

**2026 ICMC CYANIDE CODE SUMMARY AUDIT REPORT
CERTIFICATION AUDIT**

Cyanide Transport Verification Protocol

Translogística Oroz S.L.R., Buenos Aires, Argentina



Submitted to
INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE
1400 I Street, NW, Suite 550, Washington, DC 20005, USA

Submitted by
GR Auditing
Gabriel Rodriguez, CN Code Lead Auditor
Juana de Asbaje 4, Hermosillo, Sonora, 83250, Mexico

Buenos Aires, Feb. 15, 2026



Contents

- OPERATION LOCATION DETAIL DESCRIPTION3
- INFORMATION ON THE AUDIT OPERATION4
- AUDITOR’S FINDING5
- Principle 1 | TRANSPORT6
 - Standard of Practice 1.16
 - Standard of Practice 1.28
 - Standard of Practice 1.39
 - Standard of Practice 1.410
 - Standard of Practice 1.513
 - Standard of Practice 1.614
- Principle 2 | INTERIM STORAGE15
 - Standard of Practice 2.115
- Principle 3 | EMERGENCY RESPONSE16
 - Standard of Practice 3.116
 - Standard of Practice 3.218
 - Standard of Practice 3.319
 - Standard of Practice 3.420
 - Standard of Practice 3.521
- Due Diligences for Argentine Ports.....23
 - A. Rio de la Plata Terminal (TRP), Buenos Aires Port.....23
 - B. Exolgan Terminal, Buenos Aires Port25
 - C. Zarate Terminal, Zarate Port27
 - D. Terminal of the Port Management Unit of Santa Cruz Province, Deseado Port29

OPERATION LOCATION DETAIL DESCRIPTION

Translogistica Oroz is a family-owned company dedicated to the transportation of general cargo and hazardous materials.

Translogistica Oroz is a national and international logistics company serving neighboring countries of Argentina. It developed its initial activities in the oil sector, and in 1996, it expanded into the mining sector, still under the legal entity of Enrique Oroz.

The first transports of sodium cyanide were carried out in 2002 for various mining companies in the Santa Cruz region. The company has been registered under the legal name Translogistica Oroz SRL since 2004, continuing the venture initiated by Enrique Oroz.

In 2004, Translogistica Oroz SRL participated in its first bidding process in the mining sector, thereby beginning its collaboration with Cerro Vanguardia.

Translogistica Oroz has been a signatory of the Cyanide Code since September 2024.

Currently, Translogistica Oroz transports sodium cyanide in ocean containers in convoys of eight trailers, accompanied by an escort vehicle with internal company drivers and another vehicle with an emergency response team led by members of the emergency services company in Argentina, named HAZMAT.

Translogistica Oroz collects the ocean containers at the port, and they are directly transported with the client; there is no temporary or intermediate storage.

As part of this certification audit for the transportation of cyanide, due diligence was also conducted at the ports of Buenos Aires (Rio de la Plata and Exolgan Terminals), Zarate, and Puerto Deseado.



Translogistica Oroz S.R.L.
Name of Operation
Pag. 3

Signature of Lead Auditor

Feb. 15, 2026
Date

INFORMATION ON THE AUDIT OPERATION}

Name of Cyanide Transport Operation: Translogistica Oroz S.R.L.

Name of the Company Ownership: Translogistica Oroz S.R.L.

Name of Operating Company: Translogistica Oroz S.R.L.

Name of Responsible Manager: Ariel Oroz

Address: Av. Guillermo Hudson 2751 , Florencio Varela.

State / Province: Buenos Aires

Country: Argentina

Telephone: +54 54 911 5887 0279

Email: ariel@translogistica-oro.com.ar



AUDITOR ´S FINDING

The operation is **in full compliance with** **the International Cyanide Management Code**
 in substantial compliance with
 not in compliance with

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

Audit Company: GR Auditing
Lead and Technical Transport Expert Auditor: Gabriel Rodriguez
Lead Auditor Email: gabriellrdz@gmail.com
Dates of Audit: November 26-27, 2025

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as 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 Auditors.

I attest that this Detailed 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 Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.



Translogistica Oroz S.R.L.
Name of Operation

Signature of Lead Auditor

February 15, 2026
Date



Translogistica Oroz S.R.L.
Name of Operation
Pag. 5

Signature of Lead Auditor

Feb. 15, 2026
Date

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Translogistica Oroz developed Procedure No. 58, Transport Route Safety Analysis (TRSA), issued on July 23, 2025, which describes the selection of transport routes. The TRSA includes specific details regarding the route, transport unit, and the material being transported; for example: starting point and destination of the route, road types, total route length, terrain topography, unit characteristics, population in adjacent areas, weather conditions, physical and chemical properties of the transported material, physical characteristics, etc.

The route evaluation includes toll collection points, identification of crossings over rivers, streams, and lakes in each segment, consideration of the population density of each town along the route, and inclusion of emergency contact numbers for authorities in each segment such as Civil Defense, Fire Department, Red Cross, Traffic, and Police. The procedure considers winding routes with steep inclines both uphill and downhill, as well as mountain routes that are typically one lane in each direction.

The procedure specifies crossings of rivers and watercourses; most crossings occur during the rainy season or thaw. It is also noted that during these seasons, extra precautions must be taken. In the case of fog, areas with potential fog and low clouds that reduce visibility are indicated. Vehicles are equipped with fog lights, and the instruction is to reduce speed.

Translogistica Oroz personnel perform field verification for each route to ensure the safety, security, and suitability of the road infrastructure for cyanide transport.



Procedure 58, Transport Route Safety Analysis (TRSA), assesses the level of risk using William T. Fine's methodology. The auditor reviewed the analysis for the route from Puerto Buenos Aires to Mina Linderos, where a moderate risk level has been determined.

The section 9 of Procedure 58 mentions that the update of the TRSA will occur every three years or in the event of changes in the conditions of the routes. These changes may be substantiated by internal evaluations conducted by Translogistica Oroz SRL, client recommendations, or updates from the WhatsApp group called the "Mining Road Network," where warnings, changes in road conditions, civil issues, etc., are documented.

The measures adopted from the route evaluation primarily involve reducing speed and stopping in designated overnight areas or marked alternatives. Additionally, the escort vehicle inspects the road before the truckloads pass through. The WhatsApp groups for Translogistica truck drivers provide updates on road conditions while the escort vehicle is in transit. There is also another WhatsApp group for the mine, which includes all transport operators and mine security personnel.

It is important to mention that the escort vehicle, its driver and co-driver, as well as the Starlink satellite internet system, are part of Traslogistica Oroz and are included in this audit.

Regarding the communities, interactions are facilitated through the mining site, specifically with the community personnel, and include the communities of Salta, Tolar Grande, and Salar de Pocitos. An example of community requirements is the vehicle labeling additions which include the company name and the truck number in the convoy (for example, 1 of 8, 2 of 8, etc.), as requested by the province of Salta.

The Hazardous Materials Management and Emergency Company of Argentina (HAZMAT) conducts community talks at the request of the mine, where inputs from the communities regarding the transit of cyanide are gathered.

As part of community relations, Translogistica Oroz has donated household appliances and kitchen utensils to the secondary school in Tolar Grande.

The transporter carries the cyanide in eight trucks per convoy, along with an escort vehicle and a HAZMAT vehicle.

It is important to mention that the escort vehicle, its driver and co-driver, as well as the Starlink satellite internet system, are part of Traslogistica Oroz and are included in this audit, along with the emergency response equipment, procedures, and personnel from HAZMAT (Hazardous Materials Management and Emergency Company of Argentina).

Translogistica Oroz does not subcontract with other entities.



Translogistica Oroz S.R.L.
Name of Operation
Pag. 7

Signature of Lead Auditor

Feb. 15, 2026
Date

Standard of Practice 1.2

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

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

Translogistica Oroz developed Procedure 56, Control of Hazardous Materials Licenses, for the management, verification, and monitoring of the licensing of drivers transporting hazardous goods, ensuring compliance with current regulations and operational continuity without legal deviations.

In the Argentine Republic, the so-called "hazardous goods transport license certificate" is issued through CATAMP (Argentine Chamber of Motor Transport of Hazardous Goods and Waste). The control of this can be accessed through the following website domain with the driver's ID: <https://certificadommpp.seguridadvial.gob.ar/licencia>.

Procedure 56, Control of Hazardous Materials Licenses, states that Translogistica Oroz implements an internal control system that includes the following information: Name and Surname, Expiration of Hazardous Materials (C.P.), and Expiration of General Cargo (C.G.). Additionally, the Exatian system is used to upload licenses and verify that they are not expired. Translogistica has 14 active drivers.

Hazardous materials drivers are required to undergo pre-employment medical examinations before they are hired. There is a periodic requirement for alcohol testing (randomly before each shipment) and drug testing (randomly). Additionally, the government conducts health tests when issuing permits. The mine also conducts random breathalyzer and drug tests.

Traslogistica Oroz has a yearly internal cyanide training program. Additionally, all personnel undergo external training on Cyanide Handling and Emergencies provided by HAZMAT.

Two operators were audited concerning their cyanide handling and emergency response during transportation, followed by a review of their training records. The two truck drivers received training in:



Translogistica Oroz S.R.L.
Name of Operation
Pag. 8

Signature of Lead Auditor

Feb. 15, 2026
Date

- Use of Personal Protective Equipment (Cyanide Transport Operations) on July 22, 2025. The exams were available with the names of the trainee and trainer, course name, and date.
- Transport of Chemical Substances - Emergency Response (Cyanide Loads) on July 7, 2025. Exams were available.
- Safety and Occupational Health Induction on September 2, 2025, and August 27, 2025. Exams were available.
- Manual Material Handling and Response to Spills on May 24 and March 24. Exams were available.

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.3

not in compliance with

Traslogística Oroz implements Procedure 53A, Scalability in Cargo Vehicles, to utilize equipment designed and operated within the load limits established by the CNRT (National Commission for Transport Regulation). In the Republic of Argentina, it is possible to check the status of vehicles related to their authorization and scalability through the website <https://servicios.cnrt.gob.ar/equipos-carga>, which belongs to the National Commission for Transport Regulation (CNRT). To perform the inquiry, it is necessary to enter the vehicle's license plate number.

For sodium cyanide, all axles are designed to be sufficient. The cyanide is transported in 20-ton containers, arranged from the supplier's facilities. These maritime containers are loaded onto trucks where they are secured with four latches to immobilize them during transit. The inspections conducted in procedure 51 prior to the trip and in procedure 57 during the daily operations of the trip include the timely detection of signs of stress or overloading.

Only 20 wooden boxes are moved per truck (weight of the container plus load = 2.3 + 23.7 = 26 tons). The weight of a traditional truck is 17 tons, while the weight of a scalable truck is 20 tons. In total, according to CNRT regulations, they can carry 52.5 tons, which is well within limits.

No additional maritime container can be added as it would exceed the weight limit. There are also public scales available for regulation along the route.



Translogística Oroz S.R.L.
Name of Operation
Pag. 9

Signature of Lead Auditor

Feb. 15, 2026
Date

A scalable truck has one additional axle, while a normal truck has the standard axles. In total, there are 16 trucks, of which 14 are scalable and 2 are normal.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.4

not in compliance with

Sodium Cyanide is Solid, Hazard Class: 6, UN/NA: UN 1689, Packing Group: I. Traslogistica Oroz picks up the ocean containers containing sodium cyanide from the Port and transports them directly to the Mine. The heavy-duty ocean containers are designed to maintain the integrity of the product packaging. Each container holds 20 wooden boxes, each weighing 1,187 kilograms. The wooden boxes are arranged from the production plant and remain in place throughout the journey inside the ocean container.

A wooden box weighs 1,185 kg, and an ocean container carries 20 wooden boxes. Therefore, the total weight is 23,700 kg.

The weight of the empty ocean container is 2.3 metric tons + 23.7 of the 20 wooden boxes are 26 metric tons in total. The weight of a traditional truck is 17 metric tons, while the weight of a scalable truck is 20 metric tons. In total, according to CNRT regulations, their maximum load is 52.5 metric tons, which is well within limits. See data below:

- Traditional Truck: 17 metric tons + 26 metric tons = 43 metric tons (Maximum weight per regulation: 45 metric tons)
- Scalable trucks: 20 metric tons + 26 metric tons = 46 metric tons (Maximum weight per regulation: 52.5 metric tons)

One scalable truck has one additional axle, while a normal truck has the standard axles.

For wooden boxes, the regulations are governed by the SRT (Superintendence of Occupational Risks) concerning workplace environment regulations, along with the safety data sheet. The harmoniously organized system is followed in the labeling of the wooden boxes.



Regulations require UN signage or labeling (toxic, class 6 skull + nomenclature 66 very toxic + 1689) to be placed on the front, sides, and back of the ocean containers. The maritime containers are sealed by the supplier from the time of shipment and are inspected by Traslogistica operators using a checklist called "Transportation Unit Control."

Additionally, there are local requirements from the communities, such as adding signs on the trucks that include the company name and the truck number in the convoy (for example, 1 of 8, 2 of 8, etc.)

Translogistica has implemented a program for vehicle inspections prior to each departure/shipment. As part of preventive measures, daily inspections include the integrity of both the tractor and trailer, as well as the integrity of the packaging, the condition of the container doors, and the presence of seals. It is crucial that these seals remain intact during transit and are only removed at the final destination. The delivery note specifies the quantity of material transported, recipient, sender, etc. The sea containers are inspected and maintained at the port facilities by port personnel. Additionally, the inspections carried out in Procedure 51, prior to the trip, also encompass the evaluation of the twist pins.

Inspections are conducted before loading cyanide and daily during the transport of the cyanide container while mechanical maintenance is performed after each trip, so the vehicle is checked by the mechanical department before it is used again.

A total of 16 trucks is available, with 14 being used more for cyanide transport due to being more modern. Every 40,000 kilometers, the dealership provides service for 240,000 km or 2 years, whichever comes first. During this period, the normal procedure involves checking upon arrival; if necessary, the dealership is notified to determine whether they will perform the maintenance or if the transport company will handle it. After this time, preventive maintenance is conducted every 40,000 km.

Trailers arriving from the trip undergo an inspection, conducted by the maintenance department, and necessary repairs are made if needed.

In addition to pre- and post-operation checks, units must undergo scheduled maintenance based on:

- Mileage: According to manufacturer specifications (e.g., oil changes, filters, brake checks, belts, suspension, etc.).
- Elapsed Time: Even if the unit has not been used extensively, some components degrade due to aging (batteries, fluids, belts, rubber elements, etc.).

Work orders for dealership service are recorded (e.g., every 30,000 km or 40,000 km, depending on the brand's recommendation).



Translogística Oroz has developed Procedure No. 59: Limitation of Operator/Driver Hours, which states that transits do not occur at night. The clear driving and rest cycles will be established, including:

- A maximum driving period of 4 to 6 continuous hours followed by a minimum 30-minute rest.
- A second driving period of 4 to 6 hours followed by a minimum 1-hour rest.
- An obligatory minimum resting period of 8 hours before starting a new workday.

The material is already arranged by the producer; 20 wooden boxes fit in a maritime container. The net weight of the box is 1,100 kg, tare weight: 85 kg, and a total weight: 1,185 kg.

Four pins are used to secure the ocean container to the trailer.

In case of any eventuality on the road, such as bad weather or civil disturbances, it is noted in the checklist No. 58, and the established stop or an alternate stop will be sought until the issue is resolved.

For rough terrain, there is no other route, and the Lipán zone (the winding crossing) does not have alternatives either.

HAZMAT provides recommendations for possible routes; but if the new route passes through a town, they wait for the issue to be resolved, seeking the established stop or an alternate one.

Translogística has developed Procedure No. 35: Alcohol and Drug Control, which states that:

- The government conducts a psycho-physical analysis for drivers (required for licensing): general health tests, visiomotor tests (Bensder Test). The company conducts a pre-employment examination, including drug analysis, and the Mary laboratory performs analyses at least every six months.
- The company conducts random drug tests at least once every six months.
- Alcohol tests are conducted before every shipment departure for all personnel.

Additionally, Translogística Oroz conducts the following examinations for drivers before they start working and annually for those already hired: physical, psychological, drug, alcohol, spirometry, and height tests (including strength, balance, spirometry, ergometry, and heart tests).

From the implementation of this procedure in April 2025, records will be kept in the administrative files of each driver by year.



Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

This is not applicable, Translogistica does not transport cyanide by sea.

1. Are shipments of cyanide by sea transported in compliance with the Dangerous Goods Code of the International Maritime Organization?
 - a) Is the cyanide shipment packaged as required by Part 4 of the IMO DG Code and according to the packaging instructions and packaging provisions indicated on the DG List?
 - b) Are cyanide packages marked as required by Section 5.2.1 of the IMO DG Code and according to the labeling requirements indicated on the DG List?
 - c) Are cyanide packages labeled as required by Section 5.2.2 of the IMO DG Code and according to the labeling requirements indicated on the DG List?
 - d) If cyanide is shipped in cargo transport units, are the units placarded and marked as required by Chapter 5.3 of the IMO DG Code?
 - e) Has a dangerous goods transport document been prepared with the information required under Chapter 5.4 of the DG Code?
 - f) If the cyanide is packed or loaded into a container, has a "container/vehicle packing certificate" been prepared meeting the requirements of Section 5.4.2 of the DG Code?
 - g) Does the ship carrying the cyanide have a list or manifest identifying the presence and location of the cyanide or a detailed stowage plan including this information, as required under Section 5.4.3.1 of the DG Code?
 - h) Does the ship carrying the cyanide have cyanide emergency response information, as required under Section 5.4.3.2 of the DG Code?
 - i) Does the ship comply with the stowage and separation requirements of Part 7 of the DG Code?

This is not applicable, Translogistica does not transport cyanide by sea.



Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.6

not in compliance with

Mobile phones, radios, and a GPS tracking system are available. In areas without GPS signal, the Starlink system is utilized, enabling communication via calls using satellite Wi-Fi.

The hazardous materials handling and emergency company in Argentina (HAZMAT) accompanies the convoys transporting cyanide to the mines, bringing along the necessary emergency response equipment for potential cyanide incidents. The auditor reviewed the checklists for these emergency response teams and found them to be adequate.

Translogistica Oroz maintains Procedure No. 57: Shipment Tracking, for testing the communication equipment.

- Periodic and Pre-trip Testing:
- Verification Communication Equipment: Devices must be verified before departure (mobile phones, Inter-vehicle communication radio, satellite internet (Starlink):

The Satellite Internet (Starlink system) is used for communication in areas where the GPS system is not operational. The satellite system operates with a constellation of thousands of low-orbit satellites, making it highly effective in remote areas where GPS signals are unavailable.

Translogistica Oroz has developed Procedure No. 57: Shipment Tracking, which states that the GPS system tracks shipments from start to finish. When there is no signal, the information is stored and transmitted to the control system once a signal becomes available.

Shipping documents are available, including invoices that specify quantities and costs. This includes the bill of lading, delivery note, and HDS (Hazardous Data Sheet), among others.

The shipping documentation, including the bill of lading and delivery note, specifies the amount of cyanide in transit. Supplier Safety Data Sheets are also part of the shipping documentation and are available if needed. The auditor reviewed the shipping records and found them to be in order.

Translogistica Oroz does not subcontract with other entities.



Principle 2 | INTERIM STORAGE

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

Standard of Practice 2.1

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

in full compliance with

The operation is

in substantial compliance with Standard of Practice 2.1

not in compliance with

It is not applicable, Translogistica Oroz does not have interim storage

For port facilities that act as trans-shipping depots, and when rail or ship transport involves interim storage sites or interim storage occurs at ports, the questions under Transport Practice 2.1 may be addressed to the extent practical by the consignor's Due Diligence Investigation, and the information included in the Due Diligence Investigation for those facilities.

1. Are warning signs posted alerting workers 1) that cyanide is present; 2) that smoking, open flames, eating and drinking are not allowed and 3) what personal protective equipment must be worn?
2. Are there security measures in place to prevent unauthorized access to cyanide, such as lockouts on valves and fenced and locked storage of solids?
3. Is cyanide separated from incompatible materials such as acids, strong oxidizers and explosives with berms, bunds, walls or other appropriate barriers to prevent mixing?
4. Is cyanide stored in a manner designed to minimize the potential for contact of solid cyanide with water (e.g., under a roof, off the ground, or in specially designed containers)?
5. Is cyanide stored with adequate ventilation to prevent build-up of hydrogen cyanide gas and cyanide dust?
6. Are there systems in place to contain any spilled cyanide materials and minimize the extent of a release?

It is not applicable, Translogistica Oroz does not have interim storage



Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

The operation is

in substantial compliance with

Standard of Practice 3.1

not in compliance with

Translogística maintains the General Contingency Plan for the road transport of sodium cyanide, dated June 2025. This procedure addresses cyanide releases and the exposure of affected individuals.

The objective of the plan is:

- Protect communities and the environment during the transport of cyanide.
- Establish clear lines of responsibility regarding safety, protection, spill prevention, training, and emergency responses.
- Implement an appropriate emergency response plan for incidents involving the road transport of sodium cyanide.
- Train transporters and emergency response personnel to handle cyanide safely and in a manner that respects human health, communities, and the environment.
- Periodically evaluate response procedures and capabilities and make corrections as necessary.

Additionally, the plan includes the emergency numbers for the country's emergency center: CIPET: Emergency Information Center for Transport and CIQUIME: Chemical Information Center for Emergencies.

Where CIQUIME is an organization that specializes in the comprehensive management of chemical substances and hazardous materials, focusing on regulatory compliance, incident prevention, and the practical application of regulations, and CIPET is a service provided by the Argentine Chamber of Automotive Transport of Goods and Hazardous Waste, operating under the Subsecretariat of Risk Management and Civil Protection.



Translogística Oroz S.R.L.

Name of Operation

Pag. 16

Signature of Lead Auditor

Feb. 15, 2026

Date

The emergency scenarios described in the General Contingency Plan should be specific to the delivery route taken, the condition of the road, the physical and chemical form of the cyanide handled, and the transport vehicles used. The MSDS sheet is available to the authorities along the route.

Section 4 of the General Contingency Plan outlines the characteristics of the transported product, which is in solid form as briquettes. Additionally, it specifies that the briquettes are white with an exterior layer of sodium hydroxide.

Translogistica Oroz transports trucks with chassis. The sea container is placed on top of the chassis and secured at all four corners with a ball-type clamp. Overland transportation is carried out from the port to the mine.

The route evaluation mentions the state of the road, whether it is unpaved, etc. The general contingency plan for the road transport of sodium cyanide considers the road conditions detailed in the route evaluation for Minera Mansfield. It includes emergency contact information (fire department, police, hospitals, military, civil defense, national center (911), COE (national emergency operations center)) for the entire route evaluation from the port to the mine.

Where COE functions as a provincial or local body dedicated to coordinating responses to crises, natural disasters, or health emergencies. It facilitates collaboration among security forces, health services, and civil protection to mitigate risks and save lives, providing active interventions during severe weather events.

The General Contingency Plan outlines that trucks with semi-trailers and perimeter doors are used. There is no provisional storage.

The General Contingency Plan describes response actions depending of the emergency scenarios such as:

- Truck rollover and/or collision without product spill.
- Truck rollover and/or collision with product spill.
- Truck rollover and/or collision with product spill and contact with rain.
- Truck rollover and/or collision with product spill and contact with rivers and lakes.
- Truck rollover and/or collision with product spill followed by fire.

The Emergency Response Plan includes the next roles of leader of HAZMAT

- Communicate the incident/accident according to the call flowchart in Appendix V of this response plan.
- Assess the situation and establish the necessary personal protective equipment (PPE) for mitigation tasks, supervising proper placement and use by operators.



- Evaluate the incident and establish necessary actions for mitigation, overseeing all operations.
- If the response capacity of the present team is exceeded, request support from response teams on standby within the company.
- If additional equipment is needed, coordinate its hiring, subject to authorization from the cargo owner and the transporter.

Standard of Practice 3.2

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 3.2

not in compliance with

Emergency response drivers from Translogistica Oroz receive annual emergency response training from the external provider HAZMAT. The auditor reviewed the training evidence, which included the names of the trained individuals, the person who trained them, and the training materials, including a video.

The Emergency Response Plan includes descriptions of the specific emergency response, for small and large emergencies, the HAZMAT Leader Responsibilities, and a list of personnel who could assist during emergencies.

There is a list of the emergency response equipment (ERE) that HAZMAT has inside their emergency response truck and other list with the ERE in each of the Translogistica Oroz trucks.

The HAZMAT Sodium Cyanide Materials list includes, among others:

- HCN Detector (calibrated on 1/9/2025)
- Satellite phone (Indium)
- Satellite antenna (Starlink)
- Tools
- Oxygen mask with reservoir and nasal cannula
- 3M masks with filters for organic vapors

The Traslogistica Oros Sodium Cyanide Materials list includes, among others:



Translogistica Oroz S.R.L.
Name of Operation
Pag. 18

Signature of Lead Auditor

Feb. 15, 2026
Date

- Straps, tie-downs, container locks
- Fire extinguishers
- Spark arresters for parking the unit
- Spill containment (Absorbent material kit, temporary storage bags, anti-spark broom, and shovel).
- Personal protective equipment (PPE) in the unit
- First aid kits, reflective vests, danger tape, and beacons

Inspection checklists of emergency response equipment are completed before each shipment departure to ensure all emergency response equipment is in proper condition and available for use. Inspections are conducted prior to every outbound shipment by Translogistics operators and HAZMAT personnel.

During the transportation of sodium cyanide to the client, cyanide antidotes are not included. In case of cyanide exposure, mining clients have access to antidotes and qualified medical personnel to administer them. Furthermore, certain hospitals along the route have received training from HAZMAT on the use of these antidotes and can offer assistance if needed.

The materials and equipment listed in the emergency response procedure are available during ocular inspections conducted at Translogistica's facilities. Also, the Mine performs inspections of the emergency response equipment from Oroz and HAZMAT upon arrival at the mine. Translogistica Oroz does not subcontract with other entities.

The staff from Translogistica Oroz and HAZMAT are equipped to act as the initial responders in the event of any incidents along the route. Furthermore, the route assessments include external emergency contact numbers for all paths from the port to the client. These contacts will offer assistance during emergencies until additional HAZMAT personnel from the only base in Buenos Aires or those from the mine arrive.

Standard of Practice 3.3

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 Standard of Practice 3.3



Emergency Communication Protocol: Communication Flow:

- HAZMAT communicates the incident to HAZMAT Central.
- HAZMAT Central notifies Translogistica Oroz.
- Both HAZMAT and Translogistica Oroz inform Mine.

The Emergency contact numbers for external agencies are included in the route document from the port to the mine. In the event of an incident, manufacturers, the mine, and affected communities will be notified by the mine or its designated representative.

Emergency response external entities include Firefighters, Police, Hospitals, Gendarmerie, Civil Defense, Emergency Operations Center, National Poisoning Center.

Section 5.3.8 of the Emergency Response Plan mentions that the Emergency Response Plan for the Road Transport of Sodium Cyanide will be reviewed and/or modified after any incident or accident that occurs during transportation operations. If no incidents occur, it will be reviewed at least every two years.

The person in charge of operations at Translogistica Oroz SRL is responsible for communicating any cyanide accident to the International Cyanide Management Institute (ICMI). Notification is required in the following scenarios:

- Human Exposure: Exposure of individuals to sodium cyanide that requires intervention from specialized emergency response teams for decontamination and/or treatment.
- Surface Water Contact: Contact of sodium cyanide with surface waters due to spills of any kind.
- Spills on Surfaces: Spills of sodium cyanide on asphalt, soil, or gravel outside of primary and secondary containers due to their rupture.
- Cyanide Release: Any release of sodium cyanide that requires intervention from emergency response teams.
- Animal Fatalities: Spills of sodium cyanide resulting in multiple animal deaths.
- Theft or Robbery: Theft or robbery of sodium cyanide.

Standard of Practice 3.4

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 3.4

not in compliance with



The decontamination procedures are included in the emergency response plan, and HAZMAT is responsible for the initial cleanup. If the incident exceeds their capacity, external remediation companies will be contracted. Waste will either be sent to the mine or disposed of by a hazardous waste company, accompanied by the appropriate disposal documentation. The Emergency Response Plan outlines the steps for recovery and cleanup cyanide spills.

The Emergency Response Procedure states that no sodium hypochlorite, hydrogen peroxide, iron sulfate, or any other chemical products will not be used to neutralize the spill or reduce contamination in watercourses.

Standard of Practice 3.5

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

in full compliance with

The operation is in substantial compliance with Standard of Practice 3.5

not in compliance with

Section 5.3.8 of the ERP details the Emergency Response Plan revisions. The Emergency Response Plan will be reviewed and/or modified after any incident or accident that occurs during the transportation operations and after any mock drill if needed. If no incidents occur, at least every two years.

Translogistica Oroz conducts mock emergency response drills annually, testing the response to cyanide incidents during transportation. Since Translogistica has resumed its operations with sodium cyanide after many years without handling cyanide in 2025, the first drill related to sodium cyanide was held on May 15, 2025. In this drill, there was a cyanide spill; however, no personnel were exposed to cyanide. It is important to note that HAZMAT has conducted previous drills with personnel who were exposed. Nevertheless, the auditor informed the transport company that drills must be conducted annually and should include not only cyanide spills but also sodium cyanide exposure.

At the conclusion of the exercise, a review of the activities was conducted with all personnel present at the assembly point. During the discussion, the importance of conducting this exercise periodically was emphasized to streamline emergency procedures. The time spent was deemed optimal and appropriate for the specific issues of the situation.



It was verified that communication was effective, providing detailed information, and the driver's tasks were performed satisfactorily.

At the end of the exercise, a review of what was done was conducted with all personnel at the assembly point. During the discussion, the importance of conducting this exercise periodically was highlighted to mechanize emergency procedures. The time spent was considered optimal and aligned with the specific issues of the situation. It was confirmed that communication was excellent, providing detailed information, and the driver's tasks were performed satisfactorily.

Section 5.3.8 of the Emergency Response Plan mentions that the Emergency Response Plan for the Road Transport of Sodium Cyanide will be reviewed and/or modified after any incident or accident that occurs during transportation operations and after any mock drill if needed. If no incidents occur, it will be reviewed at least every two years.



Due Diligences for Argentine Ports

Translogística Oroz Supply Chain involves collecting ocean containers from ports and delivering them directly to clients. At the time of the audit the company is collecting containers at the port Buenos Aires (Río de la Plata Terminal and Exolgan Terminal) and the port Zarate (Zarate Terminal). This due diligence covers the previously mentioned ports and terminals, along with the port of Deseado and its Terminal managed by the Santa Cruz Province Port Management Unit, which is planned for future use.

Terminals characteristic:

A. Río de la Plata Terminal (TRP), Buenos Aires Port

Terminal Name:	Terminales Río de la Plata S.A.	Exolgan S.A	Terminal Zarate	Port Executive Unit of the Province of Santa Cruz
Localización:	Av. Pres. Ramon S. Castillo 13	Argentino Valle Street 281	Dr. Felix Pagola 2671	Access on National Route 281, s/n
Locality Name:	Puerto Buenos Aires	Puerto Buenos Aires	Puerto Zarate	Puerto Deseado
Department:	Retiro	Avellaneda	Zárate	Deseado
Province:	Buenos Aires	Buenos Aires	Buenos Aires	Santa Cruz
Approximate Geographic Coordinates:	Latitude 34° 35' 06" S Longitude 58° 21' 58" O.	Latitude 34° 38' 26" S Longitude 58° 20' 42" O.	Latitude 34°04'30.26" S Longitude 59°02'38.26" O	Latitude 47° 45' 10,5" S Longitude 65° 55' 41,2" O.
Capacity:	Port Terminal with an installed capacity of: 88 million TEUs 430,000 m ² of operational area	Port Terminal with an installed capacity of: 60,000 TEUs 300,000 m ² of storage	Port Terminal with an installed capacity of: 270,000 TEUs per year 19,000 TEUs yard capacity 480 m ² of operational area Truck waiting area of 40,000 m ²	Port Terminal with an installed capacity of: 572 m ² of covered fiscal deposit for import/export 15,000 m ² of operational surface
Depth:	10.05 meters of depth	10 meters of depth	11 meters of depth	9 to 11 meters of depth
Phone Numbers:	0810-4444-877 +54 11 3329-1234	+54 58113-9100 +54 4229-0000	+54-3487-42-9001	+54-0297-4872228 +54-0297-4872234

Río de la Plata Terminals (TRP), located in Puerto Nuevo, Buenos Aires, the capital of the Argentine Republic. The terminal is privately managed by the DP World Group and has been in operation since 1972. The area known as Puerto Norte comprises six berths used for port operations and servicing ocean-going and coastal vessels. The area occupied by five general



cargo terminals—1, 2, and 3 operated by TRP—covers approximately 92 hectares, with 7,250 meters of quay length and 23 docking sites.

Company Name: Terminales Río de la Plata S.A.

Location: Av. Pres. Ramón S. Castillo 13

Commune: 1

Neighborhood: Retiro

Province: Autonomous City of Buenos Aires

Country: Argentina

Approximate Geographic Coordinates: Latitude 34° 35' 06" S - Longitude 58° 21' 58" W

Port Terminal Capacity:

- Installed capacity of +88 million TEUs
- 430,000 m² of operational area

Depth: 10.05 meters

Phone Numbers: 0810-4444-877 / +54 11 3329-1234

Río de la Plata terminals have developed and certified, through an independent and globally recognized entity, its Integrated Management System under international standards for Quality (ISO 9001:2015), Environment (ISO 14001:2015), Information Security (ISO 27001:2013), Supply Chain Security (ISO 28000:2007), Energy Efficiency (ISO 50001:2018), and Occupational Health and Safety (ISO 45001:2018). The commitment is summarized in its Policy: CITO: Terminales Río de la Plata S.A. (n.d.). Certifications. Retrieved November 21, 2025, from

<https://www.trp.com.ar/la-empresa/certificaciones>

The Port of Buenos Aires handles over 62% of the country's container cargo. The port is equipped with a video surveillance system (CCTV), allowing for the transmission of images through microwave links. The Port of Buenos Aires operates independently, with its own monitoring stations. Currently, the security system includes 230 cameras monitored from the Comprehensive Security Center (CIS) in collaboration with the Argentine Naval Prefecture.

The Monitoring Center is located in a sustainable building constructed from containers and operates with trained internal agents for these tasks, alongside personnel from the Argentine Naval Prefecture. The Argentine Naval Prefecture (PNA) is the National Maritime Authority, fulfilling various security and policing functions, including navigation and port security, environmental protection of waters, and acting as customs, immigration, and health police. It is also responsible for combating organized crime, investigating crimes, and providing assistance to individuals in maritime or river emergencies.

The Rio de la Plata terminal has an Emergency Respond Plan (ERP) that addresses potential hydrocarbon spills and other hazardous substances that may occur, including the cyanide, aimed at preserving the environment and the entire port operation within the jurisdiction. It includes a National Contingency Plan in compliance with Ordinance No. 8/98 from the Argentine Naval Prefecture.



Translogística Oroz S.R.L.

Name of Operation

Pag. 24

Signature of Lead Auditor

Feb. 15, 2026

Date

Since 2022, efforts have been underway to implement ISO 22320 Emergency Management Standards, using the guidelines of the aforementioned standard as a basis for developing coordination and cooperation efforts for emergency response within the port jurisdiction, adhering to the management principles established in Resolution No. 77/2023, "Risk and Emergency Management Policy of the General Ports Administration."

The Port Training Center (CENCAPOR) is responsible for developing, disseminating, coordinating, and executing training for participants in the national and international port community. To this end, it has a team of instructors for all courses offered: three instructors responsible for programming, coordinating, and executing courses in Port Operations (Basic Port Course, Hazardous Materials Course, Cargo Operator, Containers, etc.).

The Comprehensive Emergency Skills Workshops (JIDE) aim to bring together public, non-governmental, and private entities to share experiences on prevention, emergency, and rescue topics, providing a global perspective on emergency management in the country, from the producers of goods and services utilized to the last link in the chain of mitigation, response, and recovery.

Inspections on Hygiene and Safety: Hygiene and safety inspections are evaluation and supervision processes conducted on the permit holders and concessionaires within the jurisdiction of the Port of Buenos Aires. They include, among others:

- Identifying and correcting potential risks to the safety and health of workers.
- Ensuring the use of appropriate personal protective equipment.

B. Exolgan Terminal, Buenos Aires Port

Exolgan Terminal is in the first section of Dock Sud Canal, Avellaneda district, Buenos Aires province. The terminal is privately managed by the International Trade Logistics (ITL) Group and has been in operation since 1995. The following indicates its location in the first section of Dock Sud Canal, near the maneuvering sector called Cuatro Bocas at the mouth of the Riachuelo River.

Company Name: Exolgan S.A.

Location: Argentino Valle Street 281

Locality: Dock Sud

District: Avellaneda

Province: Buenos Aires

Country: Argentina

Approximate Geographic Coordinates: Latitude 34° 38' 26" S - Longitude 58° 20' 42" W

Port Terminal Capacity with Installed Capacity of:



Translogística Oroz S.R.L.

Name of Operation

Pag. 25

Signature of Lead Auditor

Feb. 15, 2026

Date

- 60,000 TEUs
- +300,000 m² of storage facilities

Depth: 10 meters

Phone Numbers: +54 58113-9100 / +54 4229-0000

Exolgan concentrates more than 40% of the container volume of the Port of Buenos Aires. The modern design of its layout and the integration of various value-added services make this port terminal a unique multimodal operations platform in the market.

As of January 2020, Exolgan has been certified by the U.S. Customs and Border Protection Agency (CBP) as a Foreign Port Terminal Operator under the C-TPAT (Customs-Trade Partnership Against Terrorism) standards, being the only port terminal in Argentina with this certification. The C-TPAT Program is one of the largest and most successful public-private sector partnerships in the world, designed to improve and mitigate various threats by providing security to the global supply chain.

The ITL Group manages its operations and processes under the highest international standards for quality, safety, health, and environment. Annually, their QHSE management is audited by globally recognized certification bodies to verify and validate that the management system complies with all mandatory requirements of these international standards.

The ITL Group has commitment to the environment, safety, and quality. The Integrated Management System (IMS) has been designed to maximize integration possibilities of the three management areas, achieving greater resource utilization and promoting management synergy through continuous improvement. Regarding international standards achieved, The ITL Group holds certifications under ISO 9001, ISO 14001, and ISO 45001 standards issued by the certifying body DNV. Additionally, they comply with the global standard of shareholder PSA (PSA-MS), as well as WPSP promoted by the UN.

The International Maritime Organization (IMO) promoted an amendment to the SOLAS Agreement (Safety of Life at Sea) to extend controls and regulations applicable to port facilities under the new global scenario. As a result, the new security code PBIP (Ship and Port Facility Protection, or ISPS in its English acronym) was approved. Since June 30, 2004, Exolgan has held the certification issued by the Argentine Naval Prefecture, being the first terminal to achieve this important recognition, in compliance with international regulations.

The ITL Group has a certification regarding the National Contingency Plan (PLANACON) for the handling of hazardous materials. Including the next incident grades:

- Grade 1 Incidents: minor operational accidents affecting operator equipment locally, generating small or limited environmental impact, without causing harm to persons.



- Grade 2 Incidents: major operational accidents affecting operator equipment, third-party assets, soil, water, air, aquatic life, and/or fauna, which may produce considerable impact.

An automatic reporting system for containers with hazardous materials located in the yard has been created, providing IMO type, UN number, position in the yard, and whether it is in import, export, or transshipment status. Likewise, the alarm reporting system has been improved, generating an automatic message sent to mobile phones of responsible personnel regarding unattended or deactivated alarms. In line with PBIP Code requirements, the C-TPAT Program, and PLANACON, security training is provided at different levels (managerial, middle management, and general staff). When new personnel are hired, an induction briefing on awareness in this matter is conducted.

C. Zarate Terminal, Zarate Port

Zárate Terminal is the first private port built under Argentina's Port Law No. 24.093. The port complex is partnered with Murchison and Cotia Trading, companies with a long and recognized history in port and logistics operations. This partnership brings 120 years of experience, tradition, capacity, and commitment to serving every client in port activities.

Zarate Terminal goal is to be recognized as a multimodal and logistics hub serving foreign trade, given their excellent geographic location in the heart of Argentina's industrial belt and optimal road, rail, and river access connections, representing a strategic advantage for the complex.

Name: Zarate Terminal

Location: Dr. Felix Pagola 2671

District: Zarate

Province: Buenos Aires

Country: Argentina

Approximate Geographic Coordinates:

Latitude 34°04'30.26" S - Longitude 59°02'38.26" W

Port Terminal Capacity:

- Installed capacity of 270,000 TEUs per year
- 19,000 TEUs yard capacity
- 480 m² of operational area
- 40,000 m² truck waiting area

Depth: 11 meters

Phone: (+54 3487) 42-9001



Translogística Oroz S.R.L.

Name of Operation

Pag. 27

Signature of Lead Auditor

Feb. 15, 2026

Date

The beach and dock facilities are monitored 24/7 by trained personnel, assisted by a CCTV system with 150 cameras and perimeter controls. Vehicle registration and tracking in the port are managed through a custom-designed system that is continuously adapted to meet clients' needs. The facility has security and control at entry and exit points.

The quality management system of Terminal Zárate is certified under the IRAM-ISO 9001:2015 standard. In 2016, the company integrated the Quality Management Systems (Vehicles, Containers, General Cargo, and Administration) into a single certificate with comprehensive scope under the new 2015 version of the ISO 9001 standard.

Terminal Zárate has achieved ISO 14001:2015 certification for Environmental Management Systems. This is especially relevant in ports of developed countries, and the company's management assumes responsibility for environmental care. The terminal has developed an environmental management approach applied to all cargo handling operations and support activities. This not only complies with current legislation but also identifies and controls various environmental aspects and impacts through intersectoral development objectives, goals, and programs based on continuous improvement.

Terminal Zárate complies with the International Ship and Port Facility Security Code (ISPS Code), an international code for protecting ships and port facilities, promoted by the Maritime Safety Committee of the International Maritime Organization (IMO), part of the United Nations. Its application has been mandatory since July 1, 2004.

Terminal Zárate has an Emergency Action Plan where the Argentine Naval Prefecture rigorously verifies compliance with the ISPS Code, PLANACON, and other regulations, conducting assessments of both document management and exercise execution through periodic audits. This strict compliance is essential to maintain and enhance maritime protection, safeguarding the company's assets and corporate security, and ensuring an effective response to potential contingencies related to hazardous materials both in water and on land.

Terminal Zárate has trained more than 200 employees in safety, health and wellness

The safety and health of everyone in Grupo Murchison are vital, not only to protect and safeguard but also to promote suitable working environments where all employees and visitors can perform their tasks constructively, enhancing performance and harmony. Zarate terminal has an Integrated Management Policy to provide a framework for protection and care. Also, the terminal has a Task Suspension Policy and Incident Management Procedure, ensuring anyone in unsafe work situations can stop the task. These cases are reported directly to superiors, and actions are taken as needed.

To improve hazard identification and risk assessment, based on available literature and industry standards, Zarate terminal systematically identifies potential hazards through regular inspections and data analysis. The Integrated Management System (IMS) and Risk Matrix



analyze business actions concerning frequency and severity and the operational controls to be performed. This includes condition surveys, risk assessments by job position, and incident analysis.

Zarate Terminal has a Training Plan on various topics across the Group's companies. This plan is complemented by internal and external certifications and audits to ensure adherence to established standards. The terminal is certified under ISO 45001 and ISO 9001, which evaluates the health and safety processes of the Group's companies. The results are to improve risk assessment procedures and risk matrices by position, documents that are part of the IMS. Incidents are analyzed, and corrective and preventive measures are implemented to prevent them from happening again.

D. Terminal of the Port Management Unit of Santa Cruz Province, Deseado Port

The Port Management Unit Terminal of Santa Cruz Province is located in the port area of Puerto Deseado. The port is publicly accessible and owned by the province of Santa Cruz. It is managed and operated by the Port Management Unit of Santa Cruz (UN.E.PO.S.C.) and has been in operation since 1992. It is situated on the northern bank of the Deseado River's mouth in the Atlantic Ocean.

Company Name: Port Management Unit of Santa Cruz Province

Location: Access via National Route 281 s/n

Locality: Puerto Deseado

Department: Deseado

Province: Santa Cruz

Country: Argentina

Approximate Geographic Coordinates:

Latitude 47° 45' 10.5" S - Longitude 65° 55' 41.2" W

Port Terminal Capacity:

- 572 m² covered bonded warehouse for import/export
- 15,000 m² operational area

Depth: 9 to 11 meters

Phone Numbers: +54-0297-4872228 / +54-0297-4872234

The personnel are qualified and authorized by the Argentine Naval Prefecture to handle hazardous materials and include a Port Facility Security Officer (PFSO). The access to the ports



Translogística Oroz S.R.L.

Name of Operation

Pag. 29

Signature of Lead Auditor

Feb. 15, 2026

Date

are secure, with security guards, perimeter fences, and entry barriers for stopping and controlling incoming vehicles. The accesses are controlled by the Argentine Naval Prefecture. A satellite map of the port shows that not only are the accesses controlled, but there is also a detachment of the Argentine Naval Prefecture located in front of the port entrances.

The Argentine Naval Prefecture (PNA) is the National Maritime Authority and performs various security and policing functions, including navigation and port security, environmental protection of waters, and acts as customs, migration, and health police. It is also responsible for combating organized crime, investigating crimes, and assisting people in maritime or river disasters.

Deseado Port has a certification regarding the National Contingency Plan (PLANACON) for handling hazardous materials. Puerto Deseado obtained PLANACON Certification on November 29, 2024.

Deseado Port has a Protocol for Admission of Hazardous Materials which includes requirements for all parties involved in the handling and forced exit stages from the port area by land transport; it establishes preventive and precautionary guidelines to reduce the risk of incidents/accidents and the needs for emergency responses related to hazardous substances entering the port, which could endanger workers, the environment, or the facilities of the Port Management Unit Terminal Puerto Deseado.

