PUERTO COLUMBO

Cyanide Warehouse at San Antonio - Chile

SUMMARY AUDIT REPORT

for the

INTERNATIONAL CYANIDE MANAGEMENT CODE

February 2025

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Operation General Information

Name of the production operation:	Puerto Columbo S.A.
Name of the facility owner:	D&C Group
Name of the facility operator:	Puerto Columbo S.A.
Name of Responsible Manager:	Brian Abarca Díaz -Deputy Corporate Manager HSEQ (Health, Safety, Environmental, Quality) - D&C Group
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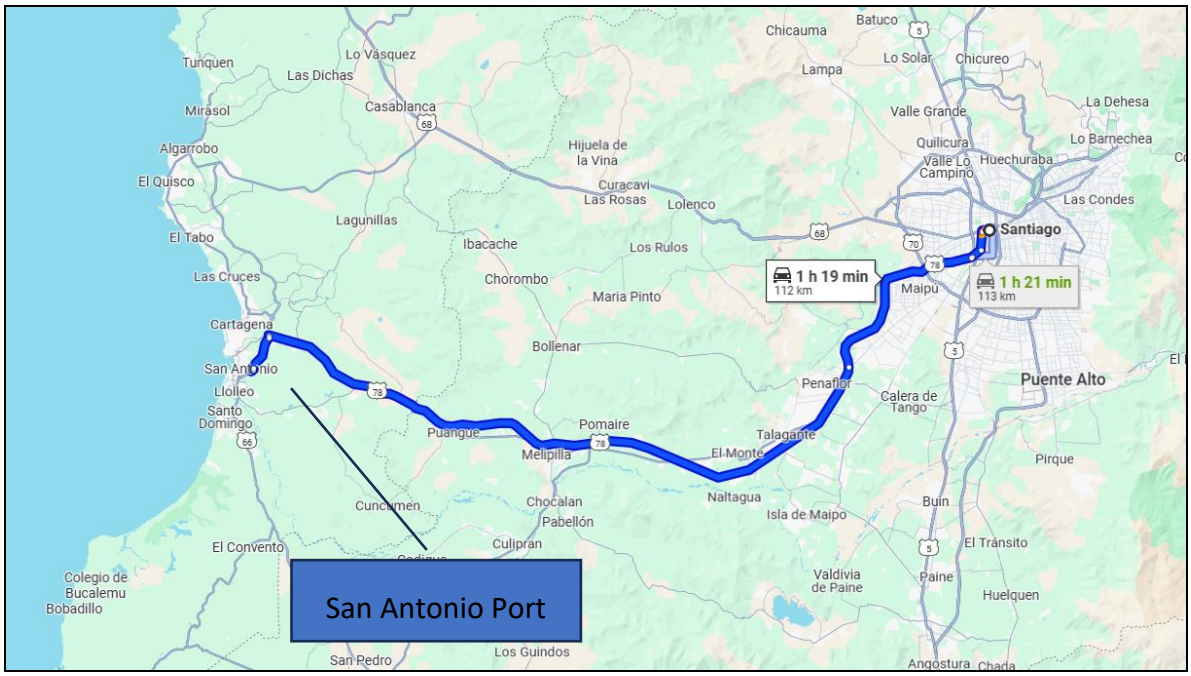
Operation Location Detail and Description

Puerto Columbo S.A. (Puerto Columbo) is a Chilean-owned company part of D&C Group, which was founded in 2008 and was authorized by Chilean National Customs Service to operate as a Bonded Warehouse in San Antonio.

The company's facilities are located in the industrial district of San Antonio, access is specifically by route 78, new access to the port, 4 km from the port of San Antonio and 100 km from Santiago in Chile. The concrete yard for storage of hazardous chemicals has an approximate area of 640 m2, where 320 m2 are intended for the storage of maritime containers with solid sodium cyanide. The area is within the project land with an approximate area of 72,000 m2, providing secure area in which imported merchandise may be stored, manipulated, or undergo manufacturing operations without payment of duty for up to 90 days from the date of importation. The facility meets the needs of companies that require customs, agriculture or health inspections, loading / unloading and terminal services of containers, general or bulk cargo, or any other requirement that the customer need outsourcing their supply chain and logistics processes.

Operation Location at San Antonio Port



Puerto Columbo Warehouse at San Antonio

In January 2019, the Environmental Assessment Service of the Valparaíso Region approved the Environmental Impact Statement of the project "Hazardous Substance Container Yard in Puerto Columbo S.A. Warehouse San Antonio Facilities" certifying that it complies with the applicable environmental regulations.

The hazardous substances yard has a concrete slab built on a stabilized ground with a 1.5 mm High-Density Polyethylene (HDPE) liner geomembrane in order to prevent any infiltration into the natural soil in the event of a spill. The concrete poured over the geomembrane is quality vibrated cement with 90% confidence level according to Chilean Standard (NCh) 170. Dramix 3D type steel fiber was added to its manufacture with a dosage of 30 kg of fiber per m3 of mixture.

The cyanide yard is made up of a reinforced concrete slab with dimensions 11.26 m wide by 28.4 m long with a total area of 320 m2. The pavement has a slope of 0.5% in the direction of the perimeter collection wells with capacity 32. 8 m3. This perimetral collection wells act as a secondary containment for spill control system. They are made up of reinforced concrete walls with a thickness of 20 cm, reinforced with double steel mesh. On the top is a metal grill installed to allow the passage of the container crane and trucks over the collection wells.

Puerto Columbo receives, stores and dispatches maritime containers with solid sodium cyanide pellets, packaged in Intermediate Bulk Containers (IBC) boxes of approximately 1 ton. In general, containers are not opened and remain sealed stored in the cyanide slab until they are released to third parties in accordance with the instructions of the cyanide consignee. In accordance with the indications of the Supervisor of Occupational Health and Safety (OSH), sometimes the transfer of the product in IBC from one container to

another is carried out, in the same yard, in a place specially designated for this purpose.

The cyanide yard has a perimeter fence of electro welded mesh and a gate that remains closed when there is no activity. The area is duly signposted with risk information signs, the obligation to use Personal Protective Equipment (PPE), the prohibition of smoking, eating, drinking, generating open flames and placing incompatible materials in the different blocks.

The area is a ventilated environment, with respective bins for the deposit of hazardous solid waste. The access control to the facilities is duly identified and registered to the authorized personnel for both entry and / or exit. The warehouse safety devices include fire cabinets, dry chemical powder (PQS due to its acronyms in Spanish) type fire extinguishers, a portable HCN (hydrocyanic gas) monitor, a portable emergency shower and low-pressure eyewash station, first aids kit, and medical oxygen.

Auditor's Finding

This operation is

✓ in full compliance

☐ in substantial compliance

☐ not in compliance

with the International Cyanide Management Code.

Auditor Information

Audit Company:	Cyanide Auditors S.A.	
Lead Auditor and Production Technical Auditor:	Bruno Pizzorni	bpizzorni@cyanideauditor.com
Dates of Audit:	October 1 and 2, 2024	

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Production Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

PRODUCTION VERIFICATION PROTOCOL

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 engineeringpractices and quality control/quality assurance procedures.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide facilities at Puerto Columbo have been professionally designed and constructed. The auditor reviewed the engineering plans for vehicles circulation, concrete slab and gutters design for the hazardous chemical substances yard area, including a descriptive report of the construction process. Also reviewed the results of the concrete quality tests carried out and verified that the construction was commissioned to the construction company Rec- Sai. A certified professional mechanical civil engineer from Rec-Sai was responsible for the construction project, who signed the construction documents. Records included a letter of delivery of work by the construction company with the engineer and the project manager signs that the facilities have been built in accordance with the design specifications and drawings.

The auditor also reviewed Puerto Columbo permits from the Regional Secretariat of the Ministry of Health of Chile (SEREMI due to its acronym in Spanish) that authorizes the facility to operate as a warehouse for hazardous chemical substances, a permit that was granted after an on-site inspection that was carried out by a specialist from SEREMI in December 2021 who verified that the facilities were adequate for the use that was going to give them. Documents reviewed: sanitary authorization for Container Yard and Isotank Yard Exempt resolution N° 2105613804 from January 2022; and Exempt Resolution N° 2305250170 from October 2023 Main Machinery and Equipment Forklift Crane Container.

As the auditor found that information regarding the design, construction and quality control of concrete for the cyanide yard storage was available and also as the facility design and construction was reviewed and approved by regulatory agencies, no additional information was required to find this in compliance.

The facility exclusively handle cyanide in closed packages such as Intermediate Bulk Containers, and sea containers, and no reagents are used or processing takes place. The facility only handles cyanide in closed containers and packages, no packages are opened.

Handling and storage of containerized and packaged solid cyanide at the warehouse operation is conducted on a concrete slab forming an impermeable surface that prevents seepage to the subsurface. Concrete surfaces and asphalt roads protect the ground throughout all the facility, which is adequate to minimize seepage to the subsurface.

The auditor inspected the yard confirming the pavement to be in good conditions, although the presence of few superficial fissures in the concrete which a recommendation of improvement required Puerto Columbo to seal them as they were not detected during inspections. After the audit, the operation sent pictures with the work carried out to seal these fissures.

Although sea containers are suitable for outside storage, Puerto Columbo considered that solid cyanide may be released when these containers are moved or when individual packages of cyanide such as IBCs are removed. The topography of the area does not represent a risk to the operation, as the cyanide yard is located in the highest part of the whole facility area but occurrence of precipitation can increase the risk to workers and the environment if such a release occurs. For this purpose, the operation built collection wells around the cyanide yard where rainwater is discharged, with no connection to any domestic drain or to the environment. Any liquid is recovered by motor pump.

Compliance with this provision was determined through the auditor's inspection of the facility and review of construction and maintenance records. The auditor also verified that this gutter or secondary containment was clean with no materials within the containment that compromise the necessary capacity and also that it was in good conditions forming a competent barrier to prevent infiltration into the subsoil.

The facility only manages solid cyanide, there are no cyanide solution pipelines. Spill prevention or containment measures are not provided for water pipelines due to the diluted nature of any cyanide solution that may be present from wash water and water used to decontaminate clothing and equipment.

Puerto Columbo only stores solid cyanide in sea containers in an open yard built in the highest topographical area of the facility to prevent any surface runoff. Sea containers are suitable for outside storage to avoid or minimize the potential for exposure of cyanide to moisture.

The cyanide containers yard is an open area with a ventilated environment, with bins to deposit any hazardous solid waste. The access control to the facilities is duly identified and registered to the authorized personnel for both entry and / or exit.

Cyanide is packed in closed wood boxes (IBC) packaged in polyethylene and polypropylene bags which protect the product from the air-environment moisture. IBCs

are stored inside sealed sea containers on a concrete slab in good conditions to prevent contact with water. No water systems for potable use is near this area; the safety shower station has its own contention tray; the cyanide storage area is designed such that leaks or other potential releases will not come in contact with cyanide containers. The surfaces adjacent to the warehouse are graded away from the warehouse to prevent ponding of water near the walls. Cyanide stored in sea containers is located in the upper area of the open yard - sea containers are suitable for outside storage.

All operations are performed outdoors, so there is minimal potential for build-up of hydrogen cyanide gas. The opening of sea containers is subject to a procedure requiring time for ventilation.

The facilities are within a locked areas with restricted access. Security guards are present 24 hours a day, 7 days a week. Gates are kept locked. Visitors must sign in upon entry. Access to the unauthorized personnel is prohibited. Cyanide is stored separately from incompatible materials in all cases.

Production Practice 1.2

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Production Practice 1.2

Summarize the basis for this Finding/Deficiencies Identified:

The facility has a management system and written procedures, emergency plan and instructions for unloading, loading and handling containers of cyanide and for managing any contaminated materials or wash water. The procedures describe how cyanide containers and contaminated wash solutions are managed in a safe and environmentally sound manner that prevents cyanide releases and exposures.

The Institute of Occupational Safety (IST due to its acronym in Spanish), a Chilean insurance mutual to which Puerto Columbo is affiliated, provides advice and assistance with the IST management system of health and safety at work, environment and quality; knowledge that allows them to migrate to the next stage of certifying the ISO 45001:2018 Occupational Health and Safety Management, ISO 14001:2015 Environmental Management, and ISO 9001:2015 Quality Management.

Puerto Columbo has standard operational procedures describing the operations activities, safety measures and personal protective equipment required during activities unloading and loading cyanide in sea containers, cyanide safe storage and in the

emergency response plan addresses instructions for managing any contaminated materials. These documents describe how cyanide containers and contaminated materials are managed in a safe and environmentally sound manner that prevents cyanide releases and exposures. Evidence reviewed is:

- PTS-SGI-073 v1 Procedure for the Reception, Storage and Dispatch of Hazardous Cargo Sodium Cyanide.
- I-PR-SGI-074 v1 Instructions for Deconsolidating and Storage of Sodium Cyanide.
- PTS-SGI-070 v1 Gate Control Procedure.
- PR-SGI-077 v1 SP Storage Area Checklist.
- SGI-009.1 v0 Emergency with Sodium Cyanide Management

The auditor reviewed the operating procedures finding the PPE list in the procedure for cyanide reception, storage and dispatch does not reflected those used/available in the field; that the cyanide containers transfer crew lacks of respiratory protection against particles as their protection masks are equipped with filters for organic and acid gas; also there are no indications to check the good condition of the reusable chemical suits; and that the procedure for measuring HCN gas level at the start of the transfer activities requires revision. After the audit Puerto Columbo sent a new version of this procedure, where all observations were addressed: they made the list of personal protective equipment included in the procedure for receiving, storing and handling cyanide compatible with those used during the transloading operation; provided respiratory protection against particulates, with N95 disposable type filters, the forklift operator uses full mask with filters for organic and acid gases, acids and particles. They establish a review of the condition of the reusable chemical protective suit before each use and to discard it if finding any tear or damage that nullifies its conditions as a protective barrier for the skin. Also, it was clearly established that the sequence measures HCN gas levels when opening the container door and at the end of the ventilation period, before entering. No additional information was required to find this in compliance.

The auditor reviewed the facility written operating procedures, among other documents, confirming that they address the safe management of cyanide. Implementation of procedures for reception, handling and storage of cyanide was confirmed through observation of these activities during the auditors' site visit. The auditor also had interviews with the personnel responsible for performing these tasks, and reviewed the available documentation, finding it in conformance.

Puerto Columbo was required to clarify what are the contingencies that may arise in the process and what actions need to be taken to control them. After the audit, the facility described in the new version of the procedure cyanide reception, storage and dispatch, the necessary actions to take in case of finding contaminated packaging, maxi bags or sacks poorly stowed and or in poor conditions. The procedure Gate Control includes contingency actions for sea containers in por conditions. No additional information as required to find this in compliance.

The operation procedures include contingency instructions for non-standard operating situations that detail contingency measures to be implemented if there is an upset in any activity that may result in cyanide exposures or releases. Contingency actions in the standard operating procedures include situations such as damage to a cyanide box on arrival inside a damaged sea container or during handling cyanide boxes.

The facility has a written management of change (MOC) procedure requiring written notification to environmental, health and safety personnel and a sign-off before the change can be instituted. The procedure Management of Change PTS-SGI-009 v0 identifies any change to the facility or its operating practices that may increase the potential for cyanide releases and adverse impacts on worker health and safety before such changes are implemented so that they can be evaluated and addressed, as necessary. The procedure includes, among others, forms PR-SGI-114 "Identification and evaluation of environmental aspects" and PR-SGI-115 "Hazard identification and risk assessment", requiring evaluating any impact on the worker´s health and safety and the environment before new projects, equipment or procedures be installed/implemented on site.

Verification was through review of the procedure as well as completed MOC forms, signed off by environmental and health and safety personnel.

The operation has a preventive maintenance program for its reach stackers used to unload, load and manage sea containers with cyanide, as well as for the forklifts used in the transloading operations, to prevent a failure that results in a cyanide release or exposure. No other equipment used for delivering to customers is the maintenance responsibility of the warehouse.

The frequency of these preventive maintenance activities is scheduled and documented, along with the hours of operation, and the basis for the maintenance frequency. Puerto Columbo manages its preventive maintenance program through Fracttal software. Monthly they take hour-meter readings from each piece of equipment and according to the manufacturer's recommendations, preventive maintenance is done. They also do corrective and predictive maintenance. The company GEMAC – from the same business group of Puerto Columbo: D&C Group – is in charge of the maintenance of the equipment. The auditor inspected the cyanide equipment, reviewed work orders issued by the software, maintenance records performed every 500 operating hours and interviewed employees to determine compliance with this provision.

There are no process equipment in use at this warehouse that require calibration.

The operation emergency response plan (ERP) describes how any water collected in the cyanide yard must be handled, how the operation determines if the water contains cyanide, and how it treats and/or disposes of water contaminated with cyanide. The operation built collection wells around the cyanide yard where rainwater is discharged, with no connection to any domestic drain or to the environment. Any liquid is recovered

by motor pump. The Plan addresses management of water found in this perimetral secondary containment. Water will be disposed of by the external company AMBIPAR. It will not be discharged into the environment; it is only outsourced to an external party. Additionally, in accordance with the environmental commitment/permit, the warehouse undertakes to declare that it will not have a discharge of industrial wastewater into the environment.

During the audit, no environmentally appropriate procedures were found for the handling and/or disposal of cyanide residues or cyanide-contaminated materials. The auditor required Puerto Columbo to specify procedures for the decontamination, handling, disposal of waste and contaminated materials, including the final destination: own procedure (level 1 emergencies) and third parties (levels 2 and 3).

After the audit, the facility sent a reviewed version of the Emergency Response Plan (ERP) where included procedures for management of cyanide materials such as cyanide spilled product, and cyanide-contaminated materials such as packaging and used equipment. The procedure specifies how any cyanide released from its primary containment is disposed of and how wastes contaminated with cyanide are to be managed. The procedure also describes how equipment that may be contaminated with cyanide should be decontaminated prior to disposal. Also provided Ambipar Response contractor procedures for remediation and decontamination.

The operation relies on Ambipar Response (Ambipar) is a contracted external entity providing services to third parties specializing in matters of accidents and contingencies related to the transport and storage of hazardous substances or emergencies including management of hazardous material and hazardous wastes. They deliver it to Via Limpia who take it to *Hidronor* or *Crowan* landfills for hazardous materials. The operation has a contract in force for one year. The auditor confirmed that the contract is for comprehensive care services for all types of emergencies that have their origin in storage and transport activities of hazardous substances and waste in general; in the event of accidents, contingencies, or other incidents involving the spill or leakage of hazardous substances stored or transported by Port Columbo.

The facility has procedures in place to confirm that labeling and packaging has not been compromised when it is shipped to customers. The Gate Control Procedure states that if the cargo is as they call IMO cargo (due to the International Maritime Organization which regulates the transport of dangerous goods by sea), it must be verified that it has corresponding IMOS logos on all four sides (CLASS and UN) and a photographic record must be taken of it. The auditor visited the Gate Control confirming this is done both at the vehicle entrance to the warehouse and on the cargo departure.

The procedure for reception, storage and dispatch of cyanide, requires during the transfer of cyanide-containing IBC boxes from one container to another that each sea container must have a standard label according to Chilean Standard (NCh) 2190, located

on the 4 sides of the container, indicating the 6.1 placard and license plate UN 1689. In the event that the signage container is not available, inadequate or deteriorated, Customer Service will notify the customer, providing Puerto Columbo with the signage, so that it can be installed in the work area. It also indicates that all packaging containing sodium cyanide must comply with the respective signage and visibility according to NCh 2190. It indicates that any labeling in poor condition must be immediately reflected on the electronic consolidated card and in turn inform the person in charge and to risk prevention.

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 ☐ not in compliance with	Production Practice 1.3

Summarize the basis for this Finding/Deficiencies Identified:

The warehouse is operated as a dry facility, there are no tanks with cyanide solutions. The facility inspects all loading, unloading, and storage areas and secondary containments to identify releases of solid cyanide or situations that pose a risk of a cyanide release as cracking of impermeable surfaces. Documentation has been retained and was available for the auditor's review demonstrating that inspections have been conducted, that they have been focused on the identification of releases and on the elements critical to the prevention of releases and exposures.

The checklists used for these inspections direct the inspector to evaluate specific items and provides sufficient detail regarding what to look for. During the site visit to the facility, the auditor confirmed that potentially hazardous conditions have been identified. The facility is regularly inspected, the workers were knowledgeable regarding the aspects that could present a threat and that they have to notify the site manager. Documentation is retained and was available for the auditor's review demonstrating that inspections have been conducted.

The warehouse operation conducts routine inspections to all trucks and containments entering and leaving the facility at the Control Gate, according to procedure PTS-SGI-070 v1 Gate Control Procedure. If during this inspection they detect a sea container in poor conditions, it is reported to the supervisor who stops the entry and communicates with the person shipper and according to that, instructions are followed. Puerto Columbo also inspects conditions of the sea containers prior to the operation of deconsolidating and transferring the cyanide load from one container to another, according to the PTS-SGI-

073 v1 Procedure for the Reception, Storage and Dispatch of Hazardous Cargo Sodium Cyanide and the work instruction I-PR-SGI-074 v1 Instructions for Deconsolidating and Storage of Sodium Cyanide.

Puerto Columbo is not responsible for their integrity; they would communicate with the shipper or the sea container responsible to replace it.

The warehouse conducts monthly inspections of the infrastructure, enough to identify potential problems before they present a risk of cyanide release or exposure. Inspections in the cyanide yard include the concrete pavement conditions, the secondary containment, the facility perimeter for integrity, lighting, tv cameras. Emergency response equipment and materials are inspected weekly, firefighting extinguishers are subject to monthly inspections. There are also pre-operational inspections before operations involving cyanide handling, and inspections of the documentation, boxes and transportation equipment. The auditor reviewed examples of inspections records confirming frequencies are sufficient to assure that equipment and installations are functioning as desired.

The facility inspections and maintenance records are documented in checklists and include the date of the inspection, the name of the inspector and any observed deficiencies. The nature and date of corrective action are documented in the inspection records. The auditor reviewed examples of the following completed inspection records: Storage Area Checklist (PR-SGI-077); Pre-task check list for cyanide transfer (PR-SGI-035); Fire Extinguisher Inspection (PR-SGI-041); and Inventory and inspection of PPE elements in the emergency cabinet equipment (PR-SGI-09 and PR-SGI-10). Records are retained in hard copy and were acceptable.

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
- ☐ not in compliance with

Production Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

The facility has a written procedure for reception, storage and dispatch of sodium cyanide in sea containers, has an instructive for deconsolidating and transfer cyanide in IBC boxes and a procedure for sea containers entrance and departure to/from the facility.

The same operating procedures discussed in Production Practice 1.2 address those aspects of the operation that are necessary for protection of workers, including its inspection programs for its cyanide facilities and its preventive maintenance programs for critical equipment. The procedures also address the required actions for non-routine and emergency operations, and maintenance activities. The procedures address the related safety issues as they describe safe practices. The level of detail in these procedures is adequate with the risks involved with the task. These documents include statements for use of personal protective equipment and for pre-work inspections, as appropriate and necessary for the warehouse operations. Pre-work inspections are required for cyanide reception and dispatch operations. The use of PPE is addressed in the procedures, safety training programs and in signs posted in specific work areas where cyanide is present.

Pre-work inspections are focused on safety and operational issues and documented in inspection. The operation has also procedures in its emergency response plans, describing the specific steps necessary to decontaminate emergency response equipment which could have been in contact with cyanide. The auditor reviewed these procedures, confirming they describe safe work practices and are implemented, through employee interviews and observation.

Workers at the facility have the opportunity to express their feedback in development and evaluation of health and safety procedures during diffusion of the updated procedures, dairy five minutes safety talk at the beginning of day. Other mechanism is

the Monthly Joint Committee and also, they have a suggestion box although it is not used frequently, according to the HSEQ (Health, Safety, Environmental, Quality) Supervisor.

The auditor reviewed the written procedures for unloading and loading and safe cyanide storage where are required such meetings, and by interviews with the warehouse's personnel. Employee participation in the development and maintenance of safety practices was found to be acceptable.

Through the development of its hazard identification, risk assessment and controls matrix, Puerto Columbo has identified the area of the cyanide yard as where workers may be exposed to hydrogen cyanide (HCN) gas and cyanide dust to harmful cyanide concentrations, and requires use of personal protective equipment and has stablished administrative controls as necessary in these areas or when performing these activities

The procedure for cyanide reception, storage and dispatch require workers to use PPE and a gas monitor in the cyanide yard area as protection from exposure to levels of cyanide greater than 4.7 parts per million (ppm) and 10 ppm for HCN gas and cyanide dust.

The auditor confirmed by direct observation of the signage in place that the operation has determined these areas and activities where such exposures may occur and require appropriate personal protective equipment and has stablished administrative controls, as necessary. The auditor also interviewed the workers to confirm that the administrative measures are being implemented.

The facility has 3 Dräger portable HCN monitoring devices when working in unloading and loading activities, to confirm that safe working conditions exist. The monitors alarms are set to 1.9 ppm and 3.8 ppm. During the audit, no prompts were found on what to do when the first alarm is triggered and the second alarm. After the audit, Puerto Columbo sent a reviewed version of the procedure for handling cyanide, addressing to stop the work and clearing the area if the first alarm of 1.9 ppm HCN gas is triggered, and to evacuate the warehouse in case the second alarm set at 3.8 ppm is activated. Compliance with this provision was verified by observation of the monitoring equipment, calibration records and employee interviews.

Of the three HCN gas monitors one of them is a multigas monitor and the other two are monogas monitors, only for HCN. The multigas monitor is maintained, tested and calibrated every year; the monogas monitors are new and are scheduled to be calibrated every six months, all according to the manufacturer recommendations. Records of these activities were retained and available for review by the auditor. Records for the new monitors included calibration as delivered by Drager distributor.

The procedure for cyanide unloading, loading and storage requires operations to be done accompanied at least by a second employee who can immediately summon assistance in the event of an exposure to harmful concentrations of cyanide. The procedure requires a crew of 3 people: operator, carder and mobilizer. Also has been determined that radios

must be used to call for aid in the cyanide storage area. In general, all the operators at Puerto Columbo carry radios for communications; they have radio channel 1, a control room that monitors the operations of the yard and radio channel 4 for emergencies. The auditor confirmed compliance with this provision through review of the procedure, interviews, visit to the control room and observation of the employees.

All employees must pass a pre-employment exam before starting to work in the company with a validity of 1 to 3 years depending on the job position and then periodically, they must go through the medical exam again. This includes respiratory evaluation, sensor metric and noise, among others. Evidence that such assessments are being conducted was available for the auditor's review.

The facility has a procedure to ensure that individuals working at the facility do not leave the premises with cyanide on their clothing. Individuals are given working clothes as reusable overalls and Tyvek suits to wear before entering areas where they may come in contact with cyanide, and this clothing is left on site when they leave so that it can be managed safely. The Procedure Use, Inspection and Replacement of PPE for Sodium Cyanide Operations SG-PTS-EEPP-004 from contractor AB Logistic/Rental (as its personnel is contracted to perform the tasks with cyanide in addition of the forklifts rental), requires in the case of the forklift operator that the coveralls for chemicals and gloves are stored in a container for PPE with exclusive access for them; in the case the carder and the mobilizer must discard the Tyvek suit once the task with cyanide is finished. Additionally, by local regulations, workers change their clothes at the entrance and exit of the workplace, for which they have dressing rooms and lockers. The auditor confirmed compliance with this provision by reviewing the procedure and interviewing and observing employees.

Visitors to all areas of the warehouse must be supervised and accompanied by operational supervisors. Supervisors should maintain a safe distance from the cyanide sea container storage and visitors are not allowed to enter to the cyanide sea container storage yard at any time. This yard is enclosed by a fence, and the containers are sealed. Access to this area is restricted to authorized personnel during any transloading of IBCs between containers. Visitors do not enter areas with potential cyanide contamination. There are no additional measures in place to prevent contamination of visitors.

The facility has placed legible signage throughout the operation as necessary to ensure that all workers who may be exposed to cyanide are aware of the risks and take appropriate protective measures. Workers have been alerted to the presence of cyanide and the need for appropriate personal protective equipment. Mandatory use of specific personal protective equipment is indicated for the sodium cyanide zone. Warning signs are placed in the facility entrance and cyanide yard among other places and in the containers parking areas. The mandatory use of specific personal protective equipment is indicated for the sodium cyanide zone as goggles, helmet, safety footwear, dust disposable mask, gloves and reflective vest. The auditor confirmed by observation the

presence of signage around the facility. Interviews with site personnel and review of the overall safety and training program with respect to cyanide safety also confirmed the workforce has been alerted to the presence and risks of cyanide.

The facility prohibits smoking, eating, drinking and having open flames in all areas of the facility where cyanide is present. The prohibition is included in the operation's safety training and is re-enforced by signage in these areas. Warning signs are placed in the cyanide yard area announcing that smoking, eating, drinking, and generating open flames is prohibited in areas where there is the potential for cyanide contamination. The auditor reviewed the training plans and records, interviewed the employees and observed on-site signage throughout the facility, finding compliance with this provision. Employees showed awareness of the restrictions and of the potential dangers of not following the rules.

Production Practice 2.2

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Production Practice 2.2

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Management with Sodium Cyanide (Emergency Response Plan or ERP) in Section 7.3 First Aid to Victims of Sodium Cyanide and/or Cyanide Solution Exposure describes specific emergency response procedures to respond to cyanide exposures. The Plan cover the processes to be followed in the event that cyanide is ingested, skin or eye contact made, and/or inhaled. The use of cyanide antidotes are also detailed. The document addresses the transfer of exposed victims to medical centers. The Plan is suited for the facility.

A portable safety shower with low pressure eyewash station and shower tray is available in the area where workers may be exposed to cyanide located outside of the cyanide storage yard area. This equipment is inspected monthly and before each cyanide task activity as part of the Pre-task check list for cyanide transfer (PR-SGI-035. The equipment is maintained and tested on a regular basis to ensure that it functions properly when needed. The monthly inspection Storage Area Checklist (PR-SGI-077) requires checking if there is a shower and eyewash near the cyanide storage area at a distance of no more than 20 m signposted and operational. The facility inspections and maintenance records are documented in checklists and include the date of the inspection, the name of the

inspector and any observed deficiencies. The nature and date of corrective action are documented in the inspection records

. There are non-acidic fire extinguishers strategically located in the cyanide storage yard area. There are three fire extinguishers with 50 kg dry chemical powder. The operation´s HSEQ area undergoes monthly inspection of fire extinguishers. An external company annually carries out its maintenance, recharging, labeling and hydrostatic testing. The auditor inspected the operation confirming that the shower, eye wash station and fire extinguishers are available and in good working condition. Inspection and testing records were reviewed and were found to be complete: Fire Extinguisher Inspection (PR-SGI-041); and Inventory and inspection of First aid cabinet (PR-SGI-09 and PR-SGI-10).

The operation has the necessary equipment available for emergency response to a worker's exposure to cyanide. They have oxygen in two 676 liters bottles with reservoir mask, an auxiliary manual breathing unit (AMBU) and an Automated External Defibrillator (AED). The cyanide first aids kit is stored in the HSEQ office and in the first aid cabinet near the cyanide yard. Cyanide antidote hydroxocobalamin (Cyanokit) is available at the hospital Claudio Vicuña is at a 3-minute drive away that has the and ambulance; on call the ambulance will come.

The auditor confirmed compliance with this provision through inspection of the facility, report of a visit to the clinic by Puerto Colombo HSEQ staff where the clinic confirms the antidote availability, including photographs. By interviews and observation at the facility, the auditor confirmed the employees' radio and cellular phones for communications. The facility in addition, has a Control Center with complete communication systems from where any emergency notification would be managed. The inspection checklist includes expiration dates of the first aids items.

Puerto Columbo inspects its cyanide first aid equipment regularly and had inspection records available for the auditor's review. In addition to pre-task inspections, work inspections are carried out on a monthly basis to the emergency and spill control equipment in charge of the prevention area. These inspections are documented and sent by mail to the Management, Maintenance and those in charge of ensuring their acquisition, replacement, conservation, maintenance or repair. The auditor reviewed completed inspections records for Storage Area Checklist (PR-SGI-077), and Pre-task check list before each task with sodium cyanide (PR-SGI-035)

Employees at the facility have access to the Safety Data Sheets (SDS) for the respective brand of stored sodium cyanide and on cyanide first aid, in the language of the workforce, in areas where cyanide is used. These documents are available at the first aid cabinet, which is located in front of the cyanide yard.

The auditor observed the safety or warning signs, reviewed the Safety Data Sheets and first aid procedures available in the language of the workforce at the first aid cabinet near the cyanide yard, finding this requirement in conformance.

The facility does not have cyanide solutions, storage tanks, process tanks, containers and piping containing cyanide. They exclusively manage cyanide in solid form in sea containers and IBC boxes. All containers with cyanide are clearly identified as such. The auditor determined compliance with this provision through inspection of cyanide containers stored at the operation.

The facility procedure for handling cyanide and signage installed require hand washing for its employees and any person who have been in areas of the facility posing the potential for skin exposure to cyanide. The procedure requires that at the end of the task all personnel must remove safety implements and change clothes and wash hands and faces, then inspect, clean and disinfect implements such as gloves, respirators and store them safely. The auditor reviewed the procedure and confirmed its implementation through observation of signage and interviews with employees.

The operation has operations personnel who are trained in cyanide first-aid on-site to respond in the event of a cyanide exposure. The auditor reviewed the training records demonstrating that the individuals have received specific training in cyanide first aid, including use AMBU, a defibrillator and administration of oxygen. Cyanide antidote will be administered by medical personnel at the local clinic.

The auditor reviewed attendance records from a Hazardous Materials (Hazmat) Course in 2023 which included first aids training with assistance of 3 employees from the HSEQ area. Other training was given the same year in October, to the Emergency Response Team (ERT) by the local fire company Bombon Valparaiso 1851, with 16 participants. On October 2024, a two-hour basic first aid course was given by IST, the mutual to which Puerto Columbo is affiliated, attended by 18 warehouse employees which included the use of a defibrillator and oxygen therapy, among others.

The facility has established in the emergency response plan (ERP) the procedure to transport to an off-site medical facility in the event that requires treatment. The ERP describes the procedure to call hospital Claudio Vicuña clinic requesting the ambulance to come; the time measured by a mock drill until the ambulance arrives at the site was around 3 minutes. The auditors reviewed the operation's response procedure and emergency mock drill report determining compliance with this provision.

Puerto Columbo, planning to transport a cyanide exposure victim to an off-site medical facility for treatment, has had formal meetings with the hospital Claudio Vicuña in September 2024, where the operation determined the medical facility is adequate and has qualified staff, equipment and expertise to treat the patient. Previously, in July 2024, has exchanged emails making aware the hospital that it may be asked to treat a victim of cyanide poisoning. The auditor reviewed the operation's documentation of its coordination with the off-site medical confirming and has taken the necessary actions to ensure proper care for exposed personnel.

The operation has a written procedure for investigating and evaluating incidents,

including cyanide incidents, to determine if the operation's policies and programs to prevent such incidents are adequate or whether they need to be revised. The SGI-012 v1 Incident Investigation Procedure requires that in the event of an incident an incident is first issued a Flash Report, then comes the investigation of the incident that includes corrective measures. In case of incidents with chemicals, a Chemical Emergency Report is issued at the internal initiative of Puerto Columbo. We saw accident statistics from both Puerto Columbo, but none related to cyanide incidents. The auditor reviewed the written procedure as well as records of past incidents reports and investigations, none related to cyanide. Records of other accidents and incidents were reviewed confirming that the general program for investigation of accidents and incidents is being implemented.

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

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

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

According to the Environmental Exempt Resolution 001 of the Regional Evaluation Commission of Valparaíso of the Republic of Chile dated January 2, 2019, after assessing the effects of the project on the quality of natural resources, including water, and that the project is not located close to protected areas, open waters, glacial and wetlands, and that in operation phase or in l emergency phase the project will not discharge temporary liquid waste into the sewer system since the spill control channels will remain contained and will be removed immediately, the authority resolved to approve the project, certifying that it complies with the applicable environmental regulations where the only monitoring commitment is to monitor environmental noise.

The facility does not discharge directly or indirectly to surface water. For the possible case of floor washing, the cyanide warehouse has a water collection channel that does not connect to any drainage; it will be collected goes to a plastic tank for its proper final disposal later.

The facility does not have direct or indirect discharges to surface water. Puerto Columbo as the facility exclusively handles unopened packages of solid cyanide.

The facility does not monitor levels of atmospheric process emissions of hydrogen cyanide gas or cyanide dust. According to the environmental approval resolution that includes the Chilean Supreme Decree 144/ 1961 of the Ministry of Health, it establishes standards to avoid emissions or atmospheric pollutants of any nature. It is declared that there will be no sources of fixed type emissions. The main pollutants to the atmosphere originate during the transit of trucks inside the facility, which due to their quantity is not significant.

The facility does not monitor water or air emissions.

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
- ☐ not in compliance with

Production Practice 4.1

Summarize the basis for this Finding/Deficiencies Identified:

The facility has the written training program Training Program PR-SGI 055 v0 dated 2024 where it recently included topics specifically related to cyanide since previously it was trained on hazardous substances. Training in cyanide awareness provides all personnel who may encounter cyanide with knowledge in recognizing the cyanide materials present at the operation, the health effects of cyanide, the symptoms of cyanide exposure, and the procedures to follow in the event of exposure. The operation provides refresher courses annually and will do so with issues related to cyanide.

The auditor reviewed the training materials, assistance records, understanding test and interviewed employees to verify that cyanide hazards are adequately addressed and potentially exposed personnel receive both initial and periodic refresher training. All personnel involved in the cyanide transfer operation were trained in cyanide awareness, also in the emergency response plan and in Fatal Accident Control). Other training had 35 participants in September 2024 which included Cyanco training videos available for the public on YouTube. Also, IST trained the entire transfer crew (6 people) in first aid including oxygen therapy.

Puerto Columbo and its contractors trains its workers regarding the proper use of personal protective equipment and the specific personal protective equipment required for various tasks and in different areas of the facility. Use of personal protective equipment is disseminated to the employees in the initial entry induction into the company; in the specific work procedure for loading, unloading and cyanide storage; in the Procedure Use, Inspection and Replacement of PPE for Sodium Cyanide Operations SG-PTS-EEPP-004 from contractor AB Logistic/Rental; in the safety annual training

program; and by signs posted in the cyanide yard work areas.

The auditor reviewed the operation's documentation as the recent training in the use of personal protective equipment that was carried out by AB Logistic/Rental in July 2024, observed the use of personal protective equipment at the facility and interviewed the employees regarding their training finding this in conformance.

All personnel involved in the management of cyanide at Puerto Columbo have been trained to perform their assigned tasks in a safe and environmentally sound manner. Task-specific training is aimed to instruct employees on how to accomplish their assigned tasks safely; the required procedures are designed such that the tasks are accomplished in a manner that prevents exposures and releases.

The facility trains its workers in the tasks for cyanide handling to perform their normal tasks to minimize risk to worker health and safety and in a manner that prevents unplanned cyanide releases. This training is given by the HSEQ area; records of training were reviewed during the audit. The HSEQ area keeps all training records registered and filed. The auditor reviewed examples of training assistance records and test of understanding. Through interviews, employees showed awareness of procedural requirements.

Task training is provided to employees before they are allowed to work with cyanide in an unsupervised manner. This is a requirement of local regulations on occupational accidents and diseases which approves regulations on prevention and communicating occupational. It is specified in Puerto Columbo´s Occupational Health and Safety Policies, and in the Internal Order, Hygiene and Safety Regulations. Training effectiveness is evaluated through testing and through observation of on-the-job performance by the Operations Supervisor. The auditor verified compliance by reviewing training records on register Talk on Obligation to Inform PR-SGI- 005 which is part of the worker induction program and interviewing operational and supervisory personnel.

In addition, through the Zerty software, the facility controls the training that each worker receives. All the inductions and task training provided and the results of the comprehension exams are uploaded to this platform. If the worker does not has completed all the required training, the worker is not listed in the system as authorized to work.

The facility provides refresher training annually to its employees, on normal tasks involving handling cyanide to ensure that employees continue to perform their jobs in a safe and environmentally protective manner, as scheduled in the Training Program PR-SGI 055 for 2024. This Program, among others, includes specific training to their assigned tasks and address cyanide safety. The register of personnel authorized to work with cyanide shows the date of its annual refresher training. Formal evaluations were verified by review of the evaluation records and interviews with employees.

Puerto Columbo's Training Program identifies the specific cyanide management elements

that each employee must be trained in to properly perform the required tasks. Training based on cyanide handling working procedure identifies the important items that must be conveyed to a new employee regarding how the cyanide-related tasks must be performed. The auditor reviewed the training material and interviewed workers and trainers finding compliance with this provision.

Training on normal tasks to handle cyanide is provided by the facility HSEQ Supervisors and by the IST mutual´s authorized trainers, who are experienced and qualified personnel with knowledge of the specific tasks to be accomplished and experience in effective communication techniques. Verification included interviews with the Supervisors, confirming their level of expertise in operating the facilities and in training is adequate.

The facility evaluates the training effectiveness through testing and observation of on-the-job performance by the Operations Supervisors. The auditor reviewed records for formally documented evaluations, finding it in compliance.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Production Practice 4.2

Summarize the basis for this Finding/Deficiencies Identified:

Puerto Columbo trains its employees working in activities related to cyanide handling and in areas where cyanide is present in what to do in the event, they observe a cyanide release and/or exposure. Employees are trained to call for the assistance of a designated Emergency Response Team or to provide cyanide first aid themselves. According to the facility emergency response plan, employees are trained to provide first response in case of cyanide spills and first aids; also, are trained to call for the assistance of medicals from the local hospital Claudio Vicuña located at 3 minutes' drive from the facility.

The auditor reviewed the operation's safety program, the emergency response plan, records of response training, and through interviews with facility personnel confirming that appropriate training is provided to site personnel by the IST mutual and the local firefighter's company.

The auditor reviewed the training records demonstrating that the individuals have received specific training in cyanide first aid, including use AMBU, a defibrillator and administration of oxygen. Cyanide antidote will be administered by medical personnel at the local clinic.

The auditor reviewed attendance records from a Hazardous Materials (Hazmat) Course in 2023 which included first aids training with assistance of 3 employees from the HSEQ area. Other training was given the same year in October, to the Emergency Response Team (ERT) by the local fire company Bombon Valparaiso 1851, with 16 participants. On October 2024, a two-hour basic first aid course was given by IST, the mutual to which Puerto Columbo is affiliated, attended by 18 warehouse employees which included the use of a defibrillator and oxygen therapy, among others.

Personnel at the facility are trained in all the necessary actions to carry out against cyanide exposures and in release response actions as is assigned in the operation's emergency response plan. The operation's requirements for employee training, including records of the training that these employees receive, is included in the operation's Training Program 2024. Training includes decontamination and the use of the oxygen and control of releases. Training records were available for review by the auditor and found in conformance.

The facility retains the emergency response training records, throughout an individual's employment documenting the training they have received and including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training material. Through the Zerty software, the facility controls the training that each worker receives. All training provided to the employee is uploaded to this platform. The auditor reviewed this documentation and interviewed trained personnel to determine compliance with this provision.

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 ☐ not in compliance with	Production Practice 5.1

Summarize the basis for this Finding/Deficiencies Identified:

The operation has the emergency response plan Emergency with Sodium Cyanide Management SGI-009.1 v0 (ERP or Plan) for responding to a cyanide release emergency. It is a document addressing cyanide only. The Plan describes specific emergency response procedures to respond to cyanide releases and exposures. The operation also uses as a reference document the Draslovka Cyanide Emergency Response Guide which is a complete document where among others it deals with initial actions of personnel at the scene, initial evaluation by the respondent, personal protective equipment required, solid cyanide spill in enclosed/ open spaces, fire hazard, symptoms of cyanide poisoning, environmental hazards, cleaning and decontamination.

The facility ERP do not consider a catastrophic release of hydrogen cyanide gas (HCN) as a scenario due to the nature of its operation. Puerto Columbo receives cyanide in sea containers and when it is necessary to deconsolidate the cargo to transfer to another sea containers, one ton IBC box is manipulated at the time; in the event of a cyanide spill during handling, the amount spilled would be less than a ton over a concrete pavement built with appropriate slopes so that it does not allow the accumulation of water puddles. The procedure prohibits the transfer of cyanide in the presence of rain or bad weather. Cyanide manipulation is carried out on an impermeable surface and no water courses are in the vicinities.

The Plan do consider the potential failure scenario of solid cyanide to concrete pavement dry and wet surfaces, during unloading, transfer and unloading operations. No packing operations are performed at the facility, cyanide IBC boxes are not opened. The first respond will be in charge of Puerto Columbo and in case of a major spill, the external contractor Ambipar Response will attend the cyanide spill.

Releases during fires are considered in the Plan, due to short circuits, hot work and

combustion equipment, and ignition due to incompatibility or poor handling of hazardous materials. In all cases, the Plan indicates that, if possible, to fight the fire with dry chemical powder extinguishers that are not acidic or that contain water. If the fire cannot be controlled, it is preferable to let the product. For larger fires, consider calling the local firefighter's company. Explosion scenarios are not considered possible in the Plan as the facility does not store substances or materials that could result in explosions.

The Plan do not consider emergency scenarios due cyanide piping, valves or tanks rupture as the facility only manages solid cyanide.

Power outages scenarios is not considered as a cyanide emergency scenario in the Plan, due to the nature of the cyanide handling operation. However, the operation has three emergency power generators for property security reasons in case of electrical blackouts, to maintain internal communications and lighting among other equipment.

The auditor verified that the Plan address those release scenarios that may be expected to occur and result in significant impacts to its workers, community and environment, as applicable to the site-specific features of the operation and its environmental setting.

The emergency response plan address the types of releases and responses that may be expected to occur at the site and include sufficient details so that personnel know the specific actions they are expected to take in response to the emergency. The degree of detail and specificity in the Plan is adequate to the environmental setting of the operation, the nature of the potential receptors, and the controls in place at the facility. The warehouse is located in an industrial area; the nearest community is more than 250 meters from the facility and among the surrounding companies is a cement factory.

The Plan describes step-by-step response actions for solid cyanide spills, fire, cyanide exposed workers and site evacuation. There is also a community telephone directory for contacting the neighboring industrial facilities should a broader evacuation be needed.

During the audit it was found that first aid procedures for cyanide contact cases described in the ERP require clear descriptions and actions different from those established. After the audit Puerto Columbo sent a reviewed version of the ERP describing procedures for responding to cyanide exposures due HCN gas inhalation, skin contact, and ingestion for both conscious and unconscious victims. The warehouse staff would administer oxygen. The Plan relays on the cyanide antidote at the local hospital, where medical personnel will administrate it. Cyanide antidote hydroxocobalamin (Cyanokit) is available at the hospital Claudio Vicuña at a 3-minute drive away that has the ambulance; on call the ambulance will come. The Plan states the use of this antidote is necessarily subject to the presence and supervision of medical personnel or nurses trained in the use of these elements, as well as in the recognition of the symptoms of cyanide poisoning and symptoms of adverse reaction to the use of the medicinal elements that make up the antidote kit.

Emergency scenarios for solid cyanide spills on dry and wet soil in the Plan contemplate

controlling the spill at its source, which in this case the source would be the IBC box.

On returning to normal operating conditions, the Plan describes containment, assessment, mitigation, and prevention measures, including a detailed investigation in accordance with the separate incident investigation procedure.

The auditor evaluated the Emergency Response Plan confirming its level of detail is appropriate.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Production Practice 5.2

Summarize the basis for this Finding/Deficiencies Identified:

Puerto Columbo has involved its own site personnel in the emergency planning process. The Plan has been developed by the HSEQ area in collaboration with the operations staff who have reviewed the potential scenarios for spills identified, the available resources and responses to result in enhanced protection of workers, communities and the environment. Stakeholders as Puerto San Antonio local authorities including the neighbor cement, hospital Claudio Vicuña and local firefighters have been involved in the emergency planning process to the extent that they may be affected by an emergency or are part of response actions called for in the Plan. Firefighters and medical personnel from the hospital Claudio Vicuña on receiving a copy of the ERP, were invited to visit the facility who toured the warehouse facilities where they were able to provide their opinions regarding an emergency in the area. The auditor reviewed pictures of this visit and assistance records registers, also interviewed site personnel confirming compliance with this provision.

The spill scenarios identified by the operation do not pose a risk to the nearest community located 250 meters from the warehouse since the scope of any spill is localized and it involves solid sodium cyanide without the possibility of spreading the spill of solids or leachates from the confined area of the cyanide yard. Puerto Columbo coordinates with local municipal authorities and holds periodically meetings with external emergency responders as local firefighters and the hospital. The site has informed authorities regarding its operations and coordination in case evacuation is required. The site provided a copy of its emergency response procedures to the authorities.

Local firefighters' company Bombon Valparaiso 1851 and hospital Claudio Vicuña are the external entities having a designated role in emergency response identified in the ERP. Both designated emergency responders have first-hand knowledge of the site and the available resources and have been involved in the emergency planning process to provide their input to the specific procedures and activities with which they would be involved and confirmed that they can fulfill their designated roles. The auditor reviewed pictures of this visit and assistance records registers, also interviewed site personnel confirming compliance with this provision.

Puerto Columbo has initiated a program to maintain periodic dialogue with the stakeholders that have specific responsibilities under the Plan, such as firefighters and medical personnel from the local hospital. They started from a working table with firefighters and hospital personnel where the next step is for each entity to report on their response capabilities, protocols, and necessary training. Then they will do a joint drill and hold periodic coordination meetings. Communication is frequent. The auditor reviewed email communications, pictures of these emergency responders visit to the facility and meeting minutes, confirming compliance.

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 ☐ not in compliance with	Production Practice 5.3

Summarize the basis for this Finding/Deficiencies Identified:

The ERP addresses the primary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Plan, identify the Emergency Response Team (ERT), requires appropriate training for emergency responders, includes call-out procedures and 24-hour contact information for the coordinators and response team members, specifies the duties and responsibilities of the coordinators and team members, lists all emergency response equipment that should be available, includes procedures to inspect emergency response equipment and assure its availability when required and describes the role of the external responders designated in emergency the response procedures is described.

During the audit it was found the Emergency Response Team (ERT) was not clearly identified. The operation was required to identify the brigade members or responders to the first/second level emergency. After the audit Puerto Columbo sent a revised version

of the ERP where all the ERT was identified with names, work position and cellphone number. Puerto Columbo´s workers and management personnel are members of the site emergency response brigade. Their roles are described in the Plan. According to the organizational chart of the Emergency Committee, the General Director of Emergencies is the General Manager, the Emergency Chief is the Terminal Manager and the alternate coordinators the Area Chiefs as appropriate, granted with the authority to provide all necessary resources. Additionally, the Plan shows contact number of alternate emergency response coordinators.

The Emergency Response Team (ERT) identified in the Plan as for evacuation, first aid, firefighting, hazardous materials, and for calls and expedited routes. The ERT is made up of personnel from all warehouse areas, yards, management and guard personnel.

The ERT is trained according to the annual training program. Training is provided by the facility own specialist personnel and also by externals such as the IST mutual, firefighters and Ambipar. Among the trainings received are the Hazardous Substances First Response Course, the Technical Level Hazmat Course and the Hazardous Substance Emergencies training.

The Plan includes internal and external call-out procedures and 24-hour contact information with the facility Control Center for the coordinators and response team members.

A list with the amount of equipment available for cyanide emergency response was not found with the quantities of equipment/material available. It was required to add it that count to attend to the emergency. After the audit, Puerto Columbo included this requirement in the reviewed version of the ERP. The Plan lists the emergency response equipment that should be available and includes PPEs, first aids kits, containment and neutralization materials and collection equipment for waste generated during the emergency.

No requirements were found to pass periodic inspection of emergency response teams to ensure their availability, although inspections have been done. After the audit, Puerto Columbo´s reviewed version of the ERP included emergency response equipment must be inspected monthly using checklists. Its availability and operability was confirmed during the audit. Filled checklists were reviewed and interviews during the audit confirmed this practice.

The roles of the as the medical facilities, firefighters and Ambipar the external emergency responder contractor are described in the plan.

The facility confirmed that outside entities with roles in emergency response as the contractor for emergency response Ambipar, firefighters, and medical services are aware of their involvement and have been provided with a copy of the emergency response plan. Puerto Columbo recently signed a service agreement with Ambipar for assistance as external responder for emergency cases that exceed their response capacity.

The auditor reviewed records of meetings with these external responders, confirming that these entities were sent copies of the ERT, and interviews with on-site and off-site personnel, as well as the records of visits by the firefighters and the hospital Claudio Vicuña to the warehouse and also, records of visits from Puerto Columbo to this hospital in San Antonio.

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 ☐ not in compliance with	Production Practice 5.4

Summarize the basis for this Finding/Deficiencies Identified:

Company management and government agencies regulating worker safety and environmental protection will be notified in the event of a cyanide emergency. The ERP procedures and contact information for notifying outside entities that will play a role in the response, such as firefighters and medical facilities, are also included in the Plan. The Plan establish who is responsible of calling the external responders and authorities. The Plan includes procedures for evaluating emergencies and as appropriate, notifying management, agencies, responders, medical facilities, and others. The auditor reviewed the Plan verifying that this information is available and up to date.

The operation's ERP include procedures and contact information for notifying San Antonio authorities although is not considered in the Plan the surrounding communities could be affected by a cyanide emergency. Contact information for local media are also included. The necessary information was available for the auditor's review in the Emergency Response Plan.

The Plan includes a requirement and details to notify the International Cyanide Management Institute (ICMI) of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such communications have been made as there was no significant incident in the operation.

Production Practice 5.5

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

The operation is	✓ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Production Practice 5.5

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan addresses the remediation issues to recovery cyanide, decontamination of soils and contaminated materials, as well as management and disposal of spill clean-up debris. The potential provision of an alternate drinking water supply is not applicable to the site as a release from the operation would not adversely impact a drinking water supply.

Procedures for recovery of released cyanide solids specify where these materials are to be taken; the ERP include procedures for neutralization and decontamination of cyanide spills and identifies the treatment chemical to be used and where it is stored; describes how the treatment chemical is to be prepared to the appropriate concentration; and defines the end point of the remediation, including how samples will be taken, what analysis will be performed, and what final concentration will be allowed in residual soil as evidence that the release has been completely cleaned up.

As the operation relies on the specialized in emergency response external entity Ambipar for major spills, second response and management of hazardous material and hazardous wastes, the procedures of this contracted entity include language that address decontamination, management, and disposal of cyanide-contaminated materials, including the ultimate destination of any disposed material.

The Plan addresses recovering the cyanide briquettes, decontamination and management and disposal of spill clean-up debris. Briquettes would be recovered using brooms, shovels, bags, and pails. Recovered materials would be returned to the boxes or disposed of as with other hazardous wastes. There are no cyanide process solutions at the warehouse, but in the unlikely event of a liquid cleanup, the plan indicates that contaminated solution will be suctioned from the perimeter gutter of the cyanide yard that acts as secondary containment. Other than washing down with water, if needed, neutralization or treatment of soils is not anticipated as cyanide is handled on a concrete pavement built on a HDPE liner.

All contaminated solid and liquid waste will be removed by Ambipar together with Via Limpia SpA for proper final disposal in a safe sanitary landfill, delivering a certificate of

adequate final disposal. Vía Limpia SpA is a company registered in Chile dedicated to consultancy, transportation, management, temporary storage and final disposal of both liquid and solid hazardous and non-hazardous waste at the national level.

The Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water or that could be expected to enter surface water, although all activities are performed inside the facility cyanide yard properly confined and waterproofed and away from bodies of water. There are no surface water bodies near the site, an estuary is about 150 meters from the warehouse, and the sea is about four kilometers away.

The ERP, Section 7.8 -Environmental Incidents Resulting from a Sodium Cyanide Spill- establishes that the HSEQ Area and the external emergency response company (Ambipar) will define the criteria and guidelines for the execution of remediation works. The responsibility for the remediation lies with the external company hired for this purpose. Likewise, monitoring of water, soil, flora and fauna must be carried out to determine the area of influence, the level of impact of a spill and the effectiveness of remediation tasks.

Production Practice 5.6

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

The operation is	✓ in full compliance with	Production Practice 5.6
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The Plan include provisions for reviewing and evaluating its adequacy on an established frequency. Section 5.4 -Review and Modification of Response Procedures- establishes that the management team must review the emergency response procedures at least once a year and modify them when appropriate, in particular after conducting drills and when real emergencies have occurred, to incorporate the corrective and preventive actions taken. The Plan also states that it should also be reviewed in cases of management reviews, organizational and legal requirements changes, and after changes in the external environment of the facility that could impact the emergency response.

The auditor reviewed the Emergency Response Plan initial version (0), dated from September 1rst, 2024. Through interviews with site personnel and emergency respond training records verified its implementation.

The facility has conducted two mock emergency drills during 2024, documenting the

emergency scenarios with a report and pictures of the drill, the personnel involved, and the response actions taken, and evaluating the drills to determine how well their procedures worked and the adequacy of the training provided to response personnel. The operation reviewed the ERP for response to cyanide releases and worker exposures and for training of response personnel based on the lessons learned from these emergency simulations. The drills were evaluated during meetings after their completion by the facility supervisors and workers. The auditor reviewed the mock drill reports, where the response times were considered, the training, the material handling suitability and the personal involvement. The reports include evaluation of the drills, the ERP compliance, and established the necessary corrective action. Corrective actions were done and closed.

On September 10, 2024, they carried out an emergency mock drill for cyanide spill during the cyanide transfer operation between containers in the cyanide yard. Participated personnel from Puerto Columbo and the contractor A&B Logistics, with 11 employees in total. The auditor reviewed the drill report, where among the opportunities for improvement found to better define the security areas and a place to deploy its equipment and the recovered cyanide, depending on the environmental conditions. Also found needed to improve accuracy and clarity when communicating emergencies, found needed to have a formally established Emergency Brigade and finally, that it would be ideal to carry out a mock drill with participation of with external responders such as firefighters and hospitals, which is planned to do so in the near future.

The auditor required the operation to perform an emergency mock drill which includes a cyanide exposure. After the audit Puerto Columbo performed another emergency drill conducted on November 11, 2024, in the cyanide yard. During the cyanide transfer operation, a warning is given that a box has spilled. They proceeded to suspend the work, activating the emergency plan. They established their security perimeter and proceeded to remove the cyanide pellets with the appropriate PPEs and equipment. The proceeded to neutralizes cyanide applying sodium hypochlorite solution (commercial bleach), into the container´s floor, especially in the affected area. During the performance of these jobs, a collaborator begins to feel bad due to the possible misuse of the full-face mask, although there is no presence of HCN gas. They called the ambulance, meanwhile, oxygen was provided to the worker relieve symptoms. The drill report has as improvement opportunities: the need arose to have a cabinet to store emergency response equipment such as oxygen to reduce the respond time. They also found that it needed to strengthen the vocabulary for emergency communications and information in an emergency. 11 employees attended it.

The Plan includes provisions to evaluate it and revise as necessary after any emergency that requires its implementation. No such reviews have been conducted as there were no cyanide incidents requiring to activate the Plan.