

# INTERNATIONAL CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

**TRANS SANTOS CORPORATION S.A.C.**

**Mz. J Lote 9 Urb. Alameda de la Rivera – Ate, Peru**


**2024**

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

Collaborated with  
MINGROUP INVESTMENTS S.A.C.

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TRANS SANTOS  
CORPORATION S.A.C.  
Name of Facility

  
Signature of Lead Auditor

26<sup>th</sup> March, 2024

Date of submittal

**MINGROUP**  
INVESTMENTS S.A.C.

  
-e quelle  
Consultoría en  
Sistemas de Gestión

# INTERNATIONAL CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

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## 1. Operation General Information


Name of Facility:	TRANS SANTOS CORPORATION S.A.C.
Name of Facility Owner:	TRANS SANTOS CORPORATION S.A.C.
Name of Facility Operator:	TRANS SANTOS CORPORATION S.A.C.
Dates of the audit:	25th and 26th March, 2024
Name of Responsible Manager:	Arturo Enrique Quispe Arroyo
Address:	Mz. J Lote 9 Urb. Alameda de la Rivera – Ate, Peru
State / Province:	Lima
Country:	PERU
Telephone:	+51.989269091
Fax:	.-.
Email:	operaciones@transantos.com

## 2. Operation Location Detail and Description:

Freight transportation company created in 2007, with Tax # 20514956759. It has its own fleet of 5, 10 and 15 T. vans. The company has the special operation permit R.D. 0854-2023-MTC/17.02 of February 10, 2023, for the road transportation service of hazardous materials and/or waste by road authorized by RD 1769-2018 MTC /15. The company has a Contingency Plan approved by the Ministry of Transportation and Communications through Directorial Resolution 0970-2023 MTC/16 that contemplates road transportation operations of hazardous materials and/or waste from the reception of the cargo to its delivery to the recipient.

TRANS SANTOS CORPORATION S.A.C have current insurance policies that cover expenses caused by personal, material and environmental damages derived from the effects of an accident generated by the cargo in accordance with the provisions of the national regulations for land transportation of hazardous materials and waste approved by D.S. 021.-2008-MTC.

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There are qualified personnel, such as having their special A4 licenses, annual training in first aid, defensive driving, fire threat, basic Dangerous Goods Course, etc.

The company transports cyanide that it collects from warehouses certified by the ICMI, it charge products from warehouses authorized by the regulatory authority for the control and transportation of controlled goods, these warehouses are located in Lurin, Callao and Lima. The company transports solid Sodium Cyanide in IBC 1,000 Kg., 1100 Kg. and 50 Kg drums. Sodium cyanide is transported to gold mines nationwide. Transportation is carried out in closed vans with a capacity of 15 T. The convoy consists of 2 vans and an escort pickup truck; 12 NACL IBCs are transported per van.

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## 3. Auditor's Finding

This operation is

- in full compliance
- in substantial compliance \*(see below)
- not in compliance

with the International Cyanide Management Code.

## 3.1 Auditor Information

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

Name and signature of the audit team.


Technical Auditor:	Marcos Mera	
Name (Print/ Type)		Signature

Dates of Audit: 25th and 26th March, 2024.

## 4 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

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Signature of Lead Auditor

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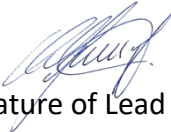
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Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

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


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Signature of Lead Auditor

25th and 26th March, 2024

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# INTERNATIONAL CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

## Cyanide Transportation Verification Protocol

### Principle 1 | TRANSPORT

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

#### Transport Practice 1.1

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


The operation is  in full compliance with Standard of Practice 1.1  
 in substantial compliance with Standard of Practice 1.1  
 not in compliance with Standard of Practice 1.1

The company has developed a Sodium Cyanide Transportation procedure TSC-PO-013 v00, dated 01/09/2024, monitoring of vehicle traffic, access routes and transit schedules, vehicle and driver requirements, has been included. The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16 includes analysis to identify potential hazards and risks associated with the roadmap for each UM. Among the dangers that are taken into account are:

- Population density: population during the route
- Traffic density: by sectors during the route
- Speed limits, sharp curves, presence of fog, rock slides, weight limits for bridges, road and train crossing infrastructure, tunnels.
- Presence of rivers and surface waters
- Slopes and road description. Sand areas, rain and hail areas.

Each route manages a route sheet that includes starting points, connections, drivers, and schedules. The sample procedure for Selection and evaluation of transport routes TSC-PE-005 v00 is taken, the following cases are taken: TSC-OP-I015 v01, Lurin – Pataz route sheet:

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CIA Minera Poderosa S.A. and TSC-PO-29.F1 v01 Lurin – Huaylillas CIA Minera Carvelí roadmap.

There is a Transportation Management Plan TSC-PO-029 v00, it includes the hazard identification and risk evaluation and controls matrix TSC-PO-08 F01 Risk Management. For each route, there is a hazard identification and risk assessment matrix that includes a risk assessment derived from probability (level of control and exposure) and consequence. Risk levels can be tolerable, medium and critical.

Within the procedure Selection and evaluation of transport routes TSC-PE-005 v00, the reevaluation of the route is included, the plan mentions:

The routes selected will be evaluated every 6 months or, failing that, when reports or communication are received from the drivers and/or convoy supervisor about new dangers and risks during their routes.

The route selection and evaluation process will be carried out with the TSC-PE-005.F01 format.

The route reevaluation will be carried out by the SSOMA Supervisor and together with the Head of Operations and/or service, they will determine the improvements in the evaluated route if necessary. They will use the TSC-PO-024.F02 format.


For the evaluation, the different available resources will be used, such as:

- MTC road plans
- Driver reports on trips made
- MTC emergency reports.

There is a procedure for the selection and evaluation of transport routes TSC-PE-005 v00, the following cases are taken: TSC-OP-I015 v01, Lurin – Pataz route sheet: CIA Minera Poderosa S.A. and TSC-PO-29.F1 v01 Lurin – Huaylillas CIA Minera Carvelí roadmap.

The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16 includes 03 different levels of emergency. There is an agreement for technical assistance in emergency response with IFSEC Perú S.A.C., a company specialized in response to hazardous materials emergencies. The company IFSEC Perú S.A.C. has also contributed to the development of the emergency response plan. IFSEC Perú S.A.C., validate the route in the field, interview

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with interested parties and on route tour to validate the information of interested parties and route conditions.

Transportation is carried out in convoy through two material transportation units and an escort pickup truck. The escort pickup truck includes a security supervisor who is knowledgeable in Hazmat III . Additionally, there is an agreement for technical assistance in emergency response with IFSEC Perú S.A.C., a company specialized in response to hazardous materials emergencies. The company IFSEC Perú S.A.C. has also contributed to the development of the emergency response plan. IFSEC Perú S.A.C., validate the route on the field.

## Transport Practice 1.2

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

The operation is  in full compliance with Standard of Practice 1.2  
 in substantial compliance with Standard of Practice 1.2  
 not in compliance with Standard of Practice 1.2

There is a support procedure for the selection, evaluation and performance of personnel TSC-PA-001 v00, which establishes the profiles for each position, including driver, escort supervisor. The profiles take into account a) education and experience; b) knowledge, skills and abilities; c) training required.


As a minimum requirement for the driver, an A-IV driver's license is required for the transportation of hazardous materials and waste at least HAZMAT II.

As a minimum requirement for the supervisor, an A-IIB driver's license is required and HAZMAT III.

Personnel are interviewed and show knowledge of operations, emergencies, controls and the results of drills and their lessons learned. Personnel are qualified to drive vehicles with Sodium Cyanide.

All workers are included in the complementary irrigation insurance policy that is renewed semiannually. Case of SANITAS insurance company and PROTECTA INSURANCE COMPANY. Last update valid until 04/30/2024.

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There is an annual training program, which is evident in 2023 and 2024, and has included courses such as:

- Hazardous material drill (Sodium cyanide) – March/Jul/Nov 2024
- Hazard identification, risk assessment and control measures – April/Oct 2024
- Occupational health, alcohol and other drug consumption April/Oct 2024.
- Use of fire extinguisher and fire extinguisher March/Sept 2024
- First aid, Basic CPR and suffocation April/Oct/2024
- Defensive driving and road safety May/Nov 2024.
- Cargo securing, lashing and sealing February/August 2024.
- Materials management and PR April / Oct 2024.
- Labeling, MM.PP signage. (UN Codes) and MSDS Apr/Oct 2024
- Contingency plan and transportation management plan April / Oct 2024

There is a list of attendance in the courses taken. It is taught by the security supervisor or external entities depending on the course.

Staff are interviewed and demonstrate knowledge of the safe handling of sodium cyanide and emergency response procedures in various scenarios.

## Transport Practice 1.3


*Ensure that transport equipment is suitable for the cyanide shipment.*

The operation is  in full compliance with Standard of Practice 1.3  
 in substantial compliance with Standard of Practice 1.3  
 not in compliance with Standard of Practice 1.3

The units used for the transportation service are described within the MTC resolution with special operation permit R.D. 0854-2023-MTC/17.02 of February 10, 2023. It has a special vehicle authorization certificate for hazardous materials.

Certificate of conformity for assembly of the van, verifies that the assembly carried out on the vehicle does not negatively affect its safety, land traffic, the environment or does not comply with the technical conditions of current regulations .

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There is a certificate of conformity from the manufacturer of Volvo Perú S.A. , where the characteristics of the vehicle are confirmed and that it is in good technical-mechanical operating conditions and that it complies with the Peruvian standard.

The units transport between 13.2 T to 15.4 T of sodium cyanide, which is less than the useful load.

The vehicles are covered by insurance policy, from the company La Positiva Seguros. All transportation units handle policies of similar amounts. Current risk insurance against third parties and vehicle technical inspection card issued by a company authorized by the state is verified in all units.

The load capacity is adequate through the Loading Instructions TSC-PO-017, Technical verification procedure for transport units, in addition, a technical inspection of transport units is carried out through form TSC-PO-25.F1 Technical inspection of transport units, which includes tires, suspension system, axles and frame, brake system, van and platform, carried out by the driver on each trip.


The instructions for loading and unloading merchandise are available, TSC-INS-005. It is included in point 8: load weights and measurements, prior to loading the driver must request a picking sheet or load manifest to verify the characteristics of the load and its total weight, the latter must not exceed the payload of the vehicle. Otherwise, the office supervisor is informed so that he can coordinate the rescheduling of the surplus. Case of referral guide from carrier BVG837 dispatched on 03/08/2024 to UM Poderosa is evident. Cyanide load sender's referral guide Net weight 12 T. (Gross P. 12.66 T) for that unit there is 17.2 T of payload.

## Transport Practice 1.4

### *Develop and implement a safety program for transport of cyanide.*

The operation is  in full compliance with Standard of Practice 1.4  
 in substantial compliance with Standard of Practice 1.4  
 not in compliance with Standard of Practice 1.4

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There is a TSC-PO-009 v00 cargo securing, lashing and sealing procedure, which includes load suggestion tasks, anchoring points, tension devices, and uses of EPPs. The driver is responsible for the correct securing and/or fastening, sealing and closing of the rear side doors of the heavy equipment van and must also report any anomaly during the process. The security supervisor is responsible for compliance with the procedure. Staff are trained on the instructions and check list for cargo transportation vehicles, which includes the check list to have all the elements for lashing.

There is a signaling procedure for transport unit TSC-PO-018, and there is also signaling instructions for HAZMAT transport units TSC-INS-003. The supervisor or driver carries out the visual inspection of the load, signage and/or pressure of the containers. This is done with each delivery.


There is a pre-use inspection, with the cargo transportation vehicle checklist (it does include driver documents, vehicle documents, safety implements, vehicle implements, tools, anti-spill kit, and implements for lashing and communication equipment).

There is a preventive maintenance program TSC-2019-002, all sampled units both the tractors and trailers used in cyanide transportation are included. The units undergo maintenance with the brand representative. There is evidence of preventive maintenance in case BVG786 of 02/20/2024; BVG837 from 02/20/2024, oil changes, filters and lubrication. The basis for the maintenance refers on distance driven according with the branch of the vehicle, Truck are every 5,000 Kms, the HINO unids 8,000 Kms, Isuzu unids every 6,000 Kms, Foton 8,000 Kms, and Volvo every 400 Hrs or approximately 15,000 To 20,000 Kms.

It is included in the Transport Management Plan procedure, TSC-PO\_029 v00, yes in point 6.1. 9. Restrictions for drivers indicate that when a vehicle is operated by a single driver, driving is prohibited from 6:00 p.m. until 6:00 a.m. the next day. Lurin – Pataz roadmap is verified: CIA Minera Poderosa S.A. and TSC-PO-29.F1 v01 Lurin – Huaylillas CIA Minera Carvelí route sheet, where stoppage times, GPS tracking and communications via the WhatsApp group to the client are verified.

There is a TSC-PO-009 v00 cargo securing, lashing and sealing procedure, which includes load suggestion tasks, anchoring points, tension devices, and uses of EPPs. The driver is responsible for the correct securing and/or fastening, sealing and closing of the rear side doors of the heavy equipment van and must also report any anomaly during the process. The security supervisor is responsible for compliance with the procedure. Staff are trained

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on the instructions and check list for cargo transportation vehicles, which includes the check list to have all the elements for lashing.

In the Transportation Management Plan procedure, TSC-PO-029 v00, section 619 includes restrictions for drivers, which includes the prohibition of transportation on access routes when they are in poor condition or due to weather conditions. In parentheses there was little visibility, rain, snow or ice. The transportation management plan also includes when incidents occur on the route such as stoppages, strikes, traffic accidents that are not involved and alter the scheduled times and hours, as the driver will immediately inform the control and operations center and wait for new instructions.

Once a year, a medical examination is carried out that includes detection of cocaine and marijuana, and training in Occupational Health, alcohol and other drug consumption. Results of medical examinations of operators are evident, including screenings of cocaine and marijuana. In exceptional cases, if the client requires other tests, other drugs such as amphetamines, benzodiazepine and methamphetamines are included.

There are documents that support the previous points, the documents are stored for a period of 5 years. All documents are kept digital. You have a backup of the information on an external USB.

The preventive maintenance program is carried out by Volvo, and the medical surveillance programs are carried out by Holomedic and Cantela occupational clinics that refer the medical examinations to administration for storage. Trans Santos Corporation include induction with the applicable Code requirements to ensure the contractors complies with those requirements.

## Transport Practice 1.5


*Follow international standards for transportation of cyanide by sea.*

It does not apply, since cyanide is transported by road.

## Transport Practice 1.6

*Track cyanide shipments to prevent losses during transport.*

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The operation is  in full compliance with Standard of Practice 1.6  
 in substantial compliance with Standard of Practice 1.6  
 not in compliance with Standard of Practice 1.6

All units have a base radio to communicate between convoy and mine when applicable. Additionally, each convoy has a satellite phone that is managed by the supervisor. All units receive the Markets response plan that includes the updated contact list. There is a communications diagram in the event of an emergency that includes updated telephone numbers for management and the operations and HSE coordinator.

There is a specific space within the cargo transportation vehicle checklist for the verification of communication equipment such as cell phone, radio, satellite phone and charger, battery and operability are verified.

A satellite phone is designated for all areas where there is no communication blackout areas along transport routes. There is a sign on the route described in the route sheet. The satellite phone is present throughout the route.


Monitoring is carried out during the journey through the route sheets which include the day, departure time and actual arrival time with the observations included by the operator within the format, personnel information such as telephone license and observation of the driving unit plate.

The units are monitored through GPS (SEGURSAT), monitoring reports are sent 3 times a day to the client. Daily reports and continuous communications are generated through WhatsApp by group.

The vans have security seals, included in the delivery guide that the client includes when loading the material. Upon arrival at the client, it is verified that the security seal is intact and the status of the cargo is verified. The van has a padlock included in the cargo transportation check list at the rear door pin point and padlocks.

There is a shipping guide for the carrier and the sender. Net weight and gross weight load information is included. The product safety sheet is provided in each shipment, and it is also included in the instructions for signaling for transport units MATPEL TSC-INS-003. The delivery guide includes documentation such as bills of landing, time when is loading the material, number of packets, chain of custody, net weight and gross weight load information.

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## Principle 2 | INTERIM STORAGE

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

For purposes of the audit, “interim storage sites” and “trans-shipping depots” refer to facilities where cyanide is held temporarily when changing carriers or transport modes. Truck and rail terminals and port facilities are examples of interim storage sites and trans-shipping depots. Activities such as parking a cyanide transport vehicle for the night while en route do not involve interim storage. However, parking a truck carrying a cyanide load at a truck or rail terminal or a port for transfer to another truck, train or ship would constitute interim storage unless such a transfer took place within a short period of time (hours as opposed to a day or more). Storage in a warehouse, as defined in the Code’s *Definitions and Acronyms* document, is a production activity and must be evaluated for compliance using the Cyanide Production Verification Protocol.

### Transport Practice 2.1

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

For port facilities that act as trans-shipping depots, and when rail or ship transport involves interim storage sites or interim storage occurs at ports, the questions under Transport Practice 2.1 may be addressed to the extent practical by the consignor’s Due Diligence Investigation, and the information included in the Due Diligence Investigation for those facilities.

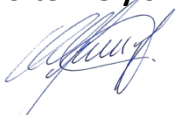
Not applicable, because these transportation operations only have vehicles parking overnight while they are on route. Its operations do not imply temporary storage.

## Principle 3 | EMERGENCY RESPONSE

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

In evaluating a transporter’s emergency response strategies and capabilities, the auditor must recognize that different approaches may be appropriate in different locations, and that for long transport routes, emergency response capabilities may vary greatly along the routes. In areas with robust emergency response capabilities, transporters of dangerous goods such as cyanide often rely on these in-place services. A single telephone

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call may trigger a rapid and comprehensive response by prepared and well-trained personnel capable of managing cyanide and other hazardous materials emergencies. This response may even include a pre-planned command structure, with the local authorities having designated incident command authority once on the scene. In areas lacking an established response infrastructure, it may be necessary for cyanide transporters, consignors, or mining operations to have their own emergency response equipment and personnel available with the cyanide shipment, and be more directly responsible for response and remediation actions. The nature of the transporter's emergency response program will be highly dependent on such local circumstances. Auditors must evaluate this element of the Code with an understanding both of what strategies and capabilities are necessary, and what expectations are appropriate, given the route and location-specific circumstances.

The Transport Practices and questions under this principle apply to interim storage sites as well as cyanide in transport. Emergency response elements should be included as practical in a consignor's Due Diligence Investigations of rail and ocean transport and rail yards and ports.

## Transport Practice 3.1

*Prepare detailed emergency response plans for potential cyanide releases.*


The operation is  in full compliance with Standard of Practice 3.1  
 in substantial compliance with Standard of Practice 3.1  
 not in compliance with Standard of Practice 3.1

The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16 includes analysis to identify potential hazards and risks associated with the roadmap for each UM. There is also an Emergency Response Plan with Sodium Cyanide TSC-PO-019.

The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16 includes all transportation routes, taking the following cases: TSC-OP-I015 v01, Lurin – Pataz route sheet: CIA Minera Poderosa S.A. and TSC-PO-29.F1 v01 Lurin – Huaylillas roadmap CIA Minera Carvelí.

Emergency Response Plan with Sodium Cyanide TSC-PO-019, the scope of the plan is road transportation of solid sodium cyanide and the method is transportation by road with a van truck.

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The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16 includes analysis to identify potential hazards and risks associated with the roadmap for each UM. Among the dangers that are taken into account are

- Population density: population during the route
- Traffic density
- Speed limits, sharp curves, presence of fog, rock slides, weight limits for bridges, road and train crossing infrastructure, tunnels.
- Presence of rivers and surface waters
- Slopes and road description. Sand areas, rain and hail areas


The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16 and the Emergency Response Plan with Sodium Cyanide TSC-PO-019, is related to transportation with the units since it is developed taking into account the characteristics of the unit to determine hazards and risks during transportation. The route sheet is validated taking into account the applicability of the van during the route, taking into account the height of tunnels, roads, bridge load, height in tunnels.

The document Contingency Plan for the land transportation of hazardous materials at the national level, dated 02/01/2023, includes the Identification of hazards and potential risks on routes for the land transportation of hazardous materials and/or waste. Section 3.1 includes route analysis and 3.2 Identification and evaluation of risks during loading, transportation and unloading operations. Under the Item 4.1.5 General procedure before the emergency includes the maintenance program of equipment and vehicles used in the loading and transportation and unloading operation, selection of equipment and vehicles in operations, training of personnel and frequency of competency assessment and preparations before each operation.

The operating procedure Emergency Response with Sodium Cyanide TSC-PO-019 includes external support such as police, firefighters, well, I am where their functions and responsibilities are written. The organization has also sent letters communicating the operation and transportation risks to external responders.

The company has advised of their roles to different interest parties like, the Meritorious and Centenary Huacho Fire Company # 20; Huarmey Support Hospital; Ancón Fire Company #163, Chugay Health Post; Sánchez Carrión Integrated Health Network; PNP Huamachuco Police Station; PNP Laredo Police Station; Volunteer Fire Department of Peru La Libertad, Casma Volunteer Fire Company #156 and Salvadora Chimbote Fire Company # 33, all communication and letters were send them on 11<sup>th</sup> March, 2024.

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## Transport Practice 3.2

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

The operation is  in full compliance with Standard of Practice 3.2  
 in substantial compliance with Standard of Practice 3.2  
 not in compliance with Standard of Practice 3.2

Scheduled training is carried out for staff:

- Hazardous material drill (Sodium cyanide) – March/Jul/Nov 2024
- Hazard identification, risk assessment and control measures – April/Oct 2024
- Use of fire extinguisher and fire extinguisher March/Sept 2024
- First aid, Basic CPR and suffocation April/Oct/2024
- Defensive driving and road safety May/Nov 2024.
- Materials management and PR April / Oct 2024.
- Labeling, MM.PP signage. (UN Codes) and MSDS Apr/Oct 2024
- Contingency plan and transportation management plan April / Oct 2024


In addition, the MATPEL II and/or III courses required for staff are held annually. A list of staff attendance at the courses carried out during 2023 and 2024 is evident up to the time of the audit.

Staff are interviewed and demonstrate knowledge of emergency response. There is also equipment in the reviewed units that has been previously inspected by the staff.

The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16 and the Emergency Response Plan with Sodium Cyanide TSC-PO-019 is included in point 5. Responsibilities and describes the activities of the General Manager, Head of operations and/or operations coordinator, convoy supervisor and driver.

Within the operational procedure for the transportation of sodium cyanide TSC-PO-013, annex number 8 TSC-PO-016 F 01 includes the Sodium Cyanide anti-spill kit checklist. It is carried out by the escort supervisor. The response kit is included in the escort van. The kit includes antidote kit and HCN monitor, rubber gloves, full-phase respirator, cartridge for dust, smoke and mist with or without oil, protective suit, among others.

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Each unit has a MATPEL anti-spill kit that includes industrial rags, absorbent cloths, black plastic bags, gloves, boots, safety tape, lamp and pick. This is verified in the cargo transport vehicle checklist.

The emergency response kit of the transport units and escort van is verified in the field.

The cargo transportation vehicle checklist includes verification of the driver's safety equipment such as helmets, glasses, earplugs, gloves, uniform, vest and safety shoes. There is procedure TSC-PO-001 Personal protective equipment. There is delivery of personal protective equipment TSC-PO-001.F02 and inspection record of personal protective equipment TSC-PO-001.F03. The emergency response kit of the transport units and escort van is verified in the field. There is a cyanide antidote kit that consists of sodium nitrite, expiration date 08/2026, and sodium thiosulfate FV 09/2026. There is also an HCN monitor NS 12700282, calibrated on 02/08/2024 and next calibration 08/08. 2024.

Within the operational procedure for the transportation of sodium cyanide TSC-PO-013 within annex number 8 TSC-PO-016 F 01 includes the Sodium Cyanide anti-spill kit checklist. Review of the Kit is verified in the dispatch of 03/08/2024, for unit BLI702. It is carried out by the escort supervisor.


Within the Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16, within the emergency response plan, 3 levels of response have been identified where for level 3 all emergencies that affect the driver to the transport unit and the transported product that cannot be controlled for its attention, external support is essential for the equipment and they see that those involved are out of service, it is necessary to activate the contingency plan in its entirety as well as the presence of support personnel, mechanical equipment, implements. of safety in terms of containment and transport vehicles, being important that the notifications, internal and external reports, have been very subsequent emergency investigation. There is a private strategic agreement between Trans Santos Corporation and IFSEC Perú SAC for the provision of emergency technical attention in the event of any accident, spill of hazardous materials, signed on January 3, 2024.

## Transport Practice 3.3

*Develop procedures for internal and external emergency notification and reporting.*

The operation is  in full compliance with Standard of Practice 3.3  
 in substantial compliance with Standard of Practice 3.3  
 not in compliance with Standard of Practice 3.3

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The organization has also sent letters to the Benemérita y Centenaria Huacho Fire Company # 20; Huarmey Support Hospital; Ancón Fire Company #163, Chugay Health Post; Sánchez Carrión Integrated Health Network; PNP Huamachuco Police Station; PNP Laredo Police Station; Volunteer Fire Department of Peru La Libertad, Casma Volunteer Fire Company #156 and Salvadora Chimbote Fire Company # 33 as of March 11, 2024.

Within the Emergency Response Plan with Sodium Cyanide TSC-PO-019, it includes in 6.4 external communications, in the event that a significant cyanide incident has occurred, it must be communicated and/or notified to the ICMI International Institute for the management of cyanide and whether by email or phone within 24 hours the event occurred.

The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16, contains the updated list of contacts. The following communications have been considered based on emergency news.

## LEVEL I

- Its communication is based on reporting the event to the control center and the security coordinator.
- Control center is responsible for communicating with the corresponding entities, be it firefighters, the police, etc. If it warrants it.
- If the truck or cargo does not present damage and/or victims in the incident.


## LEVEL II

- On site, notify the corresponding entities for external support.
- They notify the control center to monitor events and also communicate with other entities.
- If the situation worsens, they communicate with the planning coordinator and operations coordinator so that they can inform the company that performs the service on the status of the load.
- External support is requested from the national police and firefighters closest to the incident.
- In the event of a large emergency, it is communicated to the crisis manager to make service decisions.

## LEVEL III

- In the event of a large emergency, it is communicated to the crisis manager to make service decisions.

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The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16, includes within its description that the Plan is reviewed every year to update it. The plan mentions The Contingency Plan may be updated at the express and supported request of the Company. These updates will mainly take into account the opinions of the personnel responsible and involved in the standards and procedures included in the contingency plan. However, the officials authorized by the Management of TRANS SANTOS CORPORATION S.A.C. must jointly evaluate, each year, the need to update the Contingency Plan.

Within the Emergency Response Plan with Sodium Cyanide TSC-PO-019, it includes in 6.4 external communications, in the event that a significant cyanide incident has occurred, it must be communicated and/or notified to the ICMI International Institute for the management of cyanide and whether by email or phone within 24 hours the event 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 Standard of Practice 3.4  
 in substantial compliance with Standard of Practice 3.4  
 not in compliance with Standard of Practice 3.4

Sodium Cyanide Emergency Response Plan TSC-PO-019 has been included, procedures for remediation in the event of a dry spill and in the event of a water spill. All measures for recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris are included.

There is an agreement for technical assistance in emergency response with IFSEC Perú S.A.C., a company specialized in response to hazardous materials emergencies. The company IFSEC Perú S.A.C. has also contributed to the development of the emergency response plan. IFSEC Perú S.A.C., validate the route in the field.

Emergency Response Plan with Sodium Cyanide TSC-PO-019 has been included, in case of spill in water that includes 6.1.2 e): The use of chemicals, such as ferrous sulfate, sodium hypochlorite and peroxide, is prohibited. of hydrogen for the treatment of cyanide in surface waters.

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## Transport Practice 3.5


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

The operation is  in full compliance with Standard of Practice 3.5  
 in substantial compliance with Standard of Practice 3.5  
 not in compliance with Standard of Practice 3.5

The Contingency Plan approved by the MTC with R.D.0970-2023 MTC/16, includes within its description that each year the Plan is reviewed for its update, in addition the plan is updated when there has been an accident: The emergency response plan will be revised when there is a change in the applicable legal regulations, or an incident has occurred. Staff are interviewed and show knowledge of the results of the drills and their lessons learned.

There is an annual drill program, 2023 and 2024, which includes Sodium Cyanide Drill, Feb/Oct 2023, Mar/July/Nov 2024. There are reports for the drills carried out that include photographic evidence and analysis of the drill. An evaluation of the drill is carried out. There is a sample of the IFSEC group drill from February 14, 2022, sodium cyanide spill drill from October 10, 2023. Staff are interviewed and show knowledge of the results of the drills and their lessons learned.

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