In response, convoy members covered the spill with lime and a polyethylene tarp. Paramedics arrived on-site and administered first aid to the unconscious individual suspected of HCN gas exposure. Improvement opportunities were identified during the exercise and were being addressed. No further information was needed to confirm full compliance with the requirement.

Aucan was required to include in the Plan, a provision stating it must be reviewed and assessed after any incident that necessitates its implementation. Following the audit, this requirement was incorporated into the updated version of the emergency response plan. However, no revisions have been made so far, as no emergencies involving cyanide transportation have been reported to date.

AUCAN LOGISTICS SPA

SAN ANTONIO WAREHOUSE OPERATION

SUMMARY AUDIT REPORT

FOR THE

INTERNATIONAL CYANIDE MANAGEMENT CODE

MAY 2026

BP Cyanide Auditors

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Table of Contents

Operation General Information

Name of the production operation:	Aucan Logistics - San Antonio Warehouse
Name of the facility owner:	Logística El Cardal S. A
Name of the facility operator:	Logística El Cardal S. A
Name of Responsible Manager:	Joel Cortés Reyes - Contract Manager and Administrator
Address:	Suspiro 23 A Piedra Colgada, Copiapó, Atacama
Country:	Chile
Telephone:	+56 954 227 255
Email:	jcortes@aucanlogistic.cl

Operation Location Detail and Description

The San Antonio Warehouse is situated within the facilities of Logística El Cardal S.A. (Logec), known as Leyda Warehouse, where Aucan Logistic SPA (Aucan) trucking company, leases space - *Bodega 6* - to store cyanide in Intermediate Bulk Containers (IBC). The warehouse is located at Camino Vecinal La Marquesa 222, Leyda Ruta G-920, Leyda, San Antonio, Valparaíso. Its strategic location places it 15 kilometers from the Port of San Antonio, 90 kilometers from Valparaíso, and 80 kilometers from Santiago. Operations at the warehouse are carried out by Logec personnel using their equipment, under the supervision of Aucan's representative, acting as the consignor of the cyanide.

Aucan´s San Antonio Warehouse inside Logec premises, has capacity to store 800 tons of cyanide in IBCs with an area around 1,000 square meters. Logec specializes in integral logistics services, with a primary focus on the storage of hazardous materials, commonly referred to as IMO cargo. This logistics center is authorized by the Environmental Evaluation Service (SEA) to store up to 21,000 tons of hazardous materials (IMO cargo). It also holds approval from the Regional Health Department (SEREMI) for the storage of various classes, including flammables (2, 3, and 4), oxidizers (5), corrosives (8), toxic substances (6), miscellaneous dangerous goods (9), and other chemicals, along with non-hazardous substances. Logec is also authorized to store up to 117 containers of hazardous substances in the Container Yard.

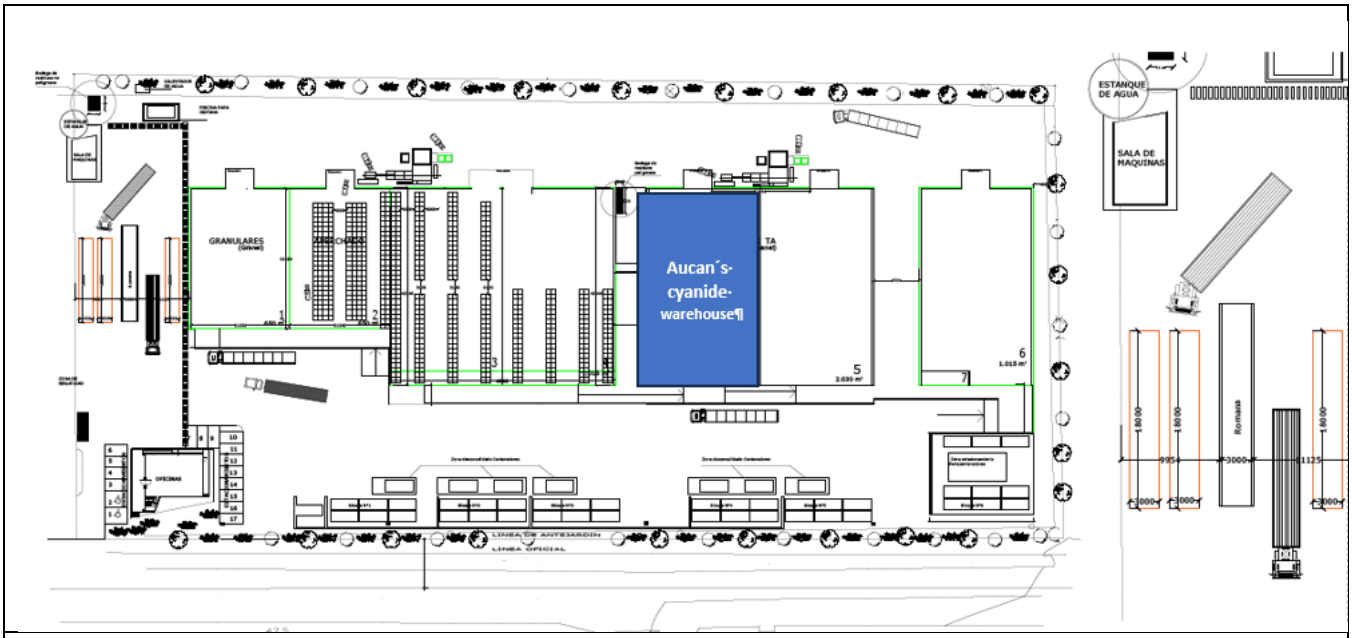
Solid sodium cyanide in briquettes shipments in standard 20-foot container, arrive in Chile by sea, where cargo unloading is managed by the San Antonio Port Authority. Once the containers are placed on Aucan´s truck platforms, the operational responsibility for cyanide transportation shifts to Aucan. Cyanide packaging involves Intermediate Bulk Containers (IBC) weighing approximately one ton each, which are protected with polyethylene and polypropylene materials to shield them

against water and humidity before being enclosed in wooden boxes. A minimum of 20 boxes of 1 ton each are carefully arranged inside a standard 20-foot container. Each container is sealed with a uniquely numbered tag by the manufacturer at the production site to safeguard against tampering or material loss, with seals only removed upon delivery to San Antonio Warehouse or to the mine sites.

This audit focuses solely on the Aucan´s San Antonio Warehouse evaluating the process upon Aucan´s trucks arriving to Logec´s premise where cyanide shipments are unloaded from the truck utilizing a reach stacker and positioning it in the yard adjacent to Aucan's warehouse. Subsequent steps involve deconsolidation operations using a forklift, which includes opening the sea containers and transferring cyanide in IBCs into the warehouse storage area. Preparation for distribution entails loading and securing 20 IBCs into sea containers of either 20 or 40 feet in dimension to facilitate delivery to customers. Finally, the interior of the cyanide storage area and container yard is thoroughly cleaned to ensure proper maintenance and compliance with safety standards.

Location Map of Logec warehouse in Chile

Logec warehouse location in San Antonio



The Aucan San Antonio Warehouse is located within the Logec premises and marked in blue.

Logec warehouse entrance

Aucan´s cyanide warehouse

Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

Compliance Statement

The Summary Audit Report for a recertification audit must include one additional statement that is not required in the Summary Audit Report for an initial certification audit. For an operation found in full compliance with the Code, the report must indicate whether the operation had any compliance issues or significant cyanide incidents since its previous certification and identify where in the report such information can be found. For a production facility found in substantial compliance or non-compliance, the report must identify the Standard(s) of Practice on which the finding was based.

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

Auditor Information

Audit Company:	Cyanide Auditors S.A.	
Lead Auditor and Production Technical Auditor:	Bruno Pizzorni	bpizzorni@cyanideauditor.com
Dates of Audit:	December 5 and 6, 2025	

Auditor Attestation

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

I attest that this Summary Audit Report accurately describes the findings of the certification

audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Production Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

PRODUCTION VERIFICATION PROTOCOL

Principle 1 | OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1

Design and construct cyanide production facilities consistent with sound, accepted engineeringpractices and quality control/quality assurance procedures.

The operation is	✓ in full *compliance* with	Production Practice 1.1
	☐ in substantial compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The warehouse has been meticulously designed and constructed to meet professional standards. The auditor reviewed the design document titled *Technical Specifications: Leyda Warehouse*, developed by MKM Arquitectos, for quality assurance purposes. This document outlines the necessary requirements for materials, their quality, brand, and type, as well as the construction methods to be followed. Key highlights include the use of high-quality materials and skilled labor in strict adherence to technical specifications, blueprints, and regulations. Oversight of proper execution and quality was ensured by a designated technical supervisor.

The construction specifications provide detailed guidelines for various structural elements, such as earthworks, excavations, compacted fillings, concrete foundations, reinforced concrete, and steel structures in line with engineering designs. Additionally, the specifications describe a 15 cm thick reinforced pavement slab tailored to withstand heavy forklift traffic; perimeter brick walls with Zinc-Alum panels, and specialized sanitary and electrical installations based on specific engineering projects. The storage facility is designed to prioritize natural cross-ventilation.

Specific materials and finishes have been detailed, including appropriate paints and varnishes for different elements, a 220-volt electrical system, conduits for electrical networks, alarm systems, and security installations. Sewage infrastructure features PVC piping, a truck yard, and parking spaces with slopes leading to underground drainage pits that are not connected to the public sewer system. The facility includes a sliding metal gate, pedestrian access doors, outdoor LED lighting fixtures with poles, water storage tanks designated for rainwater collection and washing purposes (also not connected to the public sewage system), and a fire-resistance report.

The warehouse demonstrates robust fire safety measures. Fire barriers (F-150 walls) can withstand 150 minutes (2.5 hours) under fire conditions without structural failure. Load-bearing vertical elements are protected with F-120 fire resistance, non-load-bearing walls offer F-30 resistance, and the metallic roof is treated with intumescent paint certified at F-60.

Throughout the construction process, appropriately qualified professionals assessed the facility to ensure compliance. While specific documentation confirming that the construction adhered precisely to approved plans (Quality Construction) was unavailable, the auditor verified approvals from relevant regulatory authorities. This included validation of the Environmental Evaluation Service (SEA) permit for storing hazardous materials (IMO cargo) and the Regional Health Department's (SEREMI) authorization for hazardous goods and chemicals. The auditor reviewed SEREMI's resolution dated May 3, 2018, which authorized Logec's warehouse operations for the storage of hazardous materials, including cyanide.

Qualified personnel from the Environmental Evaluation Service and the Regional Health Department conducted an inspection of the facility. They issued a report authorizing and stating that the facility's operations, when carried out within established parameters, would ensure protection against hazardous materials, including those classified as Class 6.1. Sodium cyanide falls under Class 6.1, encompassing toxic substances capable of causing harm to human health or death through inhalation, absorption, or ingestion.

The warehouse exclusively handle cyanide in closed packages such as Intermediate Bulk Containers, and no reagents are used or processing takes place.

Cyanide managed on a concrete impermeable surface that prevents seepage to the subsurface. Cyanide is stored on a 15 cm thick reinforced pavement slab, designed to endure heavy forklift traffic both within the warehouse and in the containers yard. During a previous gap audit conducted at the facility, it was identified that repairs were needed in certain areas of the containers yard and the warehouse entrance, as these spots exhibited fissures and wear caused by vehicle movements. By the time of the certification audit, the auditor observed that the pavement had been fully repaired.

The maneuvering yard features a geomembrane installed over the existing concrete slab. The repair process involved first cleaning and filling the old pavement, followed by installing the geomembrane using thermofusion techniques. Subsequently, a high-strength, quick-setting concrete mix was applied for re-paving. The geomembrane was incorporated to prevent water infiltration into the base layer of the pavement, which is critical for avoiding future settling or cracking of the surface.

During the inspection of the cyanide warehouse, the auditor noted that the concrete slab was in good condition. Additionally, the construction and expansion joints between slabs were properly sealed with waterproofing material to enhance durability. Upon further review of the facility, it was verified that the concrete surfaces were intact, with no cracks present that could compromise their ability to contain any potential cyanide spills.

The facility does not employ or conduct inspections, testing, or maintenance for systems like level indicators and high-level alarms since the operation does not involve storage vessels. The warehouse handles solid cyanide stored in unopened containers and packaging, such as intermediate bulk containers (IBCs).

The warehouse's floor and walls function effectively as secondary containment for containers of

solid cyanide stored within. Outside the storage area, the pavement is designed with slopes that prevent surface runoff water from rain from entering the warehouses. The facility does not handle cyanide solutions. Spilled liquids, such as rainwater and wash water, are channeled into an underground concrete chamber containing a 1.1-cubic-meter PVC tank. This tank operates independently of public sewage systems. During the site inspection, the auditor assessed the surfaces where cyanide is handled, along with the design of the underground tank designated for collecting contaminated wash water and stormwater. From a waterproofing standpoint, these structures form an effective barrier against subsoil infiltration. The facilities are considered suitable for their purpose and remain in good operational condition. A monthly inspection checklist is in place for this water collection tank, covering checks on water level, cleanliness, clear flow paths, and verification of leak-free integrity. Compliance with these measures was confirmed during the auditor's inspection of the site and review of maintenance records. Additionally, the auditor verified that the building's floor and walls are in proper condition.

The warehouse does not have cyanide solution pipeless. The dilute nature of any cyanide solution that is managed, such as wash water and water used to decontaminate clothing and equipment does not require secondary containment.

Cyanide is stored:

a) With measures to avoid or minimize the potential for exposure of cyanide to moisture. The cyanide warehouse has a roofed and closed structure to avoid contact with rainfall. Within the buildings there are no potable water systems; the water fire system is canceled and the safety showers that are present are designed in such a way that leaks or other potential releases do not come into contact with the cyanide containers as they have secondary containment and adequate slopes that drain into a sump connecting the buried tank for contaminated wastewater. Outside the storage, the pavement slopes are designed in such a way that they do not allow the entry of surface runoff water from rain into the warehouses.

b) With adequate ventilation to prevent the build-up of hydrogen cyanide gas and cyanide dust The enclosed areas where cyanide is stored have particularly good ventilation by windows with fixed metal lattices to prevent the accumulation of cyanide dust and hydrogen cyanide gas. The auditor determined the adequacy of ventilation by visual confirmation that enclosed storage areas are, in fact, ventilated.

c) In a secure area where public access is prohibited. Aucan´s warehouse, located within the facilities of Logec, for security reasons, prevents access by the public and unauthorized personnel. It is inside a secure building that have gates and padlocks. The entire property has a perimeter fence made of electro welded mesh with prefabricated cement walls; the back of this fence features electrified mesh and barbed wire on its upper part . The warehouse has permanent surveillance 24/7 and access limit controlled by security personnel of the operation. Closed-circuit television (CCTV) cameras and alarm systems are installed inside the facility. The Aucan's cyanide warehouse remains closed with metal

roll-up door with a padlock. Access to the area is restricted. The warehouse operates with only the necessary personnel -3 Logec's operators and Aucan's Supervisor- during the processes of receiving, storing, or dispatching cyanide. Outside of these activities, it stays closed.

d) Separately from incompatible materials. In occasion of the audit site visit only cyanide was stored. Separation of incompatible materials is a stablished practice in the Logec´s management of all hazardous materials, including cyanide.

Production Practice 1.2

Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The operation is	✓ in full *compliance* with	Production Practice 1.2
	☐ in substantial compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The facility has implemented Logec's written procedure PTS-03 – Deconsolidated, Storage and Consolidation of Cyanide to manage the cyanide operations in a manner that ensures the safety of workers and the environment. This procedure outlines the processes for unloading and storing incoming cyanide, as well as for storing and loading IBCs containing cyanide into sea containers for delivery to customers. It provides detailed guidance on conducting cyanide management activities safely and responsibly to prevent any releases or exposures.

Compliance with these procedure was further confirmed through interviews with the personnel tasked with performing these operations. However, during the site visit, no cyanide-handling activities were taking place at that time.

The auditor examined this operating procedure and mandated that Aucan incorporate a requirement to inspect the empty sea container prior to loading during cyanide dispatch operations. This inspection is to ensure there are no holes or damages that could compromise its waterproofing, verify the condition of the doors, seals, cleaning, and address any other relevant concerns. Following the audit, Aucan provided a revised version of the procedure, which specifically addressed the inspection of empty sea containers prior to dispatch.

The work procedure includes contingency actions such as treatment for IBCs boxes found in poor condition, indicating that they have a designated area where these boxes will be quarantined and

will immediately inform the client and will follow instructions in this regard. The procedures includes contingencies related to damaged cyanide boxes, presence of white powder or label in poor conditions, damaged container or shutdown of the operation due to machinery breakdown. In general, it contemplates some sufficiently probable situations that have been developed with previously planned responses.

During the site visit, the auditor verified that the warehouse has a designated area for quarantining damaged boxes. Through interviews with the staff, it was confirmed that they are aware of such potential contingencies and understand the actions to be taken.

The Aucan warehouse facility has the procedure SGC-A-INS-03 Instructions for Making Changes to Procedures, Equipment, and Infrastructure in Cyanide Transport and Storage Operations (Management of Change or MOC procedure), dated August 2025, as a formalized way of managing changes to the facility. This change management procedure has been developed to identify, among others, changes to the facility or its operating practices that may increase the potential for cyanide releases and adverse impacts on worker health and safety before such changes are implemented so that they can be evaluated and addressed as necessary. The procedure requires written notification to environmental, health and safety personnel and a sign-off before the change can be instituted.

The auditor required Aucan to include into the MOC procedure scope, that also apply to any change in the operation due to equipment and warehouse infrastructure. After the auditor´s site visit, Aucan sent a reviewed version of the MOC procedure , including the requirement to evaluate risks by mean of this MOC procedure, due to any change of procedures, equipment or the facility´s infrastructure. No additional information was required to find this Protocol Question in compliance.

The logistics operation at Leyda Warehouse, managed by the tenant, follows a structured preventive maintenance plan for all machinery, including equipment used at Aucan's warehouse, such as the reachstacker PC-45 and the forklift GH-60. A daily equipment pre use checklist is available through the operator application, where data is collected and organized into Excel spreadsheets and email reports. These reports highlight key metrics like compliance percentages, equipment availability, and preventive maintenance efficiency.

This information is systematically tracked on Logec’s operational portal, allowing authorized personnel to access and review equipment pre-use checklists, service orders, and maintenance records for all machinery. The records also document performed maintenance activities as well as inspections of warehouse infrastructure and CCTV systems.

Preventive machinery maintenance is supervised by the warehouse manager under the guidance of the operations coordinator. They employ traffic light-style Excel charts to indicate when maintenance is due, typically scheduled every 500 working hours.

The auditor reviewed during the site visit, the two most recent maintenance records for each piece of equipment operating in Aucan’s warehouse via the Logec operational portal and confirmed compliance. Meanwhile, the Aucan Operations Supervisor, based in San Antonio, oversees the

maintenance status of this equipment using a pre-task checklist conducted prior to cyanide loading and unloading operations.

There are no processes carried out at the warehouse, only the operations of receiving, storing, and dispatching IBCs containing cyanide in sea containers. Since no parameters require monitoring, no instruments for process monitoring are necessary.

The cyanide warehouse has impermeable concrete floors and walls that provide secondary containment in the event that cyanide is released from stored containers.

The facility does not store cyanide solution on-site; however, in the event of a spill, small quantities of contaminated wash or cleaning water may be generated. To prevent unauthorized discharge, gutters and sumps channel the water to an underground tank. This tank operates independently of the drainage system, ensuring that the collected water is securely managed and later disposed of by a specialized contractor. Regular inspections and maintenance are conducted to ensure the system's reliability.

The warehouse operation procedure for cyanide unloading, storage, and dispatch (the warehouse cyanide procedure) outlines the management of contaminated water. If the underground tank is discovered to contain contaminated water, the area will be secured, and gas levels will be assessed to confirm they remain within safe limits (below 4.7 PPM). Aucan Logistic will subsequently be notified to collaborate with Volta and organize the removal of the contaminated substance for proper disposal. This process will involve the use of suction pumps to transfer the polluted water into a tanker truck specifically designed for hazardous material transportation, adhering to local regulation DS 148.

The warehouse cyanide procedure describes management of cyanide materials such as spilled product and cyanide-contaminated materials such as used equipment. Tyvec suits and contaminated cleaning material such as floor sweepings, rags, and debris gathered by the floor cleaning machine, along with dust removed from its filters, must be disposed of as hazardous waste. Tools and Personal Protection Equipment (PPE) used during emergency management must be decontaminated with 5% sodium hypochlorite applied with a hand sprayer. The underground tank only collects surface runoff water from rain and any washing activity in the warehouses and is independent of the domestic water collection network that goes to the public network The authorized contractor Volta must then collect and dispose of the waste and provide a certificate of proper final disposal. The auditor observed in the building a plastic drum properly marked for hazardous waste storage and reviewed examples of shipping manifests, including contaminated water from the septic tank.

The warehouse cyanide protocol outlines management procedures to ensure compliance with Chilean regulations regarding the packaging and labeling of cyanide. This includes verifying that all boxes bear the original factory label in Spanish, clearly identifying the product. Any box found without a label will be quarantined until resolved. Labels will feature details such as the date of receipt, container number, and cargo status and will be handwritten by the supervisor to ensure accuracy and current information.

Once the cyanide is stored, a control report will be prepared periodically and submitted to Aucan´s management. The operational guidelines also mandate verifying that labeling and packaging integrity remains intact during shipment to customers. Additionally, all empty sea containers must be thoroughly cleaned, and external cyanide labels must be removed prior to reuse. During the site visit, the auditor confirmed that all packaging was in good condition.

Production Practice 1.3

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

The operation is	✓ in full *compliance* with	Production Practice 1.3
	☐ in substantial *compliance* with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The facility operates as a cyanide warehouse rather than a production plant, and thus does not contain tanks, valves, or pipelines. As part of its operations, Aucan´s Operations Supervisor conducts monthly inspections with the Warehouse Checklist to ensure the integrity of its infrastructure. This includes assessments of all pavements, which serve as secondary containments in areas like loading, unloading, and cyanide storage zones. Inspections focus on identifying potential risks for cyanide release, such as cracks in impermeable surfaces. Additionally, checks are performed on the roof and walls to ensure adequate waterproofing, ventilation systems, rain downpipes, and on the condition of electrical and plumbing installations, as well as security systems.

Regular inspections are conducted to ensure that equipment and containment systems are operating effectively and that cyanide storage areas have unobstructed aisles for thorough inspection of the warehouse perimeter and the spaces between boxes. Containers used for transporting cyanide, such as IBC boxes and sea containers, undergo checks both upon arrival and prior to departure to confirm they remain in suitable condition. The process also includes verifying that the IBCs loaded into sea containers are correctly secured and locked. It should be noted that the facility is not responsible for the upkeep of the sea containers. Workers exhibit a strong awareness of potential hazards and understand the importance of promptly reporting any issues to the site manager.

The facility maintains thorough documentation of these inspections, which was made available for review by the auditor. These records confirm that inspections are conducted regularly and that necessary cleaning, maintenance, or repairs are carried out promptly when issues are identified. Detailed checklists reviewed by the auditor guide inspectors to evaluate specific areas and provide clear instructions on what to assess during the inspections.

The operation conducts facility inspections at appropriate intervals. Aucan´s Operation Supervisor performs monthly inspections for infrastructure elements. Logec, the logistics operator, performs weekly inspections of the entire Leyda Warehouse site. Additionally, Logec conducts monthly checks of the access gates and vehicular access conditions to the warehouse. These checks cover areas such as pavement conditions, electrical installations (including grounding), and the metal gates of each warehouse. On a semi-annual basis or as specific events necessitate, Logec's Quality Supervisor arranges for detailed infrastructure inspections by an external contractor.

The auditor reviewed examples of inspection records, contractor service orders and reports, confirming that the inspection frequencies are adequate to ensure equipment and installations are operating as intended.

Aucan and Logec maintains logs of facility inspections and maintenance activities using detailed checklists. These checklists capture the inspection date, the name of the inspector, and any deficiencies identified during the process. Records also document corrective actions taken, including their completion dates, within the same inspection logs. During the review, the auditor assessed examples of completed records. Logec inspections, on the other hand, were accessible via Logec’s operational portal, a system they had developed. Logec's inspections content were also found to be in compliance.

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

Develop and implement procedures to protect facility personnel from exposure to cyanide.

The operation is	✓ in full *compliance* with	Production Practice 2.1
	☐ in substantial *compliance* with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The facility ensures comprehensive worker protection by addressing all necessary aspects, including its inspection initiatives and preventive maintenance programs for essential equipment. The operational procedure PTS-03 – Deconsolidated, Storage, and Consolidation of Cyanide has been developed and implemented to minimize worker exposure during routine processes such as cyanide unloading, storage, and loading for shipment to mining clients. This procedure outlines specific actions for handling non-routine and maintenance-related tasks, complemented by Logec's maintenance program. The operational guidelines thoroughly cover safety considerations, both explicitly and implicitly, by detailing safe practices. The depth of these procedures corresponds directly to the level of risk associated with each task.

Aucan has an open-door policy of communication and direct interaction between the Aucan´s Operations Supervisor and the 3 workers from Logec assigned to perform the cyanide handling and storage activities. During the 15-minute safety talk before work, workers have the opportunity to express their feedback, and they are also encouraged to express their opinions during designated training sessions. Both Aucan the cyanide consignor and Logec the tenant, have a Health and Safety (H&S) Committee that meets monthly where worker representatives are responsible for giving their opinion on work procedures, among other safety and health things. The auditor reviewed the training records which have also have space for comments, observations, and suggestions.

The operation has recognized specific areas and tasks where workers might be exposed to hydrogen cyanide gas or cyanide dust and has mandated the use of personal protective equipment when working in these conditions. Identified locations include the enclosed cyanide warehouse and the process of opening doors on sea containers carrying cyanide shipments, as they present potential exposure risks.

The auditor verified that the facility assessed this hazard through a review of warehouse operational procedures related to deconsolidation, storage, and consolidation of cyanide,

pinpointing critical areas where workers could be exposed to cyanide dust or hydrogen cyanide (HCN) gas. By observing the designated safety signage, the auditor confirmed that the operation has effectively identified such areas and activities, enforced the use of appropriate protective equipment, and implemented necessary administrative controls. Interviews with workers further validated that the administrative measures were being properly followed.

Aucan has equipped the facility with one fixed hydrogen cyanide (HCN) gas monitor and three portable monitors to help mitigate workers' exposure to HCN gas and cyanide dust. The fixed monitor has been strategically installed on in the upper central part of the warehouse left side wall, identified as the least ventilated area. In the event of elevated HCN gas concentrations, the monitors emit audible alarms. Both the fixed and portable monitors are calibrated with alarms set at 4.7 parts per million (ppm) for low levels and 10.0 ppm for high levels. When the first alarm is triggered at 4.7 ppm, all personnel must promptly relocate to outdoor safe zones distinctly marked and positioned upwind. Should concentrations escalate to 10 ppm, the second alarm will sound, indicating an immediate and full evacuation of the warehouse.

The auditor confirmed through interviews that operators are fully aware of these alarm thresholds and the corresponding actions required. During the evaluation, employees were observed using portable monitors in pairs. Compliance with safety protocols was further validated through observations of the monitoring equipment, a review of calibration records, and interviews with the workforce.

The operation sends its HCN monitors for maintenance, test, and calibration every six months, as recommended the manufacturer (Dragüer), and required in the operation procedure for cyanide handling. The fixed monitor is new and recently installed. The calibration certificates for the HCN monitors include actual calibration data. The auditor reviewed the calibration certificates of the portable gas monitors is carried out by the Chilean contractor NLT Chile.

The operation has established a buddy system, aligned with the operational procedures for handling cyanide, to ensure workers can assist one another or promptly notify others for help when necessary. According to the procedure, before initiating any cyanide-related tasks in the warehouse, Aucan's Operations Supervisor—responsible for overseeing the operation—must brief workers on control measures designed to reduce operational risks. A key element of these measures is the implementation of a work partner system, which guarantees that no worker is left alone during operations.

In practice, tasks are always conducted in pairs, with one individual serving as the primary operator and the other as a remote observer tasked with responding in case of emergencies. Activities involving cyanide are managed by the same team of three Logec employees under the supervision of Aucan's Operations Supervisor. To minimize health risks, at least one person is required to remain at a safe distance from potential sources of contamination, ensuring that the entire team is not exposed simultaneously. Operators are equipped with cell phones and two intercom radios: one for the forklift operator and another for the Supervisor stationed as an observer at a fixed location. Additionally, manual alarm systems and closed-circuit TV cameras

have been installed in the work areas to facilitate timely assistance if needed. The auditor verified adherence to these safety protocols by reviewing procedural documentation and conducting interviews and observations with employees.

Logec conducts evaluations annually or biennially based on the results of medical assessments issued by IST, the Chilean Institute of Workplace Safety. This organization provides workplace evaluation services in compliance with Chilean regulations outlined in Supreme Decree No. 44, which mandates that every employee must undergo medical evaluations tailored to their specific job responsibilities.

In accordance with Chilean law, employers of all sizes are required to affiliate with an administrative body for Social Security that protects against workplace accidents and occupational diseases, as stipulated by Law No. 16744. The results of these evaluations are classified as confidential medical information and are maintained by IST. These assessments typically include examinations of respirator usage capability, hearing and vision, pulmonary function, and other important factors. Workers' medical records are securely stored by IST.

Logec´s operational procedures for cyanide storage and handling, along with Aucan´s guidelines, mandate that all workers wear the appropriate clothing, accessories, and equipment necessary to perform their tasks safely. Required attire includes long-sleeved shirts and pants to ensure full coverage of extremities. For operations involving cyanide, workers utilize disposable Tyvek suits, which are discarded upon completing the task. The auditor verified adherence to these measures by reviewing the documented procedures and conducting interviews and on-site observations with employees. Since cyanide containers remain sealed during handling, the auditor deemed these precautionary measures adequate.

The facility has installed clear and visible signage across its operations to ensure all personnel potentially exposed to cyanide are aware of the associated risks and take necessary protective measures. The auditor observed signs placed both at the warehouse entrance and within the facility, notifying workers of cyanide's presence and specifying the required personal protective equipment (PPE) for the area. Employees have been made aware of the hazard and the importance of using the proper protective gear. The sodium cyanide zone specifically mandates the use of designated PPE. Through observation, interviews with staff, and a review of the site's safety and training programs, the auditor verified that workers have been adequately informed about cyanide-related risks and safety precautions.

The operation enforces a strict prohibition on smoking, eating, drinking, and open flames in areas with potential cyanide contamination through extensive signage. This prohibition is integrated into the operation’s safety training and reinforced by clear signage in the relevant areas. The signage complies with Chilean worker safety regulations. Smoking and open flames are entirely banned within the warehouse, while eating and drinking are only permitted in a designated room located away from cyanide-affected zones. The auditor examined training records, conducted employee interviews, and inspected on-site signage throughout the facility, concluding that the operation complies with these requirements. Employees demonstrated a clear understanding of the

restrictions and showed awareness of the hazards associated with violating these rules.

Production Practice 2.2

Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The operation is	✓ in full *compliance* with	Production Practice 2.2
	☐ in substantial *compliance* with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Logec has established the written emergency response document, PL-002 Leyda Plant Emergency and Evacuation Plan, which outlines a comprehensive set of preventive measures, provisions, and operational procedures. Its primary objective is to mitigate the impacts of potential incidents that could result in significant harm to the facility or individuals. This plan applies to the entire Leyda Warehouse. Specific emergency response protocols for addressing cyanide exposures, including procedures for cases of ingestion, skin or eye contact, and inhalation, are detailed in Logec and Aucan's operative procedure PTSC – 1.0 Procedure in Case of Cyanide Emergencies. This document provides guidance on the appropriate use of cyanide antidotes and the transfer of affected individuals to medical facilities. The outlined emergency response measures for cyanide exposure are well-suited to the facility's needs.

The facility is equipped with safety showers and eyewash stations located outside the cyanide warehouse, along with fire extinguishers within the warehouse area where workers might encounter cyanide exposure. This safety equipment is regularly inspected and maintained by Logec to guarantee proper functionality when required. The fire extinguishers are of a non-acidic dry chemical powder type, while the eyewash stations operate at low pressure, with nozzles shielded by overlapping caps to prevent contaminants from entering the water stream and potentially harming individuals' eyes. To minimize the risk of contact with cyanide, the storage areas for solid cyanide are specially designed, constructed, and maintained to reduce the likelihood of water coming into contact either with cyanide containers or any cyanide released during handling.

During the audit, the inspector verified the presence of an emergency shower and eyewash stations outside the cyanide warehouse , and dry powder extinguishers in necessary locations and tested the shower to confirm proper functionality. The eyewash station was found to be operational and functioning at low water pressure as intended. The inspection tags on the fire extinguishers demonstrated that they had undergone monthly visual inspections, as well as annual hydrostatic testing and certification by an external service provider.

The auditor also examined inspection and maintenance records related to the safety showers, low-pressure eyewash stations, and non-acidic fire extinguishers. These records confirmed that the specified safety equipment is consistently assessed to ensure it remains functional and readily available when needed.

The facility is equipped with essential emergency resources including oxygen with masks with reservoirs, an AMBU (Artificial Manual Breathing Unit), cyanide antidotes in the form of amyl nitrite ampoules, and injectable treatments such as sodium thiosulfate and sodium nitrite. Various communication and notification systems are readily accessible within the premises. First aid kits are stored in an emergency cabinet located at the entrance of the warehouse, while injectable antidotes are designated for use by medical professionals at a healthcare center.

For emergency communication, the facility has reliable tools such as radios, an alarm system, and cell phones. Employees are provided with radios, and there is a red emergency alarm button installed within the facility. Additionally, emergency contact lists are maintained both in the operation office and at the guardhouse. The auditor verified compliance with these safety measures through facility inspections and employee interviews.

Aucan's Operations Supervisor conducts monthly inspections to ensure the readiness of first aid equipment. Logec's operators also have a key role in inspecting this equipment before engaging in any operations involving cyanide IBCs, such as unloading, storing, or dispatching. Prior to initiating tasks like unloading or loading containers with cyanide, completing the Auc_Check_001 Checklist Emergency in Warehouse pre-task checklist is mandatory. This checklist outlines all critical items to verify, including the condition of first aid equipment, to uphold safety protocols. The process ensures all first aid kits, personal protective equipment (PPE), and emergency tools and materials are in proper working condition. Specific inspections focus on critical components, such as verifying that the oxygen bottle, mask with reservoir, cyanide antidotes and emergency shower and low-pressure eyewash have sufficient water and functional pressure. The checklist provides detailed points for each item, requiring inspectors to confirm compliance or note issues like expiration dates, while allowing space for additional observations. The first-aid and emergency response equipment is stored and tested as directed by its manufacturers and replaced on a schedule that ensures it will be effective when used.

The auditor examined the expiration dates of the cyanide antidotes as well as their storage conditions, ensuring they met the temperature requirements specified by the manufacturer. It was confirmed that the antidotes were within their valid usage period and stored appropriately.

Employees at facility have access to the first aid procedures an to the Safety Data Sheet (SDS) of the sodium cyanide in Spanish, the language of the workforce, located at the cyanide warehouse, placing them in a transparent envelope attached to the entrance of the warehouse, finding this requirement in conformance. The auditor also saw posted on the warehouse wall the first aid instructions for cyanide exposure.

As the operation deals solely with cyanide in its solid form, the labeling requirements are applicable only to cyanide containers within IBC boxes. The auditor verified compliance with this

requirement by inspecting the cyanide containers stored in the warehouse, ensuring all containers were clearly marked as cyanide, including the product's labeling prominently displayed in Spanish, among other details.

Proper signage is in place in all areas for the necessary PPE to be used to prevent potential skin exposure to cyanide. In addition, the operational procedure for handling cyanide indicates the decontamination activities that workers must carry out when leaving areas with a possibility of exposure to cyanide. The procedure requires the use of safety shoes, operating gloves, covered extremities and reflective elements. The procedure also requires washing hands after working with cyanide. The company provides its workers with uniforms, although there are no specific provisions regarding changing clothes. As a good practice, workers leave their work uniform and change clothes. They have dressing rooms with lockers and facilities for this purpose. The auditor reviewed the procedure and confirmed its implementation through observation of signaling and interviews with employees.

The facility is equipped with its own on-site resources to provide immediate assistance to workers exposed to cyanide. All cyanide operators assigned to the warehouse have undergone specialized training in cyanide first aid provided by IST. Additionally, they have been trained by Aucán and Ambipar response (Ambipar) in oxygen administration following an emergency drill conducted on June 25, 2025. The training included instructions on using AMBU (Air-Mask-Bag-Unit) bags for oxygen administration, protocols for oxygen use, recognition of symptoms and effects of cyanide exposure, and the procedure for transferring affected individuals to the medical center. This session involved the participation involved six workers. Injectable cyanide antidotes are specifically designated for use by medical staff at the Leyda rural medical post, situated just a two-minute drive (1.1 km) from the facility.

Through interviews and practical demonstrations of oxygen administration, the auditor verified that warehouse operators are adequately trained in handling oxygen equipment and using the inhalable amyl nitrite antidote for cyanide exposure. Of particular note, one of the three warehouse operators is a seasoned firefighter with comprehensive first aid experience.

The auditor requested Aucan to provide more detailed information regarding the procedures for transporting a victim of cyanide poisoning to a hospital or healthcare facility to receive appropriate assistance. The current guidelines outlined in the Emergency Response Plan (ERP) were deemed insufficiently detailed. After the audit Aucan sent a new version of the ERP where in the event of an emergency involving cyanide exposure, the Rural Clinic in Leyda will be contacted to inform them about the situation. A vehicle designated by Logec for risk prevention, operated by either the safety manager, operations manager, or general manager, will be available at the warehouse to transport the affected individual if necessary. The personnel responsible for the transfer will carry both a cyanide antidote and oxygen to provide immediate assistance. The individual will be taken to the Rural Clinic of Leyda, which is located 1.1 kilometers from the Leyda Warehouse, approximately a 2-minute drive.

The facility`s Emergency Response Plan for the Cyanide Warehouse details specific emergency

response procedures to transport exposed workers to locally available qualified off-site medical facilities. The auditor reviewed the operation's response procedure determining compliance with this provision.

The facility has notified the Rural Post of Leida about the need to treat patients in case of a for cyanide exposure using the cyanide kit treatment. On October 2, 2025, the operations manager of Aucán sent a letter to the Rural Post of Leida, outlining its activities at the San Antonio Warehouse in Leyda. Following this Aucan's managers conducted a visit to the medical center to verify the availability of necessary resources, such as oxygen and trained medical staff. Subsequently, Aucan´s Operations Manager delivered a presentation to the medical personnel, providing an overview of the cyanide kit treatment process. The operation is confident in the qualifications of the medical staff to manage cyanide intoxication cases. The auditor reviewed documentation regarding coordination with this external medical team and confirmed that measures were in place to ensure proper care for affected individuals.

Logec, acting as the site tenant and operator, has devised and implemented a comprehensive procedure for the reporting and investigation of workplace accidents, which is equally applicable to incidents involving cyanide exposure. In the event of an accident, incident, or quality failure, a Flash Report is generated using a Google application electronic spreadsheet. All reported accidents undergo thorough investigation to ascertain whether existing programs and procedures aimed at safeguarding worker health and safety are sufficient or require modifications.

In accordance with the Chilean regulation D.L. 44, established by the Ministry of Labor and Social Safety, accidents must be investigated utilizing the fault tree methodology. This analytical approach provides a systematic framework for understanding the causal relationships between a primary issue, its underlying factors, and associated secondary effects. By offering a clear visual representation of these interconnections, the methodology facilitates the identification of strategic interventions. It serves as a valuable tool in risk management, incident analysis, and ongoing improvement efforts by enabling organizations to uncover root causes and formulate effective corrective measures.

The auditor examined several accident reports available on Logec's intranet. Although these reports did not pertain specifically to cyanide-related incidents, they demonstrated procedural compliance through investigations and subsequent follow-up on the implementation of corrective actions as outlined in the company's guidelines.

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

The operation is	✓ in full *compliance* with	Production Practice 3.1
	☐ in substantial *compliance* with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The facility does not discharge directly or indirectly to surface water. No contaminated water is discharged into the facility; only unopened dry products are handled. They have a contaminated water receiver. Spilled liquids (such as wash water) drain into an underground concrete chamber which is inspected periodically according to Logec´s procedures. A contractor is in charge of removing it by suction for final disposal, which in the case of the cyanide storage facility managed by Aucan, this contractor would be Volta.

There are no compliance points or points of actual groundwater use near the facility and no government agencies have issued permits to Aucan related to groundwater.

The site is not engaged in groundwater remediation.

The facility manages only solid cyanide without opening cyanide boxes, there is no atmospheric process emissions.

At the facility the medium is not monitored due to the nature of its operations. The operation has no environmental commitment with the authority to monitor atmospheric emissions. The fixed cyanide monitor installed keep data on the levels of HCN gas emissions, which are insignificant according to the data reviewed, thus allowing the monitoring. During the visit, no dust was perceived in the environment.

Principle 4 | TRAINING

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Production Practice 4.1

Train employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.

The operation is	✓ in full *compliance* with	Production Practice 4.1
	☐ in substantial compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

Before working at the Leyda Warehouse site, all Logec personnel must complete the initial induction training in Occupational Risk Information, as stipulated by Chilean regulations. This training includes crucial information about hazardous materials, such as sodium cyanide storage at the site. On January 21, 2025, Logec conducted training for all staff on sodium cyanide characteristics and its safety data sheet (SDS). Furthermore, on January 24, 2025, they were trained in the Emergency Response Plan (ERP) for managing cyanide spills and exposure. This ERP was developed collaboratively by Aucan and Logec.

Additionally, in January 2025 and in February 3, 2025, nine workers assigned to Aucan's cyanide warehouse operations received specialized training Hazards Associated With Cyanide And Personal Protective Equipment , focusing on topics related to cyanide. The training aimed to equip these employees with the knowledge and skills necessary to handle sodium cyanide safely, prevent accidents, and effectively respond to emergencies. On June 25, 2025, these workers attended another session titled "Sodium Cyanide Awareness," held at AGR's (cyanide producer) training center in Santiago, which provided advanced insights into safe practices.

Logec and local regulations mandate annual refresher training for their personnel. Although this was the first year handling cyanide, and awareness-specific refresher courses were yet to be initiated, they have been scheduled as part of ongoing compliance measures. The auditor reviewed the annual training provided to employees, examining materials used during instruction, attendance records, tests assessing comprehension, and conducting interviews with staff to confirm that risks associated with cyanide are adequately addressed. The review ensured that those potentially exposed to cyanide receive both initial and periodic refresher training to maintain safety standards.

Logec, in partnership with Aucan, organized a training initiative for its nine cyanide operators on

January 23, 2025, under the direction of Aucan's Operations Manager, the trainer. This training, titled "Personal Protective Equipment and Its Use," aimed to enhance safety competencies among the personnel. Subsequently, on February 3, 2025, the employees assigned to work in Aucan's cyanide warehouse operations participated in a specialized training session focused on "Hazards Associated With Cyanide and Personal Protective Equipment."

The auditor conducted a thorough review examining participation records from 2025 related to the proper use of personal protective equipment. Additionally, the auditor observed employees utilizing such equipment during operations at the facility and conducted interviews to assess their understanding of the training content. The findings concluded that these activities were in full compliance with established standards.

All personnel involved in the management of cyanide at the facility have been trained to perform their assigned tasks in a safe and environmentally sound manner. Task-specific training is aimed to instruct employees on how to accomplish their assigned tasks safely; the required procedures are designed such that the tasks are accomplished in a manner that prevents exposures and releases. The auditor reviewed examples of training assistance records and test of understanding and through interviews, employees showed awareness of procedural requirements.

Task training is provided to employees before they are allowed to work with cyanide in an unsupervised manner. Before working at the Leyda Warehouse site, all Logec personnel must complete the initial induction training in Occupational Risk Information, as stipulated by Chilean regulations. This training includes crucial information about hazardous materials, such as sodium cyanide storage at the site. Training effectiveness is evaluated through testing and through observation of on-the-job performance by Aucan´s Operations Supervisor. The auditor verified compliance by reviewing training records and interviewing operational and supervisory personnel.

Logec conducts annual refresher training for its employees on routine tasks to ensure they consistently perform their work safely and in an environmentally responsible manner. Local regulations require this yearly training for all personnel. Although 2025 marks the first year the facility is handling cyanide, specialized refresher courses related to cyanide awareness have not yet been implemented but are planned as part of the company's ongoing compliance efforts. The auditor reviewed examples of annual training provided to employees, including attendance records, tests evaluating comprehension, and staff interviews, to verify that the required refresher training is being conducted.

The operation's work description outlines the specific cyanide management aspects that employees need to be trained in to effectively carry out their assigned tasks. Training on cyanide-related procedures emphasizes the critical points that employees must understand to perform these tasks safely and correctly. The auditor reviewed the job descriptions for cyanide operators, which specify the required training, examined the training materials, and interviewed both workers and trainers to assess compliance with this requirement.

Cyanide training is conducted by Aucan's Operations Manager, who possesses 15 years of experience in managing cyanide, alongside Aucan's Risk Prevention Officer, a certified engineer

specializing in risk prevention. On behalf of Logec, the training is led by the Risk Prevention Advisor, a seasoned professional in the field. Additionally, cyanide training has been delivered at the AGR training center by experts representing the cyanide producer. Verification processes included interviews, which confirmed that the trainers possess a satisfactory level of expertise to conduct the training effectively.

The facility assesses the effectiveness of its training programs by conducting tests and monitoring on-the-job performance, which is overseen by the Operations Supervisor. Knowledge is evaluated through written examinations, job performance observations, and participation in emergency drills. The auditor examined records of these formally documented evaluations and confirmed they were in compliance.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

The operation is	✓ in full *compliance* with	Production Practice 4.2
	☐ in *substantial* compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

Aucan, the cyanide consignor, is tasked with training Logec's employees assigned to work in the cyanide warehouse in the procedures to be followed if a cyanide exposure or release occurs. This training includes initiating assistance requests and administering cyanide-specific first aid as oxygen. Employees undergo comprehensive preparation to manage scenarios involving cyanide spills or exposure and to act as first responders in such emergencies. The training further incorporates instruction on the Emergency Plan, detailing steps for seeking external assistance when necessary. The auditor conducted a thorough review of the facility's records pertaining to emergency response training and corroborated, through interviews with personnel, that the site employees receive adequate and appropriate training for their roles.

The operation conducts training sessions aimed at reinforcing knowledge and skills related to first aid for cyanide exposure, with particular emphasis on the administration of oxygen therapy. The auditor evaluated the attendance records and reviewed the training materials from a session held on January 24, 2025, which was part of the Emergency Response Plan (ERP) focused on managing cyanide spills and exposure incidents. Additionally, in January 2025 and on February 3, 2025, nine employees assigned to Aucan's cyanide warehouse operations underwent specialized training on hazards associated with cyanide which included first aids training among others. This training included detailed instruction on first aid measures specific to cyanide exposure. Furthermore, on June 25, 2025, the same group of workers participated in an advanced session titled Sodium

Cyanide Awareness, delivered by AGR, the cyanide producer. This training provided enhanced guidance on safe handling practices. The auditor examined the participation records for these sessions and conducted interviews with workers to verify adherence to training protocols.

The facility maintains training records in both hard copy format and within the electronic Logec platform. These records document the training received by employees, including details such as the trainer's name, the training date, the topics covered, and the methods used to verify the employee's understanding of the material. The auditor examined these records and confirmed they comply with the relevant requirements.

Principle 5 | EMERGENCY RESPONSE

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

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is	✓ in full *compliance* with	Production Practice 5.1
	☐ in substantial compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

Specific emergency response protocols for addressing cyanide exposures, including procedures for cases of ingestion, skin or eye contact, and inhalation, are detailed in Logec and Aucan's operative procedure PTSC – 1.0 Procedure in Case of Cyanide Emergencies. This document provides guidance on the appropriate use of cyanide antidotes and the transfer of affected individuals to medical facilities. The outlined emergency response measures for cyanide exposure are well-suited to the facility's needs.

As a complement to the cyanide emergency response plan, Logec´s Leyda Warehouse has a general plan for the entire site. Logec has established the written emergency response document, PL-002 Leyda Plant Emergency and Evacuation Plan, which outlines a comprehensive set of preventive measures, provisions, and operational procedures. Its primary objective is to mitigate the impacts of potential incidents that could result in significant harm to the facility or individuals. This plan applies to the entire Leyda Warehouse.

The Plan thoroughly evaluates potential failure scenarios that align with the specific environmental and operational conditions of the site, particularly regarding the management of solid cyanide. The primary failure scenario identified involves the accidental release of cyanide during handling. Given the operational procedures, wherein a single intermediate bulk container (IBC) box is moved at a time using a forklift on a concrete floor, the most adverse situation anticipated involves the partial spill of cyanide due to the accidental dropping of an IBC box. However, such an incident would not result in a catastrophic release of hydrogen cyanide (HCN) gas. All cyanide handling occurs on an impermeable surface, and there are no nearby water courses. Furthermore, procedures explicitly prohibit cyanide transfer during rain or adverse weather conditions. Consequently, the Emergency Response Plan (ERP) does not account for a catastrophic release of HCN gas, as this scenario is deemed highly improbable given the nature of the operations.

Emergency scenarios involving fire are addressed within the ERP. It advises, wherever feasible, the use of dry chemical extinguishers that are non-acidic and water-free to combat fires. If fire containment proves unachievable, allowing the product to burn is prescribed as a preferable option. For large-scale fires, the involvement of local firefighting services is considered. The Plan does not contemplate explosion scenarios, as the facility does not store explosive substances or materials.

Additionally, emergency situations resulting from ruptures in cyanide piping, valves, or tanks are deemed irrelevant since the facility exclusively handles solid cyanide and does not involve liquid cyanide systems. Power outages and equipment failures are also considered inconsequential to safety since the transloading process is manual; operations would simply cease in such cases. Failure scenarios including the overtopping of ponds, tanks, or waste treatment facilities are similarly inapplicable because no cyanide solutions are present at the site.

The auditor has reviewed and confirmed that the Plan adequately addresses release scenarios that could reasonably be anticipated to cause significant impacts to workers, the surrounding community, or the environment. The Plan is tailored to the specific operational characteristics of the site and its environmental context.

The Plan outlines the types of potential incidents and the corresponding responses that may occur at the site, ensuring personnel are well-informed about the specific actions they should take in an emergency. The level of detail included is tailored to match the site's environmental conditions, the nature of potential receptors, and the safety controls implemented at the facility. Located in an industrial area, the warehouse operates with these considerations in mind.

The Plan provides clear, step-by-step instructions for responding to various situations, including solid cyanide spills, fires, worker exposure to cyanide, and site evacuations. It also includes a community contact directory to facilitate communication with neighboring industrial facilities in case a wider evacuation becomes necessary. Procedures for using cyanide antidotes and administering first aid for exposure are explicitly addressed. Additionally, measures for controlling releases at their source, containment strategies, incident assessment, mitigation steps, and strategies for preventing future occurrences are detailed in the ERP. The auditor reviewed and confirmed that the Plan's level of detail is appropriately comprehensive.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

	✓	in *full* compliance with	
The operation is	☐	in *substantial* compliance with	Production Practice 5.2
	☐	not *in* compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The operation actively includes its on-site personnel in the emergency planning process through regular training on the plan as well as periodic reviews and updates to the emergency procedures. Situated in an industrial area, the site has shared its Emergency Response Plan (ERP) with the Municipality of San Antonio, which is located 1.5 kilometers from the warehouse.

The Leyda Neighborhood Council serves as the connection to the community, which consists of about 70 houses located northwest of the Logec Leyda Warehouse across the highway. Interaction with this neighborhood has primarily occurred in situations involving wildfires or road improvements. Logec maintains communication with the council as part of its emergency response plan. The auditor examined meeting records with the municipality and conducted interviews with site personnel, confirming adherence to this requirement.

The facility has conveyed the risks linked to potential accidental cyanide releases of Hazmat to community representatives through the SEREMI (Regional Ministerial Secretariat), in coordination with the Municipality of San Antonio. This process ensures transparency and clarity regarding appropriate communication protocols and response strategies. Additionally, the warehouse submits a biannual report to SEREMI detailing the quantities of products stored on-site. The facility also holds a formal authorization from the relevant regulatory authority, permitting its operation as a storage site for hazardous substances. This approval requires not only confirmation of sufficient infrastructure to securely store such materials but also the development and implementation of comprehensive emergency response plans. These plans have undergone rigorous review and received approval from both the competent authorities and the local fire department.

The operation engaged external entities having emergency response roles, and involved those entities in the cyanide emergency response planning process. Local firefighters, Leyda medical center, Ambipar external contractor as emergency responder for large cyanide spills and Volta external contractor as the one in charge of properly disposing of hazmat waste.

Aucan was tasked with outlining the roles and responsibilities of various entities involved during an

emergency, specifically highlighting Logec's role as the warehouse operator and Aucan's responsibilities as the consignee of the cyanide and overseer of its storage operations. In the original Emergency Response Plan (ERP), the scope of participation for each entity—such as their involvement in initial response, subsequent interventions, waste disposal, and medical care—was unclear. These entities included Logec, Aucan, Ambipar, Leyda Medical Post, and Volta.

Following the audit, the facility updated the ERP to clearly define the responsibilities and scope for each actor during a cyanide-related emergency. According to the revised ERP, Logec's warehouse operators will administer first aid in cases of cyanide exposure and, under the coordination of Aucan's Operations Supervisor, facilitate the transfer of affected individuals to the Leyda Medical Post. Ambipar is designated to handle product recovery and site remediation if needed. Finally, Volta will be responsible for transporting and ensuring the final disposal of contaminated waste materials. No additional information was required to find this in compliance.

Considering the recent initiation of sodium cyanide storage operations by the warehouse under the commission of Aucan Logistics, the auditor confirmed through discussions with Aucan's Operations Manager that routine consultations and communication efforts have been planned with key stakeholders. These stakeholders include local firefighters, the Leyda Medical Center, the Municipality of San Antonio, and the associated mining client. Such measures aim to ensure that the emergency response plan adequately accounts for pertinent conditions and potential risks.

Production Practice 5.3

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

The operation is	✓ in full compliance with	Production Practice 5.3
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan (ERP) for the facility provides directives to both primary and alternate emergency response coordinators, granting them explicit authority to allocate the resources necessary for executing the provisions of the Plan. It designates lead coordinators along with their alternates, empowers them to mobilize resources as needed, and identifies brigade members explicitly by name.

The procedures and plans established by Logec and Aucan necessitate comprehensive training in emergency response protocols among other requirements. Furthermore, the Plan encompasses detailed call-out procedures, a communication flowchart, and 24-hour contact information for all

coordinators and response team members. Responsibilities assigned to the emergency brigade are thoroughly delineated within the Plan, which also includes an inventory of essential emergency response equipment. The Plan elaborates on the roles designated to key entities involved in the emergency response process, including Logec (warehouse operator), Leyda Medical Center, local firefighting units, Ambipar, and Volta.

The auditor identified a critical omission within the Plan: it lacked explicit procedures for inspecting emergency response equipment and ensuring its availability during emergencies. As a corrective measure, Aucan was instructed to incorporate this requirement into the ERP. Specifically, they were asked to establish measures for routine inspections of emergency response equipment, including the specification of inspection frequencies and reference to the checklist to be employed. This could be integrated within the main body of the ERP or appended as an annex to the PRE.

Following the audit recommendations, Aucan revised the ERP to address this deficiency. The updated version mandates that cyanide warehouse operators conduct a pre-task inspection using the checklist titled AUC_CHECK_001 Emergency Kit Checklist in Warehouse, which is attached to the Plan. Operators are instructed to perform these inspections whenever cyanide operations are scheduled and, in periods of inactivity, review the equipment on a weekly basis. The auditor verified that this requirement had been effectively implemented by reviewing completed checklists documenting inspections of emergency response equipment. No further revisions or information were deemed necessary to confirm compliance.

The facility has verified that external organizations, including Leyda Medical Center, local fire departments, Ambipar, and Volta, are informed of their participation and are coordinating efforts to conduct a joint cyanide emergency simulation exercise. Relevant documentation, such as meeting minutes, was made accessible for the auditor's examination.

Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

The operation is	✓ in full compliance with	Production Practice 5.4
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The Plan outlines the procedures and contact details required to notify management, regulatory agencies, external response teams, and medical facilities during an emergency. It specifies that once an emergency is identified, whether classified as Level II or III, initial communication is

directed internally to Management. Management then coordinates with relevant dependencies and authorities. The Plan also provides contact information for internal communications within Aucan and Logec, as well as for the fire department, Leyda Medical Center, San Antonio Municipality, and the police.

The Plan includes procedures and contact information for notifying potentially the San Antonio Municipality as a representative of the local community, although it is not in the vicinity of the warehouse. The situation is communicated to Logec management team, who takes the lead in media management.

The ERP includes a requirement and details to notify Aucan so that they in turn inform the ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such communications have been made as there was no significant incident in the operation.

Production Practice 5.5

Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The operation is	✓ in full *compliance* with	Production Practice 5.5
	☐ in *substantial* compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The Plan outlines specific measures for the remediation and recovery of solid materials, tailored to the minimal requirements of this particular facility and its operational context. It is important to note that the facility does not handle cyanide solutions. Nevertheless, procedures detailed in the Plan include the use of a diluted (5%) sodium hypochlorite solution for surface and material decontamination to neutralize cyanide where applicable. Any resulting neutralization materials are to be managed and disposed of as hazardous waste, adhering to appropriate environmental standards.

As part of its Emergency Response Plan (ERP), the facility includes supplementary documentation in the form of appendices. These appendices contain external protocols, such as the Volta Safe Work Procedure (PTS-SSOMA-002), which pertains to the removal of hazardous and non-hazardous waste, and Ambipar's dedicated emergency response plan for Aucan Logistic. These documents address both warehouse emergencies at the San Antonio site as well as potential incidents during Aucan's transport operations.

The Volta Safe Work Procedure v2 dated August 14, 2025, specifies detailed methodologies for managing the removal, transport, and disposal of hazardous and non-hazardous waste in various

states, including liquid, sludge, and solid. It also addresses the appropriate handling and disposal of materials resulting from spill remediation efforts. A communication from a Volta representative to Aucan specifies that hazardous waste generated at the warehouse location will be transported, treated, and ultimately disposed of at the Security Depot in Chillán (operated by Ecobio).

The Ambipar Emergency Response Plan v2 dated December 12, 2025, elaborates on the standard operating procedures and activation protocols to be followed during emergencies involving hazardous substances and waste. This plan is designed in alignment with the quality, environmental, and occupational safety policies of both Ambipar Response and Aucan Logistic. It encompasses strategies for recovering and neutralizing contaminated solutions and solids, as well as decontaminating affected soils or other media.

Lastly, provisions for an alternative drinking water supply are deemed unnecessary, as the facility already provides bottled water for its staff. Additionally, there are no surface water or groundwater discharges associated with the facility's operations that could pose a risk to water intakes or wells in the area.

Both the Logec and Ambipar-Aucán ERP systems explicitly prohibit the use of chemicals like sodium hypochlorite, ferrous sulfate, and hydrogen peroxide for the treatment of cyanide that has been released or is anticipated to enter surface water. However, all activities involving cyanide management are conducted within the facility's designated cyanide yard, which is properly confined, waterproofed, and situated at a safe distance from any water bodies. Additionally, there are no surface water bodies in proximity to the site.

The Plan address the potential for environmental monitoring to the limited extent that such procedures are needed for this facility and setting. Logec does not manage cyanide solutions at the facility; most surfaces are roofed, and pavements with concrete.

Production Practice 5.6

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

The operation is	✓ in full *compliance* with ☐ in substantial compliance with ☐ not in *compliance* with	Production Practice 5.6

Summarize the basis for this Finding/Deficiencies Identified:

The plan outlines yearly reviews and updates to its emergency response procedures. Following the audit, the facility updated the emergency response plan for the Aucan cyanide warehouse to version 2, dated December 2025.

An emergency drill took place on June 25, 2025, at the cyanide warehouse. The exercise involved the participation of Aucán, Logec, and the external emergency response contractor Ambipar, who led the drill. The objective was to assess the operation's plans, training, resources, and overall readiness to address cyanide spills and worker exposures.

The drill began at 10:50 a.m. with the simulated spill of a single box of solid cyanide during deconsolidation activities in the warehouse. The scenario centered around a forklift operator who acted as the affected worker following contact with the substance. Immediately, a colleague assisted the operator while another worker activated the emergency alarm, initiating the evacuation of personnel to pre-determined safe zones.

The affected worker received assistance at the scene from a coworker, who provided oxygen and simulated administering amyl nitrite in accordance with cyanide exposure first aid protocols. By 10:53 a.m., an internal response vehicle arrived on-site to simulate transportation to the medical center. The total response time from the incident to arrival at the medical facility was seven minutes. At the facility, authorized personnel simulated administering the antidote.

A call was also placed to activate Ambipar's services, given their expertise in handling hazardous materials emergencies. Upon reaching the drill site, Ambipar assumed technical control over the situation, verified the isolation zone, and conducted a risk assessment.

The drill concluded after confirming full execution of the emergency protocol, gathering preliminary observations, and conducting a feedback session with participants and technical observers. Throughout the exercise, significant deviations were identified and addressed with corrective actions and additional training to strengthen preparedness. The auditor conducted a thorough review of the drill report and confirmed compliance by examining photographic evidence, conducting interviews, analyzing the participants' register, and assessing the meeting minutes.

The auditor requested to include provisions in the Plan to evaluate it and revise as necessary after any emergency that requires its implementation. After the audit, the facility included into the emergency response plan the provisions for evaluation and revision following any emergency that necessitates its implementation. No such review has been done as there was no event requiring activating de emergency plan.