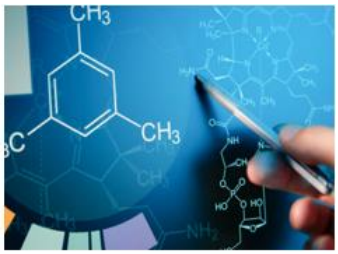
ICMI Production Verification Protocol (Revision June 2021)

Summary Audit Report

Orion Productos Industriales, S.A. de C.V

2021 Re-Certification Audit





Submitted to:

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Code Certification Service

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Operation General Information

Name and location of Operation:	Orion Productos Industriales, S.A. de C.V Av. de los Jinetes No. 43 Int A Col Las Arboledas Tlalnepantla, Edo de Mex. C.P. 54026
Names and contact information for this facility:	Andrés Arturo Rosas Gomez Jefe de Seguridad, Higiene y Gestión Ambiental Orión Productos Industriales, S.A. de C.V

Operation Description

Orion Productos Industriales, S.A. de C.V. (hereinafter called Orion) is a Cyanide Code certified distributor and transporter of solid sodium cyanide (briquettes) in Mexico. Orion has extensive experience and assets for managing, storing, and transporting hazardous materials and has been servicing the mining sector, as well as many other sectors, for over 25 years.

Orion maintains a Cyanide Code certified supply chain that includes receipt and storage of cyanide at the Port of Lázaro Cárdenas in the Mexican state of Michoacán, on the Pacific Coast of Mexico. Orion uses its own trucks and drivers to transport the cyanide to its storage facility located in Tizayuca, Hidalgo State, México. Distribution from the storage facility to gold mines is also done using Orion trucks and drivers. With regards to Cyanide Code certification, Orion is a “producer” and “transporter” of cyanide and is therefore subject to both Cyanide Code protocols.

This re-certification audit included evaluations of all parts of the Orion supply chain: Port of Lázaro Cárdenas, storage facility in Tizayuca, and truck transport from the port, to/from the storage facility, and to mines were included in this re-certification audit.

Orion procures solid sodium cyanide briquettes from Hebei Chengxin Co., Ltd (Hebei) in China. This arrangement has been in place since April 2017. Hebei production facility has been continuously certified as a Cyanide Code Signatory Manufacturer since October 2012 with the most recent recertification dated February 2019. The Hebei Global Ocean Supply Chain was first certified in 2017 and was most recently re-certified in August 2020. The ocean carriers used by Hebei for transport to Orion are included in the scope of the Hebei Ocean Supply Chain certification.

Audit Implementation and Conclusions

This re-certification audit was conducted through on-site observations, reviews of records and procedures, and interviews with senior management, operations management, engineering, and environmental, health & safety (EH&S) staff. Orion personnel were involved in the audit. The audit team used the ICMI "Cyanide Production Verification Protocol" and "Cyanide Transport Verification Protocol" to evaluate International Cyanide Management Code (Cyanide Code) compliance. A Due Diligence review of the port included interviews with port personnel, Orion personnel, a review of certifications and environmental, health, safety, and security records, and a review of publicly available port information.

Procedures, site conditions and records were evaluated during this audit. The assessment was based on random samples of information and therefore deficiencies may exist which have not been identified. The depth to which records, and data were sampled was typical of an environmental, health and safety (EH&S) management system audit. Although legally required records were sampled to evaluate Cyanide Code compliance, legal compliance with federal, regional, and local regulations was not part of the scope of this evaluation.

The audit was performed by an independent third-party audit team that fulfills all ICMI Cyanide Code Lead Auditor and Technical Auditor requirements for cyanide transportation and production operations.

All aspects of the cyanide operations were included in this Cyanide Code Re-Certification Audit. The operation was found to be in FULL COMPLIANCE with Cyanide Code Cyanide Production and Transportation requirements.

Auditor's Finding

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

The cyanide management practices for the Orion transloading operation were evaluated for Cyanide Code compliance using the 2021 versions of the *ICMI Cyanide Production Verification Protocol and ICMI Cyanide Transportation Verification Protocol.* Orion internal standards, policies, practices, and procedures regarding the management of the cyanide operations were reviewed.

The audit team found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was excellent. Management systems upon which the operation is based are mature, and requested records were readily available for review.

The results of this re-certification audit demonstrate that the Orion cyanide-related distribution, transportation, and supply chain management operations are in FULL COMPLIANCE with International Cyanide Management Code requirements.

Compliance State

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

Auditor Information

Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Auditor:	German Baruch Hernandez Signature:
Date of Audit:	June 24, 2021

Auditor Attestation

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

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

Orion Transload Terminal		July 26, 2021
Name of Operation	Signature of Lead Auditor	Date

Orion Productos Industriales, S.A. de C.V		July 26, 2021
Name of Operation	Signature of Lead Auditor	Date

Principles and Standards of Practice - Cyanide Production Verification Protocol

Principle 1 | OPERATIONS

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

Production Practice 1.1

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

The operation is ☑ in full compliance with Production Practice 1.1

Summarize the basis for this finding:

Cyanide is stored inside Orion's solid chemicals 1,000 square meter (m^2) warehouse**.** Orion's storage facility was designed and constructed by a qualified architect in January 2012. No expansions or modifications to the original structure have been performed since its construction. Orion holds the quality control and quality assurance documents for the development of the storage facility.

The storage facility is constructed with a concrete floor, concrete block walls, and a metal roof. These materials do not react with cyanide; cyanide briquettes are stored in unopened semi-bulk packaging under roof in this access-controlled building. The auditors confirmed through physical observation of the structure that is an appropriate cyanide storage facility.

Orion only handles solid cyanide in wooden boxes of 1,000 kg and 1,135 kg in weight. A power outage or equipment failure would not result in a cyanide release. Packaging is not opened.

Orion's storage facility has a concrete slab floor. Concrete walls of the storage facility would prevent cyanide from spreading outside of the warehouse in case of a cyanide release. The auditors confirmed that the floor is in excellent condition with no cracking or damaged areas.

Orion does not handle cyanide in its liquid state, in vessels or tanks. The auditors deemed any protocol questions regarding handling cyanide in its liquid state were not applicable to the Orion operation.

The storage facility is constructed with concrete block with a metal roof. The facility was observed as having appropriate ventilation and all areas of the warehouse were dry. The facility is secure with controlled access and the cyanide storage area has another layer of protection with an additional controlled access point and fence that is interior to the building. There are no incompatible materials stored in the same building as the cyanide.

The height of the walls (over 30 feet) combined with vents and large door openings was found to provide

excellent ventilation of the area.

Access to the cyanide storage facility was found to be secure during the audit and confirmation was made that only a small number of authorized personnel who work in the warehouse can gain entry to the locked area.

Production Practice 1.2

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

The operation is ☑ in full compliance with Production Practice 1.2

Summarize the basis for this finding:

Orion has developed and implemented a comprehensive managing system of procedures and work instructions that address all necessary aspects of the operations as they pertain to cyanide management.

Procedures sampled during the audit includes instructions used to operate the facility in a safe and environmentally sound manner. The controlled documentation is maintained in a formal manner in electronic databases and personnel were confirmed to have the necessary access to the documentation. The documented system includes forms that are used to record that compliance-related requirements have been met.

Orion has developed an Emergency Procedure to respond to Cyanide Emergencies in the Storage Facility which appropriately addresses the relevant scenarios for the Orion operations. Procedures also address non-standard conditions and give instructions to enable quick responses. The procedures were found to be sufficiently detailed to ensure that the risk of having a release or exposure is mitigated. Personnel showed excellent awareness of procedural requirements.

Orion's has a procedure in place to identify and evaluate hazards associated with new projects or changes as controls to avoid or minimize identified hazards. The auditors confirmed through interviews and a review of the facility that no changes in Orion's operations took place during the recertification period.

Cyanide containers are managed using forklifts. All forklifts are owned by Orion and the maintenance is provided through the forklift manufacturer. Preventive maintenance is provided every 200 hours. Orion has a daily checklist where the forklift operation hours are recorded. Additionally, forklifts are inspected by the operator at the beginning of the work shift using a formal safety checklist.

If a problem is detected, it is reported immediately, and response actions are implemented; maintenance issues are closed within 24 hours. If the deviation is classified as critical, then work is stopped. Forklift inspection records from the recertification period were available for review. Records were complete and

acceptable.

Cyanide is only stored in a solid state. There is no process equipment that needs to be monitored. The stored cyanide is protected from rain at all times. There are no washing operations where the wastewater would become contaminated with cyanide. Orion contracts authorized hazardous waste haulers to dispose of cyanide related waste if there is a need.

Cyanide is received packed according to international transport regulations that are consistent with the respective Mexican regulations. Site personnel inspect the storage area and the stored materials to confirm that the packages are labeled appropriately to fulfill all Mexican transportation and labeling laws. Re-packing is not performed.

Production Practice 1.3

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

The operation is ☑ in full compliance with Production Practice 1.3

Summarize the basis for this finding:

Orion does not handle cyanide in its liquid state, in vessels or tanks. The auditors deemed any protocol questions regarding handling cyanide in its liquid state were not applicable to the Orion operation.

Orion ships the solid cyanide in the same container as it is received from Hebei, a certified Cyanide Code Producer. Orion performs daily walk-around and monthly formal inspections of stored materials to ensure that packaging remains in good condition and suitable for transport.

Formal inspections of the cyanide storage area are done on a monthly basis by personnel responsible for the storage area. The auditors considered that the inspection frequency is sufficient. Records from the recertification period were sampled and were found to be complete. Interviews with personnel confirmed that actual practice matches written procedural requirements.

The inspection records sampled from the recertification period were found to be compliant with Cyanide Code requirements and included the date of the inspection, the name of the inspector, any observed deficiencies, and the corrective actions (as necessary).

The warehouse is inspected on a daily basis (non-recorded) and on a monthly basis (recorded). Inspection forms from the recertification period were reviewed and found to be complete. When problems were reported on the inspection form, records of prompt correction were also available.

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

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

The operation is ☑ in full compliance with Production Practice 2.1

Summarize the basis for this finding:

Orion has developed procedures that include the required practices for receiving, storage, loading and unloading activities, and use of personal protective equipment. Operational and supervisory personnel were interviewed during the audit. All personnel demonstrated excellent awareness of procedural requirements. Practices observed during the audit were consistent with the procedure.

The cyanide warehouse is dedicated to only cyanide storage activities. Non-routine and emergency operations and necessary actions are appropriately addressed in the emergency response plan.

Maintenance, as it pertains to the warehouse operations, is limited to the maintenance of the forklifts, which are owned and operated by Orion. Maintenance is conducted at the Site. Records for the recertification period were sampled during the audit and were found to be complete. Forklift equipment was observed as being in good operating condition with no deficiencies noted during the audit.

Orion verbally collects feedback on complaints and suggestions through daily 5-minute meetings. Additionally, Orion has a Health and Safety Committee (HS Committee), where representatives from the employees participate in two-way dialogue. The HS Committee performs monthly inspections at the facility and presents suggestions to improve procedures and to correct unsafe conditions. Employees are encouraged to submit their feedback, complaints, and suggestions to the HS Committee.

Cyanide packages are only stored and shipped from this facility; they are not opened.
There are no areas or activities where workers may be exposed to hydrogen cyanide gas and/or cyanide dust exceeding 10 parts per million (ppm) on an instantaneous basis or 4.7 ppm continuously over an 8-hour period. In the event, however, that a cyanide container is damaged, or a cyanide release has to be controlled, emergency procedures require the use of a class A (chemical protective) by personnel controlling the release.

Orion has three portable cyanide detectors to monitor cyanide air concentrations while loading and unloading shipping containers, plus one more for use in the event of an emergency. In addition, the cyanide storage facility has a fixed cyanide detector that operates independently. The detectors are calibrated to trigger the alarm at 4.7 parts per million (ppm) and again at 10 ppm.

Orion a calibration procedure of cyanide gas detectors found to be in alignment with manufacturer recommended calibration frequencies. Detectors observed during the audit were calibrated and calibration certificates were on file. Calibration records were reviewed for the recertification period and were found to be complete.

Orion requires that the buddy system be used when cyanide operations are carried out. This means that at least two workers must be present in the work area where cyanide is located. Mobile phones and telephones are also available for use by operational personnel, as necessary.

Orion has a pre-hire medical evaluation procedure in place. The medical exam includes the evaluation of basic health parameters, blood studies and spirometry testing. Orion also performs an annual medical assessment of all personnel, which includes a general physical exam and drug testing. Records for the recertification period were reviewed and found to be complete. The tests and their interpretation are performed by an external health care services firm.

Orion has a clothing change policy for employees, contractors and visitors that enter areas with the potential for cyanide contamination of clothing. Disposable protective work suits are used by operators as part of the PPE required in the cyanide storage area. Visitors and contractor requirements are addressed in the general safety rules of the site. Orion has also implemented a procedure that establishes that PPE is changed according to its useful life. PPE replacement is recorded in a system called “Infosphere”. Additionally, PPE replacement can be requested depending on its wear.

Warning signs that cyanide is present, and that PPE is required are posted at appropriate locations throughout the operation, including on the entry gate to the secured cyanide storage area within the warehouse.

Signs prohibiting smoking, eating, drinking, and open flames are posted in several locations where there is a very slight potential for cyanide contamination, such as in the cyanide storage area. The auditors concluded that signage was appropriate and compliant with Cyanide Code requirements.

Production Practice 2.2

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

The operation is ☑ in full compliance with Production Practice 2.2
Summarize the basis for this finding:

Orion has implemented an Emergency Response Plan (ERP) which includes steps to respond to cyanide related emergencies inside and outside of Orion’s facilities, including incidents in the cyanide warehouse and during transportation.

The ERP addresses spills, fires, and human cyanide exposure emergencies. Emergencies are classified into three levels (minor, general and major emergency). PPE levels A to D are defined. The names and contact information for the incident command system are included in the ERP.

The site has low pressure eye wash stations and dry chemical powder extinguishers available in the cyanide storage facility (three of 9 kg and one of 50 kg). According to the interviewed personnel, eye wash stations and extinguishers are inspected on a monthly basis. Emergency showers are located at the facility; their functionality was tested during the recertification audit. All emergency equipment was found to be functional during the audit. Inspection records for the recertification period were sampled and were found to be complete.

Orion maintains appropriate emergency response equipment, including an oxygen tank with a valved mouthpiece (instead of a respirator), antidote and a means of communication or emergency notification. This equipment was found to be well maintained and readily available for use. The employees have mobile phones for internal communication and the facility has telephone services.

Orion has implemented a procedure for the Cyanokit use, handling and control. The cyanide antidote kit is inspected on a monthly basis. Records for the recertification period were available for review and were found to be complete. The antidote kits are refrigerated at the temperature range recommended by the manufacturer.

The Spanish Safety Data Sheet (SDS) was available in the cyanide storage area. Only the first aid response team is authorized to treat an exposed employee. The workforce speaks Spanish.

The cyanide storage area and each individual cyanide package (wooden box) are identified regarding the presence of cyanide; there are no cyanide-containing tanks, pipes or other vessels in this operation.

Only authorized personnel are allowed to enter the cyanide storage area. A disposable Tyvek suit is mandatory to enter the area. Because the wooden boxes of cyanide are not opened, it is generally not considered possible to have skin contact with cyanide. If there is a damaged package or evidence of a release, emergency procedures are referenced. The use of PPE and the need to decontaminate after responding to a cyanide release event were appropriately addressed in the emergency procedures.

Orion has identified the nearest hospital that could treat exposed employees. In addition, the site has an emergency response team trained in first aid and is familiar with cyanide exposure (poisoning) symptoms. As previously noted, an oxygen tank and antidote kit are available on site as well.

Orion's ERP identifies the nearest hospital to the storage facility where exposed workers will be transported in case of emergency. This hospital has signed a contract with Orion for the treatment of

patients exposed to cyanide and has received training and a cyano-kit from Orion. According to the ERP, first aid and communication teams are responsible for coordinating the transfer. Orion personnel performed an assessment and concluded that the hospital has sufficient capability to treat a cyanide exposure victim.

Orion maintains a procedure for incident investigation. If an incident were to occur, the Emergency Response Plan is to be reviewed and revised as needed. Records from the recertification period were available for review and found to be complete. There were no cyanide-related incidents during the recertification period. Other records demonstrated that the incident investigation procedure is fully implemented.

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practices 3.1 through 3.7

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

The operation is ☑ in full compliance with Production Practices 3.1 through 3.7

Summarize the basis for this finding:

Orion is a storage and distribution facility; their normal operations do not generate air emission or cyanide-containing wastewater. Waste generated by an emergency would be handled as hazardous waste. The ERP details this requirement. This Cyanide Code requirement was determined to be not applicable to the operation.

Principle 4 | TRAINING

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

Production Practice 4.1

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

The operation is ☑ in full compliance with Production Practices 4.1

Summarize the basis for this finding:

Orion has a training program for all personnel that includes training on cyanide management and cyanide safety. New hire employees have to attend the General Training Framework prior to beginning activities on site. This orientation training includes cyanide safety training. Cyanide safety refresher training is provided by Orion to all their employees every two years. Orion has two internal trainers who are authorized by the Federal Labor Agency. These formally authorized trainers provide all training to employees.

Orion's training program covers the selection and use of personal protective equipment (PPE). The EHS department keeps all training records registered and filed. Records from the recertification period were available for review and found to be complete.

Orion provides training courses related to sodium cyanide management, cyanide safety, and hazardous materials management to new employees (including drivers) when they are hired and refresher training every other year. This training is given by the EHS department. The EHS department keeps all training records registered and filed. Training records from the recertification period were available for review and were found to be complete.

Candidates for employment must have experience regarding hazardous materials management to be hired by Orion. In addition, a new hire induction training program must be completed by new employees prior to them beginning their activities at the company. The new hire induction training program includes 14 sections with a total of 28 hours of training.

Refresher training on normal warehouse operational procedures and tasks is provided by Orion to all their employees every other year.

Managers of the different areas of the operation define the training that is required for their employees. Training needs are communicated to the human resources department that then coordinates the fulfillment of the training needs. Training needs are identified through interviews with the workers and observation of the workers' performance. Training materials and training records were reviewed for the recertification period and were found to be appropriate and complete.

Orion has two internal trainers authorized by the Federal Labor Agency to provide training sessions included in Orion's biennial refresher training program and in the new hire training program. Authorization granted by the Federal Labor Agency ensures that internal trainers are qualified to provided training in hazardous materials management.

The effectiveness of cyanide related training is tested using a written test. Based on the tests results, Orion determines if employees must be retrained or if they can be authorized to work independently. Depending on the training topic, a practical exam (e.g. a practical demonstration on loading/unloading procedures) may also be requested by the trainers. Test results are kept by the human resources department. Test results from the recertification period were available for review and found to be complete.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

The operation is ☑ in full compliance with Production Practices 4.2

Summarize the basis for this finding:

Orion has an Emergency Response Plan (ERP) for the different scenarios that could result in an emergency such as cyanide release. All employees are trained in this procedure by the EHS department when hired and then once every two years. Orion's drill program defines that a cyanide exposure and/or release drill should be conducted annually. Additionally, Orion's ERP states that at least three drills must be conducted at the facility on an annual basis. Drill records from the recertification period were available for review and were found to be complete. Emergency response actions for human exposure to cyanide and cyanide release scenarios were both tested during the recertification period. The results of the drills indicated that the emergency response team is well equipped and knowledgeable regarding necessary emergency response actions.

Orion has developed an annual emergency drill program. The most recent drill was held in 2021. The emergency response team, administrative and operative personnel of the facility as well as personnel from the Santa Julia Hospital participated in the emergency drill. Orion keeps records of the mock drills performed. Drill records from the recertification period were available for review and were found to be complete.

Training records are retained throughout an individual's employment. These records include the name of the employee, trainer, date of training and topics covered as well as the written exams. A sampling of employees was interviewed during the audit. They demonstrated an understanding of proper cyanide management in their work area.

Principle 5 | EMERGENCY RESPONSE

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

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is ☑ in full compliance with Production Practices 5.1

Summarize the basis for this finding:

Orion has developed an Emergency Response Plan (ERP) to address the response actions that would be required in the event of a Cyanide Emergency at the Storage Facility or during transportation. The document covers all the operations in the distribution center and all aspects of the transportation activities. It includes a section describing the sodium cyanide characteristics, emergency assessment levels and scenario-specific instructions. Additionally, Orion has a Civil Protection Plan, that includes information about the emergency organization, communications protocol, emergency drills, and emergency response procedures in case of fire and other general scenarios.

The ERP together with the Civil Protection Plan include instructions on how to respond to solid cyanide spills on paved and unpaved ground during dry and wet weather. Emergency plans also address what needs to be done in the event of a fire and/or during a severe weather event. The emergency procedures include specific response actions for these scenarios. Given the nature of site operations, this was considered to be sufficient by the audit team.

The facility has a Civil Protection Plan that includes instructions for evacuating the facility. The facility is located at an industrial park and Orion is a member of the Mutual Aid Industrial Committee (GAMITH, Grupo de Ayuda Mutua de la Zona Industrial de Tizayuca). GAMITH would notify other operations in case their evacuation was also required. Given the nature of the cyanide related operations at the site (storage and truck un/loading only), however, it is highly unlikely that such an evacuation would be required as a result of a cyanide incident.

Orion has a procedure which provides the following guidelines for cyanide exposure treatment.

Orion's Emergency Response Plan establishes steps to follow and mitigation measures for different emergency scenarios (including cyanide releases). In addition, Orion has an accident investigation procedure that requires identifying the root cause of the accident and establishing preventive and corrective actions to prevent accident repetition. This would help to prevent future releases.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

The operation is ☑ in full compliance with Production Practices 5.2

Summarize the basis for this finding:

The site Emergency Response Plan and safety procedures were prepared by site personnel. Local emergency response agencies such as the State Civil Protection Agency, Fire Department, GAMITH and Santa Julia hospital have been informed of their responsibilities in case of emergency. Additionally, personnel of the Santa Julia Hospital received training from Orion on hazardous materials management, specifically sodium cyanide. The nearest residential area is located approximately 3 km away from the facility. Records from the recertification period were available and were found to be complete.

The site regularly communicates with local stakeholders to ensure that the Emergency Response Plan is current and update to date. The most recent meeting took place in 2021. Meeting notes were available for review and were found to be complete.

Production Practice 5.3

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

The operation is ☑ in full compliance with Production Practices 5.3

Summarize the basis for this finding:

The Civil Protection Plan includes the names of the different members of the emergency committee and details their roles and responsibilities. Authorities to commit resources to implement the ERP are also included in the plan.

The Civil Protection Plan includes list of the members of the emergency response teams including, evacuation, first aid, and firefighting. Training requirements for the teams are also defined in the plan.

Orion has a team integrated by specialized internal responders for emergency events with hazardous materials, including cyanide releases. Internal responders are trained annually.

The Civil Protection Plan includes the names and 24-hour contact information for the coordinators and response team members.

Both the Emergency Response Plan and the Civil Protection Plan identify the responsibilities for the different emergency response team members.

The Civil Protection Plan and the Emergency Response Plan include an inventory of emergency response equipment that is to be available onsite. The number and availability of emergency response equipment items was confirmed during the audit.

Orion has implemented a monthly inspection checklist to confirm emergency response equipment availability and conditions; the presence of the equipment was reviewed during the audit. Additionally, inspection records from the recertification period were available for review and found to be complete.

The Civil Protection Plan and the Emergency Response Plan establish three levels of emergency response. The roles of external responders and hospitals are detailed in the plans and are dependent on the severity of the incident. The latest emergency drill was carried out in 2021. This drill was conducted at the Orion facility and included the participation of internal personnel as well as the Santa Julia Hospital personnel who provided medical attention for cyanide exposure part of the drill.

The Civil Protection Plan includes the contact information of external responders and has been provided to the municipal civil protection authorities. The Civil Protection Plan includes an annual drill program.

Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

The operation is ☑ in full compliance with Production Practices 5.4

Summarize the basis for this finding:

The Civil Protection Plan and the Response Procedure include instructions to notify management, the authorities, external responders, and medical facilities, as required. The cyano-kit use procedure includes instructions on how to notify medical facilities.

Instructions for communication with the media, authorities, and external responders are included in the emergency procedures.

Emergency procedures include the requirement to notify ICMI if a significant cyanide incident occurs. There have been no significant cyanide incidents (spills or exposures) since the operation first started.

Production Practice 5.5

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

The operation is ☑ in full compliance with Production Practices 5.5

Summarize the basis for this finding:

The cyanide storage area has a concrete floor; in case of spill or release, no soil or water remediation measures will be required. The emergency response procedure establishes that spilled cyanide must be collected using shovels and disposed of as hazardous waste. Hazardous waste procedures address hazardous waste disposal requirements. Decontamination of the cement and/or soil following a spill is addressed in the ERP. According to the job hazard analysis and the site's surrounding characteristics, no water sources would be affected by a cyanide release at Orion's facility.

This element is not applicable to Orion. There are no water bodies within a 1 km radius from the facility.

None of the site-specific scenarios consider that a release would reach unpaved soil (the warehouse and unloading area are paved with concrete). There are no water bodies near the site. Only the air would need to be monitored. This would be done with two portable and one fixed cyanide detectors. This is addressed in the emergency procedures.

Production Practice 5.6

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

The operation is ☑ in full compliance with Production Practices 5.6

Summarize the basis for this finding:

The Emergency Response Plan is reviewed every year, and after emergency drills, if necessary. Records from the recertification period were available for review and found to be complete.

Orion has an annual emergency drills program that includes a mock cyanide spill. The latest drill was performed in 2021. Drills during the recertification period included the following drills: Monday, June 21 2021 - combined drill of earthquake and spill and with human exposure; drill on July 12, 2019 - spill cyanide; December 4, 2020 - earthquake scenario with release.

The Emergency Response Plan is reviewed every other year or after any emergency. Records from the recertification period were available for review and were found to be complete. Several actions from drills were tracked to completion and led to minor revisions of the emergency procedures.

Principles and Standards of Practice - 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

Summarize the basis for this finding:

Orion has a procedure in place to select and assess cyanide transport routes. As part of the procedure, Orion uses the online service provided by Mexico's Communications and Transport Agency (SCT, Secretaría de Comunicaciones y Transportes) to select routes to transport cyanide. The service identifies the highways that are authorized by the government for the transport of hazardous materials. A route description is prepared by Orion based on the SCT system and Orion's GPS system. Orion personnel perform field verification for each route to ensure the safety, security, and appropriateness of the road infrastructure for cyanide transport. Information obtained from the field verification is included in the Orion's GPS system and route descriptions. Route description is provided to trucks operators before every shipment.

Orion's procedure considers the following items during the route selection among others:
Road description including photographs, populated areas, road pitch and grade, prevalence and proximity of water bodies, flood areas, and fog, infrastructure, landslide areas, speed limits, accident statistics, areas in constant maintenance, hospitals, schools and unsafe areas.

Orion risk assessment methodology considers three factors: consequences, exposure, and probability of occurrence, for each risk identified. Measures to control risks are identified and photographs of risky areas are included in route assessments. Risk assessment results are communicated to drivers.

Orion's procedure states that routes are re-evaluated at least every 24 months. Route risk re-evaluations are also performed if a driver notifies Management about changes in a route. During the re-certification audit assessments of currently active routes were reviewed; these were updated according to procedural requirements, most recently in 2021.

Orion's risk assessment form used to evaluate routes includes measures taken to address the identified risks. Additionally, the route assessments include general precautions (e.g. speed limits).

As part of its route risk assessment procedure, Orion uses the input from the online service provided by Mexico's governmental Communications and Transport Agency (SCT, Secretaría de Comunicaciones y Transportes) to select routes to transport cyanide. The service identifies the highways that are authorized

by the government for the transport of hazardous materials. A route description is prepared by Orion based on the SCT system and Orion's GPS system. Orion follows the routes provided by the SCT online service and respects any traffic restrictions (times at which the traffic across cities is restricted).

Convoys are prohibited in Mexico. The route assessments completed by Orion do not indicate the need for escort vehicles for cyanide transportation.

Orion does not contract any of its activities to other entities. All drivers are Orion employees and all assets are owned by Orion. Orion is a member of the Transport Emergency System for the Chemical Industry (SETIQ, Sistema de Emergencias en Transporte para la Industria Química). SETIQ provides telephone orientation for chemical emergency response during ground transport. It also identifies the teams from other SETIQ members with response capabilities in the vicinity of the incident to support the response until Orion's response team arrives. Orion has notified SETIQ about what routes are used to transport cyanide. As part of their activities, SETIQ shares this information with local authorities.

Transport Practice 1.2

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

The operation is ☑ in full compliance with Transport Practice 1.2

Summarize the basis for this finding:

Orion has a procedure for the selection and recruitment of new hire drivers. Candidates must meet the following requirements:

- Pass the HAZMAT management knowledge exam
- Hold a driver license type "E" granted by the Federal Transport Agency
- Have at least eight years of experience transporting HAZMAT
- Pass psychometric, psychological and socioeconomic tests
- Pass a 225-point driving test

Once hired, new drivers must attend a theoretical and practical introductory training (14 hours) that includes (among others) the following topics:

- Principles of transport safety,
- Transport of hazardous materials,
- Firefighting extinguishers use,
- Classification and identification of hazardous materials,
- Selection, use and maintenance of personal protective equipment,
- Defensive driving,
- Basic safety procedures, and

- Use of the transport emergency guide.

During the recertification period Orion personnel who are involved in cyanide management receive cyanide safety management training in the following topics:

- Sodium cyanide characteristics description,
- Material Safety Data Sheet information,
- PPE required,
- Safety management procedures,
- First aids,
- Risks identification, and
- Safety measures in case of fire or spill.

Orion has a training procedure which includes mandatory refresher training for all truck operators and administrative personnel. This refresher training happens every other year. Orion's training program is taught by two internal trainers that are registered with the Federal Labor Agency. A written test is given after the training. Based on the tests results, Orion determines if employees must be retrained. Depending on the training topic, a practical exam (e.g. a practical demonstration on loading/unloading procedures) may also be requested by the trainers. Test results are kept by the human resources department. Records from the recertification period were available for review and found to be complete.

Orion trains all their employees involved in cyanide transportation. All drivers are Orion employees. Records from the recertification period for initial and refresher training were available for review and found to be complete.

Orion does not subcontract any of the cyanide handling or transport.

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

Summarize the basis for this finding:

Orion receives the loaded ocean containers at the Port of Lázaro Cárdenas in the Mexican state of Michoacán, on the Pacific Coast of Mexico. Containers are loaded onto a truck chassis and transported by Orion drivers to the Orion cyanide storage facility in Tizayuca, Hidalgo, Mexico. Loads are verified by Orion in the port through the port customs process before being loaded onto the truck chassis.

For every shipment, Orion uses the table of authorized weights and dimensions determined for the type of vehicle. This information is detailed in Mexican regulations. Orion uses this information compared to bills of

lading to confirm that transport vehicles are not overloaded. Cyanide is transported in wooden 1-ton boxes packed into intermodal shipping containers. In addition to checks during the shipment planning process, the maintenance department verifies that vehicles mechanical conditions are suitable for the load weights that will transported.

Personnel interviews during the audit confirmed that a detailed inspection is performed on each truck before every trip. Additionally, a daily inspection is performed and recorded in the driver's logbook. This inspection includes: brakes, steering system, lights, and tires, among others.

Orion has also implemented a procedure for the loading, discharge, manipulation, and distribution of sodium cyanide containers procedure. This procedure is in accordance with the Official Mexican Standard NOM-012-SCT-2-2008. The procedure includes guidelines for loading cyanide into trucks and onto truck chassis to prevent movement of the cyanide load.

Maximum loads are verified by Orion before the intermodal container is loaded onto the truck chassis. Orion also determines the type of truck that will be used based on the purchase order and the table of authorized weights and dimensions maintained by the company. Weights of loads were reviewed on shipping papers from the recertification period. Records were available to demonstrate that trucking equipment is not being overloaded.

Orion does not subcontract any of the cyanide handling or transport.

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

Summarize the basis for this finding:

Orion has implemented a loading procedure that describes the safety measures that Orion's employees need to follow to ensure the integrity of the cyanide packaging during unloading, loading and transportation activities. The intermodal container is packed, locked, and sealed at the Cyanide Code certified operation in China (Hebei). The lock and seal are not removed until the intermodal container arrives at the cyanide storage facility. Orion uses formal loading, blocking and bracing procedures to ensure that the integrity of the producer's packaging is protected. Observations during the audit, a review of procedural requirements for blocking and bracing, and interviews with personnel who load the trucks were used to confirm the appropriateness of the practices.

The visual inspection pre-trip checklist requires verification of the placards that are attached to each truck and intermodal container. Truck drivers and Orion's Call Center personnel verify that placards are properly

placed according to the Mexican hazardous material transport regulations. This inspection process is part of the pre-trip inspection that is done prior to each shipment. Records for the recertification period were sampled and found to be complete. Interviews showed good awareness of requirements. Observations during the audit confirmed practices conform to procedural requirements.

Orion has implemented a procedure for inspections prior to shipment. Inspections of the truck are recorded in the driver's logbook. Visual Inspections include all aspects of the physical and mechanical condition of the truck (i.e. brakes, steering system, lights, and tires, among others). Driver logbooks from the recertification period were reviewed and found to be satisfactory.

Orion's preventive maintenance program procedure includes three types of maintenance: A) every 25,000 - 30,000 km; B) every 100,000 to 120,000 km; and, C) every 750,000 – 1,000,000 km. Maintenance programs include: oil and filters change, lights, tires, brakes, lubrication, fluids levels, cleaning, tire inspection, engine inspection and, suspension system inspection, among others.

Orion's intranet is named Infosfera. Mileage for each truck is registered by the Call Center personnel after every shipment. Maintenance personnel monitor the mileage report and notify the Call Center personnel when a truck is due for preventive maintenance. Call Center personnel notify the truck's operator who then prepares a maintenance order and brings his vehicle to the maintenance workshop located at the Orion facility. Orion also has an agreement with an external contractor to provide preventive and corrective maintenance to vehicles that are away from the workshop. Orion keeps records of the corrective and preventive maintenance activities performed on each truck. Records from the recertification period were available for review and were found to be complete.

Orions has a procedure to limit drivers' hours. For every 5 hours of driving there must be 0.5 hour of rest if cyanide is being transported. The maximum journey in a day is 14 hours of service (this includes driving and on hold time). If a shipment is going from the port directly to a mine site, two drivers are assigned to the delivery to ensure compliance with the policy and a timely delivery.

Orion has a loading procedure that includes instructions to prevent loads from shifting. The truck is loaded at the Orion cyanide storage facility. Containers are blocked and braced to prevent movement and protect the truck loading door from opening in the event of upset conditions.

Interviews with drivers were used to confirm that drivers are empowered suspend a delivery in the event that it is unsafe to continue. Additionally, Call Center personnel monitor reports issued by the National Weather Service (SMN, Servicio Meteorológico Nacional), the Federal Transport Agency, and national and local news agencies to determine if any road shipment must be suspended due to severe weather or civil unrest. Call Center personnel notify the drivers on route by mobile phone and the GPRS system if they have to suspend cyanide transportation. They will also notify drivers when conditions are acceptable for the transportation to restart. Call Center personnel may also notify drivers of available alternative routes.

In case of civil unrest, the conflict area is identified in the Orion's GPS system, so drivers and the Call Center personnel can verify the truck's proximity to the conflict zone and take appropriate action.

Orion has implemented an alcohol and drug prevention program. Potential new employees are tested prior to their hiring. Alcohol and drug tests are performed twice per year after employees are hired. Additionally, random testing with an alcoholmeter is performed. Drug testing is also performed if drug use is suspected and/or an accident has occurred. Orion keeps drug analysis results for at least three months. Additionally, Orion keeps a file of each driver for as long as the driver works for Orion. Records from the recertification period were available for review and were found to be complete.

Orion does not subcontract any of the cyanide handling or transport.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is ☑ in full compliance with Transport Practice 1.5

Summarize the basis for this finding:

Orion is involved only in ground transportation of cyanide. This practice does not apply.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is ☑ in full compliance with Transport Practice 1.6

Summarize the basis for this finding:

All the trucks are equipped with GPS tracking. These systems are monitored in real time from the Orion facility by the Call Center personnel. In addition, drivers have mobile phones.

The GPS is monitored constantly. The trucks' location is updated every 5 minutes; errors can be identified immediately at the control panel. Drivers are responsible for reviewing the functionality of their cellular phones. GPS and GPRS devices are inspected prior to shipments. GPS tracking capability was confirmed during the audit. Individuals responsible for the tracking of shipments were also interviewed during the audit.

Blackout areas have been identified by Orion. Blackout areas have also been included in the Orion GPS tracking system. Orion has a procedure for transit through blackout areas. The procedures were found to be

appropriate for the operation. Orion has implemented a GPS system to monitor the progress of the trucks 24/7. Orion's Call Center is in charge of identifying any delays or deviations. It will issue internal notifications to alert the customer in the event of a shipment delay.

Orion has implemented controls to prevent loss of cyanide during shipment. Orion maintains a cyanide inventory. Each time a cyanide shipment arrives at the Orion storage facility, the following information is included in the inventory system: purchase number order, date of entry to the Orion cyanide storage facility, and shipment weight. Every box is assigned an identification number. Then, for each shipment that Orion transports to mines, the following information is captured in the inventory records: client's name (mine site), amount of cyanide transported, delivery date, order number and remaining amount in stock.

Orion also keeps the transportation shipping documents (carta porte, documento de embarque, safety data sheet) required by Mexican regulations. The transportation shipping documents include information on the truck, the net load, and the consignee. Documentation is prepared by the GPS monitoring personnel; truck drivers are responsible for returning the signed (by mine) transport shipping documents back to Orion following the delivery to ensure that there is a chain of custody record maintained.

The trucks are all electronically tagged and tracked to prevent loses during the transport operations. Finally, the GPS system will notify Orion if unauthorized stops take place or unauthorized routes are used by drivers.

The availability of the transportation shipping document that clearly shows the amount of cyanide being shipped and the safety data sheet is verified during the pre-trip inspection prior to the truck departure. This practice was confirmed through interview and a review of documentation at the time of the audit.

Orion does not subcontract any of the cyanide handling or transport.

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 releases.

The operation is ☑ in full compliance with Transport Practice 2.1

Summarize the basis for this finding:

Orion operates a distribution center that has been audited as production facility. This practice does not apply. Please see the earlier production section of this report for specific details regarding the storage facility.

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

Summarize the basis for this finding:

Orion has implemented a General Emergency Response Plan. It is a 25-page document. This Emergency Response Plan (ERP) establishes the role descriptions for the emergency response teams, the notification chain, the phone directory for external emergency response services, the manufacturers, the customers (as necessary). The cyanide safety data sheet is also included in the ERP.

The ERP includes instructions to respond to thirteen different scenarios for ground transport of solid cyanide. The scenarios include spill on asphalted ground, on non-asphalted ground, into a body of water, spill during raining events, and onto wet ground. The scenarios were found to be appropriate for the method of transport, trucking equipment in use, the routes driven, and the solid form of the cyanide. The ERP also applies to the cyanide storage facility. The evaluation results of the ERP as it pertains to Orion as a producer are detailed in the production part of this report.

The ERP includes thirteen emergency scenarios as well as the actions to be taken (mitigation instructions) and specific response instructions. The ERP includes a detailed description of the roles of outside responders including SETIQ, police, civil protection and the fire department.

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

Summarize the basis for this finding:

As previously noted, Orion has trained personnel to respond in case of emergency with HAZMAT. Training records of the members of the multifunctional emergency response brigade (firefighting, HAZMAT management, emergency response, first aid, etc.) were reviewed during audit.

The ERP establishes the responsibilities for the members of the response team (communication, decontamination, logistics manager, traffic controller, and other internal roles during the emergency).

Orion has defined the following as the minimum required emergency response equipment that must be available during transport. The availability of the equipment was confirmed during the recertification audit.

The ERP requires that drivers carry personal protection equipment and that they are to call the base in case of an emergency. The availability of this equipment was confirmed at the main base during the audit. Orion also has an online inventory system where the availability of the emergency response equipment is controlled by the central base and updated by base personnel.

Emergency response equipment is inspected on a monthly basis. Additionally, the online inventory system identifies materials that require replacement. Inspection records from the recertification period were available for review and found to be complete.

Orion does not subcontract the cyanide transport.

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

Summarize the basis for this finding:

The ERP includes instructions for initial communication. It also indicates that it the responsibility of the communications team to identify additional resources and agencies that must be contacted. There is a directory of internal personnel and external responders.

The ERP includes the internal and external notification and reporting instructions. It is to be reviewed in its entirety at least every two years.

Emergency procedures include the requirement to notify ICMI if a significant cyanide incident occurs. There have been no significant cyanide incidents (spills or exposures) since the operation first started.

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

Summarize the basis for this finding:

The ERP includes instructions to collect solids (e.g. cyanide debris, soil, etc.) and neutralization solutions (e.g. using absorbing materials) and to dispose of them as hazardous waste.

Orion's emergency procedure establishes that no chemicals, including sodium hypochlorite, ferrous sulfate or hydrogen peroxide, can be used to neutralize cyanide that has been released into surface water.

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

Summarize the basis for this finding:

The ERP is reviewed every other year and after mock drills. Records from the recertification period were available for review and found to be complete. The last review of the ERP was conducted in 2021.

Emergency drills are completed every year. The last mock drill was conducted in 2021. Records were available to demonstrate compliance.

Ocean Port Due Diligence Investigation Results

The only port used in this supply chain is the receipt and storage of cyanide at the Port of Lázaro Cárdenas in the Mexican state of Michoacán, on the Pacific Coast of Mexico. Orion uses its own trucks and drivers to the transport the cyanide to its storage facility located in Tizayuca, Hidalgo State, México.

Solid sodium cyanide packed into intermodal shipping containers by the certified Chinese producer Hebei is shipped from China to Mexico using the Hebei certified Ocean Supply Chain. The cyanide is received at the Port of Lázaro Cárdenas and stored for a short time (normally no more than three days) and is picked up by Orion.

A Due Diligence Investigation was performed for the Port of Lázaro Cárdenas because this is a new shipping location since the previous audit of Orion and the port has not yet been added to the Hebei Ocean Supply Chain certification. A chain of custody letter from Hebei was reviewed where Hebei confirmed its intentions to include this port in its next recertification audit. Hebei also confirmed that all other parts of its ocean supply chain such as departure port and ocean carrier are appropriately included in its certified supply chain. The most recent recertification of the Hebei Chengxin, Ltd. Global Ocean Supply Chain is dated August 10, 2020.

Port and Orion personnel with knowledge of port operations were interviewed as part of this Due Diligence Assessment. The port subscribes to ISO 9001 (Quality of Service) and ISO 14001 (Environmental Management) international standards. Publicly available information on the port website shows the environmental, health, and safety policy statement, the port ISO certifications, and a description of the management systems in place to ensure safe and secure operations.

In addition to this Due Diligence Assessment, there are many agencies charted with the task of assessing organizations and ports to confirm that shipping is conducted in a safe and secure manner. One such organization is the International Maritime Organization (IMO). The IMO was established in Geneva in 1948 and it currently headquartered in London, United Kingdom. The IMO is a specialized agency of the United Nations. The IMO's primary purpose is to develop and maintain a comprehensive regulatory framework for shipping. The IMO regulates practices associated with safety, environmental concerns, legal matters, technical co-operation, maritime security and the efficiency of shipping. One initiative of the IMO is the International Convention for the Safety of Life at Sea (SOLAS), which was enacted in 1974. Ocean carriers are required to have periodic audits of their safety programs. The provisions of SOLAS include: fire protection, lifesaving equipment, radio communications, safety of navigation, transportation of dangerous goods, management of safe operations of ships, and maritime security.

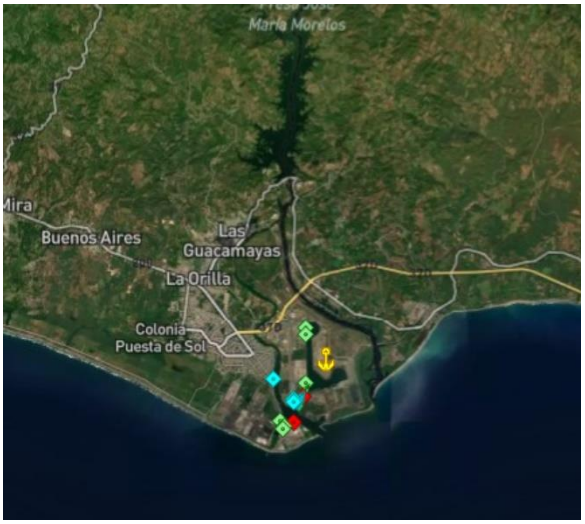
With regard to port safety and security, amendments to the SOLAS Convention were enacted in 2002. These amendments gave rise to the International Ship and Port Facility Security (ISPS) Code, which went into effect on 1 July 2004. The concept of the code is to provide layered and redundant defenses against smuggling, terrorism, piracy, stowaways, etc. The ISPS Code required most ships and port facilities engaged in

international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans. Container ships and ports that service them are required to have multiple third-party audits of safety and security. Each ship and each port involved in international trade undergoes external security, safety, and management system audits at least annually.

Port Background Information

The Port of Lazaro Cardenas is located in the Mexican State of Michoacán, on the Pacific Coast of Mexico. The port was authorized by the government in 1974 and although there are private terminals, the port is owned and operated by the Mexican government.

The Port of Lázaro Cárdenas is the largest Mexican seaport and one of the largest seaports in the Pacific Ocean basin, with an annual traffic capacity of around 25 million tons of cargo. It is the deepest port in Mexico with Navigation areas up to 19 meters (62ft) deep. The infrastructure around the port is mature and includes railway and road connections to the main economic and industrial areas of Mexico and the east coast of the United States through 15 established intermodal corridors (rail) and a modern highway system.



Detailed Due Diligence Findings

The results of Due Diligence Assessment are listed in the following table and are arranged by topic: Port Security, Safety & Training, Material Handling & Storage (including environmental considerations), and Emergency Response. Based on the results of the Due Diligence Assessment, the Port of Lazaro Cardenas has appropriate measures in place to safely manage cyanide.

Topic	Assessment Results
Port Security	• The Port of Lazaro Cardenas maintains a complete and secure perimeter fence/wall around the port. Access to the port is strictly controlled. Security practices at the port were reported as being consistent with Cyanide Code requirements. • Confirmation was made with port personnel that the following practices are in place: 24/7 manned security; complete fence line; no public access; sealed (locked storage containers); security cameras.
Safety & Training	• The port currently handles sodium cyanide and cyanide safety training is part of the overall hazardous materials training. • Port personnel receive hazardous materials handling and emergency response training initially and on a refresher basis. • Confirmation was made during the assessment that no eating, smoking, or open flames are allowed in areas where cargo is handled and stored.
Material Handling & Storage	• Dangerous Goods cargo is stored using standard chemical compatibility management practices at the port.
Emergency Response	• A written Emergency Response Plan (ERP) is maintained as part of the ISO 14001 certified management system. • The roles and responsibilities of the Emergency Response Team are defined in the Emergency Response Plan (ERP). • Emergency response equipment is maintained at the port and is inspected on a regular basis.