



Mexican Cyanide Supply Chain

SUMMARY AUDIT REPORT

FOR THE
INTERNATIONAL CYANIDE MANAGEMENT CODE

June 2023



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Introduction

Operation General Information

Name of Transport Operation:	CyPlus Idesa Mexican Supply Chain
Name of Facility Owner:	CyPlus Idesa S.A.P.I. de C.V.
Name of Facility Operator:	CyPlus Idesa S.A.P.I. de C.V.
Name of operators in this Supply Chain	<ul style="list-style-type: none">○ CyPlus Idesa S.A.P.I. de C.V. - Cyanide Consignor○ Excellence Freights S.A. de C.V. - Trucking company○ Transportes Degam S.A. de C.V. - Trucking company○ Autotransportes Nieto S.A. de C.V. - Trucking company○ Salina Cruz Port○ Mazatlán Port○ Grupo Navemar – Maritime transporter○ Ferrocarril Mexicano S.A. de C.V. (Ferromex) – rail transporter
Name of Responsible Manager:	Luis Fernando Rodríguez - ESHQ Chief Cyplus Idesa
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Cyplus Idesa Mexican Supply Chain Location and Description

CyPlus Idesa S.A.P.I. de C.V. (CyPlus or CyPlus Idesa) is a joint venture founded in 2013 between Germany's Evonik and México's Grupo IDESA. Since the beginning of production in 2016 in México, CyPlus Idesa has supplied sodium cyanide to the mining industry with the support of CyPlus GmbH, which has more than 60 years of experience producing cyanide in Europe.

As of August 2019 CyPlus GmbH is part of Röhm Group, a 100% subsidiary of Advent International. Founded in 1984, Advent International is one of the largest global private equity investors.

The company's sodium cyanide plant is located in Coatzacoalcos, Veracruz, and. It is the only sodium cyanide plant in México and its strategic location ensures the uninterrupted supply of cyanide to all mining units across the country.

The company complies with all safety and environmental regulations to ensure that the production and transportation of sodium cyanide is carried out in accordance with the International Cyanide Management Code (ICMC).

CyPlus Idesa produces solid sodium cyanide in briquettes which is delivered in two types of packaging. Solid sodium cyanide is packed in UN-approved big bags in wooden boxes as one-way box or returnable box with a capacity of 1 ton each. The UN mark is an international system created by the UN to provide standards for the classification, packaging, marking and labeling of dangerous goods so when transporting any hazardous material, the packaging grants safety in all modes of transport. CyPlus Idesa uses high-quality packaging to ensure the safest storage and transportation of cyanide.

The sodium cyanide offered is exclusive for mining customers; therefore, it is produced and delivered according to mining needs. Among its benefits is that production is local and customers are supplied directly, without any distributor; the supply chain is certified by the ICMC; and it is customized, fast and the most flexible in the Mexican market.

CyPlus Idesa developed a complete safety program that is offered to mining customers according to their needs. This ensures a high degree of safety and care for the environment. However, the company also owns solid infrastructure to support an emergency response plan in case of an eventuality.

CyPlus Idesa México Supply Chain consists of:

- Shipping solid cyanide by land transport with Excellence Freights trucking company, from the production plant of solid cyanide briquettes at Coatzacoalcos, México, ICMI last certified on July 31, 2020, either directly to mines or to the Port of Salina Cruz on the west coast of México. Excellence Freights was ICMI last certified on August 26, 2021.



- Shipping solid cyanide by sea transport from the Port of Salina Cruz to the Port of Mazatlán (with a backup option to the Port of Guaymas), performed by Grupo Navemar (Navemar).
- Shipping solid cyanide by land from the Port of Mazatlán (and/or Port of Guaymas) directly to the mines or to the Transloading Terminal and Warehouse in Ciudad Obregon, performed by Nieto trucking company.
- Shipping solid cyanide by land from the Transloading Terminal and Warehouse in Ciudad Obregon to the mines, by Degam trucking company.

CyPlus Idesa as the cyanide consignor in the México Supply Chain, has its own emergency response brigades that would assist in transportation emergencies stationed at the warehouse in Ciudad Obregon.

During this audit, the following entities have been evaluated:

- CyPlus Idesa - Cyanide Consignor (or CDO by its acronym in Spanish referring to the Obregon Distribution Center)
- Transportes Degam S.A. de C.V. (Degam) - Trucking company
- Autotransportes Nieto S.A. de C.V. (Nieto) - Trucking company

CyPlus Idesa during this recertification period, has conducted due diligence evaluations of the ports of Mazatlán (with a backup option to the Port of Guaymas), and maritime shipper performed by Navemar. In addition to the elements described above, the individual subcontractors are:

Excellence Freights was not evaluated in this audit as it is a Cyanide Code certified company.

There are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the port, plant or warehouse, containers may be temporarily stored on trailers overnight in pre-selected, secure parking areas in preparation for departure to the mines the following morning.

On January 14, 2023 Cyplus Idesa started transporting cyanide by railroad with Ferrocarril Mexicano S.A de C.V. (Ferromex) from Díselo rail terminal at Coatzacoalcos, Veracruz, until Ferromex terminal at Ciudad Obregón, Sonora. Cyplus Idesa complied notifying the ICMI opportunely regarding the beginning of this operation.

A due diligence Investigation for Ferromex was conducted on March 2, 2023 by the Environmental Health, Safety and Quality (EHSQ) chief of Cyplus Idesa Mexican Supply Chain (Cyplus Idesa).

On May 2, 2023, Cyplus Idesa required Bruno Pizzorni to review the due diligence report and to inform the ICMI regarding Ferromex´ s compliance status with the Code requirements.



Excellence Freights, an ICMI certified trucking company, transports cyanide in sea containers from the production plant to Díselo rail terminal, about 50 km away. Then comes the route section by rail of approximately 683 km to Ciudad Obregón Ferromex terminal, where cyanide is unloaded directly onto the truck platforms of Nieto or Degam for unloading in Cyplus Idesa Distribution Center at Obregón (CDO).

Cyplus Idesa EHSQ chief conducted the due diligence investigation for Ferromex on March 2, 2023, at Ciudad Obregon rail terminal with participation of the safety officer and the commercial representative from Ferromex, and on March 20 at Díselo terminal in Coatzacoalcos. As part of that investigation, the rail partner was asked to fill out a questionnaire customized Cyanide Code Due Diligence protocol and participate in interviews held.

According to information provided by the EHSQ chief of Cyplus Idesa Mexican Supply Chain in both rail terminals, cyanide sea containers transfer from truck to train and vice versa, take place within a short period of time (hours); the cyanide shipments depart before 24 hours on its arrival to the rail terminals. Therefore, as stated in the ICMI Guidance for Use of the Cyanide Transportation Verification Protocol from June 2021, none of these rail terminals are “trans-shipping depot”.

The due diligence investigation has been performed so that it can reasonably be concluded that Ferromex rail carrier used by Cyplus Idesa for sodium cyanide shipments are in full compliance with the International Cyanide Management Code.



Auditor's Finding

This operation is

- in full compliance**
- in substantial compliance
- not in compliance

with the International Cyanide Management Code.

This operation has experienced a significant cyanide incident during the previous three-year audit cycle which is discussed in this report under the following Standard of Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

Auditor Information

Audit Company:	BP Cyanide Auditors S.A.C.
Lead Auditor:	Bruno Pizzorni
Lead Auditor Email:	bpizzorni@cyanideauditor.com
Transport Technical Auditor:	Bruno Pizzorni
Dates of Audit:	July 11 to 15, 2022 June 26, 2023 Addendum - Review of the due diligence for Ferromex

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.



Transport 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
 in substantial compliance with Transport Practice 1.1
 not in compliance with

Cyplus Idesa, the cyanide consignor, has the written procedure Selection of the Routes within México, where is included an evaluation procedure for selecting transport routes to minimize the potential for accidents and releases. The procedure requires to evaluate alternative transport routes and to the extent practical, select the one that minimizes both the potential for accidents and releases and the potential impacts of such accidents and releases if they do occur.

The individual trucking companies evaluated, Degam and Nieto, have implemented similar procedures for their specific land routes and implemented the overall procedure via their own procedures, where CyPlus Idesa has approved the truck routes. Degam, and Nieto consider the required elements, as well as others.

The evaluation procedures consider issues as natural hazards (landslides, flooding, volcanic activity, etc.), security issues, population density, existing infrastructure conditions of the roads, pitch and grade and areas with presence of water bodies and visibility due to weather conditions. The procedures call for driver feedback and routes are re-evaluated when driving conditions change, or when driver feedback suggests that this is necessary.

The auditor reviewed these procedures, as well as CyPlus Idesa, to verify compliance. Records were available to demonstrate that all current routes were assessed and approved, including route approval emails from Cyplus Idesa to Degam and Nieto. The auditor reviewed evidence that such selection process were used. In all cases, the evaluation and selection of the routes was limited by the actual availability of road alternatives and the jurisdictional designations required routes for transport of dangerous goods.

Regarding the maritime transporter Navemar, there is only one transit route that goes from the port of Salina Cruz, Oaxaca to the port of Mazatlán, Sinaloa. The route is periodically monitored through the web site marinetraffic.com.

Cyplus Idesa along with the trucking companies Degam and Nieto procedures for route



selections, include evaluation of the selected routes to determine if extra precautions are necessary at points along the route. Areas posing increased risks are identified and the necessary precautions, such as reducing vehicle speed, are documented for driver training. The procedures establishes to perform a risk analysis and the steps to follow for the preparation of roadmaps for all routes covered by the organization during the execution of the transport service. Once identified the risks is required to establish the necessary control measures to manage these risks.

The procedures require to prepare and update the roadmap when there is a new route, modification of conditions or a request from the customer recording the aspects related to: unsafe conditions (road condition, weather conditions and traffic), speed of handling by sections, signs and prohibitions of the road, heights of bridges, tunnels, ridges of hills, water, population density, mist zones and other aspects of transport safety. Mine customer input is considered when routes are determined. Cyplus Idesa has reviewed and approved the routes of its transporters. The trucking companies' procedures conform with requirements of the cyanide consignor Cyplus Idesa.

The Consignor has also implemented a program to conduct regular due diligence on ports and ocean shippers. These due diligence evaluations have included training, security, safety, emergency scenarios, response actions, the roles of external responders, and other factors.

The auditor reviewed examples of the route analysis of the route risk assessments that included photographs and control measures to verify compliance.

Both Cyplus Idesa and the trucking companies Nieto and Degam procedures require to periodically reevaluate the routes used for cyanide transport to confirm that no new risks have developed. This is a formal administrative review along with the driver reports on route conditions by mean of a WhatsApp group and also by periodic inspection of the routes.

The procedures state to evaluate routes annually, or when changes are identified by drivers travelling a route. Also, require the drivers to provide feedback on the route conditions. When feedback from a driver suggests that a route needs to be revised, the company revise the route and communicates latest information to drivers.

The trucking companies have formally reviewed their routes periodically. They also maintain various mechanisms for rapid, informal feedback on route conditions. Interviews with drivers and management personnel were used to confirm that feedback about driving conditions is communicated. Special conditions noted by customers are noted and communicated to all drivers assigned to the route.

Records were available to show that the transporters periodically performs route risk assessment and participates in meetings with the mine customer.

The transporters route risk assessments require to document the risks identified along the



selected routes and to be available in writing both for driver training and as a reference. Features such as sharp turns, areas of proximity to surface water and high population density require special precautions.

Each truck transporter has listed the control measures in their route risk assessments. These control measures have been assigned to specific stretches of road identified by kilometer markings. These controls include speed reduction, co-drivers, daylight driving restrictions, experienced drivers only, escorts, load weight reduction, specialized training, and others. Nieto risk evaluation and control measures have been implemented real time via the CoPiloto software on screens in the trucks. Speed restrictions show up as boxes around each stretch of road and other control measures for river crossings, railroad crossings, dangerous intersections, etc. are announced via pre-recorded voice alerts.

Route evaluations were complete, and records were available for review. Each route segment is evaluated for risks associated with population density, infrastructure, pitch & grade, proximity to water bodies, and likelihood of encountering poor driving conditions. Routes are also evaluated for security issues and for cell phone coverage.

Cyplus Idesa has consulted with communities, stakeholders, and agencies on behalf of the trucking companies. The consignor considers consultation on route details a sensitive issue because of the very real possibility of increasing the risk of robbery or vandalism. In many cases, there is only a single route to remote mines. Nonetheless, Cyplus Idesa has made opportunities for input available via a training program on safe cyanide management and antidotes. Firefighters, police, red cross, hospitals, doctors, unions, customs agents, port management, shipping staff, emergency response brigades, security staff, mine staff, civil protection, and others have participated in these trainings. In addition, the ESHQ Manager for Cyplus Idesa is a member of the HazMat committee of the National Association of the Chemical Industry (ANIQ) in México, thus providing other opportunities for feedback from stakeholders.

By mean of the attendance lists of trainings provided in safe cyanide management, Cyplus Idesa showed records to demonstrate that input has been sought and acted on as appropriate.

Convoys of trucks carrying hazardous materials on public roads are prohibited by law in México. Occasionally, drivers from various companies will informally convoy on private roads in remote areas. However, the trucking companies do implement administrative controls in areas of special concern, such as no driving at night. For example, trucks are required to stop overnight in Yecora, Sonora so as night to drive at night on the remote roads in the Sierra Madre Mountains. By interview to management personnel, the auditor confirmed that cyanide transport operations is performed during daylight only.

Cyplus Idesa as the consignor, exercises control over its subcontractors by mean of its procedures and a program of questionnaires and due diligence site visits, covering



subcontractor selection and evaluation, route selection, safety norms and emergency response. Cyplus Idesa has provided these procedures to the trucking companies and the trucking companies have incorporated the requirements into their own procedures. As part of the route selection procedure, Cyplus Idesa has approved the routes used by Degam and Nieto.

Cyplus Idesa annually sends the trucking companies a questionnaire on Code-compliance. This questionnaire is based on the ICMI Transportation Verification Protocol. The auditor reviewed examples of these questionnaires from Degam and Nieto to verify compliance. These trucking companies do not subcontract any cyanide handling or transport.

Once every three years, Cyplus Idesa visits the ports and maritime shippers to conduct due diligence audits onsite. These due diligence evaluations have included training, security, safety, emergency scenarios, response actions, the roles of external responders, among others. The auditor has evaluated these due diligence audits for the Ports of Mazatlán and Salina Cruz, as well as the maritime shipper Navemar, finding them in compliance.

Transport Practice 1.2

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

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

Cyplus Idesa as the cyanide consignor, does not hire drivers or transport cyanide. The transportation is subcontracted to Degam and Nieto. They have implemented written procedures to select qualified operators to ensure only trained, qualified, and licensed drivers operate their transport vehicles: Degam's procedure Index for Operator Selection, and the Operator Training and Qualification procedure from Nieto. The requirements consider factors such as medical examination, education level, criminal record, vision test, psychological interview, drug/ alcohol test, reference checks, among others.

In accordance with Mexican laws, truck drivers for large loads and/or hazardous materials must obtain a Type E license from the Secretary of Communications and Transports (Secretaria de Comunicaciones y Transportes [SCT]), an agency of the México government and renew the license every two years. To verify compliance, the auditor reviewed driving licenses at Degam and Nieto to confirm the drivers had the required Type E license and that these licenses were current.

The transporters were able to demonstrate that personnel operating its cyanide transport trucks and trailers were trained, qualified and have the specific license to operate the trucks



category, as required in its jurisdiction. The transporters do not use handling equipment as forklifts and cranes in the cyanide transport operations.

All personnel operating the trucks for cyanide transportation from Nieto and Degam are trained to perform their assigned tasks in a safe and environmentally sound manner. These companies transport solid cyanide in isotankers or sealed containers that are placed on the trucks by the staff at the production plant, ports, or warehouse and then unloaded by staff at the mines.

Cyplus Idesa has provided training on safe cyanide management and antidote use to Degam and Nieto. The training materials were a PowerPoint presentation and a Cyplus Idesa handout with detailed information. The auditor reviewed the training materials and attendance lists to verify compliance.

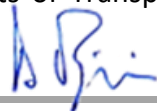
The transporters have also provided training to their operators. Degam has an annual training program that includes fatigue, defensive driving, security, general health, and others. Nieto has a training program that consists of an 8-day course for new drivers and a 5-day refresher course, every 2 years for experienced at their training facility in Queretaro. Courses include Mexican laws, hazardous waste, satellite tracking, inspections, manifesting, security, defensive driving, basic maintenance, hooking/unhooking trailers, and others.

The auditor reviewed training material as Cyplus Idesa training presentation Safety Training for Cyanide Management; Cyplus Idesa Information for doctors, attendance lists, training programs and training certificates to verify compliance. Interviews with drivers, dispatch, management, and maintenance personnel were used to confirm that they were trained in the cyanide transport operation to perform their jobs safely and appropriately.

Cyplus Idesa as the consignor, exercises control over its subcontractors. CyPlus annually sends the trucking companies a questionnaire on Code-compliance, based on the ICMI Transportation Verification Protocol, including questions to ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment. The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any cyanide handling or transport.

Once every three years, the cyanide consignor visits the ports and maritime shippers to conduct due diligence audits onsite. These due diligence evaluations have included training, security, safety, emergency scenarios, response actions, the roles of external responders, and other factors. The auditor reviewed these diligence audits for the Ports of Mazatlán and Salina Cruz, as well as the maritime shipper Navemar, finding them in conformance.

The auditor also reviewed documents showing Cyplus Idesa control procedures for its contractors as: Purchase and Evaluation of Providers, Selection of the Routes, Safety Norms for Cyanide Transport, Highway Contingency Plan, routes approval emails from to Degam and Nieto, Questionnaire for Audits of Transport Lines about the International Cyanide



Code for Degam and Nieto, and Excellence Freights, ICMI certified transporter last Summary Audit Report.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Degam and Nieto transport companies have records documenting the load-bearing capacities of its trucks and trailers detailing its maximum cyanide load weight. The transporters performs maintenance activities specific to ensure that its transport equipment retains a load-bearing capacity adequate for the anticipated load. This include periodic planned maintenance and inspections. The transporters vehicles have circulation permits issued by the Mexican Federal Agency for Transportation (SCT). These permits, in conjunction with the SCT Table of Weights and Dimensions under the regulation NOM-012-SCT2, ensure that the equipment is designed for the appropriate loads. The auditor reviewed examples of these circulation permits at each transporter to verify compliance.

Degam has a written program for annual maintenance. This program is implemented via a work order system. The auditor reviewed binders of closed work orders to verify compliance.

Nieto has a written procedure to govern maintenance. This procedure is implemented via proprietary software with a schedule based on distance driven or every six months, whichever comes first. The auditor reviewed maintenance histories on screen for randomly selected units to verify compliance.

The auditor reviewed the maintenance procedures and programs 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 as evidence of compliance, reviewed maintenance records and interviewed maintenance personnel to verify that the transporter's procedures are followed. Each trucking company commissions preventive maintenance activities to external authorized workshops according to its respective truck brand, depending on the area where trucks are working.

The auditor interviewed the transporters managers to verify its compliance with this provision. Shipment records were reviewed to confirm that standard weights within the capacity of the tractors, trailers and containers were being shipped. Weight capacities and the fulfillment of cargo inspection requirements were reviewed during the audit and were



found to be compliant. Shipping records were available to demonstrate that equipment is not being overloaded.

In addition to ensuring that the manufacturer's rating of the loading capacity of the transport equipment is adequate, the transporters Degam and Nieto also verify that the load bearing capacity of its equipment is adequate by inspecting and testing its equipment to identify signs of stress or overloading. Degam and Nieto have implemented documented daily visual inspections to verify the adequacy of the equipment for the loads it will bear. These inspections, as well as their content, are required by the SCT. Inspection items cover each side of the tractor and trailer and include, for example, tires, rims, axels, suspension, chassis, nuts/bolts, air/hydraulic lines, brakes, connections, and others. The inspection forms specifically mention conditions related to load-bearing performance, such as fissures and cracks in the various components. The auditor reviewed evidence of completed inspections performed before each shipment service and also interviewed the truck drivers in evaluating compliance with this provision.

CyPlus and its subcontractors have procedures in place to ensure that equipment is not loaded in excess of its design. The consignor is responsible for loading 1-ton wooden boxes into the sea containers, or isotankers at either the production plant in Coatzacoalcos or the warehouse in Ciudad Obregon. Twenty of the 1-ton wooden boxes fit in the sea containers. Isotanker loads are limited to 16 tons.

Degam and Nieto have implemented the SCT-required measures, as specified in the Table of Weights and Dimensions under the regulation NOM-012-SCT2, to prevent overloading of the tractors and trailers used in cyanide transport. Departure documents, shipping letters, and delivery notes list the weights of product being transported to verify the load complies with the SCT Table of Weights and Dimensions.

The auditor reviewed examples of documents Shipping Letter and Delivery Note from each transporter to verify compliance. Records of cyanide shipments were checked against weight capacities and weight limit regulatory information. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. All personnel showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

Cyplus Idesa as the consignor, exercises control over its subcontractors. Annually they send to the trucking companies a questionnaire on Code-compliance, based on the ICMI Transportation Verification Protocol, including questions to ensure that transport equipment is suitable for the cyanide shipment. The auditor reviewed examples of these



questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any cyanide handling or transport.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Cyplus Idesa and its subcontractors have implemented procedures for sodium cyanide transportation for the receipt, load, transport, and unloading of solid cyanide. Procedures and formal pre trip checklist are used to ensure that the integrity of cyanide packaging is maintained during shipment, as well as during loading and unloading.

Degam and Nieto do not handle the cyanide containers. Cyplus Idesa staff handle the unloading and loading of 1-ton wooden boxes at the Ciudad Obregon warehouse. Isotankers are loaded at the plant or the warehouse by their respective staff. Truck trailers, sea-land containers, and isotankers are locked and sealed at the time of loading and remain that way until unloading by mine staff at the mines. The transport companies do complete daily inspections of the exteriors of the truck trailers, sea containers, and isotankers while in transit to ensure the integrity of these items. The auditor reviewed examples of inspections forms to verify compliance.

The procedure Loading and Dispatch of Sodium Cyanide Final Product, CyPlus Idesa Production Plant in Coatzacoalcos, requires placards or other signage are used to identify the shipment as cyanide, as required by local regulations and international standards. According to Cyplus Idesa staff, it is the legal responsibility of the plant or warehouse staff to attach placards to the trailers, sea containers, and isotankers. The plant and warehouse have written procedures that address attaching or checking the placards. Truck trailer placarding consists of the United Nations (UN) 1689 diamond placard, whereas sea-land containers and isotankers are also placarded the Class 6 dangerous goods label and the marine toxin label.

The transporters procedures requires to review the condition of the sea containers to ensure they are suitable for the trip, without holes and with complete identification labels of solid sodium cyanide (1689) and Maritime Pollutant. The pre-trip checklist include provisions to verify signage is complete. In occasion of the audit the auditor reviewed cyanide shipments confirming placards announcing the presence of cyanide on transport vehicles.

Cyplus Idesa and its subcontractors have implemented a safety program for cyanide



transport that include the following:

- a) Vehicle inspections prior to each departure/shipment.

The transporters procedures for sodium cyanide transportation addresses formal safety vehicle inspections before each shipment. Roles and responsibilities are clearly defined Degam and Nieto have implemented daily visual inspections that also serve as pre-departure inspections. These inspections, as well as their content, are required by the SCT. Inspection items cover each side of the tractor and trailer and include, for example, tires, rims, axels, suspension, chassis, nuts/bolts, air/hydraulic lines, brakes, connections, and others. The auditor reviewed examples of Daily Visual Inspection Forms from Degam, and Nieto, which includes both the truck and the trailer, finding this in conformance.

- b) A preventative maintenance program.

Confirmation was made during interviews to company's drivers and management personnel that the transporter performs preventive maintenance to their vehicles according to a stablished schedule, depending on the truck brand and road conditions.

The truck transporters have written maintenance programs. Degam has implemented a written system of work orders, Nieto have used software programs. Maintenance is scheduled based on time or distance driven. The auditor reviewed maintenance histories on screen for randomly selected units for Nieto, as well as closed work orders for Degam, to verify compliance. The auditor reviewed Degam's transporte Maintenance Program for Cyplus units and binders of closed work orders, the maintenance history of Nieto, the List of Isotanker Inspection Expiration Dates from CyPlus, 2019. They also maintain valid third-party inspection certificates for the 20 isotankers that they own, thus supporting that they are properly maintained.

- c) Limitations on operator or driver hours.

The SCT has established limits on drivers' hours in the Mexican Regulation NOM-087-SCT. Cyplus Idesa has adopted these hours in a written procedure (Safety Norms for Cyanide Transport) that flows down to the trucking companies: 1st period = 4 hours followed by 30 minutes of rest; 2nd period = 4 hours followed by 1 hour of rest; 3rd period = 4 hours followed by 8 hours of rest. Night driving is prohibited. The auditor reviewed examples of the SCT-required forms for hours driven from Degam and Nieto to verify compliance, and Degam's Procedure for Driving Hours, Rest, and Consumption of Alcohol and Drugs

- d) Procedures to prevent loads from shifting.

The production plant and warehouse are responsible for loading truck trailers, sea containers, and isotankers in such a way as to prevent loads from shifting. The 1-ton wooden boxes are secured with straps in a designated pattern, as specified in written



procedures. Cyanide is shipped within sealed containers, which are secured to the platform safely, eliminating the possibility of displacement during transport.

The auditor reviewed the procedure Loading and Dispatch of Sodium Cyanide Final Product from CyPlus Idesa Production Plant in Coatzacoalcos, the procedures from the Oregon Cyplus Idesa Warehouse: Reception, Management, and Storage of Chemical Products; Delivery of Chemical Products; and procedure Transfer of Sodium Cyanide to Isotankers. From Degam trucking company reviewed the Procedure for Transporting Dangerous Material. Also, in occasion of the audit, the auditor saw at the Warehouse, opening a sea container with cyanide shipment of secured 1-ton wooden boxes inside before unloading.

Transportes Nieto was required to include into its pre-trip checklist, a field to ensure containers are correctly secured with twist locks to the trailer platform. After the audit Cyplus sent Nieto's completed pre-trip registers showing they have included twist locks checking. No additional information was required to find this item in full compliance.

e) Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.

Degam and Nieto have developed procedures by which transportation can be modified or suspended for adverse conditions. Degam's procedure for transporting dangerous materials addresses transport suspension. Nieto route selection procedure includes a section that allows for suspension after consultation with supervisors.

f) A drug abuse prevention program.

Cyplus Idesa has developed a written procedure (Safety Norms for Cyanide Transport) that requires subcontracted transporters conduct drug and alcohol testing at a minimum every six months. Degam has adopted this requirement in their own written procedure. Nieto staff stated their policy is to randomly test 10 percent of the drivers each month and at least 50 percent every six months.

g) Retention of records documenting that the above activities have been conducted.

Cyplus Idesa procedure for safety norms requires the transporters to retain records for at least 3.5 years. The auditor reviewed the cyanide consignor and the transporters, Degam and Nieto retained records documenting the above activities covering the recertification audit period of 3 years have been conducted. Records were available documenting inspection and maintenance records, spreadsheets to control drivers' hours, pre-trip inspections to prevent loads from shifting, procedures to suspend the trip if travel unfavorable conditions are encountered, and alcohol tests records.

Cyplus Idesa as the consignor, exercises control over its subcontractors. The consignor annually sends the trucking companies a questionnaire on Code-compliance, based on the ICMI Transportation Verification Protocol, including questions to ensure develop and



implement a safety program for transport of cyanide. The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any cyanide handling or transport.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

CyPlus ships solid cyanide in 1-ton wooden boxes along the west coast of México starting at the Port of Salina Cruz, Oaxaca, and terminating at the Port of Mazatlán, Sinaloa. The trip between Salina Cruz and Mazatlán takes several days. CyPlus has contracted to Navemar to arrange shipping for the dedicated service of a single ship. Shipments of cyanide transported by sea are transported in compliance with the International Maritime Organization (IMO) Dangerous Goods (DG) Code.

CyPlus is responsible for the cyanide packaging, containerization, labelling, and initial manifesting at their ICMC-certified production plant in Coatzacoalcos, México. According to a plant procedure, the 1-ton wooden boxes and sea containers are labelled in accordance with IMO DG protocols. This procedure shows the type and locations of labels and symbols to be attached to the various containers and includes requirements for initial manifesting. CyPlus does not ship isotankers by sea. The packaging is suitable for the transport and storage of cyanide. This is complying by the sodium cyanide production plant under the corresponding procedure.

CyPlus conducted a due diligence of Navemar on November 29, 2021. The auditor reviewed this report and prepared an assessment that can be found in Exhibit C. The assessment found no issues of concern with regards to the conduct and shipping of cyanide.

Shipment packaging is in accordance with the plant procedure and as required by Part 4 of the IMO DG Code and according to the packaging instructions and packaging provisions indicated on the DG List.. Cyplus Idesa packs cyanide into polyethylene bags that are hermetically sealed, and then placed into 1-ton boxes. The boxes are strapped into sea-land containers that are then locked and sealed with a custody seal..

Cyanide packages are marked as required by Section 5.2.1 of the IMO DG Code and labelled as required by Section 5.2.2 of the IMO DG Code and according to labelling requirements indicated on the DG List. The cargo transport units are placarded and marked as required by Chapter 5.3 of the IMO DG Code. Placards and signage used to identify the shipment as cyanide meet standards. The boxes are labelled in and diamonds are placed at the front and



rear of the vehicle exterior identifying the load as cyanide, all in accordance with the plant procedure and the IMO DG Code. Labelling consists of the UN number 1689, Class 6 dangerous goods label, and the marine toxin label.

Dangerous goods transport documents have been prepared with information required under Chapter 5.4 of the DG Code. IMO DG Declarations have been prepared with the required transport information, including consignor information, marine pollutant identification, shipping information (e.g., 2340 Wood-Box, Sodium Cyanide, Solid. UN 1689, Class 6.1, Packaging Group I), list of containers and weights, and a certification stating that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national government regulations.

Cyanide loaded into containers, have been prepared with the required packing information meeting the requirements of Section 5.4.2 of the DG Code.

The ship carrying cyanide has a manifest identifying the presence and location of the cyanide including this information, as required under Section 5.4.3.1 of the DG Code. The due diligence assessments confirmed manifesting and stowage is in accordance with the DG Code.

The ship carrying the cyanide has emergency response information as required under Section 5.4.3.2 of the DG Code. The due diligence assessment confirmed that Navemar has developed a Contingency Manual on Emergency Preparedness and Response as part of its Safety Management System.

The ship complies with the stowage and separation requirements of Part 7 of the DG Code. By interview with staff from Cyplus Idesa the contracted vessel, only transports cyanide for Cyplus Idesa. Cyanide is loaded according to a stowage plan. Therefore, stowage and separation requirements are met.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

All drivers are provided with means to communicate with the transport company, the mining operation, the cyanide producer and emergency responders, as appropriate. According to their procedures for cyanide transportation, all trucks must have communication equipment.



Cyplus Idesa does not operate transport equipment within this supply chain. It does subcontract transport companies which have multiple means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

Degam and Nieto have multiple means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders. Degam operators carry a cell phone, a short-wave radio, and a satellite phone; the truck is equipped with a satellite-based panic button. Nieto operators carry a cell phone and the truck is equipped with a satellite-based panic button.

Drivers for the transport companies have pre-determined contact information with them during deliveries. Both Degam and Nieto drivers carry their ERP that contains a contact list. All transporters use Global Positioning Satellite (GPS) to track the trucks.

Degam and Nieto inspect and test the communication and tracking equipment periodically to ensure it functions properly. The operator checks phones and radios, but only the home office can remotely verify the GPS and its antenna are operating properly. The auditor reviewed checklists and inspection forms, as well as screen shots of testing, to verify compliance. Both Degam and Nieto transport companies use checklists to verify the communication equipment is functioning properly. Degam has a checklist that includes the cell phone (and radio in the same column) and the panic button. The Nieto Emergency Response Plan (ERP) has an equipment list that includes communications equipment.

Cell phone black-out areas in the different routes from ports to the mine sites have been identified by the transporters during the routes risk analysis. By review of the routes risk analysis performed, interviews and equipment review, the auditor confirmed this practice.

Degam special procedures in these zones are to have a satellite phone available, as well as a satellite-based panic button and two satellite-based GPS tracking .

Nieto procedure for these zones consists of checking in with a supervisor upon entering and leaving the zone, as well as having a satellite-based panic button and a satellite-based GPS tracking system (i.e., CoPiloto).

The transporters Degam and Nieto have implemented satellite-based GPS systems to track trucks during transport. Both use CoPiloto, a GPS and software system that visually tracks truck locations on computers and cell phones. Cyplus Idesa, as the cyanide consignor, has also access to this system, to track the progress of cyanide shipments. The auditor observed the tracking maps on supervisor cell phones during the site visit to each transporter to verify compliance.

The dispatch of cyanide is carried out directly to the mine without opening the containers, for which the seals are controlled through pre-trip inspections and after each stop en route. Drivers, in accordance with the requirements of the procedures, must always carry the



dispatch guides indicating the amount of cyanide in transport, the shipping paperwork, including chain of custody requirements, to ensure that cyanide shipments arrive at their destination intact. Among others, a waybill accompanies the cyanide shipments which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, bill of lading, customs declarations and shipper guide.

The auditor reviewed this documentation completed during the course of several shipments and through interviews with operators. Degam and Nieto have implemented inventory controls to prevent cyanide losses during shipment. The transporters provided paperwork for review that documented the date/time/location of departure and upon delivery of the product, as well as acceptance of delivery by the mine. The number of containers and weights were listed on the paperwork. In addition, the doors of the trucks are sealed with a numbered metal strip that is removed only at the point of delivery to verify the load was not tampered with during transit. Shipping paperwork was found to be conformant to the Code requirements.

The transporters showed completed shipping records indicating the amount of cyanide transported in each truck. The procedure for cyanide transportation requires this documentation must accompany every cyanide shipment. All shipments of cyanide are accompanied by shipping papers identifying the amount of cyanide in the load and by Safety Data Sheets describing the necessary precautions for handling of cyanide. The auditor reviewed the transporter's procedure confirming that this information accompany each cyanide shipment and verified its implementation by interviewing operators and reviewing this documentation from performed cyanide shipments.

Cyplus Idesa as the consignor, exercises control over its subcontractors. Cyplus Idesa annually sends the trucking companies a questionnaire on Code-compliance, based on the ICMI Transportation Verification Protocol, including questions to ensure track cyanide shipments to prevent losses during transport. The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any cyanide handling or transport.



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 cyanide supply chain, as defined by ICMI, do not take place. Cyanide shipments are sent directly from the producer, ports or warehouse to the mine sites. Within the scope of this supply chain audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. This Transport Practice does not apply to this 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
 - in substantial compliance with
 - not in compliance with
- Transport Practice 3.1

Cyplus Idesa has developed the written emergency response plan Highway Contingency Plan (ERP) for responding to emergencies that may occur during its cyanide transport activities, a specialized document addressing cyanide only. This plan also serves as an umbrella plan for the plans of the individual trucking companies. Degam and Nieto have their own ERPs. These are detailed document that includes, among other information, the emergency response team organization chart, emergency phone directory, communication channels guidelines, emergency scenarios, and instructions to attend specific and general emergency scenarios.



The ERPs for Cyplus Idesa, Degam and Nieto reflect the issues presented by the particular transport route and the method of transport. Emergency scenarios have been identified as result of the route assessment matrix and emergency response actions have been addressed.

The emergency scenarios described in the ERPs are specific to the physical and chemical form of the cyanide handled, and the transport vehicles used. In all cases, the physical form is solid cyanide as briquettes. The physical properties are described, such as density, solubility, and color. In all cases, the chemical form is sodium cyanide.

The ERPs consider road conditions via the route assessments. Port conditions are addressed separately in the due diligence evaluation.

All emergency scenarios developed are related to ground transportation: incidents without injuries, mechanicals problems, collision, rollover with and without spill, fire during transportation, fall of the load and collision with hurt persons. The ERPs provide information regarding the packaging and transportation characteristics of the product, the container and the transportation unit.

The ERPs consider the design of the transport vehicle, although the design is not considered a significant additional factor. The transport vehicles are trucks pulling isotankers or sea containers. The isotankers are top- loading and the sea land containers are rear loading.

The design of the transport vehicles has been considered in the Cyplus warehouse operation in Ciudad Obregon, Sonora. This facility is separately Code-certified under the Production Protocol.

The auditor reviewed the ERPs verifying that appropriately considers these factors in identifying potential emergency scenarios and necessary response actions. The documents were found to be up-to-date and appropriate for this solid sodium cyanide transportation operation.

The ERPs describe the nature of the response actions to be taken for the types of emergency situations identified to land transport, such as mechanical failure, fire, roll-overs, releases (dry or wet, over asphalt/concrete or soil), roadblocks, protests, and theft. In general, the truck operators are to call the appropriate authorities, isolate the area, keep people away, don personal protective equipment (PPE), and if possible, to do so safely, cover spilled cyanide with a tarp. The appropriate authority for initial notification is the Mexican agency in charge of the Emergency Transportation System for the Chemical Industry (SETIQ). The level of detail is adequate to the nature of the potential emergencies identified in the Plans and the available response capabilities

The transporters included detailed actions, particularly for potential releases in locations along the route that have been identified as presenting increased risks, including notifications to downstream authorities for a release that occurs as cyanide is transported



near a river. The auditor reviewed the Plans verifying that they describe specific response actions to be taken for the types of potential release scenarios identified.

The ERPs for Cyplus Idesa, Degam and Nieto describe the roles of external entities in response actions. The roles of the external entities are their standard duties, as directed by SETIQ. SETIQ is responsible for directing which other entities should be involved, including police, military, firefighters, red cross, and hospitals. For chemical response actions with specialized equipment, the Cyplus Idesa brigades stationed in Ciudad Obregon are noted in the ERPs has having a significant role depending on whether other entities near the incident have similar specialized capabilities. The auditor reviewed the ERPs verifying these external responders are identified.

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 Transport Practice 3.2
 not in compliance with

Appropriate personnel at Cyplus Idesa, Degam and Nieto have received emergency response training during the recertification period.

Cyplus Idesa has provided training on safe cyanide management and antidote use to Degam and Nieto, as well as to the Cyplus Idesa brigade members. In addition, Cyplus Idesa brigade members in Ciudad Obregon, , and México City have taken specialized two-day courses in cyanide first aid, management, and emergency response from the National Association of the Chemical Industry (ANIQ) during the recertification period. The auditor reviewed the training program and certificates to verify compliance.

The two transporters have also provided other emergency response training to their own staff. Degam has a training program that includes emergency responses for robbery, theft, rollovers, and roadblocks, as well as their ERP. Nieto has a training program that includes the ERP for cyanide transportation, which in turn contains information on cyanide risks, symptoms, first aid, scenarios, decontamination, and others. The auditors reviewed training programs/matrices, attendance lists, and certificates to verify compliance.

The auditor reviewed completed training records in the ERPs, provided to their personnel. The training addresses all anticipated response activities including calling for assistance, use of personal protective equipment and first aid for cyanide exposure. The elements of these training are documented in training materials, and records including the individuals trained and the nature and date(s) of training are retained. The training materials were a



PowerPoint presentation and a Cyplus Idesa handout with detailed information. The auditor reviewed this documentation and interviewed designated response personnel verifying compliance with this provision. Training records were available and complete.

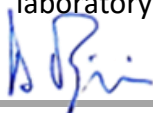
The specific duties and responsibilities of response personnel are identified in the ERPs. The expectations are clear for the consignor and the transporters and there is a basis for training of these personnel. In the event of an emergency, accident or breakdown en route, the manufacturer and the carrier will provide support and provide the clarifications requested by the public authorities, as required by local regulations. The duties and responsibilities for Cyplus Idesa are broader than the trucking companies in that Cyplus Idesa would provide emergency response brigades with the typical structure for incident commanders, brigade members, coordinators, etc. For the three trucking companies, the duties and responsibilities for cyanide emergency response are similar. The truck keeping people away, and if safe to do so, covering spilled materials with a tarp.

The transporters have complete list of the emergency response equipment in their respective ERP and checklists inspections forms for inventorying the equipment, which include all the necessary emergency equipment that must accompany the cyanide load along the transport route.

The Cyplus Idesa brigades in Ciudad Obregon transloading and warehouse facility, have developed checklists for the emergency response equipment and PPE. Degam and Nieto have prepared equipment lists for safety and emergency response equipment carried in their trucks during cyanide transport. Degam has created a checklist, while Nieto ERP contains a list of safety and emergency response equipment carried in their trucks. In all cases, the lists are divided into three categories: normal operations, PPE for emergencies, and equipment and materials for emergencies.

The transporters Degam and Nieto have available and document that the necessary emergency equipment is ready to use for each cyanide shipment by mean of a checklist, which is required in the ERPs emergency equipment and materials to be checked prior to each cyanide delivery. The auditor reviewed completed emergency equipment checklists, observed the equipment and interviewed the transporters personnel as a driver, the planning responsible and the health and safety responsible, verifying compliance with this provision.

The lists include among others, chemical resistant suits/gloves, rubber boots, half-face respirators, goggles, tarp and cords, plastic bags, shovel and pail, bag of lime, dry chemical fire extinguisher, absorbent materials, tape, traffic cones, flares, first aid kit, and a highway emergency response guide. They also have provided their operators with portable hydrogen cyanide gas (HCN) monitors. Degam has 13 HCN monitors, and Nieto has 8. Each transporter has maintained, tested, and calibrated their HCN monitors every 6 or 12 months as recommended by the manufacturers for the various brands in use. Depannage Laboratory have calibrated the monitors; a laboratory accredited by the Mexican Entity for



Accreditation (EMA). The auditor reviewed calibration certificates for the recertification period to verify compliance.

The emergency equipment and PPE list for the Cyplus Idesa brigades in Ciudad Obregon, include the same items as the transporters, plus specialized equipment such as self-contained breathing apparatus (SCBAs), sampling supplies (pH strips, cyanide test kits), portable shower, oxygen tanks, cyanide antidotes, tools, etc. Brigade members also have portable HCN monitors that have been calibrated as described above.

The emergency response equipment identified in the transporters ERPs is inspected and tested regularly so that it will be available in good working order when needed for use. Both Nieto and Degam ERPs require to check emergency equipment as part of the pre-trip inspection process. Among the control measures adopted, the ERPs addresses to perform inspections to the emergency equipment before loading the truck. Checklists are used to verify that it is available prior the shipment 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.

The Cyplus Idesa brigades in Ciudad Obregon, have implemented inspections of their emergency response equipment to ensure it is available when required. The auditor reviewed examples of inspections from the recertification period to verify compliance.

Cyplus Idesa as the consignor, exercises control over its subcontractors. Cyplus Idesa annually sends the trucking companies a questionnaire on Code-compliance, based on the ICMI Transportation Verification Protocol, including questions to related to emergency response personnel and the necessary resources for emergency response. The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any cyanide handling or transport.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Cyplus Idesa, Degam and Nieto have procedures and current contact information in their ERPs for necessary internal notification and external notifications in the event of a cyanide emergency during transport. Current contact information lists include names and telephones number of the transporter’s personnel, the shipper, the receiver (mining clients), regulatory agencies, medical facilities, ambulances, police, firefighters and potentially affected community’s information. The operators for each trucking company



carry their respective ERPs with the contact procedures and lists.

In case of an emergency, the driver will immediately communicate with the transporter's headquarters, who in turn will give notice to the consignor. Likewise, they will communicate SETIQ who will coordinate with Cyplus Idesa, external responders' agencies such as firefighters, hospitals and police delegations, and communities. The auditors reviewed the transporters notification and contact information verifying compliance with this provision.

The transporters have systems in place to ensure that emergency contact information is kept current. This are provisions in the Emergency Response Plan for annual or more frequent review of the entire Plans, and a specific requirement to periodic updating of contact information by mean of testing each contact number on a regular basis. The auditor reviewed the ERPs verifying its implementation through review of documentation as updated telephone list and by mean of interviews with the transporter's personnel.

Cyplus Idesa, Degam and Nieto ERPs require to notify the ICMI in case of cyanide emergency that constitutes a "significant cyanide incident" as defined in the Code's Definitions and Acronyms document.

On January 10, 2022, on the Yecora - Chihuahua highway kilometer 360, on the Las Gallinas bridge, a Degam van with 12 tons of sodium cyanide overturned, leaving the vehicle on the side of the river. Most of the product was spilled onto the truck's platform.

The carrier reported the incident indicating that the operator is injured and that there was a spillover without reaching the river. Operators placed a tarp over the material to prevent moisture and the river from causing the cyanide to react, in addition to cordoning off the area 50 meters around.

The emergency was attended by the Cyplus brigades based in CDO and the transporter Degam, who collected the spilled product and decontaminated the place. During the work that lasted three days, they also received support from Temosachi Municipal Civil Protection, State Civil Protection and Pineda Cranes. Cyplus was in permanent communication with Civil Protection and the Federal Attorney for Environmental Protection (PROFEPA). The ICMI was notified regarding this incident.



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
 - in substantial compliance with Transport Practice 3.4
 - not in compliance with

The ERP for Cyplus Idesa includes procedures for the brigades stationed in Ciudad Obregon to remediate spilled cyanide. Remediation consists only of recovery of product and removal of impacted soils; no chemicals would be mixed or used.

Impacted soils are to be excavated until spilled material is no longer encountered based on testing with a field test. Recovered product and/or removed soils are to be placed in proper labelled containers and then disposed at a mine or in accordance with environmental regulations.

The ERPs for Degam and Nieto role to notification, isolation of the area, keeping people away, and if safe to do so, covering spilled materials with a tarp. SETIQ would oversee overall response coordination, and once the Cyplus Idesa brigade arrives, that brigade would be responsible for remediation as described above.

The ERPs for Cyplus Idesa, Degam and Nieto explicitly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The auditor reviewed the transporter's ERPs and interviewed its supervisors, confirming their knowledge with this provision.

Transport Practice 3.5

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

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

The ERPs for Cyplus Idesa, Degam and Nieto requires to review, evaluate and update the ERP as necessary to account for changes in potential release scenarios and necessary response actions that can vary over time for a variety of reasons, including changes to transport routes, changes to the form of cyanide transported, and changes to the types of transport equipment used. The auditor evaluated the processes and its implementation reviewing the ERPs past versions. All changes are documented and confirmed through



interviews with the transporter's supervisors.

All the ERPs states to perform periodically mock emergency drills, with the purpose of evaluating the effectiveness of the Plan and correcting the anomalies found. Requires a report to be issued for each drill describing the exercise itself, who participates, the type of scenario, the basic actions taken, strengths and weaknesses. Within the same report, a sequence of actions will be made based on the time recorded, serving this report, as a means of continuous improvement of the ERP.

The Cyplus Idesa ERP does not include a provision for periodically conducting mock drills; however, Cyplus Idesa has in fact held mock drills as explained below. The auditor reviewed the following reports for drills as evidence. Cyplus Idesa evaluated all drills where findings were followed with corrective actions until closed.

Mock drill with sodium cyanide during the loading of Degam transport units in Cyplus Idesa Obregón Warehouse (CDO), in February 2019, with the participation of 14 workers from Cyplus Idesa and Degam. They simulated the forklift punch a cyanide box, which activates the emergency response plan for spill and exposure with cyanide to a Degam operator.

Report of the cyanide drill in the port of Mazatlán on November 27, 2020. A truck hits a cyanide container, causing HCN gas emanations, evacuating 42 workers from the maritime terminal. At the same time, the operator is injured and intoxicated.

Report of the cyanide drill in the port of Salina Cruz in September 2021 with six participants. The simulation with sodium cyanide was carried out in the port, where a truck hits a container, spilling 50 kilograms of solid sodium cyanide. The port department notifies its emergency response brigades to carry out the spilled cyanide collection activities. The collected material is treated according to the indications of Cyplus Idesa for proper final disposal. After decontaminating the brigades, the drill ends.

The ERPs for Cyplus Idesa and Nieto states it should be reviewed and evaluated following any incident that triggers its activation. No revision has been done in this regard as no cyanide transportation emergency was reported to in this recertification period.



Review of Due Diligence Reports

Exhibit A - Port of Mazatlán

Review of Due Diligence Report for Port of Mazatlán

This review of the due diligence report prepared on March 1, 2022, by Cyplus Idesa for the Port of Mazatlán, as required by the ICMI. The Port of Mazatlán is part of the Cyplus Idesa México Supply Chain.

Bruno Pizzorni, Cyanide Code lead auditor and transportation technical specialist, reviewed the due diligence report prepared by Mr. Fernando Rodriguez, the Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain.

This review was performed in accordance with ICMI Auditor Guidance for the Use of Cyanide Transportation Protocol from June 2021.

Port of Mazatlán

The Port of Mazatlán is located on the west coast of México in the State of Sinaloa. According to the website at [http:// https://www.puertoMazatlán.com.mx](http://https://www.puertoMazatlán.com.mx), the port can service containers, as well as bulk and general cargo. Facilities include six berths with a length of 1,300 meters and a total facility area of 16.6 hectares. Equipment involved in cyanide handling includes two fixed cranes and reach stackers. The port holds certification on ISO 9001:2015, ISO 14001:2015, *Distintivo de Garantía de Sustentabilidad* (Sustainability Guarantee Badge), *Igualdad Laboral entre Hombres y Mujeres* (Labor Equality between Men and Women), and on *Calidad Ambiental Turística* (Tourism Environmental Quality)

Please refer to Exhibit A of this report for the Due Diligence Report for the port of Mazatlán performed by Cyplus Idesa.

Conclusion

Based on the evidence provided by CyPlus, this due diligence review did not find significant issues of concern regarding the Port of Mazatlán handling of sodium cyanide product. The review was based on information provided by CyPlus from their inspection of the port, as well as publicly available information.



Exhibit B - Port of Salina Cruz

Review of Due Diligence Report for Port of Salina Cruz

This review of the due diligence report prepared on March 9, 2022, by Cyplus Idesa for the Port of Salina Cruz, as required by the ICMI. The Port of Salina Cruz is part of the Cyplus Idesa México Supply Chain.

Bruno Pizzorni, Cyanide Code lead auditor and transportation technical specialist, reviewed the due diligence report prepared by Mr. Fernando Rodriguez, the Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain.

This review was performed in accordance with ICMI Auditor Guidance for the Use of Cyanide Transportation Protocol from June 2021.

Overview of the Port of Salina Cruz

The port of Salina Cruz, Oaxaca, is located in the northern part of the Gulf of Tehuantepec, in the Pacific Ocean. It is listed as a port of height and cabotage. The port has infrastructure and equipment for handling containerized cargo, agricultural bulk, mineral bulk and oversized general cargo. Classified as an operating port, it is through its facilities that commercial cargo is mobilized from the south and southeast region of the country.

According to the website at <https://www.puertosalinacruz.com.mx>, the port can service containers, as well as bulk and general cargo. Equipment involved in cyanide handling includes three fixed cranes and one reach stacker. The port can service containers, as well as bulk and general cargo. Equipment involved in cyanide handling includes fixed cranes and one reach stacker. The Port holds the following certificates: ISO 14001, ISO 9001, ISSP (International Ship Security Certificate) and *Igualdad Laboral* (Labor Equality).

Please refer to Exhibit B of this report for the Diligence Report for the port of Salina Cruz performed by Cyplus Idesa.

Conclusion

Based on the evidence provided by CyPlus, this due diligence review did not find significant issues of concern regarding the Port of Salina Cruz handling of sodium cyanide product. The review was based on information provided by CyPlus from their inspection of the port, as well as publicly available information.



Exhibit C - Navemar Maritime Carrier

Review of Due Diligence Report for Maritime Transporter Navemar

This review of the due diligence report prepared on November 29, 2021, by Cyplus Idesa for the shipping agent Navemar, as by the ICMI. Navemar is part of the Cyplus Idesa México Supply Chain.

Bruno Pizzorni, Cyanide Code lead auditor and transportation technical specialist, reviewed the due diligence report prepared by Mr. Fernando Rodriguez, the Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain.

This review was performed in accordance with ICMI Auditor Guidance for the Use of Cyanide Transportation Protocol from June 2021.

Maritime Transporter Navemar

Navemar operates since 1962, with activities as a port shipping agent in Veracruz. It currently has offices in the main ports of Mexico with nationwide coverage. Navemar provides different types of services such as regular shipping services, maritime chartering, ground services, port agency and integrated logistics.

Maritime transport of solid cyanide in 1-ton Intermediate Bulk Containers (IBC) along the west coast of México begins at the Port of Salina Cruz, Oaxaca, and terminates at the Port of Mazatlán. The IBCs are wooden with interior polypropylene sacks. Isotankers are not shipped by sea. The trip between Salina Cruz and Mazatlán takes several days. CyPlus has contracted to Navemar to arrange shipping with a dedicated service of a single ship.

Please refer to Exhibit C of this report for the Diligence Report for Navemar performed by Cyplus Idesa.

Conclusion

Based on the evidence provided by CyPlus, this due diligence review did not find significant issues of concern regarding Navemar sea carrier handling of sodium cyanide product. The review was based on information provided by CyPlus from their due diligence report, as well as publicly available information.



Exhibit D – Addendum: Ferromex Rail Carrier

Review of Due Diligence Report for Rail Transporter Ferromex

Operational and Audit Information for Rail Carrier Ferromex

Cyplus Idesa started transporting cyanide by railroad with Ferromex on January 14, 2023. A due diligence Investigation of rail Ferrocarril Mexicano S.A de C.V. (Ferromex) was conducted on March 2, 2023 by the Environmental Health, Safety and Quality (EHSQ) chief of Cyplus Idesa Mexican Supply Chain (Cyplus Idesa), as Ferromex railroad transportation was included into this cyanide supply chain.

Ferromex was formed in 1997 by a group which includes Grupo Mexico and the Union Pacific Railroad. Ferromex is a private rail consortium that operates the largest (by mileage) railway in Mexico and is part of the North American Class I railroads.

At the time of this due diligence, cyanide shipments in sea containers through Ferromex rail were being routed from Díselo rail terminal at Coatzacoalcos, Veracruz, until Ferromex terminal at Ciudad Obregón, Sonora.

Excellence Freights, an ICMI certified trucking company, transports cyanide from the production plant to Díselo rail terminal, about 50 km away. Then comes the route section by rail of approximately 683 km to Ciudad Obregón Ferromex terminal, where cyanide is unloaded directly onto the truck platforms of Nieto or Degam for unloading in Cyplus Idesa Distribution Center at Obregón (CDO).

Cyplus Idesa EHSQ chief conducted the due diligence investigation for Ferromex on March 2, 2023, at Ciudad Obregon rail terminal with participation of the safety officer and the commercial representative from Ferromex, and on March 20 at Díselo terminal in Coatzacoalcos. As part of that investigation, the rail partner was asked to fill out a questionnaire customized Cyanide Code Due Diligence protocol and participate in interviews held.

According to information provided by the EHSQ chief of Cyplus Idesa Mexican Supply Chain in both rail terminals, cyanide transfer in sea containers from truck to train and vice versa, take place within a short period of time (hours); the cyanide shipments depart before 24 hours on its arrival to the rail terminals. Therefore, as stated in the ICMI Guidance for Use of the Cyanide Transportation Verification Protocol from June 2021, none of these rail terminals are “trans-shipping depot”.

The information contained in this section of the report was gathered from the filled out protocols, a review of information from Cyplus Idesa’s due diligence for Ferromex and interviews with Cyplus Idesa personnel. Transport Practices 1.2 through 1.6, 2.1 and 3.1 through 3.5, as appropriate, have been applied to evaluate the Cyplus Idesa due diligence report conducted for Ferromex.



Auditor's Finding

This operation is

- in full compliance
- in substantial compliance
- not in compliance

The due diligence investigation has been performed so that it can reasonably be concluded that Ferromex rail carrier used by Cyplus Idesa for sodium cyanide shipments are in full compliance with the International Cyanide Management Code.

Auditor Information

Audit Company:	Cyanide Auditors S.A.
Lead Auditor:	Bruno Pizzorni
Lead Auditor Email:	bpizzorni@cyanideauditor.com
Transport Technical Auditor:	Bruno Pizzorni
Due diligence report reviewed on:	June 22 and 23, 2023

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 meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report to Ferromex due diligence review 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
 - in substantial compliance with
 - not in compliance with
- Transport Practice 1.1

Ferromex maintains a mapping of the railway network, has route options for social situations that impede the advance of the railway. These options are based on decision making at the time of the contingency. Due to local regulations, the transport of hazardous materials has priority of advance.

Transport Practice 1.2:

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

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

Interviews with Cyplus Idesa EHSQ chief, confirmed that Ferromex provide employees with hazardous material training, chemical compatibility training, and emergency response training. Although no railroad training files are maintained by Cyplus Idesa, information in the form of completed Code surveys / audit protocols regarding the safety practices of the Ferromex is maintained on file. Cyplus Idesa contacted the rail partner in March 2023 to confirm information and update the completed Cyanide Code protocol maintained on file.

Ferromex has a policy of zero tolerances in substance consumption, in case of occurrence, the employee will be definitively separated from the company.

Ferromex' s operational staff has received training in hazardous materials, emergency plans with hazardous materials and training involving the authorities. In September 2022 Cyplus Idesa delivered training in sodium cyanide, they have scheduled a training in cyanide for 2023.



Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Ferromex loads two 20 foot sea containers with cyanide on each rail platform, which have been designed to transport sea containers and are maintained periodically. Ferromex does not open sealed containers during transport. Ferromex physically and remotely monitors rails and wagons to detect anomalies through instruments located along the tracks. Rails and wagons are periodically inspected and taken out of service when necessary. Cyplus Idesa ensures authorized packaging is used for the solid sodium cyanide.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Cyplus Idesa has confirmed that Ferromex maintains suitable safety programs. Ferromex confirmed during the due diligence evaluation that the railroad provide its employees with hazardous material training, chemical compatibility training, and emergency response training. The railroad also has programs for checking rail condition to ensure safe transportation of goods.

Cyplus Idesa supervises cyanide shipments for which it applies its cargo securing procedures, placing UN 1689 signs on containers in case any are missing. In the employment contract with Ferromex, as indicated in the due diligence evaluation, it is indicated that Ferromex must comply with local regulations NOM-087-SCT-2-2017 section Railway and Multimodal Development, which establishes driving times and breaks for drivers of federal motor transport services.

Ferromex carries out cargo inspections before leaving the Díselo terminal to ensure compliance. Ferromex performs preventive maintenance on its equipment in accordance with its equipment maintenance program. It has procedures that indicate the monitoring activities of roads where social disturbances and weather conditions can be identified. Its staff undergoes periodic medical and drug screening examinations.



By review of the completed Cyanide Code protocol information, the auditor confirmed that the railroad is in compliance with governmental regulations.

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

Cyplus Idesa reviews all shipping papers for rail transportation including the equipment type used. Seal numbers are recorded on the bills of lading and other shipping papers. This enables personnel along any portion of the segment to confirm that the containers have not been opened. When the warehouse receives the product, the seal numbers are verified against the packing list. Quality inspection also takes place at the destination, at which point any discrepancies or damages would be noted.

Ferromex monitors cargo using GPS and tracks railcars using web-enabled tracking web sites. Cyplus Idesa is able to monitor railcar status, tracking information is available at any moment.

Ferromex has radio communication, in addition to cellular telephony. They have the telecommunications area who guarantee the operation of this equipment.

Principle 2 | INTERIM STORAGE

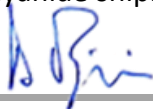
Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Transport Practice 2.1

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

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

Interim storage activities in this railway route, as defined by ICMI, do not take place. According to information provided by the EHSQ chief of Cyplus Idesa Mexican Supply Chain in both rail terminals, cyanide transfer from truck to train and vice versa, take place within a short period of time (hours); the cyanide shipments depart before 24 hours on its arrival



to the rail terminals. Therefore, as stated in the ICMI Guidance for Use of the Cyanide Transportation Verification Protocol from June 2021, none of these rail terminals are “trans-shipping depot”.

There is no planned interim storage of cyanide on the rail segments. Trans-shipping depots and rail yards are maintained by the railways. An interview with the EHSQ chief of Cyplus Idesa confirmed that hazardous cargo is moved from point to point as quickly as possible and that personnel have received training in the segregation of hazardous materials.

All Cyplus Idesa package types used for solid sodium cyanide conform to International Maritime Organization (IMO) and US DOT requirements. Seals are checked upon arrival and any instances of a security breach would be detected at that point.

This Transport Practice does not apply to this 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
 - in substantial compliance with Transport Practice 3.1
 - not in compliance with

Cyplus Idesa has an Emergency Response Plan that applies to all transportation incidents. Ferromex representatives have participated in Cyplus Idesa safety meetings. Cyplus Idesa has also transmitted its emergency response information to the railroad.

Ferromex has a general safety program that includes accident prevention plans, emergency plans and remediation plans. According to the due diligence questionnaire reviewed, Ferromex has a documented risk management system; they have an overall emergency plan for the company which is available to all employees; they confirm that employees are trained to respond to accidents; employees are familiar with the emergency plan; they have emergency equipment for personal protection and accident control and are frequently reviewed; safety data sheets related to the substances they transport are available and easily accessible; have designated key persons who will lead an emergency; and have a crisis management plan.

Cyplus Idesa would be contacted immediately to jointly address the contingency based on



experience and knowledge of sodium cyanide. If necessary, the authority and its relief agencies are involved in accordance with what is indicated in the procedure.

Transport Practice 3.2

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

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

Ferromex reported that they contract with a professional remediation firm that would assist in the case of a spill needing remediation. Ferromex has an agreement with Grupo Hesca, which is a contractor company specialized in dealing with chemical emergencies nationwide. Cyplus Idesa and Ferromex will conduct training with Grupo Hesca as soon as possible on the safe handling of cyanide.

Cyplus Idesa personnel confirmed that they would travel immediately to any site where Cyplus Idesa material had been spilled. Cyplus Idesa has established its confidence in the Ferromex’ s abilities to respond to an emergency through interacting with them through safety communications and meetings. Cyplus Idesa and the railroad interact on a regular basis in regard to environmental and safety matters.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Cyplus Idesa ensures emergency contact information (telephone number), and initial response information is clearly identified on every shipping paper for each shipment of sodium cyanide. Interviews confirmed that contact information, notification, and reporting requirements are kept up-to-date and apply to emergencies that may occur during a rail incident.

Ferromex is affiliated to ANIQ (National Chemical Industry Association) and to SETIQ (Transportation Emergency System for the Chemical Industry) and participates in the hazardous materials committee of Sonora. There is an emergency care committee. The



customer service area will be the one who contacts the owner of the merchandise. The relief agencies would be contacted by the committee based on the diagnosis of the situation.

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
 - in substantial compliance with Transport Practice 3.4
 - not in compliance with

Cyplus Idesa product stewardship personnel and environmental personnel are involved in developing comprehensive environmental plans in the event of an on-site spill. In the event of an off-site spill, Cyplus Idesa emergency response personnel will be sent to the scene. Cyplus Idesa coordinates clean-up efforts with professional remediation services. Ferromex has an agreement with Grupo Hesca, which is a contractor company specialized in dealing with chemical emergencies nationwide. Cyplus Idesa cyanide experts will coordinate any remediation with the remediation service.

Ferromex has an environmental insurance policy. In case of carrying out remediation work, these works will be coordinated with PROFEPA (Federal Attorney for Environmental Protection) in accordance with current national legislation.

The Cyplus Idesa emergency response procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The cyanide safe handling training provided to Ferromex indicates that these chemicals should not be used. Cyplus Idesa experts are very aware of the additional hazards of cyanide treatment chemicals and they would communicate these hazards to necessary personnel in the event of a spill.

Transport Practice 3.5

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

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

Cyplus Idesa emergency plans are practiced and reviewed at least annually. Ferromex



emergency response plan is reviewed periodically and if there is any contingency situation, any area for improvement or drills. Annual drills are conducted for the different hazardous materials. Ferrromex drills are also held in cooperation with the government. The results of the drills are reviewed and improvements are made, as necessary. Safety conferences are held with the rail carrier periodically. The adequacy of emergency preparedness plans is one of the topics discussed at these conferences.

