SUMMARY AUDIT REPORT

GRUPO CINCA

Cyanide Transport Operation

For The

International Cyanide Management Code

November 2021

BP Cyanide Auditors

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Information on the audited operation

Name of the Transport Operation:	Grupo Cinca
Name of the Company Ownership	Grupo Cinca
Name of Operating Company:	Grupo Cinca
Name of Responsible Manager:	CP Matias Gonzalez
Operation Address:	General Mosconi s/n entre calles 5 y Progreso. Villa Krause CP 5425 - Rawson
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Location detail and description of operation

Grupo Cinca is located in the Province of San Juan, Argentina, on Calle General Mosconi s/n between Calles 5 and Progresso. Villa Krause, in the Rawson department. It has ample spaces and adequate facilities for the development of logistics and maintenance activities.

Grupo Cinca, is integrated by Cinca S.A., Capesa and Company S.R.L. and Semisa S.R.L., forming a group of companies in the Province of San Juan dedicated to the activities of transport services, logistics and provision of human resources.

Cinca S.A. through Transporte Golden Star, is a company with a vast trajectory in the international transport of cargoes to different parts of South America (Bolivia, Brazil, Chile, Paraguay, Peru, Uruguay).

Capesa and Company S.R.L. are companies dedicated to the Transport and Logistics of General and dangerous cargo, warehouse management, coding and dispatch of goods in general.

Semisa S.R.L. (Semisa) is a company dedicated to the transport of passengers, transport of general and dangerous cargo, mechanical maintenance, logistics and provision of human resources. Sodium cyanide is transported from Buenos Aires port to the mining clients in convoy. Each truck carries a 20 foot sea container with 20 Intermediate Bulk Containers (BC)s of approximately 1 tone of sodium cyanide in each IBC.

Semisa was audited pre-operationally in the International Cyanide Management Code (Cyanide Code) in 2020 achieving pre-operational certification. Ending year 2020 Semisa started its first shipments with cyanide currently carrying solid sodium cyanide in sea containers to Gualcamayo mine in Argentina, in

convoys of at least 3 trucks.

Grupo Cinca is certified in ISO 9001: 2015, 14001: 2004, OHSAS 18001: 2007. Grupo Cinca headquarters include offices, workshop and personnel to perform predictive, preventive and corrective maintenance of all fleet units, spare parts warehouse, fuel supply tank, tire sector, sector of metallurgical for repairs of bodies and interiors of the units, carwash sector for cleaning of all fleet units, dining area for their drivers and training room for drivers.

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Auditor's Finding

This operation is

- ✓ in full compliance with — with the International Cyanide Management Code
- ☐ in substantial compliance with
- ☐ not in compliance with

This operation is in full compliance with the International Cyanide Management Code (ICMC).

Audit Company:	BP Cyanide Auditors SAC
Audit Team Leader and Technical Auditor	Bruno Pizzorni
Email:	bpizzorni@cyanideauditor.com
Dates of Audit:	November 23 and 24, 2021

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

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

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Transport Verification Protocol

1. *TRANSPORT:*

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

Standard of Practice 1.1

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

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

Grupo Cinca (Cinca) has implemented a process to select the routes that minimize the potential for accidents and spills the selection of routes is framed within the national regulations that regulate the authorized roads for transport of hazardous materials the selection defeats is given by an evaluation of risks and commercial requirements.

In the case of the route from the port of Buenos Aires to Gualcamayo mine, Cinca avoids using route 7 since it passes through an extensive water body and use route 8 that although it is more extensive avoids the risk of the water.

The auditor reviewed the roadmap updated to October 2021. This route has been reviewed and authorized also by Gualcamayo mine and the cyanide consignor Chemours and Gualcamayo mine. cyanide producer/consignor, currently Draslovka Mining Solutions, which acquired the producer/consigner The Chemours Company as of December 2021.

Potential impacts due to spill accidents has taken into account. Cinca identified the population density, any road construction, driving in the road infrastructure, inclination and slope, has identified the existence of proximity of bodies of water and fog zones.

The roadmap includes a general guide map of the evaluated route, a guide map by main segments describing for each segment the distances, travel time, maximum speed allowed, the type and conditions of the road, the population centers and location of water bodies. It includes a list of the telephone contact the numbers for emergencies, the segment conclusions, general recommendations and safe places to stop. Also includes a detailed risk assessment whereby means of photographs and symbols identify the hazards of the route and the controls necessary to minimize them

Cinca has developed and implemented the procedure PGI-03 Hazard Identification, Risk Assessment

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And Health And Safety Factors which has been applied to the road map in the selection of routes and had stablished the necessary controls. The route evaluation carried out for Gualcamayo has taken into account the characteristics that present a greater risk of accidents or potential impacts such as steep slopes, sharp curves, narrow or rough roads and proximity to surface water resources. The carrier has identified the areas that present increased risks and has documented these in their risk analysis performed such as reducing vehicle speed and also training drivers.

The auditor reviewed the route evaluation, rout reports, and the procedure for hazards and risks identification.

The procedure for hazards and risks identification states to reevaluate risks every two years or when necessary, for example due to a change in the route. After every cyanide shipment Cinca generates a trip report where any novelty and lessons actions learned is reported. Additionally, all personnel involved in the cyanide transport operation has a WhatsApp group where any news including route conditions, is communicated.

Cinca management members and drivers were interviewed and confirmation was made that feedback regarding routes is discussed between them the current transport operations, with participation also of the cyanide consignor.

The transporter documents the s risk analysis where they have identified the risk and measures taken to control them. Road characteristic's as sharp curves, areas near to waterbodies and high density population are having special precautions to transit through.

Cinca personnel were interviewed, and confirmation was made that risks and risk mitigation measures are detailed for the route. They meet to discuss risks and risk mitigation measures before departing in each trip. Route evaluations for the transportation routes used for shipments were complete and records were available for review. Routes are evaluated separately for security issues, workers safety, environmental, nature risks and for cell phone coverage.

Cinca has the authorization of the National Road Safety to use the route currently in use to transport cyanide from the Argentinian port to Gualcamayo mine, which is a document reviewed biannually by the national transport authorities and authorize to circulate on national routes according to the type of cargo and vehicle used. This document issued is also reviewed by the firefighters.

Cinca is also in contact and interacts with CIPET (Transportation Emergency Information Center) which is a nationwide service of the Argentine Chamber of Automotive Transport of Goods and Hazardous Waste together with the Secretariat of Civil Protection of the Ministry of National Security. CIPET, is the information center for emergencies in the road transport of general cargo and dangerous goods that operates uninterruptedly since 2008, 24 hours a day, 365 days a year throughout the national territory. Cinca informs CIPET at the beginning of each trip sends via WhatsApp.

Interaction with the communities in the surroundings of the mines are in charge of the mine,

according to their request. Chemours, the cyanide consignor, has also reviewed the route and authorizes its use to Cinca. The transporter has presented its contingency plan to the cyanide consigner and the mine site where it updates the risks evaluated on the route.

The auditor reviewed meeting minutes between Cinca, the cyanide consignor and the mine to share incidents, learned lessons, and action plans. Also reviewed the resolution of the National Road Safety that approves the route.

Cinca transports sodium cyanide in convoys of four trucks each, with a pickup truck as escort due to the client requirement. When entering to San Juan province Cinca is requested by local regulations to have the additional escort of local firefighters and police.

The convoy leader in the escort vehicle is trained in hazardous materials (HAZMAT). Cyanide transport is performed during daylight hours and only allowed to stop at previously authorized places due to their ample capacity for parking and availability of food and security. On every stop the convoy personnel passes inspection to the trucks to ensure that everything is in order. The auditor reviewed the standard working procedure PETC-03 Cyanide Transport, the convoys checklist controls and interview drivers and management personnel confirming all the controls mentioned above are in place to transport sodium cyanide.

Cinca does not contact other entities to transport the cyanide. All trucks are from Cinca and the drivers are employees of the company. Requirements pertaining to subcontractors are, therefore, not applicable to this organization.

Standard of Practice 1.2

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

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

Cinca only uses trained, qualified and licensed drivers to operate the transport vehicles. To be a truck driver in Cinca, certain hiring requirements must be met as to have a professional cargo driving license and experience on transport of dangerous substances. Driving tests are carried out by a Lead Driver designated by the transporter due to its experience, which reports the results to human resources. Before working, driving drivers are trained by the company in defensive driving course which is also

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given annually to all drivers.

The auditor reviewed the documents of human resources which indicates the requirements that must met the truck drivers. Also reviewed training records and operator documents finding everything compliant. Cinca is certified in the ISO 39001 vehicle safety standard.

All personnel who operates the trucks in the cyanide transport operation are trained to perform their tasks safely and environmentally responsible. Cinca´s Integrated Management System area is in charge of training the drivers. Drivers are trained in the loading and unloading procedures of their trucks, defensive driving, in the use of the spill kits, in the product safety sheet, in the contingency plan and in the cyanide transport procedure, among others. Cinca also use Google tools to train the drivers remotely and carry out the tests of this understanding, but they always look for face-to-face training when if possible.

The auditor verified that such training has been provided and that it has included elements appropriate to the nature of the transport and the responsibilities of the operator. The auditor reviewed training material including the cyanide transportation work procedure and attendance records made up of signature sheets. The auditor also interviewed the drivers verifying that they have received the training. Training is refreshed periodically and testing is performed to confirm competency.

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Cinca has a fleet of around 250 trucks and trailers designed and maintained to operate within the loads to be handled. The transporter maintains a fleet of Mercedes Bens (80%), Iveco and Scania trucks, along with semitrailers for cargo transport. All trucks are rated above 400 horsepower (hp), which allows adequate performance in the steep roads at the Andes Mountains. Each truck with its semitrailer hauls only one 20 feet sea container with 20-ton solid sodium cyanide. Semitrailers are 14.5 meters long. The rated load capacity of the transport trailers is 28 tons, which is greater than the 22 tons gross weight of the loaded sea containers that Cinca expects to transport.

The auditor reviewed the manufacturer specifications and the biannually RTO (mandatory technical review) from the Argentinian Ministry of Transport which specifies the maximum load the vehicle can transport. During this technical review, all elements related to cargo capabilities are evaluated, as the

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state of tires, axis and chassis, among others.

Vehicles maintenance, during its guarantee period, is only performed in the manufacturer authorized workshops. Semisa has their own maintenance workshops where all other maintenance is performed. Maintenance for each vehicle is tracked through an own developed software.

Vehicles are inspected by the driver prior to departure. Any concerns are addressed prior to the vehicle being permitted to depart. Records of these inspections are documented on pre-use check lists. Records were available and showed completion of a vehicle inspection checklist and sign-off by the driver.

Cinca has developed and implemented the procedure PETC 03 Cyanide Transport v3 to stablish the activities, controls, registers and necessary indicators to execute the transport service, which includes procedures to verify the adequacy of the equipment for the load it must bear.

The procedure details type of merchandise, the criteria to assign drivers, vehicles and load securing elements, load and quantity of containers to ensure the vehicle adequacy. With this information assigns the transport unit and the driver that would comply with the service requirement. Pre-trip inspections of the truck are formally performed by the transporters as part this procedure.

Cinca manages standard amounts of cyanide in one 20 feet ocean containers, weighting 22 tons approximately, to load into its transporter's trailers.

The procedure Cyanide Transport indicates the drivers must check the vehicle to prevent overload and indicates the following: when excessive loads of products (hazardous materials) are identified, they should not start the trip. The supervisor in coordination with the escort must verify and ensure that the quantity of products to be transported must be in accordance with the payload capacity of the unit, as well as the capacity established by local regulations, which must be recorded in the format of weights and measures.

To prevent overloading of the transport vehicle, Cinca has established in the procedure that each platform is loaded with only one cyanide 20 foot sea containers and that each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklists and was confirmed during the interviews.

The load made by the port operator is weighed to confirm the weight of the shipment and recorded in the shipping papers, allowing Cinca to ensure the weight of the shipment. Records of cyanide shipments 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.

Shipping paperwork and procedures were reviewed, and the transporter personnel interviewed to confirm that appropriate practices are used. Shipping records showed that cargo amounts and weights

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were within the normal weight capacity of the equipment in use.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Cinca´s procedure Cyanide Transport requires drivers to perform pre-trip inspections endorsed by the convoy leader to ensure that trailers are locked and secured, and the integrity of the doors tags. Drivers inspects the cargo upon loading the truck at the port, then on each stop in the route and on the delivery to the client. The procedure describes the administrative, operational and safety measures for the proper transportation of sodium cyanide.

The transport procedure establishes that the load cannot be altered during the transportation process. To ensure this, tags are placed in the sea container's locks at the manufacturing facility. These tags can only be removed at the mine. The procedure was found to be compliant with the ICMC requirements.

Cinca transports sodium cyanide in solid briquettes packed in 1-ton Intermediate Bulk Containers (IBCs) where cyanide is contained in polypropylene supersacks and polyethylene bags. Each sea container carry 20 IBC with sodium cyanide. For security purposes and to maintain integrity of the packaging the shipping containers remains sealed. Integrity of the seals is checked at designated points during transportation.

Shipments of cyanide are identified with the plates and signage required by the Argentinian jurisdiction. The auditor inspected the plates and signs used to identify the presence of cyanide in transport vehicles and concludes that this provision is complied. The procedure Cyanide Transport requires all sea containers to have appropriate placards showing UN 1689 (solid sodium cyanide), and the skull and crossbones marker used for Class 6.1 toxic substances, along with the Marine Pollutant marker. Placards are displayed on all four sides of the sea containers and in the truck where visible. Also, it is required drivers visually inspect the containers prior to each movement. Drivers carry spare signaling in case of need it. The drivers and the convoy leader conduct pre-trip vehicle safety checks prior to departure of the truck. These checks also include confirmation that the cyanide placarding is displayed on all four sides of the vehicle.

Prior to the vehicle departure, inspections sheets are completed and signed by the driver and the convoy leader. The procedure for cyanide transportation s require prior to departure of cargo, the

driver and the convoy leader conduct a pre-trip inspection of the vehicle and the semitrailer, to ensure the vehicle and shipment is in good operating condition. Any issues that could affect safety or the operation of the vehicle are resolved prior to departure.

Cinca implemented the procedure Maintenance Process and uses a maintenance software to provide on time preventive maintenance to its vehicles, including trucks and trailers. Maintenance for each vehicle is tracked through the software called EME Nube, which provide information regarding preventive and corrective maintenance, following up of required actions and alerts when next maintenance will be required. The system is fed by the vehicle pre-use inspections, where any needed corrective action is registered, including drivers' feedback.

Trucks that are within the manufacturer's warranty period are sent for preventive maintenance in authorized workshops. Scania and Volvo trucks are sent to their respective workshop, Iveco and Mercedes Benz vehicles receive preventive maintenance in Ficamen and Colcar workshops, respectively. The rest of the fleet that is outside the manufacturer's warranty period, receives preventive maintenance in the transporter workshops for which it has adequate facilities and personnel capacity.

Preventive maintenance is scheduled in general, to be performed each 7,500 km. This is also tracked by mean of the spreadsheet Preventive Maintenance, where a traffic light type system alerts regarding proximity of next maintenance. In addition, with the Evo Gestion software, Cinca tracks its vehicles tires life to replace them when the grooves are 2 mm, based on experience regarding its equivalence in kilometers. Each pneumatic has a code and can be tracked individually. The auditor reviewed examples of maintenance records performed as planned, Cinca was able to demonstrate complete vehicle service.

The transporter has limitations on its drivers' hours for hazardous cargo. Drivers are limited to an "on-duty" workday of 12 hours. Driving activities for hazardous cargo is stablished to be between 5 am and 9 pm, any activity detected out of this range, will shut an alarm in the 24-hour satellite tracking system Sitrack at the control room and reports will be automatically to supervisors.

It is established in Cinca' s procedure Anexo 6 Rest times Cargo Transport rev 02, that drivers must have 12 hours rest before starting a new cargo transport operation. For remote areas assignments, drivers will drive 12 hours and next day will drive its companion. With this purpose Cinca has designed shifts "on-duty" and shifts for drivers' recuperation to manage fatigue. The auditor also reviewed Cinca´s Fatigue and Drowsiness Policy.

The logistic area is in charge to assign the drivers according to their availability. The area manages a spreadsheet where all drivers hours in cargo transport operations is registered as well as their resting period, ensuring they are having enough rest time according to that stablished.

Cinca' s procedure for cyanide transportation include instructions for securing and blocking the cargo. It calls for the securing of the containers to the trailer bed using the clamping mechanisms that

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are part of the trailer itself. The integrity of the clamping mechanism and the attachment point on the container is checked during a pre-trip inspection prior to the departure of the truck or the cyanide convoy and on any stop in route. There are specific locations on the trailer that will accept the container, thereby eliminating the possibility of an unbalanced load.

Convoy leaders are responsible for evaluating weather and road conditions and determining what actions should be taken. Convoy Leaders are senior personnel, experienced with weather and road conditions, and adept at making decisions regarding the need to suspend a shipment or to modify any convoy plans. In addition to weather forecasts, regular reports are received from the Monitoring Center, including cases of civil unrest. Cinca empowers the driver and / or the convoy leader in coordination with the HSE Manager to suspend or to modify transportation if conditions to travel are not appropriate, as stated in the procedure for cyanide transportation.

Cinca has a drug and alcohol politic and prevention program which were reviewed during the audit. Before each trip, drivers must undergo alcohol testing and periodically disclose evidence of drug use. Violation of this policy could result in the separation of the worker from the organization. In the procedure Access Control, it is also required alcohol test on accessing or exiting Semisa´s headquarters.

The operation retains records documenting its safety program, including procedures, inspections, preventive maintenance, driving hours and alcohol tests, among others.

Standard of Practice 1.5

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

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

Cinca does not ships cyanide by sea. This section of the ICMC does not apply to the operation.

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Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

All drivers and personnel involved in the transport operation are provided with cell phones and a contact list to communicate with the transport company, the cargo dispatcher and emergency responders. The transport operators have a communications group in WhatsApp application where any novelty or alert in the operation is reported. For emergencies, drivers are trained on who to call and what to say, according to that stated in the Emergency Response Plan, of which they carry a copy in the vehicle. All drivers wear a card with the emergency contact list.

All trucks are equipped with two-way VHF radios to communicate between them and from specific sectors from the route to their main mining client. Trucks are also equipped with GPS that always allows Cinca to track their units all time, with periodic reporting to the operation and the client, according to settings. The auditor reviewed the trucks for communications equipment and interviewed the drivers to confirming this information.

No provisions and records were found. The carrier should establish a written requirement to ensure that such periodic tests are carried out on any communication equipment available to the vehicle operator and records demonstrating the application of the procedure should be kept. Cinca was required to have a written statement establishing must check the proper functioning of the communications equipment of the convoy at the beginning of the trip. As this requirement could be implemented in short time, this protocol question was declared in substantial compliance.

After the audit, the new version of the procedure PETC-03 Cyanide Transport included the requirement that communications equipment must be tested to insure it functions properly before the vehicle´s departure. The auditor reviewed completed pre-trip inspection records checking that these include fields allowing to review the correct operation of the communications equipment.

Cinca identifies communication blackout areas, or grey points, during the route risk assessments. As reported by Cinca managers, all route from Buenos Aires Zárate port to Gualcamayo mine has cellphone covering. In case of blackout areas, the convoy leader driver will report on entering and exiting from this areas, as stated in the cyanide transport procedure.

Semisa has a the Sitrack GPS tracking system which allows, among other utilities, continuously monitoring of the location of the trucks. Communications with the base are performed upon dispatch,

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upon arrival at the customer sites, and after unloading is complete. Personnel at the Monitor Center was interviewed, the GPS system was demonstrated, and logs showing that shipment status, other than cyanide, was being recorded.

Cinca has inventory controls and chain of custody documentation to prevent loss of cargo during shipment and keep these controls when transporting cyanide. Upon client's authorization for cargo, Cinca issues a bill of lading called Remito, indicating the cargo weight, name of the product, class, quantity, origin, place of delivery, seal number, departure and arrival hour, signature and stamp of the client indicating that they received the cargo in conformance.

Other documentation required are shipping documentation, Safety Data Sheets (SDS), packing list, customs declarations and producer invoice, among others. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer.

A waybill accompany the cyanide transportation in Cinca, which includes chain of custody data such as container numbers, the amount of cyanide delivered and the SDS, among others. The transport document, the SDS, and emergency response information are carried by each driver. The drivers have an on-board file that includes copies of its, licenses, and the cyanide SDS.

Cinca does not contact other entities to transport the cyanide. Requirements pertaining to subcontractors are, therefore, not applicable to this organization.

2. *INTERIM STORAGE:*

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

Standard of Practice 2.1

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

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

Cinca do not operate cyanide trans-shipping depots or interim storage sites in its transport operation. If a delivery is interrupted, loaded cyanide trucks would be stored in a secure location. Principle 2, Interim Storage, does not apply to the operation.

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3. *EMERGENCY RESPONSE:*

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is
- ✓ in full compliance with Standard of Practice 3.1
- ☐ in substantial compliance with
- ☐ not in compliance with

Cinca has the written plan Cyanide Emergency Plan PETC 20 Rev 4 dated November 24, 2021 to respond to emergencies that may occur during its transport activities.

Cinca´s emergency response plan reflect the risks assessed on the transport route to Gualcamayo mine and also to other mining operations. The transport plan describes the method of transportation by trucks. The emergency scenarios described in the plan are specific to the delivery route taken, the state of the road, the physical form of sodium cyanide – solid in briquettes – the chemistry of the cyanide transported and the transport vehicles used 3-axle trucks with and trailers and a 20-foot sea container per trailer. The auditor reviewed the emergency response plan verifying that is adequate in identifying potential emergency scenarios and necessary response actions.

The plan describes the nature of the response actions to be taken for the types of emergency situations identified. The level of detail is appropriate to the nature of the potential emergencies identified in the plan and the response capabilities available. In all cases, the immediate response – first response – will be carried out by transport personnel – drivers and escorts.

The carrier has included any details that may reasonably be presented in the event of possible leaks at locations on the route that have been identified as being of greatest risk. The response to a spill that occurs during the transport of cyanide to open water such as a river establishes notifying the authorities of the lower part of the river to alert the surrounding populations to refrain from using the water of the river.

The auditor reviewed the plan verifying that, to the extent possible, it outlines the specific response actions to be taken for the types of potential spill scenarios identified.

Cinca considers in its emergency response plan, the participation of external response personnel to participate in the emergency response to spills that occur during the transport of cyanide for large-

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scale response cases along the transport route.

The emergency response plan includes entities such as the CIPET (Transportation Emergency Information Center), a service of the Argentine Chamber of Automotive Transport of Goods and Hazardous Waste together with the Secretariat of Civil Protection and Integral Approach to Emergencies and Catastrophes of the Ministry of Security of the Nation. Upon calling CIPET due to a transport emergency, they are in charge to contact with external emergency responders in the area, including commercial contractors for second response attending emergencies with hazardous materials. The emergency response plan includes the commercial contractor Grupo Pelco for providing second response and final disposal of contaminants in the event of accidents involving cyanide. Grupo Pelco will provide second response on an emergency with cyanide and will be in charge for final disposal of hazardous materials. Grupo Pelco is an Argentinian company that manages industrial waste. . The auditor reviewed communications between Cinca and Grupo Pelco where Pelco confirms its availability to assist Cinca in case of a spill on route.

The plan describes the roles of external responders, medical services and communities in emergency response procedures, and have they been advised of their roles.

Standard of Practice 3.2

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

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

Cinca provides emergency response training to drivers, convoy leaders and supervisors. Training on emergency response is given periodically according to an Annual Training Program. Personnel is trained in appropriate emergency response in safe cyanide management (spill and intoxication), firefighting, first aid, hazardous materials. 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. The auditor reviewed several training records in hard copies, which include the persons trained, the nature and dates of the training. Administrative personnel, drivers and escorts were interviewed, and awareness of emergency procedures and documentation was confirmed.

The plan describes the emergency response duties and responsibilities of the transport personnel involved in this transport operation. The plan has detailed descriptions of the specific emergency response duties and responsibilities before, during and after an incident / accident or an emergency of situation for the managers, transport coordinator and the convoy leader, among others. The roles

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and responsibilities of relevant internal and external personnel are clearly described. The information in the Plan was found to be acceptable.

Cinca´s emergency response plan describes all the equipment and materials required for emergency response during transportation along the route, including spill response equipment. The emergency equipment and Personal Protection Equipment (PPE) includes Tyvek suits, leather and impermeable gloves, PVC boots, safety goggles, isolating tape rolls, HCN detector, cyanide antidotes (amyl nitrite, sodium nitrite and sodium thiosulfate), disposable respirators, oxygen, shovels, sweeps, polyethylene bags, lime and empty containers. The HCN monitors have been calibrated and maintained according to the manufacturer's recommendations. The cyanide antidotes (sodium nitrite and sodium thiosulfate) are stored following the manufacturer's recommendations. Also, the antidotes were current, that is, within the range of the expiration date. In case of emergency, the escort personnel are qualified to administer the antidote. The auditor considers that the equipment and materials are suitable for the activities required in the emergency response plans.

The plan defines what equipment must be available in each truck and extra personal protective equipment available. Equipment is checked as part of the pre- trip inspection process. The auditor reviewed the completed emergency equipment checklists and although at the time of the audit there were no cyanide shipments, he observed the storage and availability of the equipment at the carrier´s facility. It also interviewed appropriate personnel to verify compliance with this provision.

Cinca has written provisions in its emergency response plans establishing that the emergency response equipment identified must be inspected and tested regularly so that they are available in good working order when needed for use. There pass through monthly inspections and also before the departure of each convoy. The carrier has implemented this provision by doing inspections and tests as planned and maintains the records. The auditor reviewed these records and verified on site that the equipment is in good working order for the transport of cyanide.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting

The operation is

- ✓ in full compliance with Standard of Practice 3.3
- ☐ in substantial compliance with
- ☐ not in compliance with

The carrier´s emergency response plan includes procedures and flowcharts of communications for emergencies, as well as updated contact information for the necessary internal notification and

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external notifications in case of a cyanide emergency during transport.

The auditor reviewed the notification procedures and the carrier's contact information telephone list verifying compliance with this provision. It is listed current emergency numbers for CIPET, local hospitals, and for ambulance, fire, and environmental responders. Phone lists also included up-to-date contact information for the mine site, and the cyanide consignor, among others.

Cinca emergency response plan requires that internal and external emergency notification and reporting procedures are kept current. During this activity, the phone numbers are checked for accuracy to ensure that internal and external emergency notification contacts are kept current.

Cinca has included in the emergency response plan the requirement for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No reports have been done to the ICMI as such significant cyanide incidents do not have occurred during this confirmatory certification period.

Standard of 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	Standard of Practice 3.4
	☐ in substantial compliance with	
	☐ not in compliance with	

During the audit it was not concluded that the procedures for remediation such as recovery and neutralization of solutions and cyanide solids and decontamination were sufficiently detailed, so the auditor declared this protocol question in substantial compliance. After the audit Cinca presented a new version of the emergency response plan detailing the procedures for remediation, recovery, neutralization, and decontamination of environment given a cyanide spill. No additional information was required to have this protocol question in full compliance with the Cyanide Code.

Cinca´s emergency response plan describes how will neutralize cyanide and the recovery will take, the decontamination of soils, or other contaminated media and how these wastes are managed. Descriptions of necessary action steps depending on the incident scenario are outlined in the documents. Cinca´s convoy personnel will provide first response in case of small spills amounts. The second response will be in charge of Grupo Pelco, a commercial contractor. The external remediation contractor, Grupo Pelco, has procedures for recovery or neutralization of solutions or solids, decontamination of soils other contaminated media, and management and/or disposal of spill clean-

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up debris.

Cinca´s emergency response plan specifically prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water. The plan address that the use of these chemical substances in any incident for the treatment of solid sodium cyanide spilled in surface waters is prohibited. Neutralization chemicals are not allowed to be used in or near surface water bodies. Grupo Pelco procedures also prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide that has been released into surface water.

Standard of Practice 3.5

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

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

Cinca´s Integrated Management System (SIG) states all documents must be reviewed biannually. SIG staff performs internal audits twice a year to ensure documents have been updated. The plan also states to periodically review the emergency procedures and to evaluate the plan adequacy. The plan and procedures reviewed were maintained as latest versions and under formal document control. Records were available to show that this is done.

Cinca presented the reports of its annually mock performed in the last three years. The carrier has conducted and participated in emergency drills that simulate transportation-related cyanide releases, where drills have been evaluated to determine if response procedures are adequate, response equipment is appropriate, and personnel are properly trained. Written documentation of these assessments has been retained and used as a basis for any changes in procedures, equipment or training that are necessary.

Last mock emergency drill performed was on February 2, 2022 with six participants in his headquarters yard, related to spill and fire in one truck with loaded with a 20 foot container with sodium cyanide. After the fire was controlled, at the moment to disconnect the trailer from the tractor vehicle, the container´s door opened originating an IBC to fall resulting on a cyanide spill of about 2 kg. No cyanide exposures happened during the drill. Grupo Cinca evaluated the February 2022 mock drill to determine if the response procedures are adequate, equipment is appropriate, and personnel are properly trained. The drill report was detailed, included correction actions, responsibilities and deadlines to close the needed correction actions. Next drill will involve a cyanide

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exposure, as Cinca management stated.

During the review of the emergency response plan, no directive was found establishing that the plan should be reviewed after an emergency that has required its activation, so this protocol question resulted in substantial compliance. After the audit Cinca sent the new version of the emergency response plan where it was included that the plan will be revised to evaluate the plan's performance after its implementation for this reason, resulting this protocol question in full compliance with the Cyanide Code. Such reviews have not been conducted as no emergency occurred needing to activate the Plan.

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