

PRODUCTION SUMMARY AUDIT REPORT

Cyanide Production Operations


(Warehouse)

Address Parcela Rústica No 4808 Ex Fundo Larrea
- Moche Trujillo - PERU

Submitted by:

Álvaro Fuentes – Lead Auditor
Marcos Mera – Technical Auditor
Av. Lima 309 Yanahuara – Arequipa -PERÚ
+51.959227719
Alvaro.fuentes@e-quelle.net

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Tabla de contenido

1. Operation General Information	3
2. Information of the audited operation	Error! Bookmark not defined.
3. Operation Location Detail and Description:	3
4. Auditor Information	4
5. Auditor Attestation	5
6. Principles and Standards of Practice	6
Principle 1 OPERATIONS	6
<i>Production Practice 1.1</i>	<i>6</i>
<i>Production Practice 1.2</i>	<i>8</i>
<i>Production Practice 1.3</i>	<i>10</i>
Principle 2 WORKER SAFETY	11
<i>Production Practice 2.1</i>	<i>11</i>
Principle 3 MONITORING.....	15
<i>Production Practice 3.1</i>	<i>15</i>
Principle 4 TRAINING	16
<i>Production Practice 4.1</i>	<i>16</i>
<i>Production Practice 4.2</i>	<i>17</i>
Principle 5 EMERGENCY RESPONSE.....	18
<i>Production Practice 5.1</i>	<i>18</i>
<i>Production Practice 5.2</i>	<i>22</i>
<i>Production Practice 5.3</i>	<i>23</i>
<i>Production Practice 5.4</i>	<i>23</i>
<i>Production Practice 5.5</i>	<i>24</i>
<i>Production Practice 5.6</i>	<i>25</i>

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

1. Operation General Information


Name of Production Facility:	ALMACENERA PACIFICO S.A.C. – SEDE TRUJILLO
Name of Facility Owner:	ALMACENERA PACIFICO S.A.C.
Name of Facility Operator:	ALMACENERA PACIFICO S.A.C.
Dates of the audit:	13 TH , 14 TH AND 15 TH DECEMBER 2023
Name of Responsible Manager:	Enrique Lau Siu
Address:	PARCELA RÚSTICA No 4808 EX FUNDO LARREA - MOCHE TRUJILLO - PERU
State / Province:	TRUJILLO
Country:	PERU
Telephone:	+51 1 618-1620
Fax:	
Email:	elau@alpa.com.pe

2. Operation Location Detail and Description:

Almacenera Pacifico, S.A.C. (hereinafter ALPA), site Trujillo, is in industrial warehouse N° 8 within the GRUPO TRANSPESA S.A.C warehouse facilities, and it has an area of 1,330 m2.

The operations include the storage of solid sodium cyanide, the product is stored in their original package from the producer: in wooden boxes (IBC – Big Box) of 1 ton, 1.1 ton, and metal cylinders of 50 kg. ALPA stores Mercantil’s cyanide until a client puts in an order. Then, Mercantil hires an ICMI certified transporter to carry the Cyanide to the mining unit. No transfer is carried out within the warehouse activities.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

The ICMI's Auditor Guidance for Use of the Cyanide Production Verification Protocol, published June 2021, was used as a reference in evaluating compliance measures for Production Practices.

Almacenera Pacifico, S.A.C. (hereinafter ALPA), was created in 2006, with the purpose of providing logistics services to companies in the mining activity, specializing in the storage of hazardous materials. Subsequently, at the request of the market, services were expanded to companies in various sectors, which meant considerably increasing the storage capacity.

ALPA has a main warehouse in Lurín certified with the Cyanide Code in 2022 and there are additional warehouses, one in Chilca and one in Trujillo. The operations are registered in the Registry for the Control of Controlled Assets with Resolution No 3111190012372 of 08/12/20 issued by the National Administration of Chemical Inputs and Controlled Assets of the National Superintendency of Tax Administration SUNAT.

ALPA Warehouse in Trujillo, , is in industrial warehouse N° 8 within the GRUPO TRANSPESA S.A.C warehouse facilities. GRUPO TRANSPESA S.A.C .- RUC 20439331918 – is located on PARCELA RÚSTICA No 4808 EX FUNDO LARREA - MOCHE TRUJILLO – PERÚ. The currently has 1,330 m2 of storage space. The operations include the storage of solid sodium cyanide, the product is stored in their original package from the producer: in wooden boxes (IBC – Big Box) of 1 ton, 1.1 ton, and metal cylinders of 50 kg. ALPA stores Mercantil S.A.'s cyanide until a client puts in an order. Then, Mercantil S.A. hires an ICMI certified transporter to carry the Cyanide to the mining unit. No transfer is carried out within the warehouse activities.

ALPA is no longer engaged in direct aspects of the cyanide supply chain, only dry cyanide storage, for this reason, the scope of the certification audit only considers the production protocol.

3. Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

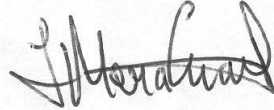
PRODUCTION SUMMARY AUDIT REPORT

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




Dates of Audit: 13TH , 14TH, AND 15TH of December 2023.

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 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.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

5. Principles and Standards of Practice

Principle 1 | OPERATIONS

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

Production Practice 1.1

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 1.1
 not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

There is a record of Technical Inspection in Building Safety based on the D.S. 002-2018 PCM, certificate 013-2022, valid until 01/20/2024.

There is a warehouse implemented within the TRANSPESA property, there is a 2023 report prepared by the HSEQ Head, reception of the property with photos of evidence of the installation and ventilation conditions of the warehouse.

There is a contract with TRANSPESA to lease the warehouse from October 30, 2023.

There is a Report HSEQ-INFO-007-2023, addressed to Enrique Lau - General Manager of ALPA and Manuel Villarreal Manager of Supply of Mercantil S.A. (ALPA client). From November 15, 2023, Transpesa warehouse security inspection - Trujillo.

It has a waterproof concrete floor construction with a lip that prevents spills. There are emergency shower and an eyewash station outside the storage site.

There is a document named "INFORME TECNICO DE PREEXISTENCIAS Y ESTADO ACTUAL DE LA NAVE INDUSTRIAL N° 8 PERTENECIENTE AL GRUPO TRANSPESA - PROVINCIA DE TRUJILLO - DEPARTAMENTO DE LA LIBERTAD" (TECHNICAL REPORT ON PRE-EXISTENCES AND CURRENT STATE OF INDUSTRIAL WAREHOUSE N° 8 BELONGING TO THE TRANSPESA GROUP - PROVINCE OF TRUJILLO - DEPARTMENT OF LA LIBERTAD") dated 10/23/2023. This is a detailed report of the construction of the industrial warehouse N°8 which contains location, climatological characteristics (temperature, wind speed), the details of materials

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

used in the construction of the warehouse that guarantee good thermal and humidity insulation and the drawings of the industrial warehouse.

There are the technical report and the drawings of the industrial warehouse N°8. Tthe TECHNICAL REPORT ON PRE-EXISTENCES AND CURRENT STATE OF INDUSTRIAL WAREHOUSE N° 8 BELONGING TO THE TRANSPESA GROUP - PROVINCE OF TRUJILLO - DEPARTMENT OF LA LIBERTAD" has been elaborated by the architect Brayan Llatas Farias, the document has been reviewed by engineer Roberto Arias Huamani, the document has been reviewed and signed by Architect Jennifer Romero (C.A.P. 27526).

ALPA exclusively handle cyanide in closed packages or containers, such as Intermediate Bulk Containers (Big box) and drums, and no reagents are used or processing takes place, and no containers are opened.

The warehouse has concrete slabs with high planimetry techniques specifications Fmin, FF, FL for warehouses, with durability to high traffic, easy and economical maintenance, with anti-slip properties that help improve movement. The concrete is an impermeable surface and do not have cracks that compromise their ability to contain released cyanide.

The warehouse building's floor and walls typically serve as sufficient secondary containment for stored containers of solid cyanide, such as IBCs and drums. In addition, on the side wall of the warehouse that adjoins the external area of the industrial warehouse, there is a 20 cm high containment wall, the purpose of which is to prevent liquids from entering and/or leaving. Another measure taken is that the unloading or loading of solid sodium cyanide (IBCs or drums) are forbidden in case that there is raining.

The floors inside and outside the warehouse are level. For the mobilization of the containers, ALPA has designed and implemented ramps to supply solid cyanide to the trucks with stability and appropriate capacity for maneuvering.

The solid cyanide is stored in a roofed and enclosed structure to prevent contact with precipitation. The enclosure of this structure is composed of metallic structure made of 2.0mm rectangular black tubes thickness and coverage of polypropylene on its lateral and front sides for good thermal and moisture insulation; they are impact resistant and do not break easily. The front enclosure has one part with Raschel mesh coverage for ventilation. Its rear enclosure is confined masonry with a height of 4.30 m and subdivided between columns; the concrete structural elements serve mainly to give ductility and provide greater resistance to roof loads. In the upper part of the wall there is a metal structure with aluzinc coverage. The parabolic roof has, along its lateral ends, where the coverage ends, with rain gutters made of galvanized iron of 1.5mm thickness.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

The warehouse has an adequate ventilation. The front enclosure has one part with Raschel mesh coverage for ventilation.

The unique access to the industrial warehouse N°8 is closed with a padlock and the access is controlled. The operations coordinator of ALPA, who is responsible of this warehouse, has the key and he controls the access to the warehouse. There is a document with the details of the persons which enters to the warehouse indicating the name, date and time of entry, time of exit, and the purpose of the entering to the warehouse. This document is at the entry of the warehouse. The operations coordinator is the person who authorizes the access to the warehouse. In addition, in the main entry to the industrial warehouse N°8 there are signs that says: "entry prohibited, restricted area".

In the industrial warehouse N°8 there are only solid sodium cyanide (IBCs and drums). It's an exclusive warehouse for solid sodium cyanide. In this warehouse, there are not materials of concern with respect to incompatibility with cyanide.

No deficiencies were identified in this practice.

Production Practice 1.2

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

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

Finding/Deficiencies Identified:

There is a procedure for the Storage and Dispatch of Sodium Cyanide - Applies to Branches PR-OP-60 rev01 of 11/29/2023. There is training for operational personnel (1) ALPA and (3) TRANSPESA. List of authorized personnel for cyanide operations. There is a record of induction, training, and emergency drills FO-SIG-09 rev06.

There is a Change Management procedure, PR-SIG-23 rev04 includes changes to the operation that may have significant impacts. In case of significant changes in operations or scope of activities, it must be approved by management and the HSE area.

There is an ALPA Contingency Plan for the Trujillo headquarters PL-OP-03 rev01 of 06.12.2023, the Cyanide Protection Program has been included that involves the arrival of

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

TRANSPESA until dispatch to the mine. The warehouse operations coordinator is included as the person in charge of the First Response Brigade; the course is held at least once a year based on the ICMI requirement, ensuring that the personnel have the required personal protective equipment, and that antidotes and emergency kits are available.

PR-OP-60 review 01 dated 11/29/2023. Marcos Leyva, the operations coordinator of ALPA, was interviewed about the procedures for unloading, loading and handling containers of cyanide and for managing any contaminated materials or wash water. Marcos Leyva demonstrated that he had knowledge of the procedures. During the unloading or loading are present the following personnel: the operations coordinator of ALPA, the forklift operator, the stocka operator, the Transpesa operations supervisor (or his assistant) and Transpesa safety personnel (manager or supervisor).


PR-OP-03 Goods reception procedure. Checklist: FO-OP-15 Review (04). The operations coordinator of ALPA check the solid sodium cyanide received in the warehouse according to the FO-OP-15 check list. The package and label is checked.

The procedure also includes a summary of what to do in the event of a spill, fire, poisoning, and/or contamination.

ALPA has implemented a management system according with the ISO-9001, ISO-14001, and ISO-45001 and will certify under these standards.

No deficiencies were identified in this practice.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Production Practice 1.3

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

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

Finding/Deficiencies Identified:

The Warehouse and Dispatch Procedure PR-OP60 rev01, transportation of sodium cyanide, including loading and unloading, has been developed.

- FO-OP-44 Pre-trip inspection of light cargo units for transport in trucks or vans considering that these do not have an escort to be inspected.*
- FO-OP-45 Pre-trip inspection of heavy cargo units. For the transport of trailers, the escort passes inspection with FO-OP-44.*

Includes name of the inspector, ID, Signature of the inspector, date of review.

If there are critical non-compliances for the operation, the unit is not sold, the client is notified in case of delays.

The procedure PR-OP-07 Transport of Sodium Cyanide rev07 04.01.2023 has been developed. There are Facility Inspections (Warehouse Inspection format FO-OP-25 v01 signed by operations and HSEQ Department, Forklift Check list and cyanide detector.

The warehouse operations managing solid cyanide in unopened containers and packaging, such as IBCs and drums.

There are no sewages and superficial water sources in the warehouse.

Warehouse operations coordinator (Marcos Leyva) inspects the warehouse on a biweekly basis.

Warehouse inspection instructions: IN-OP-12 Warehouse Inspection Format FO-OP-25 version 01.

Based on inspection records and on-site auditor observations, a 30-day frequency for inspections is sufficient. Considering that, in addition, each time a cyanide loading or unloading process is carried out, the warehouse supervisor documents any deficiency.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

ALPA documents the inspections performed on lifting equipment, cyanide storage areas in cyanide in unopened containers and packaging, such as IBCs and drums. The inspections indicate the date, the name of the inspector, and any deficiency observed.

ALPA has implemented preventive maintenance in equipment, tools and infrastructure, for which corrective actions have not been necessary. In the case of the nonconformity found on the first inspection, the corrective measures have been taken, so that the aspects related to infrastructure are reinforced.

No deficiencies are identified in this practice.

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

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


The operation is in full compliance with
 in substantial compliance with Standard of Practice 2.1
 not in compliance with

Finding/Deficiencies Identified:

Storage and dispatch procedure PR-OP-60 rev 01 has been developed, from reception, storage and dispatch of the product. In the case of emergency activities, there is a PL-OP-03 Contingency Plan, there is Safety Management for Clients, contractors and visitors, which includes induction, SCTR, IPERC, contractor emergency plans. ATS PETS, PETAR among others. There is an annual occupational health and safety plan, PL-SIG-02 rev 06 of 02/24/2023, which includes the safety committee and the safety supervisor that is contemplated for the 2024 update, and there is also an Identification procedure of hazards and Risk Assessment PR-SIG-11 rev08, which includes interviews with personnel.

There is an occupational health program that has considered occupational medical examinations, entrance examinations and periodic examinations. There is a medical surveillance program. Instructions for removing victim and operator suits. IN-OP-06 rev01 aimed at correctly removing your suit used during the handling of chemical products.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

There is a waste management procedure that includes the final disposal of used suits.

During the unloading or loading are present the following personnel: the operations coordinator of ALPA, the forklift operator, the stocka operator, the Transpesa operations supervisor (or his assistant) and Transpesa safety personnel (manager or supervisor).

The cyanide warehouse has legible signage in the main entry and inside the warehouse to ensure that all workers who may be exposed to cyanide are aware of the risks and take appropriate protective measures. The signs alert to the presence of cyanide and the need for appropriate personal protective equipment. In addition, the operations coordinator of ALPA and Transpesa personnel have received training with respect to cyanide safety.

In the main entry to the industrial warehouse N°8 there are signs prohibiting smoking, eating, drinking, and having open flames in all areas of the facility where cyanide is present. Also, the operations coordinator of ALPA and Transpesa personnel have received training with respect to cyanide safety.

ALPA performs health tests for new staff and annually for external medical services. Moreover Transpesa has health personnel within the facility.

In compliance with arts. 52.49 inc. g1.35 inc. c of Law 29783 on Safety and Health at Work and its amendment Law 30222; as well as its Regulation DS 005-2012- TR and its amendment DS 006-2014-TR, on risks in thge work and job center, complies with the obligation and reasons for occupational medical examinations. Three records were reviewed in compliance with the verification of sight, pulmonary, and hearing functions of warehouse inspector.

Personnel working in areas with potential contamination risk wear disposable protective clothing.

ALPA has in its facilities a dressing room for employees and a special enclosure for the placement of cyanide protective clothing.

This requirement was verified in the emergency response plan, in the transfer and cyanide storage procedures, as well as in the emergency stations.

There is a cyanide detector that undergoes calibration every six months.

No deficiencies were identified in this practice.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Production Practice 2.2

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 2.2
 not in compliance with

Finding/Deficiencies Identified:

ALPA has a Cyanide Emergency Response Plan which describes the actions to be followed in the event of inhalation of hydrocyanic gas or skin contact with liquid or solid cyanide.


Contingency plan, storage, and dispatch procedure. There is an emergency shower and eyewash with water change monthly. There is an inspection format for Emergency Kits. Incident and accident procedure PR-SIG-09 v09 of 01/04/2023 has been developed, at the time of the audit no incidents have occurred. The procedure includes notification to ICMI. There is a record of work accidents FO-SIG-18 Work Accident.

One safety shower (200 liters) and one eye wash station (30 liters) are located outside of the storage area, near to the main entry to the industrial warehouse N°8. We checked the safety shower pressure and it is in good working with the appropriate pressure. We checked the eye wash station to confirm that it is in good working order and it operates with low water pressure. There is one dry chemical powder extinguisher (12 kg) located near to the main entry to the industrial warehouse N°8. The extinguisher is new and it has its maintenance card, the extinguisher expires on June 2024.

ALPA has one antidote for cyanide poisoning, the brand is Cyanokit (Hydroxocobalamin), which expires on December 2024. The operation has one medical oxygen cylinder with a valved mouthpiece that can also be used as a resuscitator. The reliable mean of emergency communication or notification is mobile telephone.

The antidote is stored at the temperature specified by its manufacturer in a refrigerator in the office of the operation coordinator of ALPA, this office is located 20 mt. away from the industrial warehouse N°8 approximately. The antidote expires on December 2024. The emergency kit and first aid equipment are inspected every month.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

The MSDS is in the entry to the industrial warehouse N°8. The MSDS is in Spanish. Also, the operations coordinator of ALPA and Transpesa personnel have digital version of the MSDS in their laptops. In addition, on the entry there are warning signs.

Since the warehouse exclusively manage cyanide in solid form, the labeling requirements of this provision apply only to cyanide containers. The IBCs of cyanide are clearly identified as such, they keep the original label from the producer in good conditions.

Instructions for decontamination of personnel and transfer equipment. IN-OP-03 rev01, to ensure that all personnel working in operation know and execute physical and dry decontamination before leaving the area.


Transpesa has a nurse who can provide first aid. As part of the training program, the operations coordinator of ALPA will be trained in first aid and HAZMAT Level 2 in 2024.

The Emergency Response Plan during the handling, storage and handling of cyanide of 05.09.2023 include to transport exposed workers to locally available qualified off-site medical facilities.

ALPA has made the hospitals aware in writing that they may be asked to treat a victim of cyanide poisoning, these medical facilities have adequate and qualified staff, equipment and expertise to treat the patient: Clínica San Pablo (Av. Húsares de Junín N°690, Urb. La Merced - Trujillo) and Hospital Regional Docente de Trujillo (Av. Mansiche N° 795, Urb. Sánchez Carrion - Trujillo). Clínica San Pablo is located 7 minutes away from the warehouse. Hospital Regional Docente de Trujillo is located 15 minutes away from the warehouse.

No deficiencies were identified in this practice.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

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

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

Finding/Deficiencies Identified:

Environmental monitoring will be carried out to confirm that cyanide emissions, planned or unplanned, do not cause adverse impacts. Since there is solid cyanide, WAD cyanide is not measured at the point of direct discharge to surface waters, nor is the concentration of free cyanide in the receiving water.

There is no probability of leaks and there are low emission levels to atmospheric emissions of hydrogen cyanide gas or limited cyanide dust to protect the health of workers and the community.


There is only storage of solid cyanide in unopened containers and packaging, such as IBCs and drums. The potentially contaminated water, such as wash water and water used to decontaminate clothing and equipment, is not discharged to streams, rivers or other surface water. There is no access to surface waters in the warehouse. The contaminated water will be disposed of through a company specialized in hazardous waste.

However, the operations coordinator of ALPA, measures the HCN concentration daily. There is no presence of the HCN in the warehouse according to the records.

Environmental monitoring reports carried out by suitable environmental and chemical professionals were reviewed, showing that the values of environmental air quality and operating limits comply with the requirements of the Peruvian standards.

(1) (D.S. N° 074-2001-PCM), Approve National Environmental Quality Standards for Air. (2) (D.S. N° 003-2008-MINAM), Approve National Environmental Quality Standards for Air.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Hydrogen cyanide gas monitoring is constantly carried out while the personnel is loading or unloading cyanide, and during periodic inspections.

No deficiencies were identified in this practice.

Principle 4 | TRAINING

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

Production Practice 4.1

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 4.1
 not in compliance with

Finding/Deficiencies Identified:

There is a communication procedure for participation and consultation of GIS workers. PR-SIG-18 rev10 refers to the personnel training program PG-SIG-01 Annual program 2023 ALPA, includes IPERC, Cyanide, EPPs training. The effectiveness of the training is evaluated through evaluations at the end of the courses and the performance of the staff.

There are records of the training in safe handling of sodium cyanide. Marcos Leyva, the operations coordinator of ALPA, and 6 workers of Transpesa involved in the cyanide operation, have been trained in safe handling of sodium cyanide on 11/23/2023. Marcos Leyva received the same training on 11/15/2023 too. Marcos Leyva, the operations coordinator of ALPA, was interviewed, it was verified that he has the knowledge for safe handling of sodium cyanide and emergency response, he understands very well what cyanide is, its forms and dangers, routes of poisoning, proper storage practices, symptoms of mild and severe poisoning, measures for safe handling and storage of sodium cyanide.

The operations coordinator (Marcos Leyva) of ALPA, have been trained regarding the proper use of personal protective equipment on 12/14/2023. The personnel of Transpesa involved

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

in the cyanide operations have received training by Transpesa. No deficiencies were identified in this practice.

The employees have been instructed on how to accomplish their assigned tasks safely. In an interview with Marcos Leyva, the operations coordinator of ALPA, it was verified that he has knowledge of safe handling of sodium cyanide, unloading, storage and loading procedures, and use of PPE. In an interview with Ronald Miguel Rojas Avila, forklift operator of Transpesa, it was verified that he has knowledge of the safe handling of sodium cyanide and that he is trained to perform their assigned tasks in a safe and environmentally sound manner.

All the employees have been trained in safe handling of sodium cyanide before working with cyanide. The personnel of Transpesa involved in the cyanide operations do not work with cyanide in an unsupervised manner. Marcos Leyva, the operations coordinator of ALPA, is always supervising the unloading and loading of cyanide. Marcos Leyva has been trained in: safe handling of sodium cyanide, HAZMAT Level 1 and PPEs use.

The operations coordinator of ALPA, has a test with a result of 19 out of 20. Marcos Leyva was interviewed, it was verified that he knows and understands the topics of the safe handling of cyanide training. it was verified that he has the knowledge for safe handling of sodium cyanide and emergency response, he understands very well what cyanide is, its forms and dangers, routes of poisoning, proper storage practices, symptoms of mild and severe poisoning, measures for safe handling and storage of sodium cyanide.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 4.2
 not in compliance with

Finding/Deficiencies Identified:

There is a record control procedure PR-SIG-02 rev 11 that includes the storage time of the records corresponding to Security. Safety aspects for operation with cyanide have been

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

included in the Induction format. The program extends to forklift operating personnel belonging to TRANSPESA.

Marcos Leyva (ALPA operations coordinator) reports to César García (ALPA Operations Manager) and ALPA HSEQ (Giancarlo Motta or Julinho Ramos). Marcos Leyva also reports to Gino Li (Transpesa Safety) and Transpesa Operations.

Marcos Leyva uses the appropriate PPE , checked the ambient with an HCN detector, delimited the area and supervize the collection of the product. The detoxification is with sodium hypochlorite.

No deficiencies were identified in this practice.

Principle 5 | EMERGENCY RESPONSE

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

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 5.1
 not in compliance with

Finding/Deficiencies Identified:

There is PL-OP-03 Contingency Plan for NaCN for Trujillo, it includes level 01 cyanide accident up to 20 TN dry and level 02 Accident with cyanide with water and more than 20 TN. Includes container fall, fire, dry spill, water spill, rain event. Liquid cyanide is not applied since only dry containers are stored.

The facilities are located in an industrial park. The low risk level for neighbors has been considered. Emergency Plans are communicated to interested parties such as Firefighters and Medical Centers.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

ALPA has identified its hazards and risk assessment through the PR-SIG-11 rev08 Hazard Identification and Risk Assessment process through the probability of exposed people (1 to 3, 4 to 12 and more than 12) and severity 1 to 3 from non-disabling injury to injury with permanent disability or irreversible damage to health. There is a 3x3 matrix and intolerable risks from 25-36. Controls are established through a control hierarchy (eliminate, replace, engineering control, administrative control and EPP). Hazards such as cyanide storage and dispatch activities and the activities of the operations supervisor have been included in the MT-SIG-02 Hazard Identification and Risk Assessment Matrix. No deficiencies were identified in this practice.

ALPA maintains records of the communication of the emergency plan to interest groups such as firefighters, San Pablo clinic (12/14/2023) and regional hospital (12/15/2023).

ALPA has a cyanide kit with a delivery charge of Nov 20, 2023 (01 cyanokit expiration date 12/2024).

There is a cyanide spill drill report from 12/11/2023, which includes strengths such as the commitment and support of Transpesa brigade members and personnel, HSEQ personnel, and Transpesa security. In addition to the implementation of emergency equipment and tools. Opportunities for improvement include improving response times and hot zone signaling and minimum distances. There are action plans implemented.

There is the latest materials unloading report from 12/07/2023 with products lot 230930 (expiration date 09/30/2024) including photos of the track and photos of verification of the state of conservation of cargo, adequate signage.

Emergency equipment inspection record FO-SIG-16 rev06 is maintained, results compliant for 12/18/2023, signed by the inspector and approved by HSEQ.

There is a record of induction, training, training and emergency drill FO-SIG-09 rev06, MATPEL I. of 11/15/2023.

There is a procedure for managing dangerous and non-hazardous smelly waste PR-OP-32 rev01, which includes paragraph 2.6 management of waste contaminated with sodium cyanide. This includes waste such as boxes, bags, rags, straps, among others. A collection and operations area is established through a specialized company EO-RS

The emergency response plan includes the use of antidote in point 4.3 available equipment, describes the elements of the emergency kit that includes the antidote.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Furthermore, point 5.11 of the same plan includes first aid for cyanide poisoning, which includes the use of the antidote, for unconscious and non-breathing personnel. It also indicates that only medical personnel are allowed to apply the antidote.

The warehouse only contains solid sodium cyanide in its original packaging, there is no transfer or processing and it is not handled in a liquid state. The chances of escape are minimal. Taking that into account, the contingency plan includes the spill of solid cyanide. The response plan includes point 5.7 seo spill - cleaning and decontamination of solid cyanide. Two maximum probability events are included, 1. Accident handling and storage of container/packaging with cyanide

involving the fall of the container/packaging, without spilling cyanide in the area loading/unloading. It may result in an accident involving cyanide.

20 tons of products.

2. Fall of a container/package with a spill. It may result in

an accident with cyanide of 20 tons of products and eventually the

appearance of hydrogen cyanide gas. The actions to control spills are described in detail.

the contingency plan includes on point. 5.7 Dry spill - cleaning and decontamination

1. Use Personal Protective Elements (PPE)

2. Isolate the affected area.

3. If the cyanide is loose, pick it up with a shovel and place it in a plastic bag drums.

4. If there is a threat of rain, lime should be applied liberally to the spill. of cyanide briquettes, to maintain pH greater than 11

5. If rain is imminent, cover spilled cyanide with a tent, plastic, tarp, or waterproof material.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

6. Dike earth around the spilled area to prevent water from entering. Rain affects cyanide briquettes.

7. Wait for the rain to stop and the floor to dry, to continue with the repair work. harvest

8. Once the cyanide collection is completed, and based on a decision

agreed with the authorities, the exposed area can be decontaminated with lime and then apply a 5% hypochlorite solution to destroy the residual cyanide. Rinse the area with plenty of water. An ideal way to apply hypochlorite is using a garden-type spray pump. Allow the hypochlorite to remain in contact with the affected area for at least 15 minutes.

9. The amount of lime and hypochlorite to be applied must be abundant (At least 2 times the stoichiometric balance).

10. Allow area to dry before erecting barriers.

11. To ensure that the entire spill area has been detoxified, we will proceed to measure the pH to verify that it is above 11.

12. All liquid waste generated by the decontamination of the site must be stored in labeled containers and then disposed of by an EO-RS.

13. Please remember that after each work day, staff must remove disposable clothing and take extreme personal hygiene habits before leaving the site. Likewise, the waste generated will be disposed of as indicated in PR-OP- 32. "Management of solid waste (hazardous and non-hazardous)."

In the contingency plan, prevention activities include carrying out drills, reviewing the emergency plan based on the results of the drills, and training personnel.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 5.2
 not in compliance with

Finding/Deficiencies Identified:

The facilities are located around an industrial environment. Neighbors

- Juanjo Transport Companies*
- Danper Finished Product Warehouses*
- Scania Trujillo*
- Notary Polo Muñoz*
- Clean Energy Faucet*

Hospitals and firefighters within the affected area have been notified.


Not applicable, communication to the community no longer represents a risk for the communities that could potentially be affected since the warehouse is sealed with double-protected boxes and no transfer operations are carried out inside.

Within the Contingency Plan for sodium cyanide PL-OP-03 ed01, section 3.2.2 includes emergency contacts with Transpesa S.A.C. personnel, and a list of support institutions, such as firefighters, hospitals and police. In clause 5.3 types of emergency, incidents without injuries have been considered, due to mechanical problems, falling containers and packaging with a spill, without spill, fire in warehouses.

Responsible for delivery and communication of the contingency plan to support parties such as firefighters, hospitals and police, charge from 12/14/2023

No deficiencies were identified in this practice.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Production Practice 5.3

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 5.2
 not in compliance with

Finding/Deficiencies Identified:

In the emergency response plan, the warehouse operations coordinator acts as the person responsible for the first response brigade to secure the scene and the area. TRANSPESA includes the storage and handling of cyanide in its emergency response plan during handling GT-SEG.PL.003 rev01.

Within the rental contract signed by both parties on October 30, 2023, it includes emergency contact in the event of emergencies in the warehouse.

There is an inspection procedure PR-SIG-08 HSE inspections, it includes emergency equipment, it includes inspection of fire extinguishers, first aid kits, emergency lights, within the emergency kit it is carried out quarterly.

No deficiencies were identified in this practice.

Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.


The operation is in full compliance with
 in substantial compliance with Standard of Practice 5.2
 not in compliance with

Finding/Deficiencies Identified:

In the emergency response plan, the warehouse operations coordinator acts as the person responsible for the first response brigade to secure the scene and the area.

TRANSPESA includes the storage and handling of cyanide in its emergency response plan during handling GT-SEG.PL.003 rev01.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

Within the rental contract signed by both parties on October 30, 2023, it includes emergency contact in the event of emergencies in the warehouse.

Responsible for delivery and communication of the contingency plan to support parties such as firefighters, hospitals and police, charge from 12/14/2023

Communication flow has been included in case of emergencies through communication to supervisors, HSE headquarters and Operations Management.

The contingency plan includes instructions for handling the cyanokit, a decision tree in the event of a cyanide spill on route for cases of dry spill and spill with threat of rainwater and spill in water.

ALPA has a written procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document procedure

Communication, Participation and Consultation of collaborators PR- SIG-18 rev10. At the time of the audit, no emergencies or incidents had been reported.

No deficiencies were identified in this practice.

Production Practice 5.5

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 5.2
 not in compliance with

Finding/Deficiencies Identified:

The Use of sodium hypochlorite detoxification is included in the emergency kit and the Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface waters or that could reasonably be expected to enter surface waters.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal

PRODUCTION SUMMARY AUDIT REPORT

The contingency plan includes detoxification activities, application of lime at pH 9 to 11, application of NA ClO 5:1, solids recovery and disposal in tailings dikes or appropriate place.

Clause 6 includes evacuation and risk control and emergency response preparation and public relations and government relations.

No deficiencies were identified in this practice.

Production Practice 5.6

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

The operation is in full compliance with
 in substantial compliance with Standard of Practice 5.2
 not in compliance with

Finding/Deficiencies Identified:


There is a PG-SIG-01 drill program that includes fire threats, cyanide, chemical spills, evacuation and first aid.

The case of the Cyanide Simulation October 2023 (Lurín case) 11/25/2023 is evident for the case of cyanide isotanks. Strengths and opportunities are identified within the drill reports and worked on in an action plan. The plan considers training and drills and updating the plan when emergencies exist.

There is also a Hazard Identification and Risk Assessment procedure PR-SIG-11 IPERC that includes a review of hazards in the event of accidents.

No deficiencies were identified in this practice.

Almacenera Pacífico S.A.C.
Name of Facility


Signature of Lead Auditor

December 15th, 2023
Date of submittal