INTERNATIONAL CYANIDE TRANSPORTATION VERIFICATION PROTOCOL SUMMARY REPORT

Transportes Libertad S.A.C.

Transport Operation

November 13, 2024

PRE-OPERATIONAL AUDIT

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

Collaborated with
MINGROUP INVESTMENTS S.A.C.

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Transportes Libertad S.A.C.		12th, 13th November, 2024
Name of Facility	Signature of Lead Auditor	Date of submittal

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1. Operation General Information

Name of Facility:	Transportes Libertad S.A.C.
Name of Facility Owner:	Transportes Libertad S.A.C.
Name of Facility Operator:	Transportes Libertad S.A.C.
Dates of the audit:	12th, 13th November, 2024
Name of Responsible Manager:	Nataly Andrade
Address:	A.H. JOSE LUIS BUSTAMANTE Y RIVERO OTR. SECTOR III SUB LOTE A VD4 Mz III Lote A,
State / Province:	Arequipa
Country:	PERU
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Email:	sig1@grupolibertad.pe

2. Operation Location Detail and Description:

Transportes Libertad S.A.C. is a transport company of dangerous goods and general cargo. They do not transport sodium cyanide yet; therefore this is a pre-operational audit. It is a leading company in ground transportation services, specializing in transporting hazardous materials, hydrocarbons, controlled and regulated chemicals, and 0versized cargo nationwide. Currently, they transport diesel B5, liquefied petroleum, calcium oxide and other hazardous materials. In some cases, they collect the product from the Matarani Port, in other cases they collect the product from their client´s Plant or their client's warehouse. They don't have intermediate storage. Once they collect the products from their clients, they transport the products to different mining companies in Peru. The base of the company is located in A.H. JOSE LUIS BUSTAMANTE Y RIVERO OTR. SECTOR III SUB LOTE A VD4 Mz III Lote A in Arequipa province- PERU.

3. Auditor´s Finding

This operation is

- ✓ in full compliance with the International Cyanide Management Code
- ☐ in substantial compliance *(see below)
- ☐ not in compliance

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4. Auditor Information

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

Name and signature of the audit team.

Technical Auditor: Marcos Mera Escala

Dates of Audit: 12th, 13th November 2024.

5. Auditor Attestation

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

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

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6. Information of the audited operation

TRANSPORTES LIBERTAD S.A.C. was founded in 1998, beginning its operations in Cusco and Madre de Dios with the goal of providing professional services in comprehensive logistics solutions. Subsequently, the company initiated an expansion process, establishing itself as one of the leading companies in southern Peru.

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MINGROUP INVESTMENTS S.A.C.
-e quelle Consultoría en Sistemas de Gestión

Since 2020, Transportes Libertad S.A.C. has been certified under the following international standards:

- ISO 9001:2015: Quality Management System.
- ISO 14001:2015: Environmental Management System.
- ISO 45001:2018: Occupational Health and Safety Management System.
- ISO 39001:2012: Road Traffic Safety Management System, including the transport and storage of additives and lubricants.
- Additionally, it holds certification under BASC v.6 2022.

The company operates a fleet of 104 trucks and 23 pickup trucks dedicated to the transportation of hazardous materials, fuels, hydrocarbons, controlled and regulated goods, oversized cargo, and general cargo. Services for mining clients are mostly provided through the mine's suppliers and, in certain cases, directly with mining companies.

They do not transport sodium cyanide yet; therefore, this is a pre-operational audit. It is a leading company in ground transportation services, specializing in transporting hazardous materials, hydrocarbons, controlled and regulated chemicals, and 0versized cargo nationwide. Currently, they transport diesel B5, liquefied petroleum, calcium oxide and other hazardous materials. In some cases, they collect the product from the Matarani Port, in other cases they collect the product from their client´s Plant or their client's warehouse. They don't have intermediate storage. Once they collect the products from their clients, they transport the products to different mining companies in Peru. The base of the company is located in A.H. JOSE LUIS BUSTAMANTE Y RIVERO OTR. SECTOR III SUB LOTE A VD4 Mz III Lote A in Arequipa province.

Cyanide Transportation Verification Protocol

7. Principles and Standards of Practice

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
- ☐ in substantial compliance with Standard of Practice 1.1
- ☐ not in compliance with *Summarize the basis for this*

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Finding/Deficiencies Identified:

Transportes Libertad S.A.C. can receive the route plan from the mining company who already has a selected route, Transportes Libertad S.A.C. evaluate the hazards and risks in the route, this evaluation is done by the route monitor, safety and control center, who validate the route considering population density, Infrastructure construction and condition, pitch and grade, prevalence and proximity of water bodies and fog. There is a Roadmap Design Instructions TL-CC-I-001 v04, it includes specifications for the elaboration of the roadmap. It includes queries of the road status through SUTRAN or PROVIAS.

They have roadmaps for each product and client. The roadmap for sodium cyanide transportation will be included once the company begins transporting sodium cyanide.

Notes:

SUTRAN is the acronym in Spanish for Superintendency of Land Transportation of People, Freight, and Goods.

PROVIAS is the government entity responsible for the preparation, management, administration, and execution of transportation infrastructure projects related to the National Road Network.

As this a pre-operational audit, It is pending to review the roadmaps for the sodium cyanide, once the company starts to transport sodium cyanide.

There is a roadmap Design Instructions TL-CC-I-001, the risks are evaluated by section.

There is the procedure TL-SSOMA-P-002 Hazard identification, risk assessment and controls. A frequency (P) and severity (S) methodology is included for risk assessment.

The procedure TL-SSOMA-F-003 Hazard Identification, Risk Assessment and Controls as IPERC Base, subsequently the route evaluation is carried out through TL-CC-F-001 Route Evaluation, we reviewed the case of Arequipa - Las Bambas for transporting DB-5 diesel fuel, chemical reagents and forged steel balls, include a description of the section (whether it is paved or not), required speed of the MTC (Ministry of Transport and Communications) and speed suggested by the operating personnel and aspects of the road system (one-way, two-way, paved or unpaved, rural area, commercial area, rivers, lagoons, bridges, all hazards indicated in the procedure). It includes associated hazards, associated risks, photographs of the Area and risk controls. Route controls are carried out by the control center, safety supervisor and route monitor. It is approved by leadership and management. The matrix information, the roadmap TL-CC-HR-001 is generated (the code

number changes according to the routes created). The case of Arequipa-Las Bambas (TL-CC-HR-012) is evident, which includes:

- The starting section of the route.
- The Ending section of the route.
- Coordinates of each section.
- Mileage.
- Maximum speed (suggested speed from the document TL-CC-F-001)
- Estimated time for each segment.
- Segment description (urban area, sharp curve, slope, rivers, lagoons).

The above information is separated by days according to the round trip.

There is the Route Study and Evaluation Procedure TL-CC-P-001, which includes the route evaluation schedule TL-CC-F-005.

The route reevaluation may also occur due to the implementation of action plans under the Occupational Health and Safety Management System or corrective actions addressing deviations in the Road Safety Management System.

A case of a route evaluation schedule is evidenced that includes different routes such as Arequipa-Quellaveco, Caracoto-Las Bambas and the case that has been taken Arequipa-las Bambas – Arequipa, with a route evaluation periodically.

Within the document TL-CC-F-001 Route Evaluation and the IPERC TL-SSOMA-F-003, control measures are included on the routes based on the hierarchy of controls (elimination, substitution, engineering control, administrative control and use of PPEs. For the risk of head-on collision, crash, rollover, there are controls such as Convoy traffic at 20 km/h, Speed reduction in the presence of people, animals, traffic and slopes, Speed reduction in adverse weather conditions, Convoy advance in Sections of a road will be confirmed by escort, Permanent radio communication between escort and convoys, Use of horn and lights for unit visibility.

Through the community relations areas of the mining companies, it indicates the transportation conditions, considering the conditions required by the communities within their scope. In addition, consult the pages of the competent authorities for transportation in Peru such as SUTRAN or PROVIAS, consult the following pages in order to identify the state of the roads under the following factors: Human Factor, Climatological Factor, Accident Factor, Infrastructure Factor.

- https://gis.sutran.gob.pe/alerta_sutran/
- http://wsgcv.proviasnac.gob.pe/sgcv_emergenciavial

In the commercial conditions with the clients they indicate the requirements for supervision or plotting in each convoy, however additionally the organization has established internally through the Transport Management Procedure TL-OP-P-001, including to safeguard the integrity that the operation includes convoy plotting with safety escort for all regular services of the operation. In the case of the distribution of the units, they consider the driver's experience and driving profile.

For each convoy, one escort is required for a maximum of 5 vehicles. The escort must lead the convoy. The escort vehicle is operated by the escort supervisor.

There is the document TL-OP-I-012 v03 Units Plot Instructions.

Transport Practice 1.2

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

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

Finding/Deficiencies Identified:

Within the Organization and Functions Manual TL-RRHH-M-001, the profile of drivers has been included, who among the requirements must have Defensive Driving Courses, HAZMAT training, Fire Fighting, First Aids, License of AIIIC, AIIIB and AIV Handling, with three years of seniority, Knowledge of current national regulations in the transportation and road safety sector and basic mechanics. It Includes a note for reviewing Annex No. 1, it varies depending on the type of cargo.

In the case of the escort supervisor, Necessary Instruction, Technical or Complete University Training is required. Requirements as Defensive Driving Courses, HAZMAT training, Fire fighting, First Aids. Assistance A2B Driving License (4x4 truck), driver's record without serious or very serious infractions, with 03 years of experience as Supervisor driver of escort trucks, route supervision or hazardous materials transport units and on high-risk routes.

The personnel received training on Safety and Emergency Response in the Transportation of Sodium Cyanide, conducted by Safety Management Resources.

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A total of 22 participants attended, including escort supervisors, operations staff, control center personnel, HSE (Health, Safety, and Environment) staff, maintenance personnel, and fleet inspectors (responsible for unit implementation). The training concluded with a staff evaluation.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Finding/Deficiencies Identified:

1. **Does the transport company only use equipment designed and maintained to operate within the loads it will be handling?**

Transportation Management Procedure TL-OP-P-001, includes the note that the load capacity and maximum load weight are established using the unit's property card to verify the adequacy of the unit, defined by the certificate of cubic capacity, airtightness and non-destructive testing, if applicable.

The client sends the product's technical data sheet, and the company verifies whether its units meet the requirements.

A procedure has been developed for the Management of Sodium Cyanide TL-OP-P-006, which indicates:

- 20-foot solid bulk tank-type ISO container, secured on a platform with four anchor connectors ("twist locks"), preferably on a low-bed trailer.
- 20-foot maritime container, secured on a platform with four anchor connectors ("twist locks"), preferably on a low-bed trailer.
- Transportation in fully enclosed vehicles with a metallic hopper for smaller quantities, such as those transported in IBC boxes or cylinders.
- The transport vehicle (tractor-trailer with a 20-foot maritime container or a closed box truck) must have the respective safety labeling, which should be placed on all four visible sides of the vehicle. For this labeling, follow the guidelines outlined in section 2 of this document.

During the route there is the passage of regulatory scales, where the record of weights and measures is presented and if everything is within those legally established, the unit transits without observations. If it is overloaded, the current regulatory tax authority in transit would charge a fine due to overload. The proof of verification of weights and measures is verified according to the D.S. 058-2003 MTC national vehicle regulations and their amending regulations. The weight of the load is filled in with information from the delivery guide.

During the tour there is the passage of regulatory scales, where the record of weights and measures is presented and if everything is within those legally established, the unit transits without observations. If it is overloaded, the current regulatory tax authority in transit would charge a fine due to overload and the transport unit is detained.

The proof of verification of weights and measures is verified according to the D.S. (Supreme decree) 058-2003 MTC national vehicle regulations and their amending regulations. The weight of the load is filled in with information from the delivery guide.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Finding/Deficiencies Identified:

Within the Sodium Cyanide Management procedure TL-OP-P-006, it indicates the following:

Proper Packaging of the Product:

- Sodium Cyanide must be transported in the original packaging provided by the producer, either in IBC containers or cylinders.

Safety Regarding the Material:

- Constant monitoring of the Sodium Cyanide load, as well as the seals, locks, or seals in the transport vehicle's loading area.
- Keep the product dry and in its original packaging.
- Do not allow it to come into contact with water or acids.
- Control access to unauthorized personnel to the vehicles transporting Sodium Cyanide.

- Regular inspection during transport to ensure the integrity of the cargo area and its access points.

In addition, there is a checklist for heavy units TL-FL-F-001, which includes the verification of the external part of the unit, review of the platform, van and low bed, the status of the platform base, belts, is verified. Rachels, pinecones, chains, tensioners, lashing levers, among others.

In the instructions TL-OP-I-009 Platform loading and unloading, it is included that the operator must register the heavy unit checklist TL-FL-F-001.

Within the Sodium Cyanide Management procedure TL-OP-P-006, it indicates the following:

The transport vehicle (truck with semi-trailer and 20-foot maritime container or closed van truck) must have the respective safety labeling, which must be placed on the 4 visible sides of the vehicle. For this labeling, consider the guidelines indicated in point 2 of this document.

Within the sodium cyanide management procedure TL-OP-P-006 v.01, Minimum Labeling for Land Transport (Peru) is included: the intermodal risk code used by Mercosur can be added to it (in the first case). By common practice, in Peru the NFPA 704 Diamond is usually added, even when it is not the objective of use of said tool. The corrosive product diamond (8) is also included, the UN Number ¨1689¨, environmental risk, danger to aquatic life.

There is a checklist for heavy units TL-FL-F-001, v01, which is filled out by the driver and is carried out every day before leaving on the route. The check list is validated by HSE, fleet area, operations and maintenance, without the signature of any of these areas, the unit would not be able to go on route. It includes inspection of tools, internal part of the unit, external part, labeling, semi-trailer documents, driver documentation, system inspection, platform inspection, van and low bed, emergency kit, tire condition and among others such as cameras, tablets.

In the case of escort pick-up trucks, there is a pre-use checklist for light units TL-FL-F-005 v02, includes documentation folder, engine lights, tires, others included, interior rearview mirror mask, body condition, fire extinguisher, critical control equipment includes telephone satellite, radio, tablet and camera. It is filled out by the escort supervisor and is validated by safety, fleet area, operations and maintenance, without the signature of any of these areas, the unit would not be able to leave to the route.

There is a fleet preventive maintenance database TL-MU-F-022, it includes heavy and light units, the programming is carried out weekly and is communicated to operation for referral to maintenance.

Maintenance is carried out at the Arequipa base by its own personnel, except in the case of Antamina, which is outside the scope of the base, maintenance is referred to the headquarters and the maintenance of the semi-trailer is referred to a third party.

There is a Plan for fatigue and drowsiness control TL-SSOMA-PL-008, point 7.4.1. Design of Work Schedules and Shifts mentions:

- Transportes Libertad S.A.C. will continuously monitor compliance with work schedules, with particular emphasis on the allowed driving hours. The transit of vehicles is prohibited from 6:00 PM to 6:00 AM for units heading to Mining Units, unless explicit and written authorization is obtained from the Operations Manager, who must request approval from the client.
- All operators are provided with sleep bracelets. All drivers and/or Escort Supervisors who do not have sleep bracelets will perform a self-assessment using the "Fatigue and Drowsiness Checklist" (Annex 6) before beginning the driving activity.
- If symptoms of fatigue and drowsiness are present, the driver and/or Escort Supervisor must "Raise their hand" and report their condition to the immediate Supervisor to receive assistance that helps improve their condition.
- The immediate Supervisor will evaluate the continued driving of the driver and/or Escort Supervisor using the Fatigue and Drowsiness Checklist (Annex 6).

There is a critical control verification format TL-OP-F-015, it helps to verify the hours spent overnight, results of alcohol tests, filled out by each convoy personnel.

There is a checklist for heavy units TL-FL-F-001, v01, it includes verification of the external part of the unit, review of the platform, van and low bed, the status of the platform base, belts, rachels are verified, pine cones, chains, tensioners, lashing levers, among others. In addition, there is a Cargo Stowage and Lashing Instruction TL-OP-I-011 v02, which includes all the basic accessories to consolidate stowage and lashing, load limits and controls for each element. Insurance and lashing are included.

Within the Emergency Preparedness and Response Plan v03, TL-SSOMA-PL-002 in the case of fuel (there are plans for each type of load), point 11.7.8 includes the emergency response protocol that includes protests, strikes, stoppages, social conflicts and terrorist acts. It also includes Adverse climatic effects, the plan includes, in addition to other emergencies, landslides and landslides.

There is an internal alcohol, drug, and tobacco policy (TL-SSOMA-POL-001), and an alcohol test is administered to all staff upon entering operations. According to the BASC certification, personnel considered critical undergo annual drug tests. The protocol for annual admission and withdrawal medical examinations is carried out by the occupational doctor and nurse, in accordance with the requirements of MMG Las Bambas Mining Company. The driver profile is included, and drug dosage

in urine (a 10-drug multiparameter test) is applied to drivers and escort supervisors. The analysis profile is the same for all drivers.

The 10-drug test includes methadone, methamphetamine, morphine, marijuana, cocaine, ecstasy, tricyclic antidepressants (TCA), barbiturates, benzodiazepines and amphetamines.

All Management System documents are stored within a shared internal network, and IT performs daily backups both on the server and virtually. The information is stored on Google Drive. During the audit, the traceability of the information in the system was evident. For physical documents, there is a document warehouse, and they are stored for a defined period as outlined in the Records Retention Period list (TL-SIG-F-005 v01), which includes referral guides, IPERC matrices, and accident investigation reports.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

Finding/Deficiencies Identified:

This Transport Practice does not apply to this transport operation. Transportation is by land in trucks.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Finding/Deficiencies Identified:

During the tour, the escort supervisor has a corporate cell phone, the drivers have a radio for communications with the escort. The escort pick-up truck also has a satellite phone.

All transportation units, including supervision pick-up trucks, are monitored through GPS Tracklog 24/7 by the monitoring and control center. A lower percentage has Wisetrack GPS as part of validation at the client's request.

There are WhatsApp groups where critical controls, failure reports, start and end times, and the after-action review, end of transit are reported.

There are 03 monitoring assistants who rotate shifts day and night and a control center supervisor. There is an alert for unauthorized stops, prohibited stops, speeding, GPS manipulation, units outside the route.

The proper functioning of the GPS is periodically verified by transmitting its location in real time. There is fluid communication with the GPS contractor to report faults and resolve remote or in-person units with the units in the base of Transportes Libertad S.A.C.

In the case of the satellite telephone, control is achieved through the pre-use checklist of light units TL-FL-F-005 v02, its operation is reviewed through TL-FL-F-015 where the operation of the unit is verified. line, operation of the charger, this of the equipment. Likewise, there is the TL-FL-F-015 for the verification of the Handy radio where it is verified, charger in good condition, operating frequency, equipment in good condition.

The blackout areas have been identified in the GPS using a heat map, which shows areas with and without coverage. The mobile operator for Transportes Libertad S.A.C. is Claro, which communicates the 2G and 3G network coverage on its website for different geographical areas where it captures the satellite signal.

In areas without coverage, a satellite phone is provided in the escort supervision pick-up truck for emergency situations. To measure travel times in areas without coverage, the time taken to travel from entering the blackout areas to exiting them is being measured.

All transportation units, including supervision pick-up trucks, are monitored through GPS Tracklog 24/7 by the monitoring and control center. A lower percentage has Wisetrack GPS as part of validation at the client's request.

There are WhatsApp groups where critical controls, failure reports, start and end times, and the after-action review, end of transit are reported.

There are 03 monitoring assistants who rotate shifts day and night and a control center supervisor. There is an alert for unauthorized stops, prohibited stops, speeding, GPS manipulation, units outside the route. On Tracklog platform 03, it generates alerts when the units are outside the national speed due to the MTC.

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Through the SUTRAN platform the control center ensures the proper transit of the units. Human and climatological factors, accidents and infrastructure are seen on this platform

Weekly reports are generated for the different transportation accounts, detailing speeding incidents reported for operators (categorized as low, medium, and high), maximum speeds reached, and comparisons between weekly and monthly data. The effectiveness of actions taken to reduce speeding is evident, including the use of speed guns on units, review of areas with higher instances of speeding, and awareness campaigns aimed at personnel.

Pre-seal controls are conducted for certain loads to verify their condition and ensure they have not been tampered with. The seals are managed by the client. All loading areas are secured, and no intermediate activities such as loading, unloading, or transfer are performed. The Seal Integrity Verification form is TL-OP-F-053, which includes driver information, operation details, inspection date, unit plate number, and seal code. The inspection checks for any cuts or breaks in the seal to ensure it has not been manipulated or opened. The inspection is signed by the person responsible from inspection, operations, and SSHE. Units are inspected when they pass through the base.

Within the driver's file there are all the service documents, including the MSDS of the product and the delivery guide for the quantity transported. All delivery guides sent indicate the quantity of materials transported. The transportation guide generated by Transportes Libertad S.A.C. is based on the information and quantities generated in the delivery guides of the client of Transportes Libertad S.A.C. This information is taken from the SUNAT (National Superintendency of Customs and Tax Administration) System generated by the client.

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
- ☐ in substantial compliance with Standard of Practice 1.1
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Not applicable. Transportes Libertad does not have interim storage.

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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
- ☐ in substantial compliance with Standard of Practice 1.1
- ☐ not in compliance with *Summarize the basis for this*

Finding/Deficiencies Identified:

Yes, there is a general Emergency Response Plan for MTC contingency plan for the land transportation of hazardous materials and/or waste TL-SSOMA-PL-013 v02, approved under directorial resolution of Jan 25, 2023, no 0279-2023-MTC/ 16 valid for 5 years. There are also Emergency Response Plan annexes according to products and mining unit. There is the case of an emergency contingency plan with sodium cyanide TL-SSOMA-PL-014 v01.

The contingency plan for the land transportation of hazardous materials and/or waste TL-SSOMA-PL-013 v02, approved under directorate resolution and valid for 5 years, considers in Chapter 3 all the routes (139 identified) and in each route there is the identification of dangers and risks.

There is a contingency plan for emergencies involving sodium cyanide, TL-SSOMA-PL-014 v01, which includes, in section 02, the identification of the physical characteristics of sodium cyanide. Section 2.1 covers solid sodium cyanide, and section 2.2 addresses commercial presentations.

Additionally, the contingency plan for the land transportation of hazardous materials and/or waste, TL-SSOMA-PL-013 , was approved under Directorate Resolution No. 0279-2023-MTC/16 on January 25, 2023, and is valid for 5 years. The chemical composition is detailed between pages 1602 and 1607, along with the cyanide safety data sheet, which includes physical and chemical properties.

There is a general Emergency Response Plan for MTC contingency plan for the land transportation of hazardous materials and/or waste TL-SSOMA-PL-013 v02, approved under directorial resolution of Jan 25, 2023, no 0279-2023-MTC/16 in force. for 5 years. There are also EMERGENCY RESPONSE PLAN annexes according to products and mining unit. There is the case of an emergency contingency plan with sodium cyanide TL-SSOMA-PL-014. The contingency plan for the land transportation of hazardous materials and/or waste TL-SSOMA-PL-013, approved under directorate resolution of Jan

25, 2023, no 0279-2023-MTC/16 valid for 5 years, considers in Chapter 3 all the routes (139 identified) and in each route there is the identification of dangers and risks.

The contingency plan for the land transportation of hazardous materials and/or waste TL-SSOMA-PL-013 v02, approved under directorate resolution of Jan 25, 2023, no 0279-2023-MTC/16 valid for 5 years, considers in Chapter 3 all the routes (139 identified) and in each route there is the identification of dangers and risks and each one in the evaluation has seen the conditions of the route.

A procedure has been developed for the Management of Sodium Cyanide TL-OP-P-006, which indicates:

- The 20-foot solid bulk tank-type ISO container, secured on a platform with four anchor connectors ("twist locks"), preferably on a low-bed trailer.
- 20-foot maritime container, secured on a platform with four anchor connectors ("twist locks"), preferably on a low-bed trailer.
- Transportation in fully enclosed vehicles with a metallic hopper for smaller quantities, such as those transported in IBC boxes or cylinders.
- The transport vehicle (tractor-trailer with a 20-foot maritime container or a closed box truck) must have the respective safety labeling, which should be placed on all four visible sides of the vehicle. For this labeling, follow the guidelines outlined in section 2 of this document.

The sodium cyanide emergency contingency plan, TL-SSOMA-PL-014 v01, covers scenarios such as dry land spills, wet land spills, spills in stagnant water areas, spills in watercourses, and firefighting. There is an environmental remediation service contract with RV Soluciones Ambientales S.A.C. (SARV Peru), effective from January 31, 2024, to January 31, 2025, for the containment and mitigation of contaminants in the environment, bodies of water, and/or soil. The contract includes the preparation of reports, development of an environmental remediation plan, execution of remediation actions, environmental quality monitoring, laboratory analysis, transportation of solid waste by an authorized company, final disposal in a safety landfill, and the preparation of an environmental remediation report.

The contingency plan for the land transportation of hazardous materials and/or waste TL-SSOMA-PL-013, the roles of external responders were identified for cases of emergency levels II and III, including Hospitals, National Police, Civil Defense and General Fire Command of Peru. The Emergency Committee, also legal representative, communicates to the General Directorate of Environmental Affairs of the MTC.

Additionally, if there is environmental damage, the degree of responsibility for emergency response has been included, which includes the transportation company and external response entity.

Since sodium cyanide has not yet been transported and there are no defined routes, the external responders have not been informed of their roles in an emergency response.

Transport Practice 3.2

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

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

Finding/Deficiencies Identified:

There is an induction for incoming personnel through the General Induction Sheet for Escort Operator/Supervisor, TL-RRHH-F-019 v07, which includes information on the emergency response plan, emergency brigade, and first aid procedures.

The annual training program covers emergency response training for specific areas, the contingency plan, and the use of the safety data sheet. For 2024, the training was scheduled for May. The program includes topics such as the definition of an emergency, classification of emergencies, emergency levels, communication flow charts, communication booklets, and directories. Staff attendance records, as dictated by SSHE supervisors or based on management positions, are available.

The contingency plan for the land transportation of hazardous materials and/or waste TL-SSOMA-PL-013 v02 initially defines the crisis committee in charge of the legal representative. In 4.2. Specific responsibilities and functions before, during and after an accident, within the Crisis Committee include Director of the CME and legal representative, CME Coordinator and Head of Operations, Responsible for external communication – Head of SSHE, operator members.

The sodium cyanide emergency contingency plan TL-SSOMA-PL-014 v01 includes in point 6.2 Emergency Response Kit for each heavy transport vehicle unit:

- 01 full face mask for filters or canister
- 02 pairs of filters or 02 canister units for Sodium Cyanide (solid particulate) and Hydrogen Cyanide (acid gas). Under European standards, use equipment coded as ABEK (acid gases and organic vapors) and P (particulates). Reference: DRÄGER Panorama Nova with at least A2B2P3 canister, 3M 6800 series or FX FF-400 series with 6059 ABEK1 cartridges plus particulate overfilter.

▪ 02 semi-encapsulated chemical suits for particulates. Preferably, DUPONT Tyvek or Tychem suits, or equivalent in chemical resistance level.
▪ 01 box of disposable nitrile gloves, surgical type
▪ 01 pair of half-arm nitrile gloves
▪ 01 pair of high-top PVC boots with reinforced toe
▪ 01 industrial helmet with ratchet and chinstrap
6.3 Emergency Response Kit for escort van
▪ 04 full face mask for filters or canister
▪ 08 pairs of filters or 08 canister units for Sodium Cyanide (solid particulate) and Hydrogen Cyanide (acid gas).
Under European standards, use equipment coded as ABEK (acid gases and organic vapors) and P (particulates). Reference: DRÄGER Panorama Nova with at least A2B2P3 canister, 3M 6800 series or FX FF-400 series with 6059 ABEK1 cartridges plus particulate overfilter.
▪ 08 semi-encapsulated chemical suits for particulates. Preferably, DUPONT Tyvek or Tychem suits, or equivalent in chemical resistance level.
▪ 02 box of disposable nitrile gloves, surgical type
▪ 04 pair of half arm nitrile gloves
▪ 04 pair of high-top PVC boots with reinforced toe
▪ 04 industrial helmets with ratchet and chinstrap
▪ 02 rolls of chemical insulation tape (Chemtape or equivalent)
▪ 02 rolls of duct tape
▪ 10 bags (40x60 cm) of woven polypropylene
▪ 20 high-density polyethylene bags (40x60 cm)
▪ 04 packages of 70 liter garbage bags
▪ 02 brooms with dustpans
▪ 01 metal brush
▪ 02 cylinders of 5 or 10 gallons (with lid), with 20kg of lime or caustic soda each
▪ 01 flat mouth aluminum ladle (01 kg)
▪ 02 bronze blades
▪ 02 rolls of danger tape (01 red and 01 yellow)
▪ 02 boxes of water of 20 liters each
▪ 04 reflective orange cones of 80 cm
▪ 02 cutter-type knives
▪ 01 electrochemical HCN meter
▪ Quick attack case for first aid
▪ 01 1m3 bottle of medicinal oxygen, with 01 humidifier and 02 masks with oxygen reservoir
▪ OPTIONAL (at the request of the client company):
02 industrial self-contained air (SCBA) sets, 60 min (2.4 m3), 4500 psi or 02 encapsulated suits (level A)
o 02 pairs of high chemical protection boots (Tingley) o 01 antidote kit.
6.4 Additional Elements for Major Emergencies
Elements for destruction of Sodium Cyanide:

o Sodium Hypochlorite
o Calcium Hypochlorite
o Hydrogen Peroxide
▪ 04 backpacks for fumigation or liquid spraying (to dose decontaminating solution)
There is a first response kit inspection format TL-FL-F-010, inspection carried out monthly or quarterly depending on the client's specifications.
Additionally, there is the TL-FL-F-013 inspection of fire extinguishers, of vehicle units.

The staff manages a minimum of PPEs that is delivered and controlled by logistics, SSHE supervises the delivery and establishes the minimum standards. There is a control and delivery procedure for personal protective equipment TL-LOG-P-007 v07. There is an PPES macro that has the profile according to work time, designated PPEs, estimated life time and quantity. Cyanide PPEs are included such as a chinstrap, thermal jacket, helmet vest, windbreaker, N95 filter, half-face respirator, chamois gloves, rubber gloves, pants with reflective tape, long-sleeved polo shirt with refractive tape, clear eye protector, dark eye protector, particle protection suit and steel toe shoes.

The PPES that goes in the emergency kit has also been included, which are the same as those that appear in the emergency response plan. The minimum PPEs for escort supervisors are finally included.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Finding/Deficiencies Identified:

The contingency plan for the land transport of hazardous materials and/or waste TL-SSOMA-PL-013 v02, in point 4.4.5. It includes notifications to Transportes Libertad S.A.C., notification to the competent authority, notification to other support institutions such as the national police, civil defense, fire department, hospital, among others, and communication to the community, municipalities, media. The EMERGENCY RESPONSE PLAN includes 4.3 Organizational chart of the communication system for the activation of the contingency plan and the contact telephone numbers are included in the communication flow.

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The emergency response plan is reviewed and updated semiannually, and in the Annual Safety, Occupational Health, Environment and Road Safety Program 2024, TL-SSOMA-PRG-005 includes the annual or semiannual review of the Contingency Plan and /or emergency response plan.

Yes, the sodium cyanide emergency contingency plan TL-SSOMA-PL-014 includes communication to The INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE (ICMI). It mentions the following:
TRANSPORTES LIBERTAD is obliged to quickly and timely communicate any significant incident during operations in the land transportation of Sodium Cyanide under its responsibility. The ICMI defines a Significant Cyanide Incident as any of the following events:

a) Human exposure requiring action by an emergency response team, such as decontamination or treatment.
b) An unauthorized discharge that enters natural surface waters, on or off the site.
c) An unauthorized release that occurs off-site or migrates off-site.
d) An on-site release that requires the action of an emergency response team.
e) A transportation incident requires an emergency response due to cyanide release.
f) An event of multiple wildlife deaths in which cyanide is known or believed to be the cause of death.
g) Cyanide theft.

ICMI requires signatories to the CYANIDE CODE to report significant cyanide-related incidents within 24 hours using the Incident Reporting Form (https://cyanidecode.org/incident-reporting-form/), or by submitting an email to info@cyanidecode.org. The initial notification must include:

▪ The date and nature of the incident
▪ The name and contact information of a TRANSPORTES LIBERTAD representative.
Within seven days of the incident, companies must provide additional information, such as:
▪ Root cause
▪ Impacts on health, safety and the environment
▪ Any mitigation or remediation
It should be considered that the language for communications with ICMI is English.

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
- ☐ in substantial compliance with Standard of Practice 1.1
- ☐ not in compliance with *Summarize the basis for this*

Transportes Libertad S.A.C.		12th, 13th November, 2024
Name of Facility	Signature of Lead Auditor	Date of submittal

Finding/Deficiencies Identified:

The contingency plan for emergencies with sodium cyanide TL-SSOMA-PL-014, 5.3 Measures in case of spill: Remediation Procedures

There are three response actions or measures that must be applied together at the discretion of emergency responders in the event of leaks or spills. They will be applied separately or together, at the discretion of the evaluation of the occurrence and the classification of the leak or spill:

▪ Direct physical collection: in which all spilled product is lifted and safely confined for later disposal.

▪ Chemical stabilization: when the collection of the material cannot be carried out immediately and it is necessary to delay or stop any reaction of the product with environmental elements that can generate or generate Hydrogen Cyanide gases, elements that raise the pH can be considered, such as calcium oxide or calcium hydroxide (quicklime, slaked lime). Eventually, dry sand or dry soil can be used to absorb moisture and stabilize the product.

▪ Chemical neutralization: when after collecting the material there are remnants that cannot be collected, as in the case of spills on asphalt. In that case, the last minor remnants may be destroyed by focused chemical neutralization, considering Reaction with Sodium Hypochlorite or Reaction with Calcium Hypochlorite or Reaction with Hydrogen Peroxide.

In point 5.2 decontamination of PPE, they indicate that in the first stage of decontamination, carry out a wash with a solution of sodium hypochlorite or calcium hypochlorite between 5 and 10%, with a strong rinse of the soles of the boots and of the palms of the gloves. This is to chemically destroy any remaining Sodium Cyanide (NaCN).

It is also included in point 5.3.1 Spill on Dry Ground (Spill on dry ground / asphalt / arid lands): If Sodium Cyanide is left impregnated in asphalt or in vehicular equipment, the neutralization and destruction of remnants can be carried out with any of the following elements: Solution between 5 and 10% of Hydrogen Peroxide or Solution between 10 and 12% of Hypochlorite of Calcium / Sodium Hypochlorite. It is also included in point 5.3.1 Spill on Dry Ground (Spill on dry land / asphalt / arid lands): In case of leaving Sodium Cyanide impregnated in asphalt or vehicle equipment, the neutralization and destruction of Remnants can be made with any of the following elements: Solution between 5 and 10% of Hydrogen Peroxide or Solution between 10 and 12% Calcium Hypochlorite / Sodium Hypochlorite. It is also included in point 5.3.1 Spill on Dry Ground (Spill on dry land / asphalt / arid lands): In case of leaving Sodium Cyanide impregnated in asphalt or vehicle equipment , the neutralization and destruction of remnants can be carried out with any of the following elements: Solution between 5 and 10% of Hydrogen Peroxide o Solution between 10 and 12% Calcium Hypochlorite / Sodium Hypochlorite. It is also included in point 5.3.1 Spill on Dry Ground (Spill on dry ground / asphalt / arid lands): If Sodium Cyanide is left impregnated in asphalt

or in vehicular equipment, the neutralization and destruction of remnants can be carried out with any of the following elements: Solution between 5 and 10% of Hydrogen Peroxide or Solution between 10 and 12% of Calcium Hypochlorite / Sodium Hypochlorite. It is also included in point 5.3.1 Spill on Dry Ground (Spill on dry ground / asphalt / arid lands): If Sodium Cyanide is left impregnated in asphalt or vehicle equipment, the neutralization and destruction of remnants can be carried out with any of the following elements: Solution between 5 and 10% of Hydrogen Peroxide or Solution between 10 and 12% Calcium Hypochlorite / Sodium Hypochlorite.

In the contingency plan for emergencies with sodium cyanide TL-SSOMA-PL-014 v01., in chapter 5.3.3 Spill in Stagnant Waters (Spill in stagnant waters / waterholes / wet lands): International experience indicates that the use of Chemical neutralization elements on water beds does not guarantee the effective destruction of NaCN, since there is no way to guarantee that a homogeneous mixture of chemical elements will be produced. Likewise, any chemical element added to the water implies additional soil monitoring to verify its impregnation in the wet beds. This may result in the final volume of land to be recovered having to be increased as a precautionary measure. Therefore, ADDING ANY TYPE OF CHEMICAL PRODUCT TO THE WATER IS PROHIBITED, EITHER TO NEUTRALIZE, STABILIZE, OR TRY TO RECOVER THE SPILLED CYANIDE. This includes, but is not limited to, chemicals such as ferrous sulfate, calcium hypochlorite, sodium hypochlorite, or hydrogen peroxide.

It also includes in point 5.3.4 Spills in Water Courses (Spills in water courses / operational irrigation channels / lakes and lagoons with current tributaries / streams and rivers with current / sea): International experience tells us that the use of Chemical neutralization elements in running water are not only ineffective, but also counterproductive by once again affecting aquatic life. This is the case why the use of chemical elements such as Calcium Hypochlorite or Hydrogen Peroxide is prohibited. According to the international standard for response to spills in sea and rivers: o It is almost impossible (if not impossible) to carry out the recovery of spilled elements that are soluble in water, heavier than water or both conditions at the same time.

Transport Practice 3.5

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

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

Finding/Deficiencies Identified:

Transportes Libertad S.A.C.		12th, 13th November, 2024
Name of Facility	Signature of Lead Auditor	Date of submittal

The emergency response plan is reviewed and updated semiannually, and in the Annual Safety, Occupational Health, Environment and Road Safety Program 2024, TL-SSOMA-PRG-005 includes the annual or semiannual review of the Contingency Plan and /or emergency response plan.

There is an annual drill program TL-SSOMA-PRG-001, it includes all the drills including the cyanide drill, the case of Drill level II of sodium cyanide at the Transportes Libertad base at Arequipa. There is report TL-SIG-F-06 Final report on Level II drill, unit oversight and solid sodium cyanide spill, prepared by SSHE Supervisor. Included are participants, materials and tools, directory of Trasnportes Libertad S.A.C. The drill is carried out without the participation of third parties. Transportes Libertad S.A.C. participates in the containment of the spill for level I. Observations are included such as the case of emergency reportability and lookout functions.

Yes, under 9.2 unscheduled reviews and updates have been included in the sodium cyanide emergency contingency plan TL-SSOMA-PL-014.