

**TRANSPORTATION SUMMARY AUDIT REPORT**

Submitted to:

**INTERNATIONAL CYANIDE  
MANAGEMENT INSTITUTE**

1400 I Street, NW – Suite 550  
Washington, DC 20005, USA



**Comercializadora Aguilar Galo S. de R.L. (TransCAG)**  
Residencial Costa Mar, Etapa 2 bloque 1 casa No8  
Puerto Cortes, Honduras  
**Initial Certification Audit - SAR**

Submitted by:



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Name of Operation

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JUNE 2021

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## TRANSPORTATION SUMMARY AUDIT REPORT

### A- Operation General Information

Name of Transport Operation: COMERCIALIZADORA AGUILAR GALO S. DE R.L. (TransCAG)

Name of Facility Owner: COMERCIALIZADORA AGUILAR GALO S. DE R.L.

Name of Facility Operator: COMERCIALIZADORA AGUILAR GALO S. DE R.L.

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### B- Operation Location Detail and Description:

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

COMERCIALIZADORA AGUILAR GALO S. DE R.L. (hereinafter referred to as TransCAG) transports various cargoes within the Republic of Honduras, connecting with Central American countries and Mexico. TransCAG commenced operations for the transportation of cyanide in 2024, covering the route between the western region of Honduras, specifically from Puerto Cortés to the Copán Region, where the Minerales de Occidente (hereinafter MINOSA), company's mine is located. To date, TransCAG has completed 7 trips carrying cyanide.

The main base of operations is located at Residencial Costa Mar, Etapa 2 Bloque 1 Casa 8, Puerto Cortés, Honduras.

The cyanide shipment destined for the San Andrés mine, arrives at the Operador Portuario Centroamericano (in English, Central American Port Operator; hereinafter OPC) in Puerto Cortés, Honduras. In coordination with the Customs Agency and MINOSA the cargo is scheduled for departure from OPC and transported by TransCAG to San Andrés Mine.

TransCAG transports solid cyanide in polypropylene supersacks, each weighing up to 1 ton, from the producer. The weight of the 20-foot sea containers loaded with cyanide is 20 tons.

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## Auditor's Finding

This operation is

- ✓ in full compliance with the International Cyanide Management Code.

### Auditor Information

Audit Company: Geosoluciones Panamá, S.A.

Lead Auditor: Jorge Efrén Chong Pérez

Lead Auditor Email: [geosoluciones@cwpanama.net](mailto:geosoluciones@cwpanama.net)

Dates of Audit: June 11-14<sup>th</sup>, 2024

### 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.

Comercializadora Aguilar Galo S. de R.L.

Name of Facility

Signature of Lead Auditor

June 11-14<sup>th</sup>, 2024

Date of the audit

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## TRANSPORTATION SUMMARY AUDIT REPORT

### Principles and Standards of Practice

#### Principle 1 | TRANSPORT

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

##### Standard of Practice 1.1

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

The operation is

- ✓ in full compliance with Standard of Practice 1.1

##### *Summarize the basis for this Finding Identified:*

The only route from Puerto Cortés to the San Andrés Mine uses highways CA-5, CA-4, and RN-135. Highway CA-5 passes through significant towns and industrial areas, including Rio Nance, Choloma, and San Pedro Sula. The dual carriageway CA-4, heading west, crosses important localities such as Sula, La Entrada Copán, Santa Rosa de Copán, and Cucuyagua. It also traverses environmentally sensitive areas, including rivers and streams parallel to the route, as well as livestock and agricultural zones at various points along the highway.

Section 7 of the “Procedimiento de Transporte Terrestre para el Cianuro,” in English Ground Transportation Procedure for Cyanide (page 9) requires that the route be evaluated and, if necessary, updated each time a convoy carrying cyanide is conducted. This evaluation is based on observations made by the drivers and escort supervisors regarding any aspects that could represent risks.

It is the responsibility of TransCAG to keep updated information on the physical and safety conditions of the highways, paved roads, national routes, and dirt roads used by the units transporting cyanide containers. These physical conditions must be evaluated each time a convoy is dispatched to the San Andrés Mine. This evaluation should always consider the physical conditions of the bridges along the route, whether they are straight dual-lane bridges, curved dual-lane bridges, or single-lane bridges, as well as environmentally sensitive areas and school zones along the road where a speed limit of 20 km/h must be observed.

It will be TransCAG's safety policy, in agreement with the Mine, not to dispatch a convoy when the following adverse conditions are reported on the route:

1. Notification from the Permanent Contingencies Commission (COPECO) [<https://copeco.gob.hn/>], national meteorology, or other authorities regarding the arrival of a hurricane or tropical storms in the country.

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The route must be evaluated after the event before starting the convoy.

2. Reports of an earthquake or activation of geological faults in the route area. A comprehensive evaluation of the entire route must be conducted before starting the convoy.
3. Overflow of rivers on the route. The route must be assessed before starting the convoy.
4. Social unrest on the route, such as road blockages or bridge seizures. The convoy will proceed only when authorities confirm that the roads are clear of conflicts.
5. Strikes occurring on the route or at the San Andrés mine.
6. Landslides or sinkholes affecting the route.

*The Route Assessment also addresses specific areas and segments:*

### **Port Facilities:**

Assesses the risks associated with the internal transit areas of the port facilities in Puerto Cortés, including traffic density and pedestrian movement, including workers.

Considers the water bodies in the port area, including the bay and Alvarado lagoon in Puerto Cortés.

### **Segment of the Route between Puerto Cortés and San Pedro Sula (SPS), 66 km in length:**

Built of concrete, this section experiences high population density and heavy traffic when passing through Puerto Cortés, Choloma, and San Pedro Sula on the CA-5 highway, especially during peak hours. This is due to the presence of several industrial zones, including clothing factories along the highway in the towns of Río Nance, Choloma, and San Pedro Sula. The route through San Pedro Sula will use the peripheral ring road due to its lower population density, with speeds limited to 40 km/h or less in populated areas. The highway from Puerto Cortés to San Pedro Sula is entirely flat, except for a curved bridge.

### **Section of the Route from the Western Detour in SPS to the Detour towards La Unión Copán, CA-4 Highway, 178 km Long:**

This highway section consists of asphalt and hydraulic concrete. It experiences high population density and heavy traffic, especially when passing through Copán, Santa Rosa, and Cucuyagua, and traversing environmentally sensitive areas such as agricultural and livestock zones, and rivers parallel to the highway.

During the winter, foggy conditions are present from Naco to Chiquila. The highway features a variety of sharp and gentle curves, as well as slopes with gradients of 10 to 15 degrees after Chiquila and before reaching Santa Rosa de Copán. After Santa Rosa de Copán, and descending towards Cucuyagua, there are four curved bridges.

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### **Segment of the Route from La Unión Copán to the Adsorption-Desorption and Refinery (ADR) Gate at San Andrés Mine, 18 km of Hydraulic Concrete and Dirt Road:**

This segment traverses areas with low population density and traffic. There is a certain risk when encountering heavy equipment traveling in the opposite direction due to the narrowness of some sections of the road.

The route crosses sensitive agricultural and livestock zones, featuring both sharp and gentle curves, as well as inclines and slopes leading up to San Andrés Mine. These conditions can pose risks, especially during the rainy season.

Additionally, there are four curved bridges along this segment.

### **GENERAL CONDITION OF THE ROUTE**

The route assessed for the transportation of cyanide from Puerto Cortés to the San Andrés Mine facilities is, in general, very safe for convoy transit. The transporter is required to utilize only qualified and trained drivers who are skilled in defensive driving and knowledgeable about cyanide risks, as stipulated by the International Cyanide Management Code and other training requirements outlined in this procedure.

The assessed route is the sole access to San Andrés Mine, with vertical and horizontal signage throughout. Due to issues with the concrete or asphalt layers, the only section of dirt road, spanning 18 km, leading to San Andrés Mine is under continuous maintenance provided by Minerales de Occidente and municipal programs. This ongoing maintenance enhances convoy safety. The section is currently undergoing construction and expansion with hydraulic concrete.

In several towns along the route, there are police and traffic checkpoints, as well as health centers, hospitals, and fire departments located at the entrances to Copán, Santa Rosa, and Cucuyagua—key points on the route. Additionally, military checkpoints provide security for traffic on the road, which were noted by the auditor.

The Safety Leader of TransCAG will address any new findings, whether they are opportunities for improvement or weaknesses in the route, by discussing them with the drivers during the safety briefing for the next convoy. These findings will also be shared with the contact person at San Andrés Mine to ensure appropriate precautions are taken to avoid any potential incidents.

Any findings, should they occur, are documented in the trip report.

In the TransCAG transportation procedure, page 12, criteria are established for assessing the probability of risks associated with activities detailed during the transportation process. These include port activities, transit through various segments between the port and San Andrés Mine, proximity to bodies of water, crossing curved bridges, areas prone to landslides, and severe weather conditions.

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Before conducting a transportation process, TransCAG consults reports published by the Secretariat for Risk Management and National Contingencies (COPECO). During the audit, it was observed that information on weather alerts and other risks, such as flooding from tropical waves throughout Honduras, is readily available.

The transportation procedure, page 20, states that the convoy may consist of up to two escort vehicles. The Safety Leader, positioned at the front of the convoy, will communicate any abnormalities detected on the road ahead via radio to the drivers. The Safety Leader has the authority to halt the convoy's progress if an abnormality is observed that could affect the safety of the convoy. The other escort vehicle, positioned at the rear of the convoy, will monitor for any anomalies that may arise, reporting any external vehicles driving irregularly that could pose a risk to the containers.

TransCAG does not subcontract any of its operations related to Transport Practice 1.1.

### Standard of Practice 1.2

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

The operation is

- ✓ in full compliance with Standard of Practice 1.2

*Summarize the basis for this Finding Identified:*

TransCAG has an Annual Training Program for controlling risks on the route between Puerto Cortés and San Andrés Mine. These trainings are conducted before each transportation process for all drivers.

The auditor reviewed driver's licenses during the inspection of two trucks, fire extinguishers, chock blocks (accompanying the cabs), and transport trailers. Two drivers were interviewed, and they detailed the entire transportation process and route from the port facility to San Andrés Mine.

Additionally, there are personnel records for each driver of vehicles carrying cyanide, which include names and updated license information.

Other road incident response equipment is carried in the escort vehicles.

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The training list and training certificates given by the Puerto Cortes Fire Department and the TransCAG safety leader in first aid, fire extinguishing and training prior to the drill practice carried out was reviewed.

TransCAG does not subcontract any entity to conduct the activities required under Transport Practice 1.2.

### Standard of Practice 1.3

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

The operation is

- ✓ in full compliance with Standard of Practice 1.3

*Summarize the basis for this Finding Identified:*

The Traffic Law of Honduras, in Chapter IV, regulates the transportation of cargo, substances, and hazardous materials: <https://www.tsc.gob.hn/web/leyes/Ley-de-Transito.pdf>

Article 40 states that "vehicles dedicated to the transport of hazardous substances and materials must display warning signs and labels related to the cargo being transported, as well as specifications and load capacities, the name of the company, business, or individual owner, and comply with the requirements established by the respective regulations."

Each transport vehicle, including trailers, has a record specifying its load capacity according to the permit granted by the government of Honduras, based on the number of axles.

The workshop subjects each trailer to scheduled visual inspections to check for signs of stress. Additionally, spare parts are kept in inventory and are also available through truck dealers in the city of San Pedro Sula, located one hour from Puerto Cortés.

Purchase invoices for the installed spare parts acquired from the spare parts dealership in San Pedro Sula were reviewed, as required by the findings of the drivers and maintenance personnel of Mc Gyver Company.

The auditor verified the maintenance records and interviewed the maintenance supervisor. During the transportation process, a mechanic accompanies the convoy in the escort vehicle, equipped with tools and extra tires.

At the port facility, the trailers are subjected to Gamma Ray inspections to verify their structural integrity.

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Upon the container's departure from the cyanide factory, an invoice is issued detailing the number of boxes and the total weight of each container, after which the container is sealed.

Additionally, the cargo is weighed upon arrival at the Central American Port Authority (OPC). Similarly, vehicles are weighed both when entering empty and when exiting with the cyanide cargo. This process ensures that there is no overload of cyanide.

TransCAG subcontracts preventive maintenance and replacement of spare parts to Mc Gyver Company, with which it has a service agreement in compliance with the requirements of the Cyanide Code.

The maintenance contract between TransCAG and McGyver was agreed upon for a duration of one year, which coincides with the length of the contract TransCAG has with San Andrés Mine.

### Standard of Practice 1.4

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

The operation is

- ✓ in full compliance with Standard of Practice 1.4

*Summarize the basis for this Finding Identified:*

In Section 8.0 of TransCAG's Cyanide Transport Protocol, after loading the containers onto the vehicles, drivers must immediately secure them to the chassis switch locks and fasten them with plastic bands before leaving the port premises. It must also be ensured that the containers have their original seals on the doors and do not exhibit any anomalies such as holes, cracks, or dents. If any such defects are present, the Safety Leader is to be notified, who will then inform the Customs and Shipping Agency of the anomaly before the containers leave the port premises to avoid charges for repair costs.

Interviews were conducted with two drivers, both of whom described the procedures from the port departure consistently. At intervals of no more than two hours along the route, stops are made to inspect the condition of the containers and secure the cargo.

According to the drivers, upon arriving at the unloading site at the mine, the drivers remain in their cabins while three mine employees—security personnel, a forklift operator, and an observer—carry out the unloading procedure.

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Containers carrying cyanide are labeled by the manufacturer. In the travel report images (illustrations section), "TOXIC" placards were observed in accordance with local requirements and United Nations international standards. After unloading each container, drivers must remove the hazardous material placards and proceed to return to the transport company's depot for subsequent delivery to the shipping company.

As soon as the containers leave Operadora Portuaria Centroamericana (OPC) (Central American Port Operator), they must be assessed for potential cyanide gas leaks and inspected. This includes an evaluation of walls, floors, door seals, original seals, and security bars on door closures. Any deficiencies, such as holes or cracks detected, must be repaired to ensure the convoy's safety, especially if rain is expected on the route. All findings must be immediately reported to the San Andrés Mine staff.

A visit was made to the vehicle maintenance workshop. The auditor received explanations from the maintenance supervisors, who demonstrated the preventive maintenance program and verified some of the invoices for installed spare parts.

The operators make rest and visual inspection stops of the trucks and cargo approximately every 2 hours along the route and must have rested for a minimum of 6 hours.

- Using wooden crossbars inside the containers from the manufacturer to prevent shifting of the cargo.
- Ensuring with commercial invoices that the containers are fully loaded with 20 boxes each and not partially loaded.
- Verifying that the containers do not have significant dents in the walls and doors that could affect the packaging of the cyanide boxes.
- Avoiding sharp turns at high speeds, as centrifugal force can cause the cargo to shift and potentially overturn a container.
- Not driving the containers close to the curbs, as this may imbalance the load and cause a container to overturn.

The Emergency Response Plan, section 18.1, considers the possibility of strikes. In the event of illegal roadblocks by insurgents or common criminals, the transportation process will be suspended. During interviews with drivers, it was stated that they must remain particularly vigilant for social conflicts arising from water shortages during the dry season.

Since January 8, 2024, TransCAG has implemented a Substance Abuse Prevention Policy, which establishes that "every employee or contractor of COMERCIALIZADORA AGUILAR GALO S de RL is responsible for protecting the environment, occupational health, and industrial safety for other employees, clients, and communities. Therefore, in order to fulfill this commitment and being

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aware that the use of alcohol and drugs can affect job performance and the achievement of our goals."

The consumption of alcohol and drugs by office employees, drivers, and contractors is strictly prohibited during work hours, whether on or off the company's premises. Each employee is subject to periodic drug testing and alcohol testing before each transportation process.

All documentation related to the above activities, including drug and alcohol test records, inspection and maintenance reports, training records, travel reports, and any records related to incidents, will be retained for a period of three years.

TransCAG does not subcontract any entities for the operations required in Transport Practice 1.4.

### Standard of Practice 1.5

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

The operation is

- ✓ in full compliance with Standard of Practice 1.5

*Summarize the basis for this Finding Identified:*

This provision does not apply to the land transport of cyanide conducted by truck. TransCAG does not transport cyanide by sea.

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### Standard of Practice 1.6

*Track cyanide shipments to prevent losses during transport.*

The operation is

- ✓ in full compliance with Standard of Practice 1.6

#### *Summarize the basis for this Finding Identified:*

The transportation procedure requires that there be means of communication between the transportation vehicles, the mine, distributors, and those in charge of responding to emergencies, with 911 being the unique number of the national emergency system of Honduras.

Each transport vehicle and escort must carry a radio with autonomous power for the entire journey, as well as a cell phone.

An employee is responsible for monitoring the positioning of the convoy during the journey.

In the checklist for each transport and escort vehicle, it is required to carry a radio with autonomous charging for the entire journey and a cell phone.

Communication equipment, such as the radios and cell phones carried by each transport unit, are periodically tested and checked before commencing each transportation process to San Andrés Mine.

There are no communication blackout areas between Puerto Cortés and San Andrés Mine.

The convoy's safety leader maintains constant communication with the point of contact at San Andrés Mine. Each driver is equipped with a communication radio for contact with the rest of the convoy and escorts, as well as a cell phone.

The cargo from the manufacturer is received at the port, where the Customs Agency provides the container documentation (Gate Pass) to TransCAG personnel. After verifying the cargo quantity, TransCAG personnel distribute the documents for each container to the convoy drivers.

Upon departing from the port, the convoy drivers are provided with shipping documents that detail the quantity of cyanide being transported, as well as SDS sheets to present to authorities during the journey and upon arrival at San Andrés Mine.

TransCAG does not subcontract any entity to conduct the activities required under Transport Practice 1.6.

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### Principle 2 | INTERIM STORAGE

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

#### Standard of Practice 2.1

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

The operation is

- ✓ in full compliance with Standard of Practice 2.1

*Summarize the basis for this Finding Identified:*

The operation is in NOT APPLICABLE with Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

TrasCAG has no stores or warehouses in territory of Honduras.

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### Principle 3 | EMERGENCY RESPONSE

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

#### Standard of Practice 3.1

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

The operation is

- ✓ in full compliance with Standard of Practice 3.1

*Summarize the basis for this Finding Identified:*

TransCAG has an Emergency Response Plan (hereafter referred to as "the Plan"), which was last updated on January 20, 2024. The Plan consists of 17 sections and has been specifically designed for transporting cyanide to Aura Minerals Inc., located in La Unión, Copán, Honduras.

The Plan is governed by Honduran legislation, including: the General Mining Law, the Regulations of the General Mining Law, the General Environmental Law, the Health Code, and the Land Transport Law.

The Emergency Response Plan is suitable as it addresses the route between Puerto Cortés and San Andrés Mine, incorporating identified risk factors and threats from risk analysis. It specifies the properties and specifications of the cyanide product and outlines general precautions to be taken.

The Plan includes communication protocols in the event of incidents, identifies responsible parties for each emergency situation, and provides contact methods for support.

It also considers various scenarios and prescribes actions based on the severity of the occurrence, including the use of antidotes in cases of poisoning.

TransCAG details the physical and chemical properties of cyanide in Section 5 and page 5 of the Emergency Response Plan (hereafter referred to as "the Plan"). Section 6 outlines general precautions for handling the product.

The Plan classifies cyanide as highly toxic, noting that ingestion, inhalation, or skin contact can be fatal. Cyanide inhibits cellular oxygen utilization, leading to cellular asphyxiation. Victims may experience symptoms such as headache, confusion, weakness, difficulty breathing, loss of consciousness, and eventually death. It is crucial to handle this compound with extreme caution, using appropriate personal protective equipment and adhering to strict safety protocols.

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The Plan includes the land transportation process conducted by TransCAG from Puerto Cortés to San Andrés Mine. It addresses distances, rest stops, specifications, and equipment inspection.

In Section 5.3 of the Plan, TransCAG illustrates the conditions of the roads and the packaging used for cyanide. The transportation procedure also details the risk analysis of the evaluated route for the client.

The vehicles comply with specifications appropriate for the transported cargo, consisting of twelve truck units with retractable trailers specifically designed for transporting cyanide. This design provides enhanced protection against impact risks from the rear. Their capacities have been verified by the government of Honduras, which has granted the necessary permits.

Section 9 of the Plan describes the response actions for various incidents, treating each as a specific case requiring a UNIQUE response, guided by sound judgment.

A general sequence of actions in the event of an incident includes:

- Assessing the incident area without exposing oneself.
- Approaching the scene with the wind at your back (away from those providing support).
- Rescuing injured individuals or those in need of assistance.
- Contacting emergency services, if necessary (firefighters, Red Cross, Permanent Contingencies Committee of Honduras (COPECO), etc.).
- Warning passers-by and spectators to stay clear of the incident area, utilizing National Police, Traffic Police, or Firefighters as needed. If possible, cordon off the area with barricades to prevent affecting others.
- Informing San Andrés Mine and the cyanide producer about the incident.
- Taking measures and following the action plan based on the specifics of the accident.

Section 9.1 addresses actions for scenarios involving overturning and dry product spillage, especially in case of rain.

Section 9.2 covers overturning without spillage.

Section 9.3 discusses truck fires due to overheating and the risk of spillage.

Section 9.4 deals with collisions involving injuries.

Section 9.5 introduces the concept of tiered response: Most cyanide-related incidents are minor and can be managed locally. However, if the incident is larger and beyond local control, external assistance is required. Advancing from one level of response to another constitutes a tiered response.

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For the purposes of this Emergency Plan, there are two response levels:

### Level 1

For incidents involving up to 20 tons of dry cyanide, the following will be required:

- Organizations
  - ° With Local Equipment: First Response
  - ° With Local Contractors/Consultants: Second Response
- Resources
  - ° Local Resources: Contractors, industry, and government resources

### Level 2

For incidents involving cyanide in watercourses or exceeding 20 tons, the following will be required:

- Government Organizations
  - ° Government Response Teams: Civil Defense and Firefighters
  - ° External contractors
- Resources
  - ° Teams from the U.S. and Other External Contractors
  - ° Teams from Other Companies

The 20-ton threshold between Level 1 and Level 2 is, of course, arbitrary, and the specific circumstances will determine when a Level 2 response is necessary.

The TransCAG Emergency Response Plan identifies the roles of external entities in emergency situations according to a communication flow. This includes specifying the roles of emergency responders, medical services, and relevant community entities. Additionally, the plan ensures that all designated external responders have been notified of their roles.

The purpose of this Plan is to provide a reference model for decision-making during an incident involving a truck transporting sodium cyanide from Puerto Cortes to San Andres Mine. It is not intended to be rigid, as each incident will require a unique response.

At the onset of the event, the Convoy Leader will act as the First Response Brigade leader, ensuring the scene and area are secured, and contacting emergency and rescue services. Upon the arrival of the Emergency Brigade from MINOSA, they will support as the second response team, providing necessary equipment for remediation actions and taking control of the information provided to the media.

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External emergency services will be called in accordance with Response Levels 1 and 2, depending on the severity and potential consequences of the incident.

### Standard of Practice 3.2

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

The operation is

- ✓ in full compliance with Standard of Practice 3.2

*Summarize the basis for this Finding Identified:*

TransCAG provides initial and refresher emergency response training conducted by the fire department, covering topics such as first aid, fire control, and pre-drill training.

The auditor reviewed training records issued by the TECHNICAL OFFICE OF PREVENTION, SAFETY TRAINING AND INVESTIGATION of the Puerto Cortes Fire Department.

Section 8.1 of the Plan indicates the response duties and responsibilities for specific emergencies:

The personnel who form the first response of the Convoy are:

- Safety Convoy Leader.
- Assistant Safety Leader.
- Drivers and Mechanics Supervisor.
- Truck Drivers.

Their responsibilities include:

- Proceeding to and assessing the incident area.
- Parking undamaged trucks in a safe location as far from the affected truck as possible, but still under supervision.
- Attending to any injured individuals.
- Protecting/isolation the accident area to prevent traffic and unauthorized persons from entering.
- Reporting the incident to MINOSA.
- Ensuring that all drivers and support personnel are wearing their personal protective equipment and assisting in managing the emergency.

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- Once the incident area has been assessed, making decisions on actions such as:
  - Applying lime to spilled cyanide (if applicable).
  - Constructing containment barriers around the area exposed to cyanide (if applicable).
  - Covering the exposed area with a tarp or cover (if applicable).
  - Requesting a crane and front loader to assist in recovering the container and truck (if needed).
  - Upon arrival of the MINOSA On Scene Commander, the incident and the measures taken will be reported to Commander.

### **Section 8.2 of the Plan specifies the responsibilities of Aura Minerals personnel:**

- Deploying the Incident Commander to support activities as a secondary emergency response, if necessary.
- Providing TransCAG with materials, equipment, and trained personnel for prompt and effective cyanide emergency response along the route from Puerto Cortes to San Andrés, if needed.
- Assisting in coordinating emergency response actions after receiving notification from the convoy leader and the scene.
- Contacting governmental entities to contribute to managing the emergency, including the Red Cross, National Police, Traffic Police, COPECO, and the Municipal Environmental Unit.
- Addressing media inquiries through the mine's public relations personnel.
- Actively participating in monitoring conducted by authorities until the incident area, including any potential spill, is thoroughly cleaned, decontaminated, and neutralized with no remaining risk to public health or the environment.
- Promoting training for authorities and rescue teams along the selected cyanide transport routes.
- Maintaining an updated training program and Emergency Plan for incidents related to cyanides.

In Section 8.3, an employee from San Andres Mine, in conjunction with the Safety Leader from TransCAG, will coordinate activities at the incident site until the cleaning and restoration actions for the area are completed.

In Section 8.4, it is established that an employee from San Andres Mine is responsible for coordinating with governmental agencies and media, including authorizing the release of any information.

In Section 8.5, the manufacturer is involved in terms of advisory, technical coverage, and audits.

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### 8.6.- FIELD CONTAINMENT AND RECOVERY SUPERVISOR

This position will be filled by an employee from the cyanide producer or from San Andres Mine (whichever is deemed appropriate based on the magnitude of the incident). This individual will assume control of the response to the accident concerning containment, cleanup, and recovery at the incident site, until the site is fully decontaminated and neutralized.

During the transportation process, TransCAG maintains a list of emergency response equipment as described on page 45 of the Plan. Verification is carried out during the pre-departure checklists for each convoy.

The Safety Leader and truck drivers were interviewed, during which they demonstrated the equipment and described its use for emergency response, including personal protective equipment.

Each driver carries a kit bag containing personal protective equipment and emergency contact numbers.

During cyanide transport, at least one individual trained and qualified to administer the Cyanokit antidote is always present. The individuals identified for this task are Keren Acosta and Joaquín Aguilar. Both have received theoretical and practical training in the following procedures:

1. Intravenous cannulation, including identifying suitable veins and understanding the circulatory system.
2. Administration of intravenous medications.
3. Use, preparation, dosage calculation, and proper infusion rate for intravenous solutions like Cyanokit.

This training was provided by a licensed physician, Dr Héctor Xavier Gutiérrez García, with a medical degree and registered under license number 14021716773. Both were issued medical certifications by the Colegio Médico de Honduras (Medical Association of Honduras). The training lasted 40 hours and was conducted from August 26 to 30, 2024.

The auditor reviewed the medical certifications for both individuals.

During the audit, the checklist for inspecting emergency response equipment was reviewed, including the HCN detector. These inspection records are part of the travel report for each truck driver and escort vehicle.

TransCAG does not subcontract any entity to conduct activities required in Transportation Practice 3.2.

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### Standard of Practice 3.3

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

The operation is

- ✓ in full compliance with Standard of Practice 3.3

*Summarize the basis for this Finding Identified:*

In Section 7 of the Plan, TransCAG establishes the communication flow, starting from the driver or route supervisor to San Andres Mine.

At the mine or at TransCAG, if necessary, they handle external calls to firefighters, health agencies, police, and COPECO.

In Section 17, the telephone numbers of individuals involved in the emergency response flow are provided. Since there is a single national emergency number, calling \*911 would coordinate other government and external support entities.

During each transportation process, TransCAG regularly tests phone numbers to continually ensure their currency. This testing begins as soon as actions are coordinated for the removal of the cargo at Cortes port.

Additionally, the Emergency Response Plan, Section 16, specifies that the Plan must be updated every three (3) months.

Pursuant to Section VI.A. of the Signatory and Certification Process (DECEMBER 2022) of the Code and as agreed by the signatory company in the ICMI Signature Request Form, TransCAG has established in section 7.1 of the Plan: "Notification MUST be given to ICMI, within 24 hours of the significant incident occurred in the following communication channels:

Tel +1.202.495.4020

Email [info@cyanidecode.org](mailto:info@cyanidecode.org)

TransCAG has not had any significant cyanide incidents.

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### Standard of Practice 3.4

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

The operation is

- ✓ in full compliance with Standard of Practice 3.4

#### *Summarize the basis for this Finding Identified:*

Section 11.1 of the Plan establishes the procedure for cleaning up and decontaminating a cyanide spill, including the use of appropriate personal protective equipment and the necessary measurements.

The cleanup procedure addresses both dry and aqueous spills, with neutralization using lime and hypochlorite.

#### **FINAL DISPOSITION**

To collect the spilled solid material, contact of the product with water or moisture must be avoided by placing a waterproof blanket over the spilled material and proceeding to recover all the product, in the event of approaching rain.

The recovered product, along with contaminated soil, will be placed in bags and plastic containers to be sent to the mine for processing in a location designated by San Andres Mine.

Chemical neutralization is applied when, after the collection of material, remnants remain that cannot be gathered, such as in cases of spills on pavement. In such cases, the remaining minor residues can be destroyed through focused neutralization using a 10-12% solution of calcium hypochlorite or sodium hypochlorite.

If the body of water is limited and does not have movement, apply lime abundantly to alkalize the medium and achieve a pH greater than 11, ideally 12.

Section 11.2.5 specifies that no chemical products should be applied for pH control or destruction in the event of a spill in a body of water.

Section 11.2.17 prohibits the use of detoxifiers such as sodium hypochlorite, hydrogen peroxide, ferrous sulfate, etc., limiting their application only if the spill is confined to a small pool or pit.

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### Standard of Practice 3.5

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

The operation is

- ✓ in full compliance with Standard of Practice 3.5

#### *Summarize the basis for this Finding Identified:*

The Emergency Response Plan was created on January 20, 2024. This Plan must be reviewed for modifications of substance and form, and annually or in the event of activation due to a cyanide emergency. The review includes procedures and drills, personnel, telephone numbers, equipment, methods, or any other considerations that enhance effectiveness and efficiency.

Telephone numbers will be reviewed every three (3) months.

The parties involved are responsible for these modifications.

Section 15.5 specifies that two drills will be conducted annually, with objectives to assess the effectiveness of response procedures in cases of spill or poisoning.

A drill was conducted on January 20, 2024, and a report was generated. The drill aimed to:

- Train personnel to maintain communication flow among all parties involved according to the emergency plan.
- Assess the drivers' proficiency in utilizing personal protective equipment (PPE).
- Evaluate the promptness of initial emergency response by convoy personnel at the scene of the hypothetical spill and the effectiveness of the response from the Mine's cyanide emergency team.

The scenario of the hypothetical spill involved construction machinery on a section of CA-4 near Naco, Cortes, impacting a container, penetrating both the container and the cyanide packaging, causing a spill of approximately 200 kg of cyanide upon moving the container and construction machinery.

#### 5.- OBSERVATIONS ON THE PERFORMANCE OF THE FIRST RESPONSE TEAM

There was evidence of interest and participation from all personnel involved in the sodium cyanide spill simulation, with questions asked during the theoretical practice.

The emergency response equipment available to the convoy met the logistical needs for the drill.

Equipment such as Tyvek suits, rubber boots, gloves, goggles, and masks were appropriate and used correctly by staff. Drivers acted promptly and effectively in donning their PPE and

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responding to the accident scene, performing recovery and containment actions efficiently and in accordance with the emergency plan protocol.

### 6.- OTHER OBSERVATIONS

Weaknesses observed during the drill included that two out of three calls made to San Andrés Mine as per the emergency plan protocol were not answered. Subsequent verification with San Andrés Mine confirmed changes in personnel (phone numbers updated).

Additionally, during the collection and recovery of the hypothetical spill, a non-participating motorcyclist provided incorrect information to a supposed passerby.

Section 16 of the Emergency Response Plan indicates that it will be reviewed annually or following an emergency incident or improvements resulting from a drill.

The Emergency Response Plan was created on January 20, 2024, and has not yet undergone revisions.

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