INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

CENTROQUIMICA S.A.C.

2025

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

Collaborated with
Mingroup Investments S.A.C.

Álvaro Fuentes Huanqui – Lead Auditor
Marcos Mera Escala – Technical Expert Auditor
Av. Lima 309 Yanahuara – Arequipa -PERÚ
+51.959227719
Alvaro.fuentes@e-quelle.net

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE
1400 I Street, NW, Suite 550, Washington, DC 20005, USA
Tel +1.202.495.4020 | Fax +1.202.835.0155 | Email
info@cyanidecode.org | Web CYANIDECODE.ORG

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

Tabla de contenido

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

1. Operation General Information

Name of Production Facility:	CENTROQUIMICA S.A.C.
Name of Facility Owner:	CENTROQUIMICA S.A.C.
Name of Facility Operator:	CENTROQUIMICA S.A.C.
Dates of the Audit:	21st and 22th October, 2024
Name of Responsible Manager:	EDITH ROSARIO SALINAS FERNÁNDEZ
Address:	CAL.7 MZA.F1 LOTE 8 URB. PARQUE INDUSTRIAL LUCUMO – LURIN - LIMA
State / Province:	LIMA – LIMA
Country:	PERU
Telephone:	+51.1 7179770
Fax:	.-.
Email:	rsalinas@centroquimica.com

2. Operation Location Detail and Description:

CENTROQUIMICA S.A.C., founded in 1980, specializes in the purchase, sale, distribution, import, and export of chemical products. Its main administrative office is located at Calle Monterosa 233, Office 704, in the district of Santiago de Surco, Lima. Additionally, it has two warehouses:

1. **Villa El Salvador Warehouse**: Mz. K, Lot 04, Coop. Las Vertientes de la Tablada de Lurín, Lima.
2. **Lurin Warehouse**: Calle 7, Mz. F1, Lot 8, Urb. Parque Industrial Lúcumo, Lurín, Lima.

The main products it imports and sells are caustic soda flakes and sodium cyanide.

The operation to be audited is Centroquimica's sodium cyanide warehouse, located at Calle 7, Mz. F1, Lot 8, Urb. Parque Industrial Lúcumo, Lurín, Lima.

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

Sodium cyanide is imported from Cyplus GmbH (Germany), Cyplus Idesa S.A.P.I de C.V. (Mexico), TaeKwang Industrial Co., Ltd (Republic of Korea) and Orica Australia Pty Ltd (Australia) in 1,000 kg IBCs, 1,135 kg IBCs (Intermediate Bulk Container) and 50 kg drums. These products are transported in 20-foot sea containers to the port of Callao and then transferred to the Lurin warehouse. Centroquimica is responsible for unloading, storing, and loading the sodium cyanide onto transport units for distribution to various mining companies in Peru.

These products arrive in 20-foot sea containers at the port of Callao, where Centroquimica manages the import process through its customs agent. Once the product is cleared, container pickup is coordinated. Centroquimica contracts a transport company authorized to handle hazardous materials and access the port of Callao, which transports the containers to the warehouse in Lurin.

Centroquimica personnel unload the sodium cyanide at the warehouse following the company's safety protocols. The product is stored on-site until a client request is received. Upon receiving the purchase order, the necessary arrangements are made for dispatch according to internal procedures. The sodium cyanide is distributed to various mining companies in Peru.

The scope of the audit includes the unloading, storage, and loading processes of sodium cyanide at the **Lurin warehouse**.

The audit does not cover the transportation of sodium cyanide from the port of Callao to the Lurin warehouse or from the warehouse to customers in Peru.

Cyplus GMBH's current certification date in the Cyanide Code is 23-Feb-2022.
Cyplus Idesa S.A.P.I de C.V.'s current certification date in the Cyanide Code is 26-Sep-2023.
TaeKwang Industrial Co., Ltd.'s current certification date in the Cyanide Code is 21-Aug-2023.
Orica Australia Pty Ltd (Australia) – Yarwun site's current certification date is 31-Oct-2023.

3. Auditor's Finding

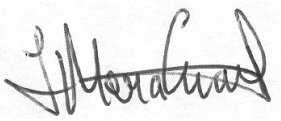
This operation is
✔ in full compliance
☐ in substantial compliance *(see below)
☐ not in compliance
with the International Cyanide Management Code.

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

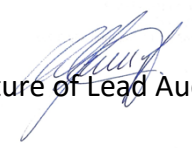
4. Auditor Information

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

Name and signature the audit team.

	Name	Signature
Lead Auditor	Álvaro Fuentes Huanqui	
Technical Expert Auditor	Marcos Mera Escala	

Dates of Audit: October 21st and 22th , 2024

CENTROQUIMICA S.A.C. |  | February 25, 2025
Name of Facility | Signature of Lead Auditor | Date of submittal

5. 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.

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

6. Information of the audited operation

CENTROQUIMICA S.A.C., founded in 1980, specializes in the purchase, sale, distribution, import, and export of chemical products. Its main administrative office is located at Calle Monterosa 233, Office 704, in the district of Santiago de Surco, Lima. Additionally, it has two warehouses:

3. **Villa El Salvador Warehouse**: Mz. K, Lot 04, Coop. Las Vertientes de la Tablada de Lurín, Lima.
4. **Lurin Warehouse**: Calle 7, Mz. F1, Lot 8, Urb. Parque Industrial Lúcumo, Lurín, Lima.

The main products it imports and sells are caustic soda flakes and sodium cyanide.

Sodium cyanide is imported from Cyplus GmbH (Germany), Cyplus Idesa S.A.P.I de C.V. (Mexico), TaeKwang Industrial Co., Ltd (Republic of Korea) and Orica Australia Pty Ltd (Australia) in 1,000 kg IBCs, 1,135 kg IBCs (Intermediate Bulk Container) and 50 kg drums. These products are transported in 20-foot sea containers to the port of Callao and then transferred to the Lurin warehouse. Centroquimica is responsible for unloading, storing,

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

and loading the sodium cyanide onto transport units for distribution to various mining companies in Peru.

7. Principles and Standards of Practice

Principle 1 | OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1

Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 1.1
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

There are construction plans made by Architect. The organization retains the following documentation:
- Factory declaration signed by Engineer.
- Electrical installation plans signed by Engineer.
- Evacuation plan signed by, Architect.
- Architectural plan and signage plan signed by Architect.
Factory declaration signed by Ing, document notarized by notary.
The documents with the plans for the foundation, reinforcement, porch, roof and lateral elevations have been signed by Architect. The electrical installations design, signed by an engineer.

Factory declaration signed by engineer, document notarized.

The warehouse floor surface was inspected by the auditors, and it was verified that the concrete surface has no significant cracks, is in good condition, and undergoes regular maintenance.

The floors are made of concrete, which prevents environmental contamination in the event of a spill.

The warehouse has concrete slabs with high planimetry techniques specifications Fmin (The F-min number is used to define the WORST acceptable flatness and levelness conditions in a defined aisle of traffic, to control the wheel track profiles), FF (Finished Floor), FL (Finished Level) for warehouses, with durability to high traffic, easy and economical maintenance, with anti-slip properties that help improve movement. The concrete is an impermeable surface and do not have cracks that compromise their ability to contain released cyanide.

In this case, the warehouse floor and walls provide adequate secondary containment for the stored solid cyanide containers, such as IBCs and drums. Additionally, the warehouse floor is elevated approximately 10 cm above the surrounding ground level, designed to prevent liquids from entering. This area also experiences minimal rainfall.

The solid cyanide is stored in a roofed and enclosed structure to prevent contact with rainfall. The parabolic roof provides good thermal and moisture insulation, The ceiling has a height of 7 meters; the brick wall prevents the exposure to rainfall and moisture. The parabolic roof has, along its lateral ends, where the coverage ends, with rain gutters made of galvanized iron. The rain gutters discharge the rainfall to the public sewage.

In addition, the solid sodium cyanide IBCs and drums are stored 2 meters away from the brick wall, to prevent contact of the packages with any moisture in the brick wall.

The warehouse has optimal ventilation, with a 20-meter opening along the front and an additional opening at the top of the rear. Additionally, the ceiling is 7 meters above the floor, contributing to adequate ventilation.

The unique access to the warehouse is closed with an automatic metallic door and access is controlled.

The warehouse manager and warehouse assistant are responsible for opening and closing the warehouse's automatic door. Access is restricted, and only authorized personnel are allowed inside. This warehouse is exclusively for sodium cyanide, and only the warehouse manager and assistant work in this area. Centroquimica's offices are in another part of Lima, far from the warehouse.

The operations and logistics department coordinates with the warehouse, providing information on transport units and drivers who bring imported containers from the port to the warehouse, allowing their entry. Similarly, the sales department coordinates with the

warehouse, providing information on transport units and drivers who will collect sodium cyanide for distribution to clients.

A record is kept of visitors to the warehouse, noting each visitor's name, their company, visit date, and entry and exit times. The warehouse is enclosed, with front and perimeter walls reaching a height of 5 meters. Security cameras and motion-sensor alarms are installed along the perimeter wall and within the warehouse interior to prevent unauthorized access.

This warehouse is exclusively for sodium cyanide, there are 1,000 kg IBCs and 50 kg drums. There are no other products.

Production Practice 1.2

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

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

Finding/Deficiencies Identified:

There is a procedure for safe work in warehouses, CQ-003.01. The procedure includes:
- Import reception.
- Inspection of warehouse.
- Handling of damaged and/or observed packages, labelling and pallets.
- Dispatch of orders with third parties.
There is an annual occupational health and safety plan 2024.
In the Safety and Contingency Plan - CQ-002.03 it is indicated in point 8.5 that contaminated waste will be placed in polyethylene bags and stored in plastic containers such as tanks or drums; these containers will be labelled indicating that they contain sodium cyanide, store in a well ventilated area, keep the container tightly closed and locked. Subsequently, the company Caresny Perú SAC will be contacted for final disposal. It is also indicated that the water used for washing tools, PPE and/or utensils will be stored in a 50-litre plastic drum and 250 ml of sodium hypochlorite (bleach) will be poured in it for the total elimination of sodium cyanide.

The Centroquímica operation involves the storage of solid sodium cyanide in its original packages, which can be IBCs of 1,000 kg or drums of 50 kg. During daily operations, there is no direct contact with sodium cyanide, as the containers are not opened within the storage facility.

Emergency Response Procedures
In exceptional situations, such as a spill of solid sodium cyanide, the following procedures will be implemented to ensure the safe and proper management of contaminated waste:

Waste collection: Contaminated waste will be placed in polyethylene bags and stored in plastic containers (tanks or drums), properly labeled as "containing cyanide."
Final disposal: Caresny Perú SAC, an authorized company for hazardous waste management, will be contacted for the final disposal of the material.

Treatment of Water Used in Cleaning
Water used for washing tools, personal protective equipment (PPE), and utensils will be stored in a 50-liter plastic drum.
This water will be treated with 250 ml of sodium hypochlorite (bleach) to ensure the complete neutralization of sodium cyanide.
After treatment, the water will be discharged into the public drainage system, which mixes with other industrial and residential effluents. This public drainage system is ultimately treated at a Wastewater Treatment Plant before being released into the Lurín River.

Clarification About Daily Operations
It is important to emphasize that these procedures are exclusively for emergency situations. During daily operations, there is no contact with sodium cyanide, as it is solely a storage process in closes original packages.

In the safety and contingency plan CQ-002-03, it includes an analysis of the current situation, first aid, emergency response, risk and emergency situations, emergency protocols, environmental monitoring and follow-up.
The emergency protocols include non-standard operating situations such as:
- Procedure for an accidental spill of solid cyanide in briquettes.
- Accidental inhalation of cyanide and leakage of cyanide gas.
- Accidental ingestion of sodium cyanide.
- Skin contact with sodium cyanide.
- Fire involving sodium cyanide.
- Procedure on detection of cyanide gas in the environment.

There is a change management procedure CQ-003.09, at the time of the audit no previous changes were generated in environment, operations or safety. There were no changes in initial design and operations practice.

There is a preventive maintenance program for units such as forklifts and stackers. In the case of the stackers, preventive maintenance was carried out in August 26-Aug-2024, there are 04 stackers and 01 forklift.
There are forklift and stackers maintenance reports. Maintenance records are available.

The Safety and Contingency Plan CQ [SIG] 002.03 v.1.0 mentions: Go to the eyewash and emergency shower stations for the personal hygiene of the people involved in the task of collecting the sodium cyanide briquettes. When using the emergency shower, the drainage outlet should be covered so that the water used is stored and then 5% sodium hypochlorite is poured in, thus eliminating possible sodium cyanide residues.

In the CQ [GIS] 002.03 Safety and Contingency Plan (v.1.0), section 8.5 states that contaminated waste shall be placed in polyethylene bags and stored in plastic containers such as tanks or drums; these containers shall be labelled as containing sodium cyanide. Store in a well-ventilated area, keep the container tightly closed and locked. Subsequently, the company Caresny Perú SAC will be contacted for final disposal. It is also indicated that the water used for washing tools, PPE and/or utensils will be stored in a 50-litre plastic drum and 250 ml of sodium hypochlorite (bleach) will be poured in it for the total elimination of sodium cyanide.

The labeled boxes and drums come directly from the supplier (Cyplus). In the CQ procedure [SIG] 003.01 Safe Work Warehouse (v.1.0), point 7.3 has been included. HANDLING OF DAMAGED AND/OR OBSERVED CONTAINERS, LABELLINGS AND PALLETS, there is an import reception report format, where the labelling observations are included if they are identified. We reviewed the inspection format of Lurin warehouse, CQ-003-16.

Production Practice 1.3

Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

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

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

Finding/Deficiencies Identified:

Here is a biweekly inspection form for the Lurin warehouse, CQ-003-16 including verification of labelling. Includes whether sodium cyanide containers / packages are free of spills or leaks.
There is also a planned warehouse inspection form CQ-003.14 on a fortnightly basis, which includes information on the planned inspection. Recommendation of closure of cracks by internal maintenance personnel. The check list is made by the warehouse manager.

Bi-weekly infrastructure inspections are carried out. The frequency of the inspections for the infrastructure is sufficient enough regarding the dimension of infrastructure, the area of the warehouse and the amount of equipment's including the employees working in the area.

In the inspection checklist , CQ-003-16 includes inspection date, inspector responsible and remarks of any observed deficiencies.
There is also a planned warehouse inspection form CQ-003.14 on a fortnightly basis, which includes information on the planned inspection.

There is a closing report of the observations detected in the inspections, such as the observation of cracks detected in the floor, which were sealed and corrected. Records are maintained for work to collect observations and condition warehouse floors.

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

Develop and implement procedures to protect facility personnel from exposure to cyanide.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 2.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

CQ [GIS] 003.01 Safe Working Procedure Warehouses (v.1.0), includes activities of
- Import reception.
- Warehouse inspection.
- Handling of damaged and/or observed containers, labelling and pallets.
- Dispatch of orders with third parties.

Document CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), which contains:
- First Aid.
- Emergency response organization.
- Cases in which an evacuation must be carried out.
- Evacuation procedure.
- Preventive instruction and coordination.
- Emergency risk situation.
- Emergency protocol.

In the safety and contingency plan CQ-002-03 rev, it includes an analysis of the current situation, first aid, emergency response, risk and emergency situations, emergency protocols, environmental monitoring and follow-up.
The emergency protocols include non-standard operating situations such as:
- Procedure for an accidental spill of solid cyanide in briquettes.
- Accidental inhalation of cyanide and leakage of cyanide gas.
- Accidental ingestion of sodium cyanide.
- Skin contact with sodium cyanide.
- Fire involving sodium cyanide.

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

- Procedure on detection of cyanide gas in the environment.

Within the document CQ [SIG] 003.01 Procedure Safe Work Warehouse (v.1.0) includes routine and non-routine work. Activity related to the use of sodium cyanide that does not have an established frequency or is not common within routine tasks.

The Hazard Identification, Risk Assessment, and Control Determination Matrix (HIRAC) code CQ-003.32 rev 01 dated 14-oct-2024, identifies the routine and non-routine activities, however, for the Lurin warehouse operations, all the activities are considered routine. The HIRAC suggests control measures to be implemented and the person responsible for implementing said measure to reduce the risk of an identified hazard.

Within the document CQ [SIG] 003.01 Procedure Safe Work Warehouse (v.1.0) includes routine and non-routine work. Regarding the scope, this procedure applies to all CENTROQUIMICA SAC staff and any person who works in its name (suppliers, contractors, among others), under the supervision of CENTROQUIMICA SAC, also considering customer requirements for job analysis before execution.

Communication flows across the organization in a transversal manner, reflecting its structure and operational characteristics. Staff needs and suggestions are gathered through the safety supervisor, with whom weekly meetings are held to discuss operational feedback and review any improvements identified over the week's work. Document CQ [SIG] 002.01, the Annual Occupational Safety and Health Plan (v.1.0). This plan also incorporates the development of an occupational health program, informed by the results of the occupational monitoring evaluations conducted the previous year. The evaluation determined that occupational risks remain tolerable; however, to address recommendations for enhancing the Occupational Safety and Health Management System, targeted activities will be implemented to maintain or further reduce these occupational risks.

Before unloading the container, the door should be opened slightly and allowed to ventilate for about 10 minutes. Then measure the levels of hydrogen cyanide gas in the environment; if it is greater than 4.7 ppm, the worker should be removed from the work area. The employee entering the container should check the levels of hydrogen cyanide gas using a hydrogen cyanide gas sensor (4.7 and 10 ppm limit), this sensor measures the concentration of hydrogen cyanide gas in the air, ensuring that it does not exceed safe limits. It is a vital protective measure for workers' health. If the permissible limit for the presence of hydrogen cyanide gas is exceeded, employees must be removed from the work area.

Additionally, 7.2. Storage inspection mentions that the collaborator responsible for the inspection must review the levels of cyanide gas (limit 4.7 and 10 ppm). If the permissible limit of the presence of hydrogen cyanide gas exceeds, employees must leave the work area.

7.3. Handling of damaged and/or observed containers, labels and pallets, mentions that using a hydrogen cyanide gas sensor, it must be verified that the presence of hydrogen cyanide gas in the environment does not exceed 4.7 or 10 ppm, which are the permissible limits to carry out the activities safely. If the permissible limits are exceeded, employees must leave the work area.

Hydrogen cyanide gas detector is used. It must be verified that the presence of hydrogen cyanide gas in the environment does not exceed 4.7 or 10 ppm, which are the permissible limits to carry out activities safely. If the permissible limits are exceeded, employees must leave the work area.

The hydrogen cyanide detector is a new one. According to the annual Occupational Health and Safety Plan, the records will be stored according to the legal requirement for a period of 5 years, including calibration records.

CQ [SIG] 003.01 Procedure Safe Work Warehouse (v.1.0) - provision number 6 about PARTICIPANTS, it is mentioned that all tasks carried out in the warehouse related to Sodium Cyanide must be executed under a buddy System. The participants are:

- *Stacker operator (Warehouse Assistant).*
- *Forklift operator (Warehouse Manager).*
- *Service providers.*

There are annual preventive medical examinations of operational personnel. There is a case of a warehouse manager, suitable without observations. The records are managed by the occupational doctor and the patient to preserve the security of the information. The company handles a copy of the medical fitness.

In daily operations, it is not necessary to change clothes because it is a sodium cyanide warehouse with closed containers / packages and the possibility of cyanide contamination in routine work is minimal. However, in CQ [SIG] 003.01 Procedure Safe Work Warehouses (v.1.0), it is mentioned: Wash all PPE with hypochlorite (bleach) in polyvinyl chloride (PVC) plastic containers. Those PPE that cannot be used again will be permanently discarded.

Additionally, in CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), it mentions that at the end of the procedure, it is important that the specialists remove the PPE used and then place it in the polyvinyl chloride (PVC) plastic container. The process should start from the top down. Those people who help with the removal of PPE and materials used in the emergency must use surgical gloves and a respirator with ABEK filters against particles and gases. Tools, PPE and/or utensils that have been used must be decontaminated with a 5% sodium hypochlorite spray, then cleaned and rinsed with water. Those tools, PPE and/or utensils that have become unusable will be discarded and those that can be used again will be saved. Likewise, the remains of the fire and contaminated waste will be placed in polyethylene bags and stored in plastic containers such as tanks or drums; These containers will be labeled indicating that they contain sodium cyanide. Store in a well-ventilated place, keep container tightly closed and lock up.

Subsequently, the company Caresny Perú SAC will be contacted for definitive elimination. The water used to wash tools, PPE and/or utensils will be stored in a 50-liter plastic container and 250 ml of sodium hypochlorite (bleach) will be poured to completely eliminate sodium cyanide.

The Centroquímica operation involves the storage of solid sodium cyanide in its original packages, which can be IBCs of 1,000 kg or drums of 50 kg. During daily operations, there is no direct contact with sodium cyanide, as the containers are not opened within the storage facility.

Emergency Response Procedures
In exceptional situations, such as a spill of solid sodium cyanide, the following procedures will be implemented to ensure the safe and proper management of contaminated waste:

Waste collection: Contaminated waste will be placed in polyethylene bags and stored in plastic containers (tanks or drums), properly labeled as "containing cyanide."
Final disposal: Caresny Perú SAC, an authorized company for hazardous waste management, will be contacted for the final disposal of the material.

Treatment of Water Used in Cleaning
Water used for washing tools, personal protective equipment (PPE), and utensils will be stored in a 50-liter plastic drum.
This water will be treated with 250 ml of sodium hypochlorite (bleach) to ensure the complete neutralization of sodium cyanide.

After treatment, the water will be discharged into the public drainage system, which mixes with other industrial and residential effluents. This public drainage system is ultimately treated at a Wastewater Treatment Plant before being released into the Lurín River.

Clarification About Daily Operations
It is important to emphasize that these procedures are exclusively for emergency situations. During daily operations, there is no contact with sodium cyanide, as it is solely a storage process in closes original packages.

The cyanide warehouse has legible signage in the entry and inside the warehouse to ensure that all workers who may be exposed to cyanide are aware of the risks and take appropriate protective measures. The signs alert to the presence of cyanide and the need for appropriate personal protective equipment. There are the following signs: NFPA (The National Fire Protection Association) Diamond, toxic and hazardous classification sign, forbidden to pour water in case of fire, mandatory use of personal protective equipment.

Also, there are posters from the manufacturer Cyplus containing product information, procedures for handling cyanide, emergency equipment, symptoms of poisoning and first aid procedure.

Also, the personnel of the warehouse have received training about safe handling of sodium cyanide.

In the entry to the warehouse there are signs prohibiting smoking, eating and drinking. Also, the personnel of the warehouse have received training about safe handling of sodium cyanide.

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 Standard of Practice 2.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

CQ [SIG] 002.03 Safety and Contingencies Plan (v.1.0) is available, where it has been included
- Procedure for an accidental spill of solid cyanide in briquettes.
- accidental inhalation of cyanide and leakage of cyanide gas.
- accidental ingestion of sodium cyanide.
- contact of sodium cyanide with the skin.
- fire involving sodium cyanide.
- procedure for the detection of cyanide gas in the environment.
- environmental monitoring/tracking.

The warehouse has an emergency shower connected to the public drinking water system and an eyewash station with a 30-liter capacity, both located near the main warehouse entry. The auditor inspected the safety shower, confirming it functions at the appropriate pressure, and confirmed that the eyewash station is in good condition and operates with low water pressure.

Throughout the warehouse, there are six 6-kg dry chemical powder fire extinguishers and one 9-kg dry chemical powder fire extinguisher.

The emergency shower and eyewash station are inspected prior to any sodium cyanide unloading or loading activity, following checklist code CQ-003.17, Revision 1.

Additionally, there is an inspection checklist for the fire extinguishers, which records the date for the next recharge for each fire extinguisher.

They have one antidote for cyanide poisoning, Nithiodote (Sodium Nitrite Injection and Sodium Thiosulfate Injection).

The operation also has two medical oxygen cylinders with a valved mouthpiece, which can be used as resuscitators, as well as an Ambu Manual Resuscitator.

The primary method for emergency communication is via mobile phone, and there is an emergency alarm in the warehouse for immediate activation if needed.

There are inspections through checklists of the different teams.
- Inspection of Lurin warehouse emergency kit.
- Hydrogen cyanide gas detector check list..
- Anti-spill kit check list.

- The cyanide antidote kit is stored according to the manufacturer's instructions. In this case the Nithiodote is stored in a refrigerator in the warehouse office. Expiration dates are checked and the kit is kept in its original packaging.

The operation of the hydrogen cyanide gas detector is tested through drills and training with the equipment. There is, CQ-002.02.

The MSDS is in the entry to the office to the warehouse. The MSDS is in Spanish. Also, the warehouse manager and warehouse assistant have digital versions of the MSDS in their laptops. In addition, on the entry there are warning signs.

Also, inside the warehouse, there are posters from the manufacturer Cyplus containing product information, procedures for handling cyanide, emergency equipment, symptoms of poisoning and first aid procedures.

Since the warehouse exclusively manages cyanide in solid form in their original package, the labeling requirements of this provision apply only to cyanide containers. The IBCs and drums of cyanide are clearly identified as such, they keep the original label from the producer in good condition.

In CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), the Storage and Disposal policy is included: Decontamination of utensils and disposal of contaminated materials Tools, PPE and/or utensils that have been used must be decontaminated with a sprayer with 5% sodium hypochlorite (bleach) by spraying, then they are cleaned and rinsed with water. Those tools, PPE and/or utensils that have become unusable will be discarded and those that can be used again will be saved. Contaminated waste will be placed in plastic bags and stored in plastic containers such as tanks or drums; These containers will be labeled indicating that they contain sodium cyanide. Store in a well-ventilated place, keep container tightly closed and lock up.

It also mentions that affected personnel should go to the shower to decontaminate the affected person for at least 15 minutes. Wash the affected area with a diluted 5% sodium hypochlorite (bleach) solution, ensuring that no sodium cyanide residue remains on the affected person's body. Use a foil thermal blanket if the affected person feels cold.

Provide inhalation of medical oxygen at a level of 15 liters per minute. Hydrogen peroxide should be used when providing medicinal oxygen.

Place a pulse oximeter in the left hand, leaning on the leg to measure the heart rate and blood saturation in the intoxicated person.

If it comes into contact with the eyes, the use of special washing solutions with high buffering capacity (borate or diphotherin buffer solutions) is recommended as part of first aid. You can also wash thoroughly with plenty of water immediately with the eyelid open, for at least 10 minutes.

Upon arrival of the ambulance, the MSDS (Safety Sheet) and the Sodium Cyanide antidote kit must be provided so that it can be applied by a specialist immediately.

Internal staff have been trained in first aid - HAZARDOUS MATERIALS Training US OSHA HAZWOPER LEVEL 1, Objective: provide first aid to staff. For medical treatment, the organization will be supported by the Santa Martha del Sur Clinic, which is located 20 minutes away and has a category II – I Clinic, for general care, with modern infrastructure, and has 24-hour EMERGENCY service. Composed of 25 general topics, 2 shock trauma topics, 1 traumatology topic, 1 surgery topic, emergency doctors and other clinic specialists are present 24 hours a day.

In the CQ [SIG] 002.03 Safety and Contingencies Plan (v.1.0), it is included. The collaborators who provided aid to the intoxicated person must go to the Santa Martha del Sur clinic located in the district of San Juan de Miraflores to undergo a general preventive check-up. It is mentioned that you must call the ambulance at the Santa Martha del Sur clinic in San Juan de Miraflores at (01) 6156767, it is crucial to specify that it is an inhalation of Sodium Cyanide so that they can act appropriately and indicate that they supply you with oxygen high flow if necessary. It also mentions that upon arrival of the ambulance, the MSDS (Safety Sheet) and the Sodium Cyanide antidote kit must be provided so that it can be applied by a specialist immediately. The person responsible for emergency care will accompany the victim to the Santa Martha del Sur clinic.

This area has 8 adult ICU beds, plus one bed, modern monitoring, diagnosis and isolation treatment equipment, a 24-hour pharmacy. A Trauma Shock topical with a single bed, 24-hour pharmacy. In the ICU service (Intensive Care Unit) it has 5 cubicles and an intensive care doctor per shift when required.

The clinic has two type 3 ambulances: Specific equipment according to the specialized care they provide, such as a portable mechanical ventilator, infusion pump, oxygen cylinders, and specialized machines.

There are the following documents:

- *Incidents investigation procedure. Code CQ- 003.10.*
- *Work Accident and Incident Disclosure Format (v.1.0), and CQ [SIG] 003.13 Incident Investigation Testimonials Format (v.1.0).*

At the time of the audit no accidents related to cyanide have been recorded.

Additionally, it has taken the initiative to create a WhatsApp group for rapid response to any type of work accident, to accelerate patient care in the clinic.

At the time of the audit no accidents related to cyanide have been recorded.

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 Standard of Practice 3.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

There is only storage of solid cyanide in unopened containers and packaging, such as IBCs and drums. The potentially contaminated water, such as wash water and water used to decontaminate clothing and equipment, is not discharged to streams, rivers or other surface water. There is no access to surface waters in the warehouse. The contaminated water will be disposed of through a company specializing in hazardous waste.

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

The Centroquímica operations involves the storage of solid sodium cyanide in its original packages, which can be IBCs of 1,000 kg or drums of 50 kg. During daily operations, there is no direct contact with sodium cyanide, as the containers are not opened within the storage facility. Centroquímica does not have the presence of surface waters, therefor there is no

direct nor indirect discharge to surface water. In exceptional situations, such as a spill of solid sodium cyanide, in case there is water from the emergency response procedure is disposed by the specialized company in hazardous waste for final disposal.
At the time of the audit, no spill or accident related to cyanide had occurred, there were no potentially contaminated water.

If the specialized company in hazardous waste disposes the contaminated water, it will issue a certificate about its final disposition that is presented to the current authority.

Emergency Response Procedures
In exceptional situations, such as a spill of solid sodium cyanide, the following procedures will be implemented to ensure the safe and proper management of contaminated waste:

Waste collection: Contaminated waste will be placed in polyethylene bags and stored in plastic containers (tanks or drums), properly labeled as "containing cyanide."
Final disposal: Caresny Perú SAC, an authorized company for hazardous waste management, will be contacted for the final disposal of the material.

Treatment of Water Used in Cleaning
Water used for washing tools, personal protective equipment (PPE), and utensils will be stored in a 50-liter plastic drum.
This water will be treated with 250 ml of sodium hypochlorite (bleach) to ensure the complete neutralization of sodium cyanide.
After treatment, the water will be discharged into the public drainage system, which mixes with other industrial and residential effluents. This public drainage system is ultimately treated at a Wastewater Treatment Plant before being released into the Lurín River.

Clarification About Daily Operations
It is important to emphasize that these procedures are exclusively for emergency situations. During daily operations, there is no contact with sodium cyanide, as it is solely a storage process in closes original packages.

Principle 4 | TRAINING

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

Production Practice 4.1

Train employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 4.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

The warehouse manager and warehouse assistant were interviewed, it was verified that they have the knowledge for safe handling of sodium cyanide and emergency response, he understands very well what cyanide is, its forms and dangers, routes of poisoning, proper storage practices, symptoms of mild and severe poisoning, measures for safe handling and storage of sodium cyanide, first aid response, procedure in case of sodium cyanide spill, how to supply oxygen through the oxygen cylinder.

There is an annual occupational health and safety training program,. In the annual HES (Health, Enviroment and Safety) plan, annual courses have been included.

There is an annual occupational health and safety training program, CQ-002.02 rev0.

The employees have been trained in safe handling of sodium cyanide before working with cyanide, through an induction. The warehouse manager and warehouse assistant were interviewed, and they explained that when they were hired by the company, the operations manager gave them an induction about the safe handling of sodium cyanide and emergency response.

There are talks fortnightly with warehouse staff about safety in handling tasks with cyanide. There is a record of attendance list and topic.

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

There is the Manual of Organization and Functions Code CQ-002.08

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

In addition, there is an annual occupational health and safety training program, CQ-002.02 rev01, in this document the specific training necessary for each job are identified. In this program are identified the following trainings for the warehouse manager and the warehouse assistant:

- *Hazard identification, risk assessment and implementation of controls.*
- *Ergonomic risks at work.*
- *Psychosocial Risks at work.*
- *Use of MSDS.*
- *Personal Protective Equipment (PPE).*
- *Symptoms of cyanide exposure and toxicity in the human body.*
- *Methods for the safe storage and handling of materials which contain cyanide.*
- *Procedure to follow in case of cyanide exposure.*
- *Preventive measures in the management of cyanide.*
- *Monitoring and detection of cyanide in the work environment.*
- *Emergency planning and cyanide spill response along with cyanide emergency drills, training in first aid and CRP(cardiopulmonary resuscitation).*
- *Treatment and disposal of cyanide waste and the impact environmental use of cyanide.*

Training was carried out with trainers with experience in the management of cyanide. The company that provides the training is Safety Management Resources. The company will store the trainer's certificates.

Monthly inventories are carried out in the warehouse by the operations manager and feedback is provided to staff on improvements in operations.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 4.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

Within the CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), mentions:

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

CENTROQUIMICA S.A.C. It will apply before, during and after the emergency, prevention, training and response measures against possible emergencies related to sodium cyanide inside the premises. This aims to prepare all personnel, reduce vulnerability and increase response capacity, minimizing injuries, loss of life, damage to property and the environment.

For this, it is necessary that all the people who work in the operation of the company participate, whose main and permanent task will be to detect any sign of exposure to sodium cyanide that potentially is an emergency, communicate it and try to mitigate it.

There are records of Emergency Response Training with Sodium Cyanide (First Aid and Spill Management) where topics such as: identification of labeling and communication elements, signs and symptoms of cyanide poisoning, first aid protocol, identification and characteristics of PPE, among others.

There are attendance records as lists for the last training, for all operational and administrative personnel related to the warehouse. The records includes 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 materials.

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

Principle 5 | EMERGENCY RESPONSE

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

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.1
- ☐ not in compliance with

Finding/Deficiencies Identified:

There is the Safety and Contingency Plan CQ-002-03

The warehouse handles only solid sodium cyanide in its original packaging, and the plan includes the following sections for catastrophic hydrogen cyanide gas release:

Chapter 8.1. PROCEDURE FOR ACCIDENTAL SPILL OF SOLID CYANIDE BRIQUETTES
This procedure specifies that, in the presence of hydrogen cyanide gas, the area must be cordoned off in a 10-meter radius. Two trained personnel will enter the spill area using the specified PPE and equipped with a hydrogen cyanide (HCN) gas detector to measure gas levels in the environment. Upon entry, one worker will continuously monitor the sensor, while the second will remain behind, placing a hand on the first's shoulder for guidance and direction. If the sensor detects hydrogen cyanide (HCN) levels above 4.7 or 10 ppm, the area must be evacuated until HCN gas levels drop below 4.7 ppm.

Chapter 8.2. ACCIDENTAL INHALATION OF CYANIDE AND LEAK OF GASEOUS CYANIDE
This section outlines the actions to take, including warnings, symptoms, and the emergency response procedure.

Chapter 8.6. PROCEDURE FOR DETECTION OF HYDROGEN CYANIDE GAS IN THE ENVIRONMENT
This section details the actions to take, including warnings, symptoms to observe, and the emergency response procedure.

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

The plan includes the following section for the release of solid sodium cyanide during the operations in the warehouse (storage, loading and unloading activities):

This section details the actions to take, including warnings and the emergency response procedure.

The Plan includes the following section:

Chapter 8.5. FIRE INVOLVING SODIUM CYANIDE
This section details the actions to take, including warnings and the emergency response procedure.

The response plan CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) includes sections 6.1 and 6.2 on CASES IN WHICH AN EVACUATION MUST BE CARRIED OUT, covering scenarios such as:

- *Activation of the sensor due to hydrogen cyanide gas (HCN) levels equal to or exceeding 4.7 or 10 ppm.*
- *An uncontrolled fire.*

EVACUATION PROCEDURES

Personnel must proceed to the designated safe assembly point, moving in the opposite direction of the wind. In the event of a spill, maintaining a distance of at least 10 meters from the perimeter; in the presence of hydrogen cyanide gas (HCN), 30 meters is required.

Additionally, there is coordination in place for training and community engagement within the emergency response plan. There is coordination for training and community in the emergency response plan.

The response plan CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) includes in ANNEX B CYANIDE ANTIDOTE KIT.

The warehouse only stores solid sodium cyanide in its original packaging, there is no transfer or processing, and it is not handled in a liquid state. Additionally, the response plan CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) includes chapter 8.1. Emergency protocols, procedure for an accidental spill of solid cyanide in briquettes.

The response plan CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) includes chapter 8.1 Emergency protocols, procedure for an accidental spill of solid cyanide in briquettes,

mentions background information and the procedure for Containment, assessment and mitigation, considering:

• Immediately inform the safety supervisor and the emergency brigade.

• Paralyze all types of activities and evacuate the spill area at no less than 10 meters, in all cases.

In any case, the hydrogen cyanide gas detector must be used to detect the presence of the gas in the indicated perimeter.

The corresponding Personal Protective Equipment (PPE) must be used by those who participate in the collection of sodium cyanide briquettes. This includes full-face mask with particle and dust filters (ABEK), surgical gloves to be used under half-arm nitrile gloves, rubber boots with metal tips and rubber soles, disposable Tyvek suit, safety helmet. Easy-tear adhesive tape will be used at the junction between the Tyvek suit and the gloves, full face mask, safety boots and at the closure of the Tyvek suit to avoid any contact or inhalation of sodium cyanide in its form.

Delimit the restricted area to limit access exclusively to specialized personnel. This area must be marked with emergency cones and danger tape, located 3 perimeter meters from the site of the spill if the Sodium Cyanide remains in its solid state. If there is a presence of cyanide gas, the area must be delimited to 10 perimeter meters. Two trained collaborators will enter the spill area using the PPE mentioned above and equipped with a hydrogen cyanide (HCN) detector to measure the presence of this gas in the environment. During entry, one collaborator will continually check the sensor while the second will remain behind, with a hand on the shoulder of the first to guide and direct him. If the sensor detects the presence of hydrogen cyanide gas (HCN) at levels above 4.7 or 10 ppm, the area must be evacuated until the HCN gas levels drop to less than 4.7. With caution, a shovel and a polyvinyl chloride (PVC) plastic scoop will be used to collect the dispersed material. One employee handles the shovel while the second will use the dustpan, always making sure to remain visible face to face during the operation.

If Sodium Cyanide is left impregnated in asphalt or vehicle equipment, the neutralization and destruction of remnants can be carried out with the following materials: Hydrogen peroxide (solution between 5 and 10%): Stored in the chemical products warehouse, Calcium Hypochlorite (solution between 5 and 10%): Stored in the chemical products warehouse, Sodium Hypochlorite (solution between 5 and 10%): Stored in the chemical products warehouse.

Collect contaminated material with polyethylene bags, place it in polyvinyl chloride (PVC) plastic containers and labels indicating that they contain sodium cyanide residues. Subsequently, the company Caresny Perú SAC will be contacted for definitive disposal.

Wash the affected area with a diluted 5% sodium hypochlorite (bleach) solution, making sure that no cyanide residue remains in the area.

At the end of the procedure, it is important that the specialists make sure to remove the PPE used and place it in the polyvinyl chloride (PVC) plastic container. The process should start from the top down.

Those people who help with the removal of PPE and materials used in the emergency must use surgical gloves and a respirator with ABEK filters against particles and gases.

Tools, PPE and/or utensils that have been used must be decontaminated with a 5% sodium hypochlorite spray, then cleaned and rinsed with water. Those tools, PPE and/or utensils that have become unusable will be discarded and those that can be used again will be saved. Contaminated waste will be placed in polyethylene bags and stored in plastic containers such as tanks or drums; These containers will be labeled indicating that they contain sodium cyanide. Store in a well-ventilated place, keep container tightly closed and lock up. Subsequently, the company Caresny Perú SAC will be contacted for definitive disposal.

The water used to wash tools, PPE and/or utensils will be stored in a 50-liter plastic container and 250 ml of sodium hypochlorite (bleach) will be poured to eliminate sodium cyanide.

Emergency Response Procedures
In exceptional situations, such as a spill of solid sodium cyanide, the following procedures will be implemented to ensure the safe and proper management of contaminated waste:

Waste collection: Contaminated waste will be placed in polyethylene bags and stored in plastic containers (tanks or drums), properly labeled as "containing cyanide."
Final disposal: Caresny Perú SAC, an authorized company for hazardous waste management, will be contacted for the final disposal of the material.

Treatment of Water Used in Cleaning
Water used for washing tools, personal protective equipment (PPE), and utensils will be stored in a 50-liter plastic drum.
This water will be treated with 250 ml of sodium hypochlorite (bleach) to ensure the complete neutralization of sodium cyanide.

After treatment, the water will be discharged into the public drainage system, which mixes with other industrial and residential effluents. This public drainage system is ultimately treated at a Wastewater Treatment Plant before being released into the Lurín River.

There is an eyewash stations and emergency showers to clean the people involved in the task of collecting sodium cyanide briquettes. When using the emergency shower, the drain outlet must be covered so that the water used is stored and then 5% sodium hypochlorite is poured, thus eliminating possible sodium cyanide residues. The emergency shower and eyewash should be located near the work site and additionally have aluminum thermal blankets on hand.

The collaborators involved in the incident must go to the Santa Martha del Sur clinic located in the San Juan de Miraflores district to undergo a general preventive check-up.

Document the incident and review safety procedures to avoid future similar occurrences.

Send incident and accident reports to the Operations manager.

The Operations Manager must report the incident to ICMI (International Cyanide Management Institute) within 24 hours after the event through the incident notification form located at the following link https://cyanidecode.org/incident-reporting-form / or through email info@cyanidecode.org.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.2
- ☐ not in compliance with

Finding/Deficiencies Identified:

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

The police, firefighters and health centers have been involved in the emergency response plan.
In the case of the Santa Martha del Sur Clinic (located 20 minutes from the warehouse) and the Insurance. Coordination has been made with the firefighters of the San Pedro de Lurín Volunteer Fire Company No. 129 regarding the emergency response plan.

The objective was to provide participants with a set of conceptual tools and management elements to understand the risks of the presence, transportation and use of hazardous materials in their district, and specifically of Sodium Cyanide. This training was given by Jean Lostaunau from Safety Management Resources

The first response in first aid is carried out internally, in addition in the CQ [SIG] 002.03 Safety and Contingencies Plan (v.1.0) considers ANNEX D telephone directory of nearby hospitals and clinics, annex E identifies fire services.

Internally, continuous communication is made with the safety supervisor and the internal staff. Warehouse staff receive constant training through an annual training program. In the case of external entities, it is the firefighters who participate in an emergency. If levels above 10 ppm are detected, the firefighters will be called because there is no adequate self-contained breathing equipment to deal with this emergency.

On 24-Oct-2024, training was held for the First Responder members of the Civil Defense Platform and the Disaster Risk Management Working Group of the District Municipality of Lurin. The objective was to provide participants with a set of conceptual tools and management elements to understand the risks of the presence, transportation and use of hazardous materials in their district, and specifically of Sodium Cyanide. This training was given by Jean Lostaunau from Safety Management Resources

On 06-Nov-2024, The response plan CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) was sent by email to the First Responder members of the Civil Defense Platform and the Disaster Risk Management Working Group of the District Municipality of Lurin.

Production Practice 5.3

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

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

The operation is
- ✓ in full compliance with
- ☐ in substantial compliance with Standard of Practice 5.3
- ☐ not in compliance with

Finding/Deficiencies Identified:

The response plan CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) indicates in the Annex I the functions and responsibilities of the personnel of Centroquimica S.A.C. The general manager, the logistics manager, the warehouse manager and the warehouse assistant are involved in the Plan.
The warehouse manager and the warehouse assistant have explicit authority to commit the resources necessary to implement the Plan.
The Plan indicates in the Annex H, the Emergency Response Brigades:

- *First aid brigade: Primary and alternate coordinators are mentioned with their contact numbers.*
- *Area/zone isolation: Primary and alternate coordinators are mentioned with their contact numbers.*

The response plan CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) indicates in the Annex H the Emergency response Team:

- *First aid brigade: Primary and alternate coordinators are mentioned with their contact numbers.*
- *Area/zone isolation: Primary and alternate coordinators are mentioned with their contact numbers.*

There is an annual occupational health and safety training program, CQ-002. The HAZWOPER/HAZMAT Training Manual, Safety Management Manual in the Handling of Sodium Cyanide, Emergency Response Guidebook 2024 is delivered to the staff. The effectiveness of the training is measured through evaluations. The warehouse manager certificate is evidenced.
The plan includes Required training for the entire team: All collaborators involved in the management of cyanide must receive training on first aid recommendations, spill cleanup, and emergency plan before working with sodium cyanide.

Communication with the head of operations is included in the emergency response plan, who responds to communications from the safety supervisor and communication with the brigades if necessary.

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

The CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), includes the responsibilities under the Annex I.

There are inspections through checklists of the emergency response equipment.

All the reviewed check lists were carried out by the warehouse manager.

The CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) includes communication protocols with Santa Martha del Sur Clinic at phone number (01) 6156767 and with the fire department at phone number 116. Additionally, Annex I lists the responsibilities of CENTROQUIMICA S.A.C. top management, which include communicating incidents to the media, community, suppliers, customers, and authorities. Annex D provides a phone directory of nearby hospitals and clinics, and Annex E contains the fire department's contact directory.

At all emergency points, including cases of accidental ingestion, inhalation, or skin contact with sodium cyanide, contacting the Santa Martha del Sur Clinic ambulance service is specified. In the event of a fire, communication with the fire department is also indicated.

There is communication with the Santa Martha del Sur Clinic, and training was held for the First Responder members of the Civil Defense Platform and the Disaster Risk Management Working Group of the District Municipality of Lurin. The objective was to provide participants with a set of conceptual tools and management elements to understand the risks of the presence, transportation and use of hazardous materials in their district, and specifically of Sodium Cyanide.

The response plan CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) was sent by email to the First Responder members of the Civil Defense Platform and the Disaster Risk Management Working Group of the District Municipality of Lurin.

There is document CQ [Sig] 002.06 Drill Calendar, which includes the Warehouse Emergency Situation Drill Report and the cyanide poisoning drill in a warehouse and spill. Results and conclusions have been included, such as the ability of staff to recognize and respond to an emergency. The report identified improvements such as warehouse signage that facilitates the identification of evacuation routes. There are action plans for collecting observations. The emergency plan considers firefighters and medical facilities, if necessary. For the emergency level of this drill, only Centroquimica´s personnel participated.

.

Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

The operation is
✓ in full compliance with
☐ in substantial compliance with Standard of Practice 5.4
☐ not in compliance with

Finding/Deficiencies Identified:

The CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0) includes communication protocols, lists the responsibilities of CENTROQUIMICA S.A.C. top management, which include communicating incidents to the media, community, suppliers, customers, and authorities. Annex D provides a phone directory of nearby hospitals and clinics, and Annex E contains the fire department's contact directory.

At all emergency points, including cases of accidental ingestion, inhalation, or skin contact with sodium cyanide, contacting the Santa Martha del Sur Clinic ambulance service is specified. In the event of a fire, communication with the fire department is also indicated.

The CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), includes in Annex I, within the authorities of CENTROQUIMICA S.A.C., the responsibility of the General Manager to communicate the event that has arisen to the media and citizens.

The CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), mentions in chapter 8.3 that the Logistics Manager must report the incident to the ICMI (International Cyanide Management Institute) within 24 hours after the event through the incident notification form located at the following link https:// cyanidecode.org/incident-reporting-form/ or through email info@cyanidecode.org.

Production Practice 5.5

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

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

INTERNATIONAL CYANIDE MANAGEMENT CODE
PRODUCTION SUMMARY AUDIT FINDING REPORT

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

Finding/Deficiencies Identified:

The CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), in the chapter 8.1 mentions that If Sodium Cyanide is left impregnated in asphalt or vehicle equipment, the neutralization and destruction of remnants can be carried out with the following materials: Hydrogen peroxide (solution between 5 and 10%): Stored in the chemical products warehouse, Calcium Hypochlorite (solution between 5 and 10%): Stored in the chemical products warehouse, Sodium Hypochlorite (solution between 5 and 10%): Stored in the chemical products warehouse.

The CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), includes in point 8.1 If Sodium Cyanide is left impregnated in asphalt or vehicle equipment, the neutralization and destruction of remnants can be carried out with the following materials :
• Hydrogen peroxide (solution between 5 and 10%): Stored in the chemical products warehouse, shelf 1.
• Calcium Hypochlorite (solution between 5 and 10%): Stored in the chemical products warehouse, shelf 2.
• Sodium Hypochlorite (solution between 5 and 10%): Stored in the chemical products warehouse, shelf 2.
It mentions that the contaminated material should be collected with polyethylene bags, placed in polyvinyl chloride (PVC) plastic containers and labeled indicating that they contain sodium cyanide residues. Subsequently, the company Caresny Perú SAC will be contacted for definitive elimination. The affected area will be washed with a diluted 5% sodium hypochlorite (bleach) solution, ensuring that no cyanide residue remains in the area.
It is included that at the end of the procedure, it is important that the specialists make sure to remove the PPE used and place it in the polyvinyl chloride (PVC) plastic container. The process should start from the top down.
Those people who help with the removal of PPE and materials used in the emergency must use surgical gloves and a respirator with ABEK filters against particles and gases.

The CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), includes in point 6.3 Instruction and preventive coordination, at the point of Storage and Disposal, that the tools, PPE's and/or utensils that have been used They should be decontaminated with a 5% sodium hypochlorite (bleach) spray, then cleaned and rinsed with water. Those tools, PPE and/or

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal

utensils that have become unusable will be discarded and those that can be used again will be saved. Contaminated waste will be placed in plastic bags and stored in plastic containers such as tanks or drums; These containers will be labeled indicating that they contain sodium cyanide. Store in a well-ventilated place, keep container tightly closed and lock up.
It also indicates that for the Disposal of contaminated utensils and/or materials, the contents/container must be disposed of in an authorized facility in accordance with national, international, regional and local regulations. This process must be carried out by a company specializing in hazardous waste management. In this case, the EPS-RS in charge is Caresny Perú SAC.

CQ [SIG] 002.03 Safety and Contingency Plan (v.1.0), includes in chapter 9. Environmental Monitoring, indicates that after any of the emergency situations that have been described in the plan have occurred, to hire a company specialized in environmental monitoring/tracking to verify that there are no traces of sodium cyanide that harm the health of workers and the environment where the activities are carried out. Annex G details relevant information from companies that provide this environmental monitoring service, including Kanay S.A.C., Green Safety S.A.C. or AD LAB S.A.C., address and contact telephone number are included.

Production Practice 5.6

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

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

Finding/Deficiencies Identified:

CQ [SIG] 002.03 Security and Contingency Plan (v.1.0) indicates that it must be reviewed annually according to the development of operations and in the following cases:
• When local Rules and Laws are updated (e.g. Mining Health and Safety Regulations, Sodium Cyanide Marketing Regulations, Sodium Cyanide Marketing Regulations).
• When International Regulations, Standards and Good Practices are updated (ISO standards, Cyanide Code).
• Occurrence of an incident or accident.

There is CQ [Sig] 002.06 Drill Schedule 2024 (v. 1.0), from which CQ [SIG] 002.07 Warehouse Emergency Situations Drill Report (v.1.0) has been identified for the case of the last drill

developed on 11-Feb-2024, for the case of cyanide poisoning in a warehouse and spill. Results and conclusions have been included such as the staff's ability to recognize and respond to an emergency. Improvements were identified such as warehouse signage that facilitates the identification of evacuation routes. There are action plans for collecting observations.

CENTROQUIMICA S.A.C.		February 25, 2025
Name of Facility	Signature of Lead Auditor	Date of submittal