

INTERNATIONAL CYANIDE MANAGEMENT CODE PRODUCTION SUMMARY AUDIT REPORT

Almacenera Pacífico S.A.C. – side Chilca

Address: Sub Lote 2B-01 Zona Denominada La
Chutana, Distrito Chilca, Provincia Cañete,
Departamento Lima – PERÚ

2024

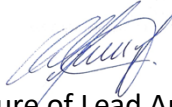


Submitted by:
E QUELLE E.I.R.L.

Collaborated with
Mingroup Investments S.A.C.

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Almacenera Pacífico S.A.C.
Chilca
Name of Facility


Signature of Lead Auditor

February 8th and 09th, 2024


Date of submittal

INTERNATIONAL CYANIDE MANAGEMENT CODE PRODUCTION SUMMARY AUDIT REPORT

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1. General Information

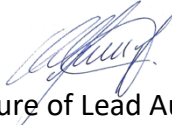
Name of Production Facility:	ALMACENERA PACIFICO S.A.C. – SITE CHILCA
Name of Facility Owner:	ALMACENERA PACIFICO S.A.C.
Name of Facility Operator:	ALMACENERA PACIFICO S.A.C.
Name of Responsible Manager:	Enrique Lau Siu
Address:	SUB LOTE 2B-01 ZONA DENOMINADA LA CHUTANA , DISTRITO CHILCA, PROVINCIA CAÑETE, DEPARTAMENTO LIMA - PERÚ
State / Province:	Lima - PERÚ
Telephone:	+51 1 618-1620
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2. Information of the audited operation

Almacenera Pacifico, S.A.C. (hereinafter ALPA), site Chilca, It is ALPA's own premises of 108,155.36 m2 Sub Lot 2B-01, area called La Chutana, Chilca District, Cañete Province, Lima Department PERU.

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.

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3. Operation Location Detail and Description:

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. , 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 site Chilca, It is ALPA's own premises of 108,155.36 m² Sub Lot 2B-01, area called La Chutana, Chilca District, Province Cañete, Department Lima – PERU in accordance with the Technical Inspection Certificate in Buildings ITSE exp.4270-2022 (valid for 2 years) by the Municipality Chilca – Cañete from January, 16th 2023 exp. January 16th 2025. There is 3,333.7 m² of covered warehouse, there is a maneuvering yard, open-air warehouse, general services including dining room, parking, administrative offices. 3 people participated in the operations, 01 warehouse coordinator, 01 forklift operator (auxiliary), 01 warehouse assistant. There are third-party services such as security personnel Monday to Friday 01 shift, 07 am to 7:00 pm. The warehouse has peripheral security camera (07), perimeter fencing, entry and exit control, with prior communication for authorization.

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.

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4. Auditor's Finding

This operation is

in full compliance

in substantial compliance *(see below)

not in compliance
with the International Cyanide Management Code.

5. Compliance Statement

"This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle."

6. Auditor Information

Audit Company:

Mingroup Investments S.A.C. and
-e QUELLE E.I.R.L.

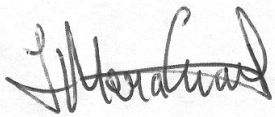
Lead Auditor:

Álvaro Fuentes Huanqui

Email Lead Auditor:

alvaro.fuentes@e-quelle.net

Name and signature the audit team.

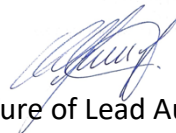
Technical Auditor :	Marcos Mera	
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Dates of Audit: February 8th and 09th , 2024

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7. 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.

8. 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 are construction plans made by Registry Architect. CAP 2148. August 2020. The organization retain the following documentation:

- Foundation plans and reinforcement of the Plant and details,*
- Porch structures*

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- Roof structure

- Lateral elevation structure

All documents signed by Edwin Arias Flores – Civil Engineer Reg CIP 126450

The documents with the plans for the foundation, reinforcement, porch, roof and lateral elevations have been signed by– Civil Engineer Reg CIP 126450. There is also a HASEQ-INFO-001-2024 report, signed by chief HSEQ.

Seismic zone 3 is taken into account according to the Peruvian code.

The materials used for construction of cyanide production facilities are compatible with reagents used and processes employed.

Equipment:

- There is a ramp and a forklift.
- There is an oxygen cylinder.
- They have a current cyanide antidote kit on site.
- There are deposits of sand and lime near the warehouse.
- They have an emergency shower to act in the event of an incident with chemical products.
- The products that are stored in the adjacent area are not chemical, which avoids reactions due to contact with incompatible products.
- All the necessary signage for the storage of Cyanide is now in place.

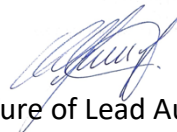
Yes, The warehouse infrastructure has the following characteristics:

- The infrastructure in general has been designed based on what is available in our warehouses located in Lurin. The roofs are designed with two pitches and it has been ensured that they do not leak.
- There are elevated lateral gutters that lead to drains.
- It has good natural lighting
- The warehouse has an upper section with raschel mesh that allows the warehouse to remain ventilated.
- The floors are made of asphalt, which prevents environmental contamination in the event of a spill.
- The floor/wall joints have been sealed with a cement wall to ensure that water or any type of liquid does not enter the storage area.

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- *The walls are made of metal sheets and are in good condition, preventing the entry of liquids and dust.*
- *Additionally, they have humps in the door section for the specific purpose of preventing the entry of liquids.*

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.

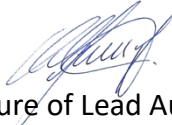
The requirements of this provision do not apply to warehouse operations managing solid cyanide in unopened containers and packaging, such as IBCs and drums.

In this case, 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 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 and lateral sides have one part with Raschel mesh coverage for ventilation 1.5 m high. The ceiling has a height of 7.00 m; 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. 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.

The warehouse an adequate ventilation. The front enclosure and lateral sides have one part with Raschel mesh coverage for ventilation.

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The unique access to the warehouse 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 (in case the operations coordinator is not at the office, he let the keys to the operations assistant). If a third party (customer, auditor, ALPA employee) is going to visit the warehouse, they must send an email to the operations coordinator of ALPA to obtain an authorization. The operations coordinator is the person who authorizes the access to the warehouse. In addition, in the main entry to the warehouse there are signs that says: "entry prohibited, restricted area".

There are 3 warehouses under roof. Environments are separated for the storage of different products divided by calamine. An exclusive space is designated for solid sodium cyanide. In this warehouse, there are no materials of concern with respect to incompatibility with cyanide.

Production Practice 1.2

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

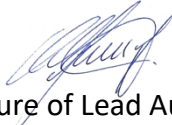
The operation is in full compliance with
 in substantial compliance with Standard of Practice 1.2
 not in compliance with

Finding/Deficiencies Identified:

ALPA has developed an internal procedure PR-OP-60 review 01 dated November 29th 2023 Storage and dispatch of sodium cyanide - applies to all sites. The operations coordinator of ALPA and the operations assistant, were interviewed about the procedures for unloading, loading and handling containers of cyanide and for managing any contaminated materials or wash water. The interviewed personal demonstrated that they have knowledge of the procedures.

There is an ALPA Contingency Plan side Chilca PL-OP-04 rev01 of December 15th 2023. The plan contains a notification and communication system, emergency cases due to dry spills and water spills. Based on the risk assessment, the most probable event is the accident during the movement of the container and packaging of sodium cyanide from the warehouse.

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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.

There is a procedure for the Storage and Dispatch of Sodium Cyanide - Applies to Branches PR-OP-60 rev01 of November 29th 2023. There is a Change Management procedure, PR-SIG-23 rev04 includes changes to the operation that may have significant impacts. During the last year there have been no changes in operations, infrastructure or scope of service. There is a preventive maintenance plan for 2023 – 2024

As a solid sodium cyanide warehouse, packaging are not opened during storage (it remains in the original packaging), the only possibility of having cyanide solutions, or liquids contaminated with cyanide, would be in cases of decontamination. Within the contingency plan PL-OP-04, it includes under point 5.7 section 12, that all liquid waste generated by the decontamination of the site must be stored in containers labeled by an EO-RS (operating company of solid waste) approved by the Peruvian Ministry of the Environment.

There is a solid waste management plan hazardous and non-hazardous PR-OP-32. The contingency plan the reference to the Waste management plan where the activities to be carried out with materials with traces of Cyanide in bags and wood.

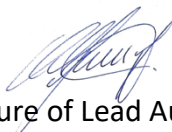
ALPA has a designed document, PR-OP-03 Goods reception procedure. Checklist: FO-OP-15 Review (04). The operations coordinator or operations assistant of ALPA check the solid sodium cyanide received in the warehouse according to the FO-OP-15 check list. The package and label are checked.

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
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Finding/Deficiencies Identified:

ALPA has the FO-OP-15 Merchandise Entry format, rev04, includes vehicle information, loading information and loading details with photographic information (on the opening of the vehicle, unloading process and end of unloading). The status of the IBCs is verified, signed by the person responsible for entry (assistant or coordinator). Record of case December 26th 2023 is evident, import of 20 boxes of cyanide batch 230928, inspects the warehouse on a biweekly basis. Warehouse inspection instructions: IN-OP-12 - Warehouse Inspection Format FO-OP-25 version 01. Records for the last few months are kept.

The inspections to the warehouse are done on a biweekly basis, Warehouse Inspection Format FO-OP-25. Warehouse Inspection Format FO-OP-25 version 01, include information like date of the inspection, the name of the inspector, and any observed deficiencies.

Within the documentation generated by ALPA it has been included, Warehouse Inspection Format FO-OP-25 version 01, include the nature and date of corrective actions documented, and are records retained. Under the latest records reviewed, there were no observations and corrective actions detected.

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:

ALPA has developed the Storage and dispatch procedure PR-OP-60 rev 01, from reception, storage and dispatch of the product. Includes operations, emergency kit review, loading and unloading, product storage communications and response to cyanide emergencies. The clearance process, including audits, is also included.

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In the case of emergency activities, there is a PL-OP-04 Contingency Plan, there is Safety Management for Clients, contractors and visitors, which includes induction, SCTR, IPERC, contractor emergency plans. ATS PETS, PETAR among others. Emergencies such as dry spill, water spill and first aid for cyanide poisoning are included.

ALPA has a maintenance procedure PR-GSG-04 v04, it includes preventive maintenance of the facilities, where staff must issue a work order through the "SSGG Works" app. Corrective maintenance in facilities is included. Maintenance can be carried out with ALPA's own personnel or external personnel if they consider it necessary. In the case of contractors, there is a Security Management procedure for clients, contractors and visitors, PR-SIG-25, rev04. The warehouse in the area conditioned for cyanide has a previous maintenance from May 2023, where work was done on walls, ceilings, room separation, retaining walls on doors and sides. 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, which includes the safety committee and the safety supervisor that is planned for the 2024 update, and there is also an Identification procedure of hazards and Risk Assessment PR-SIG-11, which includes interviews with personnel. The annual occupational health and safety plan, PL-SIG-02 applies to all locations and includes training, inspections, management of dangerous substances, investigation of accidents, incidents and occupational diseases. The hazard and risk matrix is carried out at the workplace, in the case of the matrix of forklift operator, operations assistant and coordinator MT-SIG-04 There is a PG-SIG-01 training program Annual program (2023-2024) that includes the IPERC matrix. (see record of field training carried out in July). Storage and dispatch training is evident on January 24th 2024, Safe handling and use of sodium cyanide on January 24th 2024. The staff participates in the preparation and review of documents through daily meetings, 5-minute talks at the beginning of work and through the security supervisor who refers the needs of the staff to management.

In the PR-OP-60 cyanide storage and dispatch procedure, the preparation of operations is included and before unloading, the personnel must turn on the cyanide gas detector and verify that it is at 0.0 ppm. In the PL-OPP-04 contingency plan, point 6.1 includes the most probable event: an accident during the movement of a container/packaging of sodium cyanide within the warehouse.

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In the PR-OP-60 procedure for cyanide storage and dispatch, it includes the use of a portable hydrogen cyanide detector. The alarm is setting on 4.7 ppm. Activities are described when alarm is activated. During the interview with the staff, knowledge of security aspects and controls is confirmed.

In all operations with sodium cyanide, it is always required that at least 2 people be present. It is mentioned in point 2.2.1 Operations of procedure PR-OP-60 Storage and dispatch of cyanide. During the unloading or loading are present the following personnel: the operations coordinator of ALPA or the operation assistant and the forklift operator.

There is an occupational health program that has considered occupational medical examinations, entrance examinations and periodic examinations. There is a medical surveillance program. Case of Chilca's Operation Coordinator placed on 18.05.2023 by red de Salud Ocupacional accredited 028.2022 exp. 6427-2022-SSO, signed by the occupational medic CMP 57308 RNM 000650. The medical examination includes Hearing and vision test, pulmonary function and the ability to use a respirator.

Instructions for removing victim and operator suits. IN-OP-06 rev01 aimed at correctly carrying out the removal of the suit used during the handling of chemical products. There is a waste management procedure that includes the final disposal of used suits.

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 have received training with respect to cyanide safety.

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

Production Practice 2.2

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

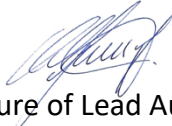
in full compliance with

The operation is in substantial compliance with Standard of Practice 2.2

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not in compliance with

Finding/Deficiencies Identified:

ALPA has a Contingency Plan PL-OP-04 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 PL-OP-04, storage, and dispatch procedure. There is an emergency shower and eyewash with water change monthly. There is an inspection format for Emergency Kits FO-SIG-15 rev07, 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.

There is an annual safety program PG-SIG-01 which inspections of fire extinguishers, cabinets, emergency lights, among others. FO-SIG-11 Fire extinguishers inspection (monthly frequency), FO-SIG-15 rev07 Inspection of emergency shower and eyewash station (monthly frequency).

The warehouse have one safety shower (440 liters) and one eye wash station (30 liters) are located outside of the storage area, near to the main entry to the warehouse. The auditor checked the safety shower pressure and it is in good working with the appropriate pressure, the eye wash station to confirm that it is in good working order and it operates with low water pressure. In the entire warehouse there are 12 dry chemical powder fire extinguishers (50 kg each one), near the sodium cyanide warehouse there are 4 fire extinguishers.

The last 2 Inspection of emergency shower and eyewash station formats (FO-SIG-15). This inspection is done monthly. The inspection was done by the HSEQ coordinator and signed by the operations coordinator and HSEQ manager.

There is one antidote for cyanide poisoning, the brand is Cyanokit (Hydroxocobalamin). 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 administrative offices. The emergency kit and first aid equipment is inspected every month.

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The MSDS is located in the entry to the warehouse. The MSDS is in Spanish. Also, the operations coordinator and operations assistant have digital versions 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.

The contingency plan for sodium cyanide-Chilca Headquarters, PL-OP-04 rev01, includes in point 5.11.3 first aid in case of poisoning, the antidote must be provided only by authorized medical personnel. The plan considers medical personnel as an external resource and includes updated telephone numbers of the closest medical centers. In the event of a medical emergency, the Chilca headquarters has a transportation unit that takes the injured person to the nearest medical center. In the PL-OP-04 contingency plan, in point 5.11.1 They include the rescue procedure, which describes the procedures 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.

APLA 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.

Incident and accident procedure PR-SIG-09 v09, 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.

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

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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:

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.

As there is only storage of solid cyanide in unopened containers and packaging, such as IBCs and drums, the current measures of the HCN concentration are appropriate.

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:

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There are records of the training in safe handling of sodium cyanide. There are 3 workers involved in the cyanide operation, have been trained in safe handling of sodium cyanide on The operational staff has MATPEL I, Contingency plan for sodium cyanide, storage and dispatch of sodium cyanide dictated all by HSEQ Supervisor.

The operations coordinator of ALPA and operations assistant of ALPA were interviewed , it was verified that they have 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 employees have been instructed on how to accomplish their assigned tasks safely. In an interview with 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 operation auxiliar , it was verified that he has knowledge of the safe handling of sodium cyanide and 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, through virtual safety induction. There are records of the induction and evaluations from a Google form. Case Induction from Operation Coordinator placed on May 25th 2023, Operational Assistant placed on January 09th 2024.

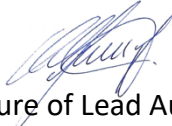
The employees have been instructed on how to accomplish their assigned tasks safely. In an interview with operations coordinator of ALPA and the operations assistant, it was verified that they have knowledge of safe handling of sodium cyanide, unloading, storage and loading procedures, and use of PPE. Employees have 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.

The 2 last records of the training about "Safe handling and use of sodium cyanide" (FO-SIG-09). The instructor for both courses was the HSEQ supervisor.

The employees have been instructed on how to accomplish their assigned tasks safely. It was verified that he has knowledge of safe handling of sodium cyanide, unloading, storage and loading procedures, and use of PPE.

The employees have been instructed on how to accomplish their assigned tasks safely.

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After each training and when appropriate, evaluations are taken, and effectiveness is measured through drills and tests.

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:

The operational staff has MATPEL I training, Contingency plan for sodium cyanide, storage and dispatch of sodium cyanide.

There is a record control procedure PR-SIG-02 rev 11 that includes the storage time of the records corresponding to Security. In the Induction format. The documented information is shared in the sharepoint, protected in the cloud and backed up through systems.

Principle 5 | EMERGENCY RESPONSE

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

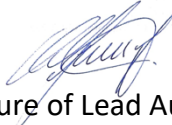
Production Practice 5.1

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:

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ALPA has developed the PL-OP-04 Contingency Plan for NaCN for Chilca, 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 location has been taken into account. The facilities are located in an industrial area, without any next neighbor under 600 m away.

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. 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 store solid sodium cyanide in its original packaging, there is no transfer or processing and it is not handled in a liquid state. In the contingency plan for sodium cyanide - Chilca headquarters, PL-OP-04 rev01, includes in point 5.10.1. In the event of a container/packaging fall, it includes controls taking into account the direction of the wind to prevent contact with the gases, the conditions of the area where the event occurs, and the possibility of monitoring cyanide gases in case there is contact with water, close of the container/packaging.

The contingency plan for sodium cyanide - Chilca headquarters, PL-OP-04 rev01, includes point 5.6 initial response actions, 5.7 dry spill cleaning and decontamination, 5.8 fire response, 5.9 water spill - cleaning and decontamination, main actions in case of accident. Likewise, the plan includes the action guide for warehouse members in the event of an accident, actions such as information to the company and the customer, actions in the event of containers/packaging falling, and if there is a spill without the presence of liquids, in addition of cases of adverse weather such as rain and cases of fire.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

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The operation is in full compliance with
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 not in compliance with

Finding/Deficiencies Identified:

External organizations such as firefighters, hospitals, and the company's senior management and organizational personnel have been included in the containment plan.

Hospitals and firefighters within the affected area have been notified.

There is Matrix MT-SIG-05 Stakeholder Matrix includes support groups for emergency response such as Firefighters and Hospitals. The procedure includes references to the PR-SIG-18 Communications procedure, including the Contingency Plan for sodium cyanide.

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:

The contingency plan has included a communications flow. Any of the 03 operators on the warehouse will communicate the emergency to HSEQ department. HSEQ Manager and Operation Manager are the Designate primary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Plan.

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All 03 operators in the warehouse make up the emergency response team. All staff are trained regarding the contingency plan. There is the ALPA Emergency Plan PL-SIG-01 that includes the brigade members.

The operational staff has MATPEL I training from February 05th 2024, Safe handling and use of sodium cyanide from January 24th 2024, Contingency plan for sodium cyanide from February 05th 2024, storage and dispatch of sodium cyanide from January 24th 2024 dictated all by HSEQ Supervisor.

There is a circuit of security cameras and the camera operator has 24-hour surveillance designated at the Lurin warehouse, there is access to the Chilca cameras and communication to the HSEQ Manager in case of any event during 24 hours. HSEQ office is available 24-hour for the coordinators and response to an emergency. There is a flow of communications with charge of the communication of the contingency plan and contact number.

Yes, The Emergency Plan PL-SIG-01 details the functions of the HSEQ Chief, HSEQ Supervisor and Brigade Leader. The Contingency Plan describes the functions of personnel in charge of emergency leadership: Function of the HSEQ Chief:

- a. The Chief HSEQ will assume command during the emergency.*
- b. It will call for external help if required.*
- c. Will inform the Security Committee about the emergency and the actions taken for control or evacuation.*
- d. Likewise, he will direct the Brigades, providing advice in case if necessary.*

HSEQ Supervisor Role:

- i. In the absence of the HSEQ Chief, he will assume his duties in controlling the emergency.*
- ii. Likewise, he will direct the Brigades, providing advice if necessary.*

In the PL-OP-04 Contingency Plan for NaCN - Chilca Headquarters in its clause 1.5 Responsibilities of the company's personnel, includes the following responsibilities:

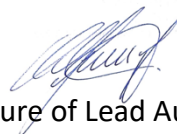
1. General Manager of the Company

- To inform the client.*
- Give guidelines to the organization to fulfill its functions.*
- Recommend when it is appropriate to invoke the Emergency Plan.*
- At its discretion assumes direct control of on-site response activities of the accident.*
- Activates the Emergency Plan and presides over its functions.*

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2. HSEQ Head

- Designates the Field Coordinator for emergency control activities or assumes it at his or her discretion.
- Establish priorities to attend the event.
- Request resources to assist if necessary.
- Dispatches appropriate personnel to the accident scene.
- Ensures that all notification to authorities and handling of reports are Delivered on time and responsibly.
- Your first actions in the event of an accident are to ensure the safety of the people.
- It will require the support and technical assistance that each case warrants.
- Will contact external companies to provide services.
- It will alert medical services about probable risks.

The emergency response plan includes inspection in a monthly bases. 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.

In the case of fires, the presence of police and firefighters is requested in the emergency area to help cordon off the sector and communicate the characteristics of what is stored. Communication to interest groups includes communication of emergency plans and contingency plans, where possible emergency scenarios and the functions of all interested parties are described.

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 PL-OP-04, item 3 of the notification and communications system has been considered, and 3.1 in the scene where the warehouse manager,

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communication to the HSEQ head and the operations manager are included. and point 4.1.2 includes that All communication will be coordinated with the Company's Management

The contingency plan PL-OP-04 under the 7.Public relation / Governmental relation for branches includes within the responsibilities of the person in charge of liaison with the government and communications the following obligations.

- Go to the cyanide accident site upon receiving notice from the Field Coordinator and obtain the cyanide accident reports.*
- Establish a place outside the accident area to be used as a meeting center and issuance of press releases.*
- Ensure that any applicable government regulatory body has been notified and informed of the fact.*
- Obtain approval from appropriate government agencies regarding specific operations that are subject to regulations (waste disposal, traffic diversion, etc.).*
- Is the main liaison contact with government agencies for the publication of information and for obtaining the necessary requirements, policies and regulations.*
- Conduct observation tours of the cyanide accident site, where safety permits, for representatives of government agencies.*
- Act as a spokesperson with the public, media and government agencies.*
- Authorize the publication of any information pertinent to the operation.*

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.


There is a procedure for Incidents and accidents PR-SIG-09 of January 04th 2024, which includes in the section of Significant Incident with cyanide the communication to the ICMI within 24 hours following its occurrence in accordance with the requirements of the ICMI.

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
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not in compliance with

Finding/Deficiencies Identified:

In the Contingency Plan for Sodium Cyanide – Chilca PL-OP-04, on 5.7 dry spill, include cal application to neutralize the Sodium Cyanid. For cleaning and subsequent detoxification, sodium hypochlorite is included.

*In the Contingency Plan for Sodium Cyanide – Chilca PL-OP-04, on 5.7 includes **Decontamination of soils.***

The Procedure for handling hazardous and non-hazardous solid waste PR-OP-32 rev01 is also considered in paragraph 2.6 management of waste contaminated with sodium cyanide.

The Plan prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water or that could reasonably be expected to enter surface water. Described under Contingency Plan PL-OP-04 under the 5.9 spill in water - cleaning and decontamination..

Production Practice 5.6

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

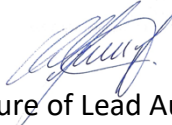
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Finding/Deficiencies Identified:

The emergency plan and the contingency plan are reviewed annually. In the annual SIG program, the drill program is included where there is at least 1 drill per year. In addition, the program includes keeping the Emergency Plan updated at least once a year. The PL-OP-04 contingency plan includes in point 9. the update of the plan.

In the Emergency Response Plan include drills in point 8.5. It is included that: 2 drills will be carried out annually, one theoretical, and one practical, with the purpose of evaluating the effectiveness of this Plan and correcting the anomalies found. ALPA keep records as report

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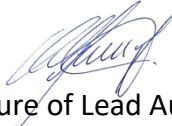
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of January 05th 2024 Chilca headquarters drill – sodium cyanide spill, includes strengths and weaknesses that are being worked on at the time of the audit.

In the Emergency Response Plan include drills in point 9.0 includes Update. This Plan requires being updated at every opportunity that there are modifications of substance and form, in terms of procedures, people, telephone numbers, equipment, methods, or any other consideration that allows us more effectiveness and efficiency.

Those responsible for these modifications will be the parties involved and the person who must update and retransmit the Plan is The Company to all interested parties.

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