

INTERNATIONAL CYANIDE TRANSPORTATION
SUMMARY AUDIT REPORT

Chemsupply S.A.C.

Transport Operation

July, 2024

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

Collaborated with
MINGROUP INVESTMENTS S.A.C.

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Chemsupply S.A.C.
Name of Facility


Signature of Lead Auditor

12th July, 2024
Date of submittal

MINGROUP
INVESTMENTS S.A.C.



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Consultoría en
Sistemas de Gestión

INTERNATIONAL CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

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INTERNATIONAL CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

1. Operation General Information


Name of Facility:	CHEMSUPPLY S.A.C.
Name of Facility Owner:	CHEMSUPPLY S.A.C.
Name of Facility Operator:	CHEMSUPPLY S.A.C.
Dates of the audit:	10 th , 11 th , 12 th , July, 2024
Name of Responsible Manager:	Diego Vallejos
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2. Operation Location Detail and Description:

CHEMSUPPLY S.A.C. began operations in 2001 and is a distributor of chemical products for mining and industry. They import and commercialize sodium cyanide in 50 kg drums and 1,100 kg big boxes. They mainly purchase the product from Anhui Anqing Shuguang Chemical Co., Ltd (China), a manufacturer with current certification under the Cyanide Code (22-Jun-2023), and Hebei Chengxin Co., Ltd (China), a manufacturer with current certification under the Cyanide Code (18-Apr-2023). Occasionally, they import sodium cyanide from other producers who also have certification under the Cyanide Code.

The product is stored in CONTRANS S.A.C., CONTRANS operates a transport supply chain that includes transport by truck from the Port of Callao, Peru to the CONTRANS warehouse and storage at CONTRANS warehouse. CONTRANS is certified under the Cyanide Code as a transport company, current certification date: 02-Aug-2023.

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The product is stored and transported in its original packaging; there is no repackaging.

CONTRANS has an exclusive warehouse for storage of sodium cyanide, this warehouse has parabolic roofs with gutters for rain drainage and is completely enclosed by a brick wall on one side and chain link fences on the other three sides. This design provides good ventilation thanks to the fences and the high ceiling.

Around the perimeter of the warehouse fences, there are several warning and safety signs indicating:

- Presence of sodium cyanide.
- Toxic product with hazard class 6.
- Area with regulated chemical, as sodium cyanide is a regulated product according to Peruvian laws and must meet certain storage, handling, and transportation requirements.
- No open flames allowed.
- No smoking allowed.
- Personal Protective Equipment required inside the warehouse.
- No use of water in case of fire.
- NFPA 704 hazardous materials diamond.
- Segregation table/compatibility matrix of hazardous materials.
- No entry - Restricted area.
- No eating or drinking in this area.

The transport from CONTRANS warehouse to the customers (mines) in several locations in Peru is done by TRANSPORTES MERIDIAN S.A.C. Currently certified in the Cyanide Code: 11-Sep-2023.

CHEMSUPPLY S.A.C. offices are in Lima (Peru). CONTRANS warehouses are in Callao (Peru). TRANSPORTES MERIDIAN base is in Callao (Peru).

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3. Auditor's Finding

This operation is

- in full compliance with the International Cyanide Management Code
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

3.1 Auditor Information

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

Name and signature of the audit team.

Technical Auditor: Marcos Mera
Name (Print/ Type)



Signature

Dates of Audit: 10th, 11th, and 12th July 2024.

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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.

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Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

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

CHEMSUPPLY S.A.C. has a "Storage and transportation" procedure OPE-FPR-01 v01, include the selection of the supplier. In addition, the supplier's procedure from TRANSPORTES MERIDIAN, P-TRA-008, the route risk assessment is performed in the F-TRA-008 format that include: Route risk assessment, unsafe conditions, road conditions, driving speed, signaling, inclination and slope, population density, loss of signal, prevalence and proximity of water bodies and fog.

The procedure of the supplier TRANSPORTES MERIDIAN, P-TRA-008 V04 from 30-OCT-2023, includes F-TRA-008 Route risk assessment, F-TRA-009 Routing form, F-TRA-011 escort truck check list. F-TRA-008 Risk assessment on route from CONTRANS warehouse to Mine Colquisiri (Huaral), evaluation dated 02-Jul-2024, includes:

- Population density (CONTRANS warehouse area) risk control: defensive driving, traffic signal compliance.

- Water sources, control: defensive driving, traffic signal compliance and repeat maximum speed.

The head of the monitoring center and the head of the Integrated Management System are in charge of updating the route evaluations on an annual basis or when there are changes in the route.

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In the Procedure for making the road map of TRANSPORTES MERIDIAN S.A.C. P-TRA-008, mentions that it should be done every year or when there are geographic changes caused by natural phenomena and/or driver communications.

Under the document F-TRA-008 Risk assessment on route from CONTRANS warehouse to Colquisiri mine (Huaral), evaluation date 02-Jul-2024, the risk is population density (CONTRANS warehouse area) and the risk control measures are defensive driving, traffic signal compliance. During the Marquez area, the risk includes Water sources, the control measures are defensive driving, traffic signal compliance and meet maximum speed.

CHEMSUPPLY consults TRANSPORTES MERIDIAN for route evaluation and control measures.

TRANSPORTES MERIDIAN consults with Civil Defense in each municipality through which the cyanide convoy passes to obtain contact phone numbers for inclusion in the Route Map and Contingency Plan.

The transport is carried out in convoy with an escort truck. The convoy may consist of one, two or more units. There is continuous communication through the escort supervisor with the driver of the transport truck to reinforce the controls on route. Personnel and units are directly from the carrier and no units are subcontracted.

There is a storage and transportation procedure OPE-FPR-01, for the selection of the supplier, including ICMI certification and in section 3.3 it includes ICMI compliance. All the questions of the Principle of the Code are included and supported through its certification. The selected carrier TRANSPORTES MERIDIAN is certified by ICMI, last certification 11-Sep-2023.

Transport Practice 1.2

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

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

The drivers must have OSHA HAZWOPER Level I and Level II, in addition they have trainings of the product to carry Sodium Cyanide.

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The carrier TRANSPORTES MERIDIAN has documented the Driver Profiles and Supervisor Profile, which includes functions such as:

- Immediately informing the base of any irregularity or mishap that occurs during the development of assigned activities.
- Driving in a responsible and accurate manner, maintaining the company's image.
- Complying with service procedures and the contingency plan for the land transport of cyanide.
- Securing cargo lashing in containers, machinery, and equipment.
- Ensuring compatibility and segregation of hazardous materials (HAZMAT) during transport.

Courses and training required include:

- Hazardous materials courses HAZMAT level I and HAZMAT level II.
- A defensive driving course.
- A first aid course.

Among the driver's requirements, the following are requested:

- A valid A4 driver license.
- 2 years of experience in handling HAZMAT.
- A III C license.
- Registration in SUNAT (Peruvian tax agency) IQBF platform (Chemical Inputs and Controlled Goods).

CHEMSUPPLY has an internal training program, which includes such things as chemicals and MSDS sheets, fire extinguisher training.

In CONTRANS, the team of Organizational Safety, Health, and Environment, Industrial Safety, and Prevention also take the course on Safety and Emergency Response with Sodium Cyanide. The members of the industrial brigade have OSHA HAZWOPER Level II certification issued by Safety Management Resources.

CONTRANS has a job profile for stacker and/or forklift operator, document GT-E-CD-007, which specifies the purpose, functions, education, knowledge, and experience, and required competencies.

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There is a storage and transportation procedure OPE-FPR-01, for the selection of the supplier, including ICMI certification and in section 3.3 it includes ICMI compliance. All the questions of the Principle of the Code are included and supported through its certification. The selected carrier TRANSPORTES MERIDIAN is certified by ICMI, last certification 11-Sep-2023.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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


TRANSPORTES MERIDIAN, according to the route assessment, designates the appropriate type of unit for the transportation of sodium cyanide on that specific route.

In the specific case of CHEMSUPPLY, for dispatch to the Colquisiri Mine, a truck with a low-bed trailer is used, and the product is transported in a 20-foot maritime container. This maritime container belongs to TRANSPORTES MERIDIAN. Usually, 380 drums x 50 kg are transported. The load is palletized, wrapped with stretch film, and secured with plastic straps. The container is secured to the trailer with four fastening devices (twist locks), one at each corner of the container. Additionally, the container is secured with 2 chains to ensure stability throughout the journey.

TRANSPORTES MERIDIAN adheres to the requirements of the mining units and their clients for the specifications of their units. For transportation to mines, it is TRANSPORTES MERIDIAN's policy that the unit must not be older than 8 years.

Through weighing controls by the authority in force, not only the weighing control is included but also the control of the driver's license and his authorization for the transport carried out. CHEMSUPPLY generates in the SUNAT (Peruvian tax agency) portal the sender's waybill with the data of the transport company that will carry out the transport. The transporter generates in the SUNAT (Peruvian tax agency) portal the carrier's waybill that includes the information of the unit and the driver. The portal would not allow the carrier's waybill to be issued in case the unit or driver does not comply with the cargo to be shipped. There is a SUNAT (Peruvian tax agency) Portal manual that regulates the entry of information.

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In the case of controlled goods, there is a list of detailed data for registration by SUNAT (Peruvian tax agency).

The SUNAT (Peruvian tax agency) doesn't allow the issue of the carrier's waybill if the weight of the product exceeds the authorized weight to carry by a specific unit.

There is a storage and transportation procedure OPE-FPR-01 v01, for the selection of the supplier, including ICMI certification and in section 3.3 it includes ICMI compliance. All the questions of the Principle of the Code are included and supported through its certification. The selected carrier TRANSPORTES MERIDIAN is certified by ICMI, last certification 11-SEP-2023.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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


The product is stored and transported in its original packaging; there is no repackaging.

Sodium cyanide is stored in its original packaging; there is no repackaging or transferring of the product. There are 2 types of sodium cyanide packaging: 50 kg drums and 1,100 kg big boxes. The big boxes have an included pallet. The 50 kg drums are palletized, wrapped in stretch film, and secured with plastic straps, in 2 levels (9 drums per level in one pallet).

For the transport to the customers, a truck with a low-bed trailer is used, and the product is transported in a 20-foot maritime container. The container is secured to the trailer with four fastening devices (twist locks), one at each corner of the container. Additionally, the container is secured with 2 chains to ensure stability throughout the journey.

CHEMSUPPLY receives information from the warehouse CONTRANS via email, including photographic information of the product load. When the product arrives at the customer's location, any observations regarding the condition of the load are communicated to CHEMSUPPLY, who then makes the necessary corrections. The customer's signature on the sender's waybill confirms that the shipment arrived without any observations.

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The storage and transport procedure OPE-FPR-01 v01, in point 3.2 indicates the proper packaging of the product provided by the seller either in IBC boxes or drums.

In Peru, it is a legal requirement for the transportation of hazardous materials to have safety signage on all four sides of the transport unit. Along the route, Peruvian authorities conduct inspections to ensure compliance with this requirement, among others.

The storage and transport procedure OPE-FPR-01, in point 1.4 safety labeling of packaging, has the minimum labeling for land transport in Peru, which is based on the risk code used by MERCOSUR and the diamond NFPA 704 has been added. Toxic diamond 6.1 and UN 1689 required by the national legal standard.

TRANSPORTES MERIDIAN performs pre-trip inspections to ensure, among others, that the placards identifying the shipment as cyanide are on all four sides of the containers as required by the Peruvian jurisdiction through which it will pass. Each cyanide container is labelled to meet International Maritime Dangerous Goods (IMDG) Code labelling requirements. This labelling is posted on each side of the container and includes identification of solid sodium cyanide by United Nations (UN) number (1689) and the skull and crossbones marker used for Class 6.1 toxic substances, along with the Marine Pollutant marker.

Vehicle inspections are carried out by the drivers themselves using form F.TRA.011 v02 before the departure of the units. The route supervisor participates in the inspections through the escort pick-up checklist. The inspection includes emergency first response equipment, satellite equipment, an HCN gas monitor, a first aid kit including medical oxygen, an AMBU respirator, and a binasal cannula, as well as a cyanokit antidote (Hydroxocobalamin). The checklist includes the components of the truck mechanics as well as the toolkit.

TRANSPORTES MERIDIAN has an internal maintenance area. There is a preventive maintenance program and there is evidence of preventive maintenance in the units' own workshop.

The preventive maintenance program for the semi-trailer includes maintenance levels M1, M2, and M3. The maintenance plan for the pick-up escorts is based on scheduled kilometers, with maintenance B1 and C1 performed every 5,000 km. A checklist of minimum requirements is used for each maintenance.

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TRANSPORTES MERIDIAN has the Sodium Cyanide Transportation Procedure, code P-TRA-009, revision 03 dated 12-Dec-2022. This procedure indicates that:

- Truck drivers transporting sodium cyanide to its destination must have rested at least eight (08) hours before the start of the trip.
- The working day for drivers transporting sodium cyanide must not exceed eight (8) non-consecutive hours per day, allowing stops every two (02) hours for ten (10) minutes or more for equipment inspection, meals, and active breaks. After eight (8) hours of driving, the driver must rest for eight (08) hours before resuming the trip.

Transportation will only be conducted during daylight hours from 6:00 am to 6:00 pm, as Sodium Cyanide is considered a hazardous material for mining services.

The storage and transport procedure OPE-FPR-01 v01, in the procedural management point 3.2 general transport safety measures, includes transport only during daylight hours from 6 a.m. to 6 p.m., preferably from Monday to Friday.

For the transport of sodium cyanide, a truck with a low-bed trailer is used, and the product is transported in a 20-foot maritime container. In the case of drums x 50 kg, the load is palletized, wrapped with stretch film, and secured with plastic straps. The container is secured to the trailer with four fastening devices (twist locks), one at each corner of the container. Additionally, the container is secured with 2 chains to ensure stability throughout the journey.

TRANSPORTES MERIDIAN In the Sodium Cyanide Transportation Procedure, document code P-TRA-009, specifies in Point 6.12 regarding the selection of unplanned convoy stop locations:

The convoy supervisor will define the place to park the convoy in an unplanned stop due to bad weather conditions, civil unrest, among others, based on the following parameters:

- Sufficient space to accommodate all trucks and escort vehicles.
- Away from populated areas or sensitive locations.
- Availability of food facilities for drivers and supervisors.
- Does not obstruct the free circulation of other transport units.
- Obstacle-free access.
- No presence of products incompatible with cyanide.
- Permanent security.

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TRANSPORTES MERIDIAN has the document 'No Alcohol and No Drugs Policy,' code D-SIG-002 version 05 dated 16-Jun-2023. This policy indicates that the company reserves the right to conduct inspections and random laboratory tests (blood or urine) at any time, with zero tolerance for alcohol and drug levels.

Regarding the dispatch of sodium cyanide, drivers and supervisors undergo breathalyzer tests upon entering the facilities and before starting the convoy.

The 'No Alcohol and No Drugs Policy' states that in the first positive case, the employee is suspended for 3 days without pay. In case of recurrence, the employee is terminated from the company.

Digital files are stored in TRANSPORTES MERIDIAN's cloud information system. Physical documents and records are archived by Iron Mountain, the company responsible for managing these records.

There is a storage and transportation procedure OPE-FPR-01 v01, for the selection of the supplier, including ICMI certification and in section 3.3 it includes ICMI compliance. All the questions of the Principle of the Code are included and supported through its certification. The selected carrier TRANSPORTES MERIDIAN is certified by ICMI, last certification 11-SEP-2023.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is in full compliance with Standard of Practice 1.5
 in substantial compliance with Standard of Practice 1.5
 not in compliance with Standard of Practice 1.5

This Transport Practice does not apply to this transport operation. Transportation is by land in trucks.

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Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Communication with the convoy supervisor is maintained via cell phone throughout the entire supply chain, from the loading of the product at CONTRAN's Warehouse, during the journey, and upon arrival at the mine. The units are equipped with GPS and have cell signal coverage throughout the entire route. The units also have a radio system, which the drivers use to communicate with the escort vehicle during the trip. The GPS of the units is monitored at TRANSPORTES MERIDIAN's base by the monitoring and geolocation department.

Before starting the convoy, the convoy supervisor tests the radio with the transport units. Also, it is verified that the cell phones are functioning properly.

Throughout the route there is always a signal from any mobile operator, the areas that do not have any signal are very short intervals of time, between 1 to 2 minutes.

The sodium cyanide transport units have GPS, the system and platform is called Tecnología Motriz, which indicates location, mileage, speed, stops. The GPS of the units is monitored at TRANSPORTES MERIDIAN's base by the monitoring and geolocation department.

Communication with the convoy supervisor is maintained via cell phone throughout the entire supply chain, from the loading of the product at CONTRAN's Warehouse, during the journey, and upon arrival at the mine.

Communications between the CHEMSUPPLY's Head of Operations and Transport Supervisor of TRANSPORTES MERIDIAN by cell phone and/or WhatsApp, on different stages during the trip: at the entrance to the CONTRANS Warehouse, exit of CONTRANS, arrival at the SUNAT (Peruvian tax agency) control in Ancon and at the arrival to the customer.

CHEMSUPPLY performs inventory control in the CONTRANS Warehouse at least twice a year, once internally and once with external companies. Sales and purchases are managed using SAP BUSINESS ONE, ensuring traceability of shipments from the sales offer to delivery to the customer.

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CHEMSUPPLY has an appointment format with CONTRANS for picking up merchandise, which includes the number of packages and the weight of the load. The sender's waybill contains the same information regarding the quantity and weight of the product. During the journey from the warehouse to the customer, the transport unit undergoes SUNAT (Peruvian tax agency) control, where the quantities listed in all transport documents are verified. Upon arrival at the customer's location, the delivered quantities are confirmed, and the customer signals their conformity by signing the sender's waybill.

CHEMSUPPLY sends all the documentation to TRANSPORTES MERIDIAN before a dispatch of sodium cyanide; this documentation includes the MSDS and the Safety Summary Sheet.

CHEMSUPPLY has an appointment format with CONTRANS for picking up merchandise, which includes the number of packages and the weight of the load. The warehouse makes the dispatch according to the schedule and the delivery note based on the appointment format. CHEMSUPPLY generates the sender's waybill indicating the units of product, packaging, and total net weight. One day before shipment, the documentation is sent to TRANSPORTES MERIDIAN including the sender's waybill and material safety data sheets of the products. Upon arrival at the customer's location, the delivered quantities are confirmed, and the customer signals their conformity by signing the sender's waybill.

There is a storage and transportation procedure OPE-FPR-01 v01, for the selection of the supplier, including ICMI certification and in section 3.3 it includes ICMI compliance. All the questions of the Principle of the Code are included and supported through its certification. The selected carrier TRANSPORTES MERIDIAN is certified by ICMI, last certification 11-SEP-2023.

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 Standard of Practice 2.1
 in substantial compliance with Standard of Practice 2.1
 not in compliance with Standard of Practice 2.1

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This Transport Practice does not apply to this transport operation. Interim storage activities in this cyanide supply chain, as defined by ICMI, does not take place. Cyanide shipments are sent directly from the distribution warehouse to the mine sites. There are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

CHEMSUPPLY within the supply chain hires CONTRANS as distribution warehouse. CONTRANS is certified in the Cyanide Code as a transport company, current certification date: 02-Aug-2023.

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 Standard of Practice 3.1
 in substantial compliance with Standard of Practice 3.1
 not in compliance with Standard of Practice 3.1

The Contingency Plan for the Land Transport of Hazardous Materials and/or Waste from TRANSPORTES MERIDIAN is in place, documented under code D-TRA-001. It has the approval resolution from the Ministry of Transport and Communications of Peru, Number 1107-2022-MTC/16

There is an emergency response plan SIG-DOC-32 annex 4.1 referring to the Cyanide Code.

TRANSPORTES MERIDIAN's Contingency Plan includes form F-TRA-008 – Risk Assessment on Route. The Contingency Plan also includes the Route Sheet code F-TRA-009.

The F-TRA-008 document evaluates the risks along each route and control measures are taken: defensive driving, obeying traffic signals, reducing speed, established speed limits, etc.

TRANSPORTES MERIDIAN's Contingency Plan includes the MSDS for sodium cyanide, which contains the chemical and physical properties of the product. These properties are considered in the risk and hazard assessment of the Contingency Plan.

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TRANSPORTES MERIDIAN's Contingency Plan consider the land transport of sodium cyanide to mines in Peru by truck and trailers. The risk and hazard assessment of the Contingency Plan is based on this method of transport. The Contingency Plan for the Land Transport of Hazardous Materials and/or Waste under code D-TRA-001 has the approval resolution from the Ministry of Transport and Communications of Peru, Number 1107-2022-MTC/16.

TRANSPORTES MERIDIAN's Contingency Plan includes the infrastructure assessment in form F-TRA-008 – Risk Assessment on Route. This document analyzes the infrastructure and conditions of the roads used to transport sodium cyanide from the warehouse to the mining units, considering whether the road is paved or not, the presence of sharp curves, the load capacity of the bridges, the steepness of the slopes, and the population density. Additionally, the Contingency Plan contains maps of the routes from the warehouses to the mining units.

TRANSPORTES MERIDIAN, according to the form F-TRA-008 – Risk Assessment on Route, designates the appropriate type of unit for the transportation of sodium cyanide on that specific route.

In the specific case of CHEMSUPPLY, for dispatch to the Colquisiri Mine, a truck with a low-bed trailer is used, and the product is transported in a 20-foot maritime container. This maritime container belongs to TRANSPORTES MERIDIAN. Usually, 380 drums x 50 kg are transported. The load is palletized, wrapped with stretch film, and secured with plastic straps. The container is secured to the trailer with four fastening devices (twist locks), one at each corner of the container. Additionally, the container is secured with 2 chains to ensure stability throughout the journey.

TRANSPORTES MERIDIAN's Contingency Plan indicates that for a 20' or 40' container, the container must be secured with fastening devices (twist locks). Exceptionally, for trips outside Lima with containers, 02 additional crossed chains will be added for greater security, as the twist locks are always subject to mechanical wear. Reference is made to the procedure P-TRA-005 Load Securing and Lashing.

TRANSPORTES MERIDIAN's Contingency Plan includes the Risk Assessment and Control Matrix by Route, encompassing various risks (chemical spill, adverse weather conditions, load falling off, assaults, thefts, rollovers, natural disasters), their potential causes, and control measures, which can include elimination, substitution, engineering, administrative controls, and personal protective equipment. (defensive driving, use of spill kits, vehicle inspection, use of PPE, adherence to speed limits).

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The Contingency Plan considers the following emergency levels:

LEVEL I (Minor)

A minor emergency that can be controlled by the TRANSPORTES MERIDIAN SAC driver(s), who can respond to the event and take the necessary actions to address the emergency. At this Level I, the emergency is controlled with internal resources.

LEVEL II (Medium)

A medium emergency that involves the driver, the transport unit, and the goods. At this Level II, the emergency is controlled with the resources of the company, the sender, and the recipient. It may or may not involve the intervention of support organizations (Police, firefighters, health services) and local authorities.

LEVEL III (Major)

An emergency that requires external support; the presence of the emergency team and/or external support institutions is necessary. The scope of the accident may extend inside or outside the company.

CONTRANS has the Emergency Preparedness and Response Plan for Sodium Cyanide, document code SM-N-010.

This Plan has the following scenarios: Mild and acute cyanide poisoning, loose cargo with contaminated material, intoxication, environmental emergencies, dry spill, and spill on wet ground.

The Plan addresses the recovery of cyanide briquettes, decontamination of contaminated materials, and management of spill clean-up debris. Briquettes would be recovered using brooms, shovels, bags, and pails. Recovered materials would be returned to boxes or disposed of as hazardous waste. There are no cyanide process solutions at the warehouses, but in the unlikely event of a liquid spill, absorbent materials or sand would be used, followed by recovery as with solid cyanide. Neutralization or treatment of soils is not anticipated since cyanide is handled on an asphalt pavement.

TRANSPORTES MERIDIAN identifies in the Contingency Plan the external support for Level II and Level III emergencies. In the communication flowchart, these external entities are identified: hospitals, fire departments, civil defense, police, and the General Directorate of Socio-Environmental Affairs of the Ministry of Transport and Communications.

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There is evidence of communications delivered to the following entities informing them about the Contingency Plan, the Transport of Sodium Cyanide, and their role as external support entities:

- Ventanilla Bomba 75 Fire Company.
- Ventanilla Hospital.
- Nuevo Progreso Pachacutec Fire Company.
- Chancay Hospital.
- Chancay N°80 Fire Company.
- Huaral N°44 Fire Company.
- San Juan Bautista Hospital in Huaral.

In the case of the sodium cyanide warehouse, **CONTRANS** has the following communications informing and sharing the Contingency Plan with external support entities:

- Salvadora Callao 9 Fire Company, which is the fire unit closest to CONTRANS. Communication.
- San Gabriel Clinic, communication.

Transport Practice 3.2


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

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

In the case of **CHEMSUPPLY**, all staff from sales, purchasing, general management and planning management, operations, management system and accounting have undergone training in sodium cyanide handling and emergency response, OSHA HAZWOPER level 1, the cases of the IMS Coordinator and the Head of operations are verified on 24-May-2024.

Sodium cyanide safety and emergency response course on May 24-May-2024. Both online and synchronous classroom delivered by Safety Management Resources.

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TRANSPORTES MERIDIAN drivers and supervisors have the following trainings:

- OSHA HAZWOPER level I - First Responder Awareness Level.
- OSHA HAZWOPER level II - First Responder Operations.
- Safety in the Transport of Sodium Cyanide.
- Defensive driving.
- Contingency Plan.

CONTRANS personnel has the following trainings:

- Forklift operators: Certificate of Course in Safety and Emergency Response with Sodium Cyanide.
- Stacker operators: Certificate of Course in Safety and Emergency Response with Sodium Cyanide.
- The team of Organizational Safety, Health, and Environment, Industrial Safety, and Prevention also take the course on Safety and Emergency Response with Sodium Cyanide.
- The members of the industrial brigade have OSHA HAZWOPER Level II certification.

TRANSPORTES MERIDIAN's Contingency Plan outlines the obligations and responsibilities before, during, and after an emergency for the following roles:

- Drivers.
- Safety Supervisor
- Coordinator of the Emergency Response Committee
- Coordinator II of the Emergency Response Committee.
- Head of the Emergency Response Committee.

CHEMSUPPLY's document SIG-DOC-31 rev01 04-Jul-2024, Emergencies with Hazardous Materials, includes duties and obligations of emergency brigades.

CHEMSUPPLY's Emergency response plan, document code SIG-PRG-02 v03 dated July 2024, includes the duties and responsibilities of general management, the person in charge of the warehouse, who carries out the drills, communicates emergencies and monitors the training and drill program, and reviews the plan with drills. Includes the responsibilities of the Safety Committee, collaborators, and first aid, firefighting, evacuation, and hazardous materials brigades.

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TRANSPORTES MERIDIAN: In the Sodium Cyanide Transportation Procedure, document code P-TRA-009, revision 03 dated 12-Dec-2022, specifies the list of the Emergency Response Kit that should be available during the transportation route in the safety escort pick-up truck, includes items such as plastic buckets, signaling glow sticks, chemical bags, rubber boots, first aid kit, lime, personal protective equipment, caution tape, neck brace, cones, brooms, 12 kg fire extinguisher, 2 kg fire extinguisher, leather gloves, high waterproof rubber gloves, nitrile gloves, surgical gloves, calcium hypochlorite, full-face mask, medical oxygen, spark-proof shovel, absorbent pads, spark-proof pick, security seals, plastic dustpan, AMBU respirator, particle respirator, disposable Tyvek suits, absorbent booms, rubber mallet, reflective vest, HCN monitor, sodium cyanide antidote kit, among others. This emergency response kit is verified in the escort vehicle checklist, document code F-TRA-011 version 02.

TRANSPORTES MERIDIAN have available the emergency response kit for the escort safety pick-up truck.

Also, they have available 2 cyanide antidotes Cyanokit (Hydroxocobalamin injectable).

TRANSPORTES MERIDIAN has one MSA Altair portable HCN monitoring device used during the transport of sodium cyanide. Monitor alarm at 4.5 ppm. HCN monitors is calibrated every 6 months.

TRANSPORTES MERIDIAN: The inspections of the emergency response kit are carried out by the drivers using form F-TRA-011, prior to the departure of the units. Also, the escort safety supervisor participates in the inspections of the escort vehicle with the same checklist.

CONTRANS: In the sodium cyanide warehouse, emergency response spill kits and equipment are located near the warehouse entrance. Showers, low-pressure eye wash stations, and non-acidic fire extinguishers are strategically located throughout the facility. A portable safety shower and eye wash station with a pressurized water supply are near the cyanide warehouse. These are tested before each cyanide handling operation. Inspection/testing records are complete.

The facility has oxygen, antidotes, an AMBU resuscitator, and emergency communication means. Employees have radios and cell phones for internal communication. The facility also has a Control Center with comprehensive communication systems for emergency notifications.

CHEMSUPPLIER has the storage and transportation procedure OPE-FPR-01 v01, for the selection of the supplier, including ICMI certification and in section 3.3 it includes ICMI compliance. All the

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questions of the Principle of the Code are included and supported through its certification. The selected carrier TRANSPORTES MERIDIAN is certified by ICMI, last certification 11-SEP-2023.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

CHEMSUPPLY's document SIG-DOC-31 rev01 dated 04-Jul-2024, Emergencies with Hazardous Materials includes the Initial communication protocol, which is initiated in case of leakage or spill of hazardous material. The emergency is communicated to the number 01-7190100, and WhatsApp 994725142. The receiver of the communication must activate the emergency services in the company and notify the brigade leader and SSOMA (Health, Occupational Safety, and Environment) team.


Within the EMERGENCY RESPONSE PLAN ANNEX 04: Hazardous Materials Emergencies CODE: SIG-DOC-31 rev01 dated 04-Jul-2024, includes the initial communication protocol where communications for internal and external emergencies are included, including contact telephone numbers for the brigade chief, Integrated Management System Coordinator, and operations chief. It also includes the emergency numbers for the fire department, police and SAMU (Mobile Emergency Care System). The emergency response plan is reviewed at least once a year.

within the CHEMSUPPLY's Emergency response plan, document code SIG-PRG-02 v03 dated July 2024, it mentions that for cyanide emergencies you must additionally review the document: SIG-DOC-32 EMERGENCIAS WITH SODIUM CYANIDE Approved on 04-Jul-2024.

In the specific case of incidents or accidents involving sodium cyanide, the International Cyanide Management Institute should be notified by e-mail (info@cyanidecode.org) or telephone call (001-202-495-4020)

This communication must be made in English and no later than 24 hours after the initial incident has occurred (or knowledge of the occurrence). Incidents occurring with cargo in transit by sea, in port areas, in warehouses, or in land transport are considered in this case. Notification will also be considered in the case of incidents occurring to mining customers using sodium cyanide. Significant cyanide incidents include any of the following confirmed events:

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- Human exposure requiring action by an emergency response team, such as decontamination or treatment.
- An unpermitted release that enters natural surface waters, inside or outside your warehouse or operating facility.
- An unpermitted release that occurs off-site or migrates off-site.
- An on-site release requiring action by an emergency response team.
- A transportation incident requiring an emergency response to a cyanide release.
- A multiple wildlife fatality event where cyanide is known or credibly believed to be the cause of death.
- Cyanide theft.

Initial notification is requested within 24 hours of occurrence and should include the date and nature of the incident, and the name and contact information of a company representative to respond to requests for additional information. Additional salient information, such as root cause, health, safety and environmental impacts, and any mitigation or remediation, is requested to be provided within seven days of the 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 Standard of Practice 3.4
 in substantial compliance with Standard of Practice 3.4
 not in compliance with Standard of Practice 3.4

Within the EMERGENCY RESPONSE PLAN ANNEX 04.1: Sodium Cyanide Emergencies CODE: SIG-DOC-32, REVISION 01, DATE OF ISSUE: 04-Jul-2024, includes in point 4.3 Measures in case of spill: Remediation procedures for cases of spills on dry land, spills on wet land, spills in stagnant waters and spills in watercourses.

Within the EMERGENCY RESPONSE PLAN ANNEX 04.1: Sodium Cyanide Emergencies CODE: SIG-DOC-32, REVISION 01, DATE OF ISSUE: 04-Jul-2024, includes in point 4.3 Measures in case of spill: Remediation Procedures where there is an explicit prohibition on the use of any chemical element in surface water to neutralize or destroy sodium cyanide, or inhibit the formation of HCN gas. This prohibition includes the use of Calcium Hypochlorite, Sodium Hypochlorite, Hydrogen Peroxide, or Ferrous Sulfate.

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Transport Practice 3.5

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

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

All Management System documents include a change control box where the next revision is included, which are on an annual basis. The emergency response plan includes that the person in charge of Safety and Occupational Health or Operations updates the plan annually or when required. EMERGENCY RESPONSE PLAN ANNEX 04: Hazardous Materials Emergencies CODE: SIG-DOC-31 rev01 dated 04-Jul-2024 includes updates and changes and the different scenarios to consider a change and update of the emergency plan.

TRANSPORTES MERIDIAN has the 2024 Drill Schedule, document F-SIG-011 version 1. Among various drills, it includes fire, first aid, and hazardous materials spill (cyanide or fuel).

For the sodium cyanide spill drill, it is scheduled for March and October 2024.

The drill report of 12-Mar-2024 was verified.

Location: Meridian Transport Garage

Scenario: Solid Sodium cyanide spill at km 35 of the Panamericana Norte.


It includes strengths, weaknesses, and corrective actions.

CONTRANS has the Annual Occupational Safety and Health Program, document SM-G-001. This document has scheduled sodium cyanide spill drills for July 2024 and December 2024.

The Emergency Drill Report SM-R-018 was verified, conducted on 29-Dic-2023. Scenario: Solid sodium cyanide spill in the warehouse. The report includes a description of the spill, weaknesses, and corrective actions.

within the document SIG-PRG-02 - EMERGENCY RESPONSE PLAN dated 29-Jul- 2024 v03, includes the item "updates and changes", where it mentions that the Plan will be reviewed no more frequently than 12 calendar months after the last revision or modification recorded. Revisions in shorter periods than this may be considered in case of:

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- Changes in applicable legislation or regulations for emergency response in Peru, both at the level of Civil Defense, labor legislation, health protection and/or occupational health legislation, as well as land transportation and storage of chemicals and hazardous materials.
- Lessons learned from incidents or accidents that occurred to the company or to third parties (related or unrelated), whose operations are similar to those of the company, or in which the conclusions and opportunities for improvement identified in the investigation of the incident are relevant to the company's emergency response preparedness.
- Technological, technical and/or regulatory changes that have relevance to emergency response planning, preparedness, equipment, and training.
- Company adherence to voluntary management systems, standards or norms with specific implications or requirements for emergency response preparedness (i.e., ISO 45001, CYANIDE CODE, others).
- Changes in the format or codification of the documents that make up the company's Integrated Management System.

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