Empresa de Transportes N&V
Trujillo – Perú

Summary Audit Report
for the

International Cyanide Management Code

February 2025

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BP Cyanide Auditors

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Content

Operation General Information

Name and location of Supply Chain Consignor	Empresa de Transportes N&V S.A.C.
Name of Facility Owner:	Empresa de Transportes N&V S.A.C.
Name of Facility Operator:	Empresa de Transportes N&V S.A.C.
Name of Responsible Manager:	Carola Villar - Operations Management
Address:	Carretera Industrial Km 560 – Sector Primavera
State/Province/Country:	Trujillo, Perú
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Operation Location Detail and Description

Empresa de Transportes N&V S.A.C. (N&V) is a transport trucking company with 25 years' experience in the Peruvian territory, specialist in transportation of hazardous materials and merchandise in general for the different industrial sectors in Peru, complying with the Standards ISO 9001:2015, ISO 45001, ISO 14001.

N&V initially certified the Cyanide Code in 2017 and then recertified it in 2021.

N&V's cyanide transport operation involves the activities of supervision of the transport units, vehicle monitoring from its control center. All activities are carried out by its personnel, based on the operations of escort of vehicles in convoy, vehicle monitoring and transport management supervisor. The company has a modern truck fleet equipped with trailers for sea containers with 3-axle and semi-trailers.

N&V has appropriate units appropriate for the Peruvian roads and geography environment, for the routes on which they travel (coast, mountains, jungle). They currently have a fleet of around 80 vehicles with different conformations such as vans, platforms, tankers, lower beds and containers holders, which adapt to the transfer in the diversity of products that client needs.

The transporter currently operates various ground transport routes for cyanide from Lima warehouses to mine sites in the south and north of the country. N&V trucks transport

solid sodium cyanide packed in 1-ton Intermediate Bulk Containers (IBC) and in 30 kg barrels in 20- and 40-foot sea containers. All containers are received locked and tagged. These tags are removed only at the destination site. Cyanide is delivered in convoys with escort.

During the cyanide shipment journey, they monitor their vehicles through their Monitoring Center, which tracks the vehicles assigned to the service via GPS. Likewise, it corresponds to the management of early detection alerts for the efficient management of transportation, the sending of status reports according to the frequency established with the customer and official communication channel in case an emergency arises during the execution of the service.

For the supervision of their transport vehicles, they have a 4x4 truck that guides the convoy of loaded heavy vehicles from origin to arrival at destination in accordance with the provisions of the route map. It is also responsible for executing the security controls established for the service, reporting the location of the convoy to the control center, complying with the travel plan and providing support in case of emergency situations.

Auditor's Finding

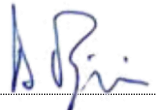
This operation is

- ✓ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

with the International Cyanide Management Code

Compliance Statement

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

Empresa de Transportes N&V S.A.C.		February 7, 2025
Name of Operation	Signature of Lead Auditor	Date

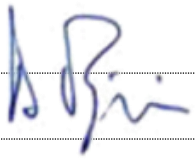
Auditor Information

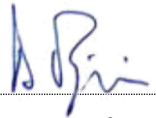
Audit Company:	BP Cyanide Auditors SAC
Audit Team Leader and Technical auditor | Email:	Bruno Pizzorni | bpizzorni@cyanideauditor.com
Dates of Audit:	September 17 and 18, 2024

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, 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 Verification Auditors.

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

Empresa de Transportes N&V S.A.C.				January 29, 2025
Name of Operation		Signature of Lead Auditor		Date

Empresa de Transportes N&V S.A.C.		February 7, 2025
Name of Operation	Signature of Lead Auditor	Date

Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

The operation is	✓	in full compliance with	Transport Practice 1.1
	☐	in substantial compliance with	
	☐	not in compliance with	

Empresa de Transportes N&V S.A.C. (N&V) has developed and implemented the written procedure NV-SSMA-P-014 v3 Route Evaluation Procedure to minimize the potential for accident and releases during transport. The evaluation and selection of routes is limited on the actual availability of route alternatives, jurisdictional designations and required routes for transport of dangerous goods. The evaluation considers the issues identified in the Code Transport Protocol as well as any others that may affect the relative risks of the various routes being evaluated, such as natural hazards and security issues.

According to the procedure, N&V considers the following for selecting and evaluating transport routes:

- All transport routes for hazardous material must be authorized for this purpose by the Peruvian Ministry of Transport and Communications (MTC).
- Type of road: in accordance with local regulations on the weight, dimensions and capacity of transport vehicles transiting on roads and bridges, the type of roads that make up the route must be defined, that is to say there may be sections that are motorways of 1 or more lanes or sections of land, for which the roads are defined as Interprovincial, urban or secondary road.
- Length: Refers to the distance between the origin and destination (door to door), this can be determined by using existing tabs on the different road maps, however, it is advisable to determine it by taking the reading of the odometer at the beginning and end of the trip.
- Transit time allowed: The transit time is determined by the maximum working day per day which shall be 12 hours; every 4.5 hours of travel, the driver must stop the vehicle and rest for 25 minutes and take active breaks; after 12 hours of travel, the driver must rest 8 hours; and the schedule of travel shall be made only during daytime hours.

- Route description: this is the core part of the evaluation of a route since it details the locations of dangerous curves; steep climbs and descents; population density; resting places; communications services and blackout areas; police stations and hospital services; significant bridges; railway crossings; landslide and fog zones; areas with ice, snow or water; environmentally sensitive areas; and areas at high risk of theft.

The auditor was able to review evidence of the annual routes evaluations performed to the warehouses to the mine sites, confirming that the procedure was used in selecting the route used by the transporter, and the results of the selection process. The auditor considered the local restrictions for selecting the transport routes.

The procedure for route evaluation includes identifying hazards and evaluating the risks, requiring that control measures must be established to control the risks identified.

The procedure requires the routes evaluations must be done physically, that is to say by means of a route of the same, for which the formats of Roadmap and Route Analysis are used; the review must be done observing all the relevant security measures, as well as the precepts of the "defensive management". This evaluation can be done in conjunction with the cyanide distributor, as well as with the client if required by the same.

Risks identification on route is carried out on the basis of the population density, condition of road infrastructure, long slopes, curves, bridges and uneven steps, areas under repair, exits, roads or gaps where they could divert the unit. Also consider estimated travel, if on the way there are hospitals, schools, or places of concentration of people. Considers transit through water concentration zones such as rivers, lakes, lagoons, swamps, and fog zones. Identifies presence of authorities and Civil Protection, phone and GPS coverage during the journey.

Measures are also taken to treat risks identified as high or intolerable in order to minimize the possibility of these occurring. The annual route evaluation reviewed by the auditor included this risk analysis, finding it in compliance with the Code requirements. The auditor confirmed this is implemented by review of the route reevaluations performed during the recertification period. The company's health, safety and environmental (HSE) supervisor and the convoy escort supervisor travel together through the route in evaluation in a pickup truck where during the journey they evaluate the state of the bridges, the location of dangerous curves, urban areas, the state of the road as if it is asphalt or if it is dirt or a trail, the location of the police stations, if it is any construction, the inclination of the roads, the slopes, the presence of snow, fog, water bodies, among others. This information is collected in a route supervision report, then they establish the document road map where they do the risk analysis. The auditor reviewed the road map for Lagunas Norte mine where they had identified the risks as required by the Cyanide Code.

The transporter procedure states the routes reevaluation will be performed under the same initial analysis methodology and its updating will be carried out annually or as needed. The procedure also states that drivers must inform of any situation that may cause risk or deviation on the route, whether temporary or definitive. All personnel involved in transport of hazardous material, including cyanide, use the WhatsApp application to report immediately about any incidence along the transport route. Based on the feedback received the traffic monitor officer monitor reports toe the Operations Manager and the Health and Safety (H&S) Supervisor Monitoring who reviews the information to manage the situation and to update the route risks evaluation if necessary, following the criteria set out in this procedure, and inform the parties involved.

The auditor was able to access evidence of routes reviews and documentation of resulting modifications to the routes during this recertification period. N&V prepares monthly route supervision reports to verify the compliance of the route and the transport procedure. These reports are about the responsibility of the company's HSE supervision and the operational area. The auditor reviewed the route supervision reports for the Boroo Misquichilca (former Lagunas Norte) mine and for Pierina´s mine, among others.

Based on the route assessment performed, measures are taken to treat risks identified as high or intolerable in order to minimize the possibility of them occurring. According to the procedure for routes evaluation, all route evaluation must be done physically, that is, traveling through the route, to identify and locate the risks along the route. With this information, the transporter carrier carries out the Route Risk Assessment, which consists of an Excel worksheet where it documents the necessary control measures to be taken to control and reduce the risk identified on the selected route. The auditor reviewed the transporter documentation with examples of Route Risk Assessments that addresses management of risks along the selected routes to the mine sites finding it in conformance.

To accurately evaluate potential routes for their relative risk, identify the risks that exist along the chosen route, and determine the measures necessary to manage this risk, the transporter interacts along the route with emergency response providers, service stations providers, the client and the mine, as necessary. On the other hand, along the route they interact with places where they can park their vehicles for activities such as resting, eating and spending the night and inquiries about safety for the route. Regarding the interaction with the communities along the route, this is the responsibility of the mining operations because it is a sensitive issue. Additionally, for new routes, the company asks for feedback to the mine site and the client who owns the cargo.

According to local regulations, an escort must accompany all transportation of hazardous materials. The regulations indicate that for every three vehicles there must be an escort. Both the escort and the driver must have passed the hazardous materials (hazmat) course

III and preferably with firefighter experience. Cyanide shipments at N&V are sent in convoys as road conditions frequently are poor, there are recognized security concerns and the potential need for immediate emergency response is high.

As additional safety measures, the vehicles are only aloud to stop at authorized places, they have continuous GPS tracking, driving is only during daytime hours and dependent on weather conditions. The convoy leader assesses the safety of the route in each case and may stop the shipment if the conditions do not allow safe transit.

For safe stop on route, the site must have enough space to fit all trucks and escort vehicles, be away from populated centers and sensitive places, have feeding facilities for drivers and escorts, do not impede the free movement of other transport units, the accesses must be free of obstacles, be separated from incompatible products with cyanide (flammable, liquids, foodstuffs, etc.) and have permanent custody.

The transporter does not subcontract any portion of their cyanide transportation operations. All transport vehicles are owned by N&V and the drivers are employees of the transport company. The Code requirements pertaining to subcontractors are not applicable to the organization.

Transport Practice 1.2

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

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

The transporter works with qualified and licensed drivers. Personnel operating its cyanide transport vehicles have been professionally trained and are appropriately licensed with a specific professional driving license to operate this equipment as required by the local jurisdiction. The transporter does not operate handling equipment for the cyanide transport operation.

To be able to qualify as a driver in N&V, the worker must pass the company´s evaluation as for experience and test of driving, police records and medical examination, among others. The transport company only hires licensed drivers with a driving license category A4 which refers to professional drivers for heavy vehicles. Also requires/provide training in first aid, hazardous materials, firefighting.

According to the company Job Profile Manual NV-GTH-M-02, the Trailer Driver must meet

the following knowledge and experience: know how to handle heavy load transport units; know the country routes, have approved the defensive driving and hazmat courses level 1, 2, 3, have knowledge of first aids, knowledge in the use and handling of fire extinguishers, knowledge of basic mechanics and knowledge of traffic regulations. Minimum experience of 3 years is required in similar positions; driving license type A3C-A4 is needed and no transit infractions.

There are specific requirements for drivers who transport hazardous materials, including a theoretical and practical driving test. Drivers are also requested for police and criminal records. The auditor saw a series of documents kept on the staff of each driver documenting all of the above.

They have a general induction and a specific 24-hour induction by the staff selection procedure. They take a practical driving test by the company owner or a lead driver. They review the single work certificate, which is a document issued by the state that shows the driver's background and work history. The driver's record of infractions and his educational history. This is a document issued by the Ministry of Labor and Employment Promotion. The person in charge of document management reviews that the drivers and transport units have all the governing documents by an Excel worksheet for the entry of drivers. General induction is repeated annually. Drivers are also subject to a route recognition evaluation. The auditor reviewed the drivers' competence documents, training records and results of the understanding exams.

Operational training on safe cyanide handling is given upon hire and there is a skills evaluation process to ensure that drivers are competent to perform their job and to drive the designated route prior to their first delivery. Safety related training is given at defined intervals to ensure that all personnel operating cyanide transportation equipment can perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

All personnel involved in the cyanide transport operation are trained annually, as corresponding, in Defensive Handling, Hazardous Materials, First Aids, Fire Fighting, and Safe Cyanide Handling. This last course has 3 sessions: Cyanide 1 with a duration of 2 hours about cyanide recognition and dangers; Cyanide 2 with a duration of 2 hours on first aids for exposure cases; and Cyanide 3, with a duration of 4 hours, related to the emergency response plan.

The auditor reviewed training registers provided to the drivers during this recertification period. The records were found to be acceptable. The auditor also reviewed documents from 3 drivers kept on the personal file documenting all of the above.

The transporter does not subcontract any part of their cyanide transportation operations. All transport vehicles are owned by N&V and the drivers are employees of the transport

company.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is	✓	in full compliance with	Transport Practice 1.3
	☐	in substantial compliance with	
	☐	not in compliance with	

The truck transporter has records documenting the load-bearing abilities of its transport equipment and its maximum cyanide load weight; these records were available for the auditor's review. To assign these vehicles for the cyanide transport operation, the transporter performed a technical study to decide the characteristics of the vehicle needed, considering the engine power, haul and cargo capacity, torque and transmission capacity, among others. The auditor reviewed technical sheets of the vehicles verifying their power and towing capacity were adequate for the load bearing and the type of road to go.

N&V transports cyanide in trailers and semi-trailers loaded with 20- and 40-foot maritime containers and plans to transport isotanks in the future, according to the state by the Maintenance Supervisor. The auditor verified that the company has modern, recently bought, 460 and 540 horsepower Volvo trucks with gearboxes specially designed by the manufacturer for the company´s routes in steep mountain roads. N&V also has 420 horsepower trucks to be used on the coast of Peru on relative flat terrains.

Trucks and trailers were reviewed during the audit. All available tractors and trailers have been checked and were rated for weights that exceed maximum loaded weights. The load ability of the platforms used by the transporter is larger than the gross weight of an ocean container fully loaded with cyanide. The auditor reviewed the certificates and technical sheets of the transport units where the power of each vehicle is shown, the trailers also have manufacturing certificates dated 2020 that indicate a payload of 33 tons.

N&V keeps its equipment operating within the loads it will be handling. The first year the maintenance of the trucks is done at the parent company then the manufacturer tells them the type of preventive maintenance to be performed according to mileage (every 20,000 km). This maintenance is done at the main headquarters of the carrier since they have equipment and personnel trained to perform it. The company checks the fifth wheel every time the truck is uncoupled from the trailer and the fifth wheel is greased. The auditor reviewed completed inspection records of the equipment condition in a report format that is delivered at the end of the trip where among others is reported the

condition of the steering, the suspension, shock absorbers, the trailers locks, tires, lights, axles, brakes and the turntable or fifth wheel.

The transporter verifies that the load bearing capacity of its equipment is adequate by inspecting and testing its equipment to identify signs of stress or overloading. In addition to the transporter's routine preventive maintenance inspection program, local regulations from the MTC (Ministry of Transport and Communications) require the vehicles must pass and approve an annual third-party technical review which includes verifying the equipment adequacy load bearing capacity.

By other side, the carrier must comply with the authorized configurations for loading its vehicles. N&V has four types of vehicles in its fleet: Volvo, Freightliner, Mercedes Benz and Mack trucks, Class N3 for tractors and Class O4 for the trailers, according to the configuration that has been approved and certified by the MTC (Ministry of Transport and Communications). This appears in the vehicle´s ownership card in accordance with the vehicular configuration of the MTC which issues a table of weights and measures (Proof of Verification of Weights and Measures) indicating the loads and truck trailer configurations authorized for the vehicle.

N&V´s procedure Cyanide Loading, Transport and Unloading Procedure NV-OPE-P-001 v7 has the guidelines to verify the adequacy of the equipment for the load it must bear. The procedure establishes that only one container can be loaded per trailer and each truck can only pull one trailer. The convoy leader performs the inspection of the trucks together with the driver of the inspected vehicle before they are loaded. The platform truck assembly must withstand the total weight and comply with the maximum weight grade per axle. Prior to the departure of the trucks from the carrier's premises, the convoy leader is responsible for the final visual inspection of each of the trucks that transport the sodium cyanide to the final destination, which includes the correct condition of the containers.

The auditor reviewed evidence of inspections records and interviewed maintenance personnel and vehicle operators to find this in conformance. The carrier keeps these inspection records in its files for eventual verifications.

The carrier's operations area assigns the vehicles according to the cargo requirements. Normally N&V transports cyanide in 20-foot sea with a gross load of 22 tons. According to local Traffic Regulations and the Table of Approved Weights and Measures, the carrier must use the indicated configuration which is an approved combination of the tractor and trailer indicating the load capacity of that vehicle configuration.

It is established that only one container is loaded per trailer and that each truck will haul one chassis (trailer). This is consistent with the information included in the inspection checklist and was confirmed during the interviews.

Records were checked against weight capacities and weight limit regulatory information. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. Office personnel and driver showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

The transporter does not subcontract any portion of their cyanide transportation operations.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is	✓ in full compliance with	Transport Practice 1.4
	☐ in substantial compliance with	
	☐ not in compliance with	

N&V transports solid cyanide packed in one-ton Intermediate Bulk Containers (IBC) in sealed sea containers, which are transported on platform trailers hauled by trucks without the need to change the packaging. Per the interviewed personnel, the load is not removed from the container. The transporter has the procedure Cyanide Loading, Transport and Unloading Procedure NV-OPE-P-001 v7 which addresses the load cannot be altered during the transportation process. Seals are placed in the sea container door at the warehouse; the driver is responsible for verifying and recording the seal code and registers it in his check list, then secures the sea containers with chains to the trailer, in addition to enduring the trailer twist locks are fixed to the sea container. These seals can only be removed at the final destination.

According to the procedure, the convoy leader is responsible of inspecting the trucks, together with the driver, before they are loaded; review of the condition of the containers, which are suitable for travel, without holes and with the identification labels of solid sodium cyanide; and allow the departure of each trip once all truck inspections are complete. The auditor reviewed this procedure and completed inspection records of the “Check List for Inspection and Securing of Cargo (before, during and after the trip) v1”, and interviewed the driver’s confirming compliance with this provision.

Cyanide shipments are identified with placards as required by the Peruvian jurisdiction and international standards. Local regulations require to be displayed on all four sides of

the vehicle (sea containers in this case), appropriate placards showing Class 6 - Toxic, United Nations - 1689, Marine Pollutant and the National Fire Protection Association (NFPA) Rhombus. The transport procedure establishes that these placards signs must be placed on the container; this is verified through the vehicle´s inspection Check List for Cyanide Units NV-SSMA-F-026A. Per the reviewed operation files, the presence of the placards was verified through the checklist. Drivers visually inspect the containers prior to each movement. Equipment markings were found to be adequate and conformant.

N&V has implemented a safety program and address in the cyanide transport procedure vehicle inspections prior to each departure, limitations on its drivers' hours, inspections and procedures to prevent loads from shifting and procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered. The safety programs include performing preventive maintenance to its vehicles according to the program and a drug abuse prevention program.

The auditor reviewed the procedure for cyanide transport and required to clarify the process and frequency of inspections during each shipment: before travel, once the vehicle is loaded, inspections en route; to clarify how the cargo is lashed or if it is the responsibility of the warehouse or cargo dispatcher.

After the audit N&V updated both the cyanide transport procedure and the checklist, including and clarifying all the required above, sending the auditor new versions of both documents along with completed checklists. The carrier clarified that inspections are done before leaving to pick up the cargo. Once the container has been loaded to secure the load, inspections are then done after each stop and that lashing is the responsibility of the warehouse or cargo dispatcher as they receive the sea containers loaded and closed and the transporter does not deconsolidate the cargo in any part of the route. No additional information was required to find this in compliance with the Code.

Drivers conduct a pre-trip inspection before the vehicle departs for the shipment loading (documented through the vehicle inspection checklist). Mechanical defects are called to the attention of the approved mechanical contractors. Issues that would affect safety and/or legal compliance are resolved prior to moving off-site. Drivers interviewed demonstrated knowledge of the process of performing pre-trip inspections. Pre-trip inspection checklists were reviewed and found to be acceptable.

According to the procedure Preventive Maintenance for Transport Units NV-MANT-P-01 the vehicle´s mileage is updated through the odometer information in the travel report and also by the control of the guardhouse that read the mileage at the entrance and exit of the vehicles to N&V headquarters. Preventive maintenance for new vehicles is generally done by the supplier during the first year for free, then the transporter is responsible for preventive maintenance of trucks and trailers; the transporter is not

responsible for the sea containers maintenance but inspects and inform the shipper of any finding on the containers. The transporter also has the procedures Corrective Maintenance of Transport Units NV-MANT-P-02; and Procedure for Changing Tires NV-MANT-P-03. The auditor reviewed examples of preventive maintenance records performed where the mechanic signs to confirm that it has been done, it also indicates the list of spare parts that have been used. N&V also generates maintenance indicators for the mine's reviews. and

The transporter has individualized preventive maintenance programs for each truck brand: Freightliner, Mercedes, Volvo. Per interview with the maintenance supervisor, trailers are maintained every six months according to the document Execution of Preventive maintenance of the Platform and Low Bed. Then, according to the brand of the tractor there are maintenance plans called M1, M2 and M3 controlled by means of an Excel worksheet which controls mileage every 20,000 km or according to manufacturer's specifications. This is monitored through the maintenance plan for units called Control of the Preventive Maintenance Plan for Transport Units. The Maintenance Manager generates and approves the preventive work order in the Spring platform software and delivers it to the mechanic.

In order to program the units, it is necessary that the mileage of the units is updated in the "Mileage of the transport units" record and this update is reflected in the "Control of the Preventive Maintenance Plan for Transport Units" and in the "Sequential Record of Preventive Maintenance," the latter being an entry to know what type of plan (M1, M2, M3 or M4) corresponds to the transport unit.

The procedure for cyanide transportation requires transit time must be determined by the maximum working day per day which shall be 12 hours; every 4.5 hours of travel, the driver must stop the vehicle and rest for 25 minutes and take active breaks; after12 hours of travel, the driver must rest 8 hours; and the schedule of travel shall be made only during daytime hours.

To prevent loads from shifting the cyanide transport procedure requires drivers to inspect their units after loading the sea container and after every stop on route, to ensure the trailer´s pins are correctly embedded preventing it from shifting, and the chains properly tensioned and secured. Cyanide travels in sealed containers, which are secured to the platform safely, eliminating the possibility of displacement during transport.

According to the transport procedure the transport can continue only if the leader of the convoy has provided the relevant conditions. The supervisor of the convoy informs the state of progress of the operation and any event in each one of the points indicated in its itinerary, and any event requiring stopping the convoy. If conditions are not favorable to allow the convoy to reach its destination, it will be parked in an appropriate place.

Before each trip, the employee must undergo alcohol testing and periodically through a drug test. Violation of this policy has resulted in the separation of the worker from the organization.

Records were available to demonstrate that the requirements of each of the above-mentioned controls had been fulfilled. Records are maintained in electronic and hard copy at the office for a period. The auditor determined the program reasonably addresses each identified issue as necessary to ensure the safe transport of cyanide and considering the specific circumstances presented by the transport route.

The transporter does not subcontract any portion of their cyanide transportation operations. The International Cyanide Management Code (ICMC) requirements pertaining to subcontractors are, therefore, not applicable to the organization.

Transport Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

The operation is	✓	in full compliance with	Transport Practice 1.5
	☐	in substantial compliance with	
	☐	not in compliance with	

The transporter does not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

The operation is	✓	in full compliance with	Transport Practice 1.6
	☐	in substantial compliance with	
	☐	not in compliance with	

The transporter was required to establish in a written procedure that the transport vehicle has to carry communications equipment, although the vehicles are provided with radios, the drivers have cellphone and if required, the convoy leader carries a satellite phone. Communications during transport are with N&V headquarters, the mining client and the cyanide distributor. All vehicles have a radio used to communicate with the mining client and especially to communicate between them in the convoy vehicles. They

use 5 radio channels to communicate with the clients. Drivers' personal cell phones are collected at the beginning of the convoy driving day and delivered to the convoy leader. Additionally, the vehicle operators have pre-determined contact information in a written list for emergency notification of the appropriate individuals and organizations, and entities along the route, as necessary to mobilize the appropriate response capabilities.

All personnel involved in the cyanide transport operation have a communication group via WhatsApp, which involves drivers, cyanide transport operation personnel, the cyanide destination at the mine, the cyanide distributor including N&V the safety personnel. The convoy leader reports at departing from the distributor warehouse, reports any stop to rest or for lunch, and upon arriving and delivering the cyanide shipping. Any incident in the road is communicated via this group.

Communications equipment available in the vehicles is tested periodically. According to the cyanide transport procedure, the GPS (Global Positioning System), a space-based radio-navigation system installed in each truck, must be tested before delivering the cyanide shipment to ensure it is working properly. This includes testing the audio system in the cabin that is working and the remote vehicle shutdown system works. Regarding cellphones and radios, the Cyanide Convoy Escort Van Check List includes checking the operational/charged satellite phone, cell phone, radio handy and radio base. According to the cyanide transport procedure it is the responsibility of the convoy leader to test the communication equipment to verify that communications equipment is operational before the start of the trip. The auditor reviewed completed checklists demonstrating that the procedure has been implemented.

Additionally, the HSE area, including the company's management, carries out inspections of convoys en route, where, among other activities, it reviews the operational status of communications equipment such as base radios and cell phones. They do 3 road inspections and route supervision per month. The auditor reviewed these inspection records, also Motorola´s base radio maintenance reports and GPS operativity certificates from the Tracklog and Conexa GPS services providers.

The transporter has developed and implemented procedures to account for mobile phones identified communication blackout areas in their routes to the mine sites stablishing in the GPS monitoring system the expected time to the signal to be recovered; if necessary, the convoy carries a satellite phone. The transporter tracking system has set geofences identifying these places. The GPS signal, as reported by the HSE Supervisor, is continuously covered with the new "Ruptela" GPS equipment providing accurate GPS tracking. Due to this continuous connectivity system the transporter has not set special procedures other than GPS tracking for the mobile phone blackout areas.

The carrier takes great care in the operativity of its GPS devices because in addition to

using the trucks to transport cyanide, it also provides fuel transportation services. By legal regulation, if the vehicle does not emit a GPS signal, there is an alert and the vehicle with the fuel load is not attended.

The transporter tracks the progress of its cyanide shipments by means of communication with periodic mobile phone contact, text messaging, use of GPS and reports from checkpoints along the route. These systems are addressed in the procedure Monitoring Procedure GPS NV-OPE-P-005 v8 with the following specific objectives: to simultaneous tracking of all vehicles the Tracklog platform as well as emergency signals sent through the panic button; real-time vehicle location and reporting; speed control, preventing it from exceeding the speed established; control the stops made by drivers in unauthorized places; monitoring of routes by reconstructing historical routes, through the creation of geofences and personalized points, to verify any illicit act or suspicious activity in vehicles according to the Tracklog platform; keep internal areas and/or customer informed about the monitoring of the vehicle, until it reaches its destination, via mail or printed reports; and alert drivers of speeding committed in real time according to established parameters.

The convoy leader communicates by cellphone or radio to its base upon dispatch, upon arrival at the mine site, and after unloading it is complete. Personnel responsible for tracking shipment status from the transporter were interviewed, the GPS system was demonstrated, and logs showing that shipment status was being recorded were reviewed and were found to be complete.

The transporter has a chain of custody documentation to ensure that cyanide shipments arrive at their destination intact. The system only requires confirming that the initial inventory arrives in full and intact at the destination. Inspection of locks and seals on sea containers are also performed during the shipment.

The transport documents show the amount of cyanide delivered. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The amount of cyanide delivered is carefully monitored remotely through the cyanide supplier, the transporter and the mine site.

The customer's (cyanide supplier) shipping guide indicates the amount of cyanide transported, which must be consistent with the purchase order. The customer requests via email the cyanide transport service to N&V and upon pick-up of the cargo issues its remittance note. In turn, the carrier issued a transport bill with reference to the remittance note, which is received in accordance with the mine.

The auditor reviewed the chain of custody documentation which included cyanide shipment bill of ladings matching the port scale reports, and inspection records of locks and seals on sea containers completed during the course of the shipments and through interviews with the HSE Supervisor and operators.

The transport document, the Safety Data Sheets (SDS), and emergency response information are carried by each driver. The drivers have an on-board file that includes copies of it, licenses, and the cyanide SDS.

The transporter does not subcontract any portion of their cyanide transportation operations. ICMC requirements pertaining to subcontractors are, therefore, not applicable to the organization.

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PRINCIPLE 2 - INTERIM STORAGE

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

Transport Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental

The operation is	✓	in full compliance with	Transport Practice 2.1
	☐	in substantial compliance with	
	☐	not in compliance with	

N&V does not operate any cyanide trans-shipping depots and interim storage sites. Transport Practice does not apply to the transporter.

PRINCIPLE 3 - EMERGENCY RESPONSE:

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is	✓	in full compliance with	Transport Practice 3.1
	☐	in substantial compliance with	
	☐	not in compliance with	

N&V has a written plan for responding to emergencies that may occur during their cyanide transport activities. The auditor reviewed the transporter emergency response plan NV-SSMA-PDC-007 v4 Emergency Preparedness and Response Plan for Sodium Cyanide Transport (ERP or Plan) dated September 27, 2024.

The transporter's Emergency Response Plan reflects the issues presented by the different transport routes between the warehouses and the mine sites and is appropriate for the physical and chemical form of the solid sodium cyanide. The Plan identifies emergency situations such as sodium cyanide release to road, land, surface water and robbery during transportation. The transporter does not operate an interim storage facility.

The Plan considers the physical and chemical form of the cyanide toxic white solid in the form of briquets or granules. The only form of cyanide to be shipped using this supply chain is solid sodium cyanide. Emergency response procedures address actions to be taken in response to a solid sodium cyanide spill. The Plan includes the sodium cyanide SDS where is defined the physical and chemical form of cyanide: solid white granular cyanide and specific information regarding the hazardous material to be transported.

The transporter was required to describe the cyanide method of transport: by truck and trailer platform in one-ton wooden boxes (Intermediate Bull Containers or IBC) within one 20- or 40-foot sea container loaded with 20 boxes each. After the audit N&V sent a new version of the emergency response plan where all audit findings were adequately addressed. The Plan describes cyanide transportation is made in convoy by trucks with one semi-trailer type for container chassis according to a stablished configuration. This trucking company uses no other methods of transport. The Plan considers the transport of cyanide in its own trucks and appropriately addresses the emergency response actions.

The Plan considers all parts of the transportation infrastructures, as it was identified in the route risk analysis, including the condition of road infrastructure, long slopes, curves,

bridges and uneven steps, areas under repair, exits, roads or gaps where they could divert the unit. Considers transit through water concentration zones such as rivers, lakes, lagoons, swamps, fog zones and danger of landslides on the route, among others. Identifies phone and GPS coverage during the travel journey. The Plan addresses the emergency response to events that occur in relation to these risks and hazards.

The ERP considers the trucks design of the transport vehicles. It describes the appropriate trucks and chassis to use to transport cyanide, also indicates cyanide is transported in sea containers. Each truck hauls one trailer with a sea container. For cyanide transportation the transport vehicles are described as articulated trucks, with one trailer chassis for sea containers.

The Plan specifically considers response actions that may be needed for emergency situations during transportation. The Plan considers a series of instructions covering the potential hazards that could occur during the loading, transportation and unloading of the cyanide cargo. The Plan describe detailed response actions for cases vehicle collisions with and without spillage, vehicle rollover with and without exposure and intoxication, spillage of the product and contact of this with streams, rivers, fire and robbery.

The first to respond to the emergency are the drivers and the convoy leader, who will attend to the cyanide spill event by applying their knowledge acquired in the trainings in the emergency response plan, the use of its PPE, spills containment, use of fire extinguishers and tools such as brooms, bags and plastics, among others, so that the cyanide does not react with any water source. The second response will be in charge of N&V emergency response brigades arriving at the site, with the help of the mine client, and external private contractor IFSEC for removing the contaminated material and its final proper final disposal.

The Plan also establishes the logical line of actions that convoy must take when irregularities arise during transport of sodium cyanide, including civil commotion, adverse conditions, bad weather and unplanned stops.

The transporter Emergency Response Plan includes external hazardous materials responders, local police fire departments, and medical facilities located along the route. These public entities, including ambulance services, will provide emergency response support as part of their routine activities and responsibilities. External service provider IFSEC has the designated role for removing the contaminated material, cleaning any contamination at the site -remediation activities- and for the final adequate disposal of any contaminated material.

Transport Practice 3.2

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

The operation is	✓	in full compliance with	Transport Practice 3.2
	☐	in substantial compliance with	
	☐	not in compliance with	

Specific induction includes training in the ERP is given at the driver's entrance to the company and then repeated annually. Training in emergency response is given periodically to drivers and supervisors. They are trained in emergency response in safe cyanide management for spills, firefighting, hazardous materials, including calling for assistance, use of personal protective equipment and first aid for cyanide exposure. Training is provided by internal staff and external companies as workouts which are renewed annually complying with the training plan and verifying compliance with specific skills.

Drivers were interviewed and awareness of emergency procedures and documentation was confirmed. The auditor reviewed the training records and training material in Power Point presentation “Sodium Cyanide Safe Use and Emergency Management" for this recertification period, finding it in conformance.

The specific duties and responsibilities of response personnel are identified in the Emergency Response Plan, with descriptions of the emergency response duties and responsibilities before, during and after an incident / accident or an emergency of situation for the general manager, operations manager, operations and HSE supervisors, convoy leaders and drivers, so that expectations are clear and is a basis for training of these personnel.

It was not clear from the emergency response plan whether drivers would be involved in the first response by collecting cyanide in case of an emergency involving a small cyanide spill on route. After the audit, in the reviewed version of the ERP, the transporter clarified the drivers will participate as first responders in this aspect as they are trained. No additional information was required to find this in compliance with the Code.

The transporter has a list of the emergency response equipment that must accompany the cyanide load in the convoy leader truck along the transport route. This list is mentioned in the Emergency Response Plan as Appendix 4 and it is also maintained as a checklist for inventory the equipment. The list includes a cyanide antidote kit containing sodium nitrite, sodium thiosulfate and medicinal oxygen. As personal protective equipment (PPE) includes an HCN gas monitor, Tyvec suits, disposable Type N95 masks,

chemical and leather gloves, rubber safety boots, full face mask with gas filters and goggles, among others. Also includes materials and tools to recover any cyanide spill such as shovels, sweeps, isolating tape rolls, polyethylene bags, empty containers and lime.

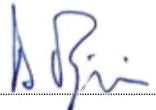
The transporter was required to include in the list an emergency air insufflator AMBU (auxiliary manual breathing unit) type; mask filters for particulate material N° 95 or 100; to include a check for adequate pressure in the oxygen balloon; to indicate in the ERP the proportion of sodium hypochlorite to obtain the desired 5% solution for cyanide destruction; to include water for decontamination, among its material lists. After the audit, the transporter sent a reviewed version of the ERP as well as of the list emergency response equipment including all the above requirements. N&V opted to use commercial bleach instead of hypochlorite. The auditor found in compliance with the Code the new version of the list includes equipment appropriate for the activities that are called for in the ERP. No additional information was required.

The transporter has available the necessary emergency equipment noted in the list for each cyanide shipment. The auditor reviewed completed emergency equipment checklists, inspected the equipment, materials and interviewed the HSE Supervisor, the escort leader and the drivers, verifying compliance with this provision. After the audit, the transporter sent pictures purchase orders and invoices of the AMBU and particle filters N°100. No additional information was required to find this in compliance with the Code requirements.

In addition, each truck has the required emergency response equipment, as the auditor had the opportunity to inspect the vehicles on arrival at the truck parking area in N&V headquarters. Each truck travels with rubber boots, leather gloves, reflective vests, safety cones, half-face mask, shovel, peak, dry powder fire extinguisher and lantern with batteries.

The emergency response equipment identified in the list is inspected and tested regularly so that it will be available in good working order when needed for use. The transporter has organized monthly inspections of the emergency response equipment, in addition to the inspections before every cyanide shipment. The ERP aims to perform inspections of the emergency response equipment before loading the truck and also on returning from the transport operation. Also, emergency equipment is inspected on a regular basis when vehicles are brought in for maintenance and inspections. A checklist is used to verify that it is available, records are kept in the operation file. The availability of the material and inspection records was confirmed during the audit. The auditor reviewed these records and verified that the equipment is in good working order during transport of cyanide.

N&V does not subcontract any of cyanide handling or transport.

Empresa de Transportes N&V S.A.C.		February 7, 2025
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Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is	✓	in full compliance with	Transport Practice 3.3
	☐	in substantial compliance with	
	☐	not in compliance with	

The transporter has procedures and current contact information for necessary internal notification and external notifications in the event of a cyanide emergency during transport. The ERP has current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. The Plan has a detailed communications flowchart, stating that in case of a transport emergency the convoy leader should communicate with the Operations Supervisor or with the vehicles monitoring personnel, who will call the Operations Manager, who in turn will communicate with the client and other interested parties. A flowchart details the communications in case of any emergency.

The transporter has a provision in place to ensure that emergency contact information is kept current in the Emergency Response Plan, for annual or more frequent review (as necessary) of the entire Plan. The Plan addresses that on every update, the contact list the phone numbers will be checked for accuracy to ensure that internal and external emergency notification contacts are kept current. The auditor reviewed the procedure and verified its implementation through review of documentation of previous ERP versions phone lists and by interview with the HSE Supervisor.

The transporter was required to include a requirement and details to notify the International Cyanide Code Institute (ICMI) of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. After the audit, N&V sent the new version of the ERP where this requirement was included detailing the ICMI´s definition of significant cyanide incident. The operation has not notified the ICMI of such incidents as they have not occurred during this recertification period.

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Transport Practice 3.4

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

The operation is	✓	in full compliance with	Transport Practice 3.4
	☐	in substantial compliance with	
	☐	not in compliance with	

The convoy personnel will perform spill cleanup and cyanide neutralization in case of small cyanide spills; the transporter has appropriate procedures in the ERP detailing how activities such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and disposal of spill cleanup debris will be conducted. For a significant accident with cyanide spill, the transporter will call external responders IFSEC, a specialized contractor to perform cleanup and remediation activities to ensure the land has been free of cyanide contamination. The auditor verified IFSEC was available to carry out remediation activities reviewing the emails exchanged between N&V and the contractor where IFSEC confirmed his availability to intervene in an event of this type, providing their work proposal and institutional image presentation. The auditor also reviewed, IFSEC´s emergency and remediation procedures for cyanide spills to provide safe and environmentally sound remediation and management and disposal of cyanide waste materials.

The Plan and procedures prohibit the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The ERP addresses that the use of these chemical substances in any incident for the treatment of solid sodium cyanide spilled in surface waters is prohibited.

Transport Practice 3.5

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

The operation is	✓	in full compliance with	Transport Practice 3.5
	☐	in substantial compliance with	
	☐	not in compliance with	

The transporter has established in the ERP it has to be reviewed, evaluated and updated as necessary to account for changes to transport routes, changes to the form of cyanide transported, and changes to the types of transport equipment used. The Plan also states it has to be reviewed at least annually. The auditor evaluated the process and its

implementation by reviewing the last version of the ERP v4 from September 2024 and previous versions since 2021, covering this recertification period. Records were available to show that this is done.

The Plan establishes that mock emergency drills must be carried out every year. The practices will be scheduled to keep the personnel permanently prepared for an emergency. The auditor reviewed the drills reports or the certification period, which included cyanide spillage and exposition.

Section 10 of the ERP states the emergency mock drills will be carried out according to the Drill Schedule with code: NV-SSMA-CR-005, where were scheduled three cyanide related mock drills for the second quarter 2024, one involving first aids, another due to a traffic accident with cyanide spill and another related to fire with the presence of cyanide.

After the audit on October 15, 2024, the carrier conducted a unit collision drill with first aid for exposure to cyanide and spill containment, with the participation of 10 employees, including the company's operations manager. The simulated location was kilometer 566 of the Panamericana Norte, when the convoy was heading to Summa Gold mine. The drill report identifies opportunities for improvement, such as the fact that they had difficulty covering the spilled product with plastic due to strong winds and they also had to improve the times to execute the actions. Corrective actions were closed with training.

On October 11, 2023, an emergency mock drill was performed on the road to Huamachuco on the way to a mine site. It was a convoy made up of 6 trucks and trailers plus 2 escort pickup trucks, when a vehicle collides strongly against the perimeter structure of the place and as a consequence the door of the container opens as a result of the impact of braking, causing the fall of a box with cyanide, an approximate amount of sodium cyanide (50 Kg) is exposed in the area. The mock drill was attended by 19 participants, including the cyanide consignor Orica, the transporter N&V, IFSEC the external contractor emergency responder that will provide support to the transporter and also to Orica for second response. Also participated a motorized police officer, an ambulance and medical team, and an N&V forklift to remove the contaminated material. The auditor reviewed this very complete drill report, where among others, they identified a series of opportunities for improvement, establishing an action plan until the required actions were closed.

On September 12, 2022, an emergency mock drills was performed related to cyanide spill, fire threat and cyanide first aid, with a total of 11 participants. In circumstances in which the convoy made of 6 trucks and one escort pickup truck, loaded with cyanide from Orica, bound for Mina Boroo, Lagunas Norte, leaves the Trujillo base bound for the Lagunas Norte operation, at km 15, surprisingly, the 6th unit is hit by a private truck, causing one of the doors of the container to open and spill product inside and outside it. As a result

of the impact there was a threat of fire due to the spillage of fuel from the minor vehicle. The transported identified opportunities for improvement during the meeting after the mock drill, establishing correction actions.

On September 28, 2021, an emergency mock drill was performed related to a cyanide spill with 11 participants. In circumstances in which the convoy made up of two trucks plus a pickup truck loaded with sodium cyanide leaves the base bound for the operation of Minera el Toro, at km 561, surprisingly, the driver loses control of the vehicle, causing the container to overturn, producing a spill of cyanide on the surface. In this incident, the sodium cyanide spill is taken as a scenario. At the end of the drill, they had a meeting where they evaluated the drill and prepared a final report on the improvements to be implemented according to the opportunities for improvement; they made an analysis of strengths and weaknesses, had conclusions, recommendations for improvements and implementation times.

The Plan stablishes that after implementing the Plan and mock drills, an analysis of the observations or failures detected during it be carried out, for which it will have to prepare a schedule of actions and courses that must be received by the personnel to correct these observations and of that to complete the equipment or information needed. At the date of the audit, there was no need to activate the Plan, so no revisions to it had been carried out for this reason.