Mexican Cyanide Supply Chain

SUMMARY AUDIT REPORT

(With Fourt Addition – Port of Guaymas, Sonora, Mexico)

FOR THE

INTERNATIONAL CYANIDE MANAGEMENT CODE

April 2025

Tel +51 947 259 440 | Email bpizzorni@cyanideauditor.com | Web CYANIDEAUDITOR.COM

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Name of Facility Owner:	CyPlus Idesa S.A.P.I. de C.V.
Name of Facility Operator:	CyPlus Idesa S.A.P.I. de C.V.
Name of operators in this Supply Chain to July 15, 2022.	• CyPlus Idesa Mexican Cyanide Supply Chain - Cyanide Consignor • Cyplus Idesa cyanide production plant at Coatzacoalcos • CyPlus Idesa Transloading Terminal and Warehouse in Ciudad Obregon • Excellence Freights - Trucking company • Transportes Degam - Trucking company • Autotransportes Nieto - Trucking company • Port of Salina Cruz, Mexico • Port of Mazatlán, Mexico • Grupo Navemar - Sea transport
Operator included in First Addendum from June 30, 2023.	• Ferrocarril Mexicano S.A. de C.V. (Ferromex) – rail transporter.
Operators included in Second Addendum from May 2024.	• Port of Veracruz, Mexico. • Hapag-Lloyd – Shipping company
Operator included in Third Addendum from August 2024	• Puerto Cortez, Honduras
Operator included in Fourth Addendum from March 2025	• Port of Guaymas, Sonora, México
Name of Responsible Manager:	Luis Fernando Rodríguez - ESHQ Chief Cyplus Idesa
Address:	Boulevard Morelos Km 4.2 Parque Industrial Petroquímico, Morelos, Coatazacoalcos

State / Province:	Veracruz de Ignacio de la Llave, 96400
Country:	México
Telephone:	+52 553-139-8107
Email:	frodriguezr@cyplusidesa.com

Cyplus Idesa Mexican Supply Chain Location and Description

CyPlus Idesa S.A.P.I. de C.V. (CyPlus or CyPlus Idesa) is a joint venture founded in 2013 between Germany's Evonik and México's Grupo Idesa. Since the beginning of production in 2016 in México, CyPlus Idesa has supplied sodium cyanide to the mining industry with the support of CyPlus GmbH, which has more than 60 years of experience producing cyanide in Europe.

As of August 2019, CyPlus GmbH is part of Röhm Group, a 100% subsidiary of Advent International. Founded in 1984, Advent International is one of the largest global private equity investors.

CyPlus Idesa produces solid sodium cyanide in briquettes which is delivered in two types of packaging: Intermediate Bulk Container (IBC) where solid sodium cyanide is packed in United Nations (UN) approved one-ton big bags in wooden boxes as one-way box and in isotanks. CyPlus Idesa uses high-quality packaging to ensure the safest storage and transportation of cyanide.

The sodium cyanide offered is exclusive for mining customers; therefore, it is produced and delivered according to mining needs. Among its benefits is that production is local and customers are supplied directly, without any distributor; the supply chain is certified by the ICMC; and it is customized, fast and the most flexible in the Mexican market.

CyPlus Idesa Mexican Supply Chain, as the cyanide consignor, has its own emergency response brigades that would assist in transportation emergencies stationed at the warehouse in Ciudad Obregon.

From July 11 to 15, 2022, a professional ICMI registered auditor performed the Cyanide Code recertification audit to CyPlus Idesa Mexican Supply Chain, achieving its Code recertification. On June 30, 2023, the rail transporter Ferromex was included into the supply chain.

This report is updated to include the distribution of sodium cyanide in maritime containers from the port of Veracruz through Hapag-Lloyd shipping company to the Port of Cortés in Honduras. Puerto Cortés is included within the supply chain by mean of this Third Addendum.

Below is the list of entities participating in this supply chain and a brief description of their role in it.

- CyPlus Idesa as the cyanide consignor of CyPlus Idesa Mexican Supply Chain. The supply chain was ICMI certified four times with its last certification in November 2022.
- Cyplus Idesa cyanide production plant at Coatzacoalcos, which was first certified pre-operationally in January 2016 then certified three times with its last certification in September 2023.
- CyPlus Idesa Transloading Terminal and Warehouse in Ciudad Obregon (Obregon Distribution Center or CDO), certified as well with the Code four times with its last certification in November 2022 .
- Excellence Freights trucking company. Land transportation in IBC, within 20 feet sea containers, and isotanks, from Cyplus Idesa production plant directly to mine sites or in sea containers to Port of Salina Cruz, Port of Veracruz, and to Diselo Multimodal Terminal for Ferromex rail. Excellence Freights was first certified pre-operationally in January 2017, then certified two times with its last certification in August 2024.
- Transportes Degam (Degam) trucking company. Land transportation from CDO to the mine sites; transport of sea containers from Ferromex Intermodal Terminal at Ciudad Obregón to CDO; transport of sea containers to Port of Salina Cruz, Port of Veracruz, and to Diselo Multimodal Terminal for Ferromex rail.
- Autotransportes Nieto S.A. de C.V. (Nieto) - Trucking company. Transport of sea containers from Ferromex Intermodal Terminal at Ciudad Obregón to CDO; transport of sea containers to Port of Salina Cruz, Port of Veracruz, and to Diselo Multimodal Terminal for Ferromex rail.
- Ferrocarril Mexicano S.A. de C.V. (Ferromex) – rail transporter and the two intermodal terminals: Diselo Multimodal Terminal in Veracruz and Ferromex Intermodal Terminal at Ciudad Obregón, Sonora.
- Port of Salina Cruz, Mexico. Cyanide shipments to the Port of Mazatlán (with a backup option to the Port of Guaymas), by Grupo Navemar shipping company.
- Port of Mazatlán, Mexico - Cyanide shipments to the mine site s or to the Transloading Terminal and Warehouse in Ciudad Obregon, by Nieto trucking company.
- Port of Veracruz, Mexico - Cyanide shipments to the Port of Cortez in Honduras, by Hapag-Lloyd shipping company.
- Grupo Navemar (Navemar) - Sea transport in 20 feet sea containers from the Port of Salina Cruz to the Port of Mazatlán (with a backup option to the Port of Guaymas).

- Hapag-Lloyd shipping company. Sea transport in 20 feet sea containers from the Port of Veracruz to the Port of Cortes in Honduras.
- Puerto Cortés, Honduras - Cyanide shipments from the Port of Salina Cruz.
- Port of Guaymas - Cyanide shipments from the Port of Mazatlán, by Grupo Navemar shipping company

The following entities were evaluated during the recertification audit to Cyplus Idesa Mexican Supply Chain performed on July 11 to 15, 2022:

- CyPlus Idesa as the cyanide consignor
- Transportes Degam S.A. de C.V. (Degam) - Trucking company
- Autotransportes Nieto S.A. de C.V. (Nieto) - Trucking company

Cyplus Idesa cyanide production plant and Excellence Freights were not evaluated as these are ICMI certified entities. CyPlus Idesa Transloading Terminal and Warehouse in Ciudad Obregon (Obregon Distribution Center or CDO) was evaluated separately in occasion of this site visit, for its Code recertification.

During the recertification period 2019 – 2022 the cyanide consignor CyPlus Idesa, conducted due diligence evaluations to the Port of Salina Cruz, the Port of Mazatlán (with a backup option to the Port of Guaymas) and to the maritime shipper performed by Navemar.

The auditor reviewed due diligence (DD) reports prepared by Cyplus Idesa Mexican Supply Chain for maritime transporter Navemar from November 2021; report for Port of Mazatlán from March 2022; and DD report for Port of Salina Cruz from March 2022.

There were no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the port, plant or warehouse, containers may be temporarily stored on trailers overnight in pre-selected, secure parking areas in preparation for departure to the mines the following morning. Following collection from the port, plant or warehouse, containers may be temporarily stored on trailers overnight in pre-selected, secure parking areas in preparation for departure to the mines the following morning.

On January 2023, Cyplus Idesa started transporting cyanide by railroad with Ferrocarril Mexicano S.A de C.V. (Ferromex) from Diselo Multimodal Terminal (Diselo), until Ferromex Intermodal Terminal at Ciudad Obregón, Sonora (Ferromex Obregon Terminal), Coatzacoalcos, Veracruz. Cyplus Idesa complied notifying the ICMI opportunely regarding the beginning of this operation.

A due diligence Investigation for Ferromex was conducted on March 2023, by the Environmental Health, Safety and Quality (EHSQ) chief of Cyplus Idesa Mexican Supply Chain at Ferromex Obregon Terminal with participation of the safety officer and the commercial representative from Ferromex, and in March 2023 at Diselo terminal in

Coatzacoalcos. As part of that investigation, the rail partner was asked to fill out a questionary.

On May 2023, Cyplus Idesa requested the auditor to review Ferromex´ s due diligence report and to inform the ICMI regarding Ferromex´ s compliance status with the Code requirements.

Excellence Freights transports cyanide in sea containers from Cyplus Idesa production plant to Diselo rail terminal, about 50 km away. Then comes the route section by rail of approximately 683 km to Ferromex Obregon Terminal, where cyanide is unloaded directly onto the truck platforms of Nieto or Degam for unloading in Cyplus Idesa Distribution Center at Obregón (CDO).

According to information provided, for both rail terminals, cyanide in sea containers is transferred from truck to train and vice versa, take place within a brief period of time (hours); the cyanide shipments depart before 24 hours on their arrival to the rail terminals. Therefore, as stated in the ICMI Guidance for Use of the Cyanide Transportation Verification Protocol from June 2021, none of these rail terminals are “trans-shipping depot”.

On February 2024, Cyplus Idesa performed a DD to the Port of Veracruz and to Hapag-Lloyd shipping company via questionary, as began shipping solid cyanide in sea containers to Port Cortez in Honduras, by mean of the shipping agency Rovesa, which was also subject of a DD in February 2024.

The Port of Veracruz is part of the Cyplus Idesa México Supply Chain. The port of Veracruz is located within the state of Veracruz, exactly in the city of Veracruz in Mexico, this seaport is considered the best and busiest in Mexico.

Veracruz and to Hapag-Lloyd shipping company via questionary, as began shipping solid cyanide in sea containers to Port Cortez in Honduras, by mean of the shipping agency Rovesa, which was also subject of a DD in February 2024

On October 2024, Cyplus Idesa performed a DD Investigation to the Port of Guaymas operator. Port of Guaymas is located on the Gulf of California in Sonora on Mexico's Pacific coast. The port, sheltered by an inside bay with minimal tidal variation and rainfall, is one of the safest in the Pacific. Its strategic location offers a competitive advantage for moving various goods within the logistics chain.

Auditor's Finding

This operation is

✓ **in full compliance**

☐ in substantial compliance

☐ not in compliance

with the International Cyanide Management Code**.**

This operation has experienced a significant cyanide incident during the previous three-year audit cycle which is discussed in this report under the following Standard of Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

Auditor Information

Audit Company:	Cyanide Auditors S.A.
Lead Auditor:	Bruno Pizzorni
Lead Auditor Email:	bpizzorni@cyanideauditor.com
Transport Technical Auditor:	Bruno Pizzorni
Dates of Audit:	July 11 to 15, 2022 - Site audit June 26, 2023, Addendum - Review of the due diligence for Ferromex. May 15, 2024, Addendum - Review of due diligence for Port of Veracruz and Hapag- Lloyd shipping company March 26, 2025 - Review of DD Investigation for Port of Guaymas

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.

Transport Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

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

Cyplus Idesa, the cyanide consignor, has the written procedure Selection of the Routes within México, where is included an evaluation procedure for selecting transport routes to minimize the potential for accidents and releases. The procedure requires to evaluate alternative transport routes and to the extent practical, select the one that minimizes both the potential for accidents and releases and the potential impacts of such accidents and releases if they do occur.

The individual trucking companies evaluated, Degam and Nieto, have implemented similar procedures for their specific land routes and implemented the overall procedure via their own procedures, where CyPlus Idesa has approved the truck routes. Degam and Nieto consider the required elements, as well as others.

The evaluation procedures consider issues as natural hazards (landslides, flooding, volcanic activity, etc.), security issues, population density, existing infrastructure conditions of the roads, pitch and grade and areas with presence of water bodies and visibility due to weather conditions. The procedures call for driver feedback and routes are re-evaluated when driving conditions change, or when driver feedback suggests that this is necessary.

The auditor reviewed these procedures, as well as CyPlus Idesa, to verify compliance. Records were available to demonstrate that all current routes were assessed and approved, including route approval emails from Cyplus Idesa to Degam and Nieto. The auditor reviewed evidence that such selection process were used. In all cases, the evaluation and selection of the routes was limited by the actual availability of road alternatives and the jurisdictional designations required routes for transport of dangerous goods.

Regarding the maritime transporter Navemar, there is only one transit route that goes from

the port of Salina Cruz, Oaxaca to the port of Mazatlán, Sinaloa. The route is periodically monitored through the web site marinetraffic.com.

Cyplus Idesa along with the trucking companies Degam and Nieto procedures for route selections, include evaluation of the selected route to determine if extra precautions are necessary at points along the route. Areas posing increased risks are identified and the necessary precautions, such as reducing vehicle speed, are documented for driver training. The procedures establishes to perform a risk analysis and the steps to follow for the preparation of roadmaps for all routes covered by the organization during the execution of the transport service. Once identified the risks is required to establish the necessary control measures to manage these risks.

The procedures require to prepare and update the roadmap when there is a new route, modification of conditions or a request from the customer recording the aspects related to: unsafe conditions (road condition, weather conditions and traffic), speed of handling by sections, signs and prohibitions of the road, heights of bridges, tunnels, ridges of hills, water, population density, mist zones and other aspects of transport safety. Mine customer input is considered when routes are determined. Cyplus Idesa has reviewed and approved the routes of its transporters. The trucking companies' procedures conform with requirements of the cyanide consignor Cyplus Idesa.

The Consignor has also implemented a program to conduct regular due diligence on ports and ocean shippers. These due diligence evaluations have included training, security, safety, emergency scenarios, response actions, the roles of external responders, and other factors.

The auditor reviewed examples of the route analysis of the route risk assessments that included photographs and control measures to verify compliance.

Both Cyplus Idesa and the trucking companies Nieto and Degam procedures require to periodically reevaluate the routes used for cyanide transport to confirm that no new risks have developed. This is a formal administrative review along with the driver reports on route conditions by mean of a WhatsApp group and also by periodic inspection of the routes.

The procedures state to evaluate routes annually, or when changes are identified by drivers travelling a route. Also, require the drivers to provide feedback on the route conditions. When feedback from a driver suggests that a route needs to be revised, the company revise the route and communicates latest information to drivers.

The trucking companies have formally reviewed their routes periodically. They also maintain various mechanisms for rapid, informal feedback on route conditions. Interviews with drivers and management personnel were used to confirm that feedback about driving conditions is communicated. Special conditions noted by customers are noted and communicated to all drivers assigned to the route.

Records were available to show that the transporters periodically performs route risk

assessment and participates in meetings with the mine customer. The transporters route risk assessments require to document the risks identified along the selected routes and to be available in writing both for driver training and as a reference. Features such as sharp turns, areas of proximity to surface water and high population density require special precautions.

Each truck transporter has listed the control measures in their route risk assessments. These control measures have been assigned to specific stretches of road identified by kilometer markings. These controls include speed reduction, co-drivers, daylight driving restrictions, experienced drivers only, escorts, load weight reduction, specialized training, and others. Nieto risk evaluation and control measures have been implemented real time via the CoPiloto software on screens in the trucks. Speed restrictions show up as boxes around each stretch of road and other control measures for river crossings, railroad crossings, dangerous intersections, etc. are announced via pre-recorded voice alerts.

Route evaluations were complete, and records were available for review. Each route segment is evaluated for risks associated with population density, infrastructure, pitch & grade, proximity to water bodies, and likelihood of encountering poor driving conditions. Routes are also evaluated for security issues and for cell phone coverage.

Cyplus Idesa has consulted with communities, stakeholders, and agencies on behalf of the trucking companies. The consignor considers consultation on route details a sensitive issue because of the very real possibility of increasing the risk of robbery or vandalism. In many cases, there is only a single route to remote mines. Nonetheless, Cyplus Idesa has made opportunities for input available via a training program on safe cyanide management and antidotes. Firefighters, police, red cross, hospitals, doctors, unions, customs agents, port management, shipping staff, emergency response brigades, security staff, mine staff, civil protection, and others have participated in these trainings. In addition, the ESHQ Manager for Cyplus Idesa is a member of the HazMat committee of the National Association of the Chemical Industry (ANIQ) in México, thus providing other opportunities for feedback from stakeholders.

By mean of the attendance lists of trainings provided in safe cyanide management, Cyplus Idesa showed records to demonstrate that input has been sought and acted on as appropriate.

Convoys of trucks carrying hazardous materials on public roads are prohibited by law in México. Occasionally, drivers from various companies will informally convoy on private roads in remote areas. However, the trucking companies do implement administrative controls in areas of special concern, such as not driving at night. For example, trucks are required to stop overnight in Yecora, Sonora so as night to drive at night on the remote roads in the Sierra Madre Mountains. By interview to management personnel, the auditor confirmed that cyanide transport operations is performed during daylight only.

Cyplus Idesa as the consignor, exercises control over its subcontractors by mean of its procedures and a program of questionnaires and due diligence site visits, covering subcontractor selection and evaluation, route selection, safety norms and emergency response. Cyplus Idesa has provided these procedures to the trucking companies and the trucking companies have incorporated the requirements into their own procedures. As part of the route selection procedure, Cyplus Idesa has approved the routes used by Degam and Nieto.

Cyplus Idesa annually sends the trucking companies a questionnaire on Code-compliance. This questionnaire is based on the ICMI Transportation Verification Protocol. The auditor reviewed examples of these questionnaires from Degam and Nieto to verify compliance. These trucking companies do not subcontract any cyanide handling or transport.

Once every three years, Cyplus Idesa visits the ports and maritime shippers to conduct due diligence audits onsite. These due diligence evaluations have included training, security, safety, emergency scenarios, response actions, the roles of external responders, among others. The auditor has evaluated these due diligence audits for the Ports of Mazatlán and Salina Cruz, as well as the maritime shipper Navemar, finding them in compliance.

Transport Practice 1.2

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

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

Cyplus Idesa, as the cyanide consignor, does not hire drivers or transport cyanide. The transportation is subcontracted to Degam and Nieto. They have implemented written procedures to select qualified operators to ensure only trained, qualified, and licensed drivers operate their transport vehicles: Degam´s procedure Index for Operator Selection, and the Operator Training and Qualification procedure from Nieto. The requirements consider factors such as medical examination, education level, criminal record, vision test, psychological interview, drug/ alcohol test, reference checks, among others.

In accordance with Mexican laws, truck drivers for large loads and/or hazardous materials must obtain a Type E license from the Secretary of Communications and Transports (Secretaria de Comunicaciones y Transportes [SCT]), an agency of the México government and renew the license every two years. To verify compliance, the auditor reviewed driving licenses at Degam and Nieto to confirm the drivers had the required Type E license and that these licenses were current.

The transporters were able to demonstrate that personnel operating its cyanide transport trucks and trailers were trained, qualified and have the specific license to operate the trucks category, as required in its jurisdiction. The transporters do not use handling equipment as forklifts and cranes in the cyanide transport operations.

All personnel operating the trucks for cyanide transportation from Nieto and Degam are trained to perform their assigned tasks in a safe and environmentally sound manner. These companies transport solid cyanide in isotanks or sealed containers that are placed on the trucks by the staff at the production plant, ports, or warehouse and then unloaded by staff at the mines.

Cyplus Idesa has provided training on safe cyanide management and antidote use to Degam and Nieto. The training materials were a PowerPoint presentation and a Cyplus Idesa handout with detailed information. The auditor reviewed the training materials and attendance lists to verify compliance.

The transporters have also provided training to their operators. Degam has an annual training program that includes fatigue, defensive driving, security, general health, and others. Nieto has a training program that consists of an 8-day course for new drivers and a 5-day refresher course, every 2 years for experienced at their training facility in Queretaro. Courses include Mexican laws, hazardous waste, satellite tracking, inspections, manifesting, security, defensive driving, basic maintenance, hooking/unhooking trailers, and others.

The auditor reviewed training material as Cyplus Idesa training presentation Safety Training for Cyanide Management; Cyplus Idesa Information for Doctors, HCN, Cyanides; attendance lists, training programs and training certificates to verify compliance. Interviews with drivers, dispatch, management, and maintenance personnel were used to confirm that they were trained in the cyanide transport operation to perform their jobs safely and appropriately.

Cyplus Idesa as the consignor, exercises control over its subcontractors. CyPlus Idesa annually sends the trucking companies a questionnaire on Code-compliance, based on the ICMI Transportation Verification Protocol, including questions to ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment . The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any cyanide handling or transport.

Once every three years, the cyanide consignor visits the ports and maritime shippers to conduct due diligence audits onsite. These due diligence evaluations have included training, security, safety, emergency scenarios, response actions, the roles of external responders, and other factors. The auditor reviewed these diligence audits for the Ports of Mazatlán and Salina Cruz, as well as the maritime shipper Navemar, finding them in conformance.

The auditor also reviewed documents showing Cyplus Idesa control procedures for its

contractors as: Purchase and Evaluation of Providers, Selection of the Routes, Safety Norms for Cyanide Transport, Highway Contingency Plan, routes approval emails from to Degam and Nieto, Questionnaire for Audits of Transport Lines about the International Cyanide Code for Degam and Nieto, and Excellence Freights, ICMI certified transporter last Summary Audit Report.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Degam and Nieto transport companies have records documenting the load-bearing capacities of their trucks and trailers detailing their maximum cyanide load weight. The transporters performs maintenance activities specifically to ensure that their transport equipment retains a load-bearing capacity adequate for the anticipated load. This include periodically planned maintenance and inspections. The transporters vehicles have circulation permits issued by the Mexican federal agency for transportation (SCT). These permits, in conjunction with the SCT Table of Weights and Dimensions under the regulation NOM-012- SCT2, ensure that the equipment is designed for the appropriate loads. The auditor reviewed examples of these circulation permits at each transporter to verify compliance.

Degam has a written program for annual maintenance. This program is implemented via a work order system. The auditor reviewed binders of closed work orders to verify compliance.

Nieto has a written procedure to govern maintenance. This procedure is implemented via proprietary software with a schedule based on distance driven or every six months, whichever comes first. The auditor reviewed maintenance histories on screen for randomly selected units to verify compliance.

The auditor reviewed the maintenance procedures and programs for cyanide transportation, addressing the responsible practices for sodium cyanide transportation to ensure that safety standards are met and maintain the integrity of the packaging throughout the journey. Also reviewed documentation of the load capacities as evidence of compliance, reviewed maintenance records and interviewed maintenance personnel to verify that the transporter's procedures are followed. Each trucking company commissions preventive maintenance activities to external authorized workshops according to its respective truck brand, depending on the area where trucks are working.

The auditor interviewed the transporters managers to verify their compliance with this

provision. Shipment records were reviewed to confirm that standard weights within the capacity of the tractors, trailers and containers were being shipped. Weight capacities and the fulfillment of cargo inspection requirements were reviewed during the audit and were found to be compliant. Shipping records were available to demonstrate that equipment is not being overloaded.

In addition to ensuring that the manufacturer's rating of the loading capacity of the transport equipment is adequate, the transporters Degam and Nieto also verify that the load bearing capacity of its equipment is adequate by inspecting and testing its equipment to identify signs of stress or overloading. Degam and Nieto have implemented documented daily visual inspections to verify the adequacy of the equipment for the loads it will bear. These inspections, as well as their content, are required by the SCT. Inspection items cover each side of the tractor and trailer and include, for example, tires, rims, axels, suspension, chassis, nuts/bolts, air/hydraulic lines, brakes, connections, and others. The inspection forms specifically mention conditions related to load-bearing performance, such as fissures and cracks in the various components. The auditor reviewed evidence of completed inspections performed before each shipment service and also interviewed the truck drivers in evaluating compliance with this provision.

CyPlus Idesa and its subcontractors have procedures in place to ensure that equipment is not loaded in excess of its design. The consignor is responsible for loading 1-ton wooden boxes into the sea containers, or isotanks at either the production plant in Coatzacoalcos or the warehouse in Ciudad Obregon. Twenty of the 1-ton wooden boxes fit in the sea containers. Isotank loads are limited to 16 tons.

Degam and Nieto have implemented the SCT-required measures, as specified in the Table of Weights and Dimensions under the regulation NOM-012-SCT2, to prevent overloading of the tractors and trailers used in cyanide transport. Departure documents, shipping letters, and delivery notes list the weights of product being transported to verify the load complies with the SCT Table of Weights and Dimensions.

The auditor reviewed examples of documents Shipping Letter and Delivery Note from each transporter to verify compliance. Records of cyanide shipments were checked against weight capacities and weight limit regulatory information. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. All personnel showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

Cyplus Idesa as the consignor, exercises control over its subcontractors. Annually they send to the trucking companies a questionnaire on Code-compliance, based on the ICMI

Transportation Verification Protocol, including questions to ensure that transport equipment is suitable for the cyanide shipment. The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any 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
	☐	in substantial compliance with	
	☐	not in compliance with	

Cyplus Idesa and its subcontractors have implemented procedures for sodium cyanide transportation for the receipt, load, transport, and unloading of solid cyanide. Procedures and formal pre trip checklist are used to ensure that the integrity of cyanide packaging is maintained during shipment, as well as during loading and unloading.

Degam and Nieto do not handle the cyanide containers. Cyplus Idesa staff handle the unloading and loading of 1-ton wooden boxes at the Ciudad Obregon warehouse. Isotanks are loaded at the plant or the warehouse by their respective staff. Truck trailers, sea-land containers, and isotanks are locked and sealed at the time of loading and remain that way until unloading by mine staff at the mines. The transport companies do complete daily inspections of the exteriors of the truck trailers, sea containers, and isotanks while in transit to ensure the integrity of these items. The auditor reviewed examples of inspections forms to verify compliance.

The procedure Loading and Dispatch of Sodium Cyanide Final Product, CyPlus Idesa Production Plant in Coatzacoalcos, requires placards or other signage are used to identify the shipment as cyanide, as required by local regulations and international standards. According to Cyplus Idesa staff, it is the legal responsibility of the plant or warehouse staff to attach placards to the trailers, sea containers, and isotanks. The plant and warehouse have written procedures that address attaching or checking the placards. Truck trailer placarding consists of the United Nations (UN) 1689 diamond placard, whereas sea-land containers and isotanks are also placarded the Class 6 dangerous goods label and the marine toxin label.

The transporters procedures requires to review the condition of the sea containers to ensure they are suitable for the trip, without holes and with complete identification labels of solid sodium cyanide (1689) and Maritime Pollutant. The pre-trip checklist include provisions to verify signage is complete. In occasion of the audit the auditor reviewed

cyanide shipments confirming placards announcing the presence of cyanide on transport vehicles.

Cyplus Idesa and its subcontractors have implemented a safety program for cyanide transport that include the following:

a) Vehicle inspections prior to each departure/shipment.

The transporters procedures for sodium cyanide transportation addresses formal safety vehicle inspections before each shipment. Roles and responsibilities are clearly defined Degam and Nieto have implemented daily visual inspections that also serve as pre-departure inspections. These inspections, as well as their content, are required by the SCT. Inspection items cover each side of the tractor and trailer and include, for example, tires, rims, axels, suspension, chassis, nuts/bolts, air/hydraulic lines, brakes, connections, and others. The auditor reviewed examples of Daily Visual Inspection Forms from Degam, and Nieto, which includes both the truck and the trailer, finding this in conformance.

b) A preventative maintenance program.

Confirmation was made during interviews to company´s drivers and management personnel that the transporter performs preventive maintenance to their vehicles according to a stablished schedule, depending on the truck brand and road conditions.

The truck transporters have written maintenance programs. Degam has implemented a written system of work orders, Nieto have used software programs. Maintenance is scheduled based on time or distance driven. The auditor reviewed maintenance histories on screen for randomly selected units for Nieto, as well as closed work orders for Degam, to verify compliance. The auditor reviewed Degam´s transporte Maintenance Program for Cyplus Idesa units and binders of closed work orders, the maintenance history of Nieto, the List of Isotank Inspection Expiration Dates from CyPlus, 2019. They also maintain valid third-party inspection certificates for the 20 isotanks that they own, thus supporting that they are properly maintained.

c) Limitations on operator or driver hours.

The SCT has established limits on drivers' hours in the Mexican Regulation NOM-087-SCT. Cyplus Idesa has adopted these hours in a written procedure (Safety Norms for Cyanide Transport) that flows down to the trucking companies: 1st period = 4 hours followed by 30 minutes of rest; 2nd period = 4 hours followed by 1 hour of rest; 3rd period = 4 hours followed by 8 hours of rest. Night driving is prohibited. The auditor reviewed examples of the SCT-required forms for hours driven from Degam and Nieto to verify compliance, and Degam´s Procedure for Driving Hours, Rest, and Consumption of Alcohol and Drugs

d) Procedures to prevent loads from shifting.

The production plant and warehouse are responsible for loading truck trailers, sea containers, and isotanks in such a way as to prevent loads from shifting. The 1-ton wooden

boxes are secured with straps in a designated pattern, as specified in written procedures. Cyanide is shipped within sealed containers, which are secured to the platform safely, eliminating the possibility of displacement during transport.

The auditor reviewed the procedure Loading and Dispatch of Sodium Cyanide Final Product from CyPlus Idesa Production Plant in Coatzacoalcos, the procedures from the Oregon Cyplus Idesa Warehouse: Reception, Management, and Storage of Chemical Products; Delivery of Chemical Products; and procedure Transfer of Sodium Cyanide to Isotanks. From Degam trucking company reviewed the Procedure for Transporting Dangerous Material. Also, in occasion of the audit, the auditor saw at the Warehouse, opening a sea container with cyanide shipment of secured 1-ton wooden boxes inside before unloading.

Transportes Nieto was required to include into its pre-trip checklist, a field to ensure containers are correctly secured with twist locks to the trailer platform. After the audit Cyplus Idesa sent Nieto´s completed pre-trip registers showing they have included twist locks checking. No additional information was required to find this item in full compliance.

e) Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.

Degam and Nieto have developed procedures by which transportation can be modified or suspended for adverse conditions. Degam´s procedure for transporting dangerous materials addresses transport suspension. Nieto route selection procedure includes a section that allows for suspension after consultation with supervisors.

f) A drug abuse prevention program.

Cyplus Idesa has developed a written procedure (Safety Norms for Cyanide Transport) that requires subcontracted transporters conduct drug and alcohol testing at a minimum every six months. Degam has adopted this requirement in their own written procedure. Nieto staff stated their policy is to randomly test 10 percent of the drivers each month and at least 50 percent every six months.

g) Retention of records documenting that the above activities have been conducted.

Cyplus Idesa procedure for safety norms requires the transporters to retain records for at least 3.5 years. The auditor reviewed the cyanide consignor and the transporters, Degam and Nieto retained records documenting the above activities covering the recertification audit period of 3 years have been conducted. Records were available documenting inspection and maintenance records, spreadsheets to control drivers' hours, pre-trip inspections to prevent loads from shifting, procedures to suspend the trip if travel unfavorable conditions are encountered, and alcohol tests records.

Cyplus Idesa as the consignor, exercises control over its subcontractors. The consignor annually sends the trucking companies a questionnaire on Code-compliance, based on the

ICMI Transportation Verification Protocol, including questions to ensure development and implement a safety program for transport of cyanide. The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any 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
	☐	in substantial compliance with	
	☐	not in compliance with	

CyPlus Idesa ships solid cyanide in 1-ton wooden boxes within 20 feet sea container along the west coast of México starting at the Port of Salina Cruz, Oaxaca, and terminating at the Port of Mazatlán, Sinaloa. The trip between Salina Cruz and Mazatlán takes several days. CyPlus Idesa has contracted to Navemar to arrange shipping for the dedicated service of a single ship. Shipments of cyanide transported by sea are transported in compliance with the International Maritime Organization (IMO) Dangerous Goods (DG) Code.

CyPlus Idesa conducted due diligences (DDs) of Navemar in November 2021, and for Port of Mazatlán and Port of Salina Cruz in November 2022 . The auditor reviewed these reports and prepared the DD assessments that can be found in the Exhibits A,B and C of this audit report. The assessments found no issues of concern with regards to the ports conduct and shipping of cyanide.

Cyplus Idesa began shipping cyanide to Honduras in twenty feet sea containers from Port of Cortez, by mean of Hapag-Lloyd shipping company. CyPlus Idesa conducted DD of the Port and shipping company in February 2024. The auditor reviewed these DD reports and prepared its assessments. The assessments found no issues of concern.

CyPlus Idesa is responsible for the cyanide packaging, containerization, labelling, and initial manifesting at their ICMC-certified production plant in Coatzacoalcos, México. According to a plant procedure, the 1-ton wooden boxes and sea containers are labelled in accordance with IMO DG protocols. This procedure shows the type and locations of labels and symbols attached to the various containers and includes requirements for initial manifesting
The packaging is suitable for the transport and storage of cyanide. This is complying by the sodium cyanide production plant under the corresponding procedure.

Shipment packaging is in accordance with the plant procedure and as required by Part 4 of the IMO DG Code and according to the packaging instructions and packaging provisions indicated on the DG List. Cyplus Idesa packs cyanide into polyethylene bags that are

hermetically sealed and then placed into 1-ton boxes. The boxes are strapped into sea-land containers that are then locked and sealed with a custody seal.

Cyanide packages are marked as required by Section 5.2.1 of the IMO DG Code and labelled as required by Section 5.2.2 of the IMO DG Code and according to labelling requirements indicated on the DG List. The cargo transport units are placarded and marked as required by Chapter 5.3 of the IMO DG Code. Placards and signage used to identify the shipment as cyanide meet standards. The boxes are labelled in and diamonds are placed at the front and rear of the vehicle exterior identifying the load as cyanide, all in accordance with the plant procedure and the IMO DG Code. Labelling consists of the UN number 1689, Class 6 dangerous goods label, and the marine toxin label.

Dangerous goods transport documents have been prepared with information required under Chapter 5.4 of the DG Code. IMO DG Declarations have been prepared with the required transport information, including consignor information, marine pollutant identification, shipping information (e.g., 2340 Wood-Box, Sodium Cyanide, Solid. UN 1689, Class 6.1, Packaging Group I), list of containers and weights, and a certification stating that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national government regulations.

Cyanide loaded into containers, have been prepared with the required packing information meeting the requirements of Section 5.4.2 of the DG Code.

The ships carrying cyanide have manifests identifying the presence and location of the cyanide including this information, as required under Section 5.4.3.1 of the DG Code. The due diligence assessments confirmed manifesting and stowage is in accordance with the DG Code.

The ships carrying cyanide have emergency response information as required under Section 5.4.3.2 of the DG Code. The due diligence assessments confirmed that Navemar and Hapag-Lloyd have developed contingency procedures on emergency preparedness and response as part of its safety management systems.

The ships complies with the stowage and separation requirements of Part 7 of the DG Code. Cyanide is loaded according to a stowage plan. Therefore, stowage and separation requirements are met.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is ✓ in full compliance with / ☐ in substantial compliance with Transport Practice 1.6

☐ not in compliance with

All drivers are provided with means to communicate with the transport company, the mining operation, the cyanide producer and emergency responders, as appropriate. According to their procedures for cyanide transportation, all trucks must have communication equipment.

Cyplus Idesa does not operate transport equipment within this supply chain. It does subcontract transport companies which have multiple means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

Degam and Nieto have multiple means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders. Degam operators carry a cell phone, a short-wave radio, and a satellite phone; the truck is equipped with a satellite-based panic button. Nieto operators carry a cell phone and the truck is equipped with a satellite- based panic button.

Drivers for the transport companies have pre-determined contact information with them during deliveries. Both Degam and Nieto drivers carry their ERP that contains a contact list. All transporters use Global Positioning Satellite (GPS) to track the trucks.

Degam and Nieto inspect and test the communication and tracking equipment periodically to ensure it functions properly. The operator checks phones and radios, but only the home office can remotely verify the GPS and its antenna operate properly. The auditor reviewed checklists and inspection forms, as well as screen shots of testing, to verify compliance. Both Degam and Nieto transport companies use checklists to verify the communication equipment is functioning properly. Degam has a checklist that includes the cell phone (and radio in the same column) and the panic button. The Nieto Emergency Response Plan (ERP) has an equipment list that includes communications equipment.

Cell phone blackout areas in the different routes from ports to the mine sites have been identified by the transporters during the routes risk analysis. By review of the routes risk analysis performed, interviews and equipment review, the auditor confirmed this practice.

Degam special procedures in these zones are to have a satellite phone available, as well as a satellite-based panic button and two satellite-based GPS tracking .

Nieto procedure for these zones consists of checking in with a supervisor upon entering and leaving the zone, as well as having a satellite-based panic button and a satellite-based GPS tracking system (i.e., CoPiloto).

The transporters Degam and Nieto have implemented satellite-based GPS systems to track trucks during transport. Both use CoPiloto, a GPS and software system that visually tracks truck locations on computers and cell phones. Cyplus Idesa, as the cyanide consignor, has

also access to this system, to track the progress of cyanide shipments. The auditor observed the tracking maps on supervisor cell phones during the site visit to each transporter to verify compliance.

The dispatch of cyanide is carried out directly to the mine without opening the containers, for which the seals are controlled through pre-trip inspections and after each stop en route. Drivers, in accordance with the requirements of the procedures, must always carry the dispatch guides indicating the amount of cyanide in transport, the shipping paperwork, including chain of custody requirements, to ensure that cyanide shipments arrive at their destination intact. Among others, a waybill accompanies the cyanide shipments which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, bill of lading, customs declarations and shipper guide.

The auditor reviewed this documentation completed during the course of several shipments and through interviews with operators. Degam and Nieto have implemented inventory controls to prevent cyanide losses during shipment. The transporters provided paperwork for review that documented the date/time/location of departure and upon delivery of the product, as well as acceptance of delivery by the mine. The number of containers and weights were listed on the paperwork. In addition, the doors of the trucks are sealed with a numbered metal strip that is removed only at the point of delivery to verify the load was not tampered with during transit. Shipping paperwork was found to be conformant to the Code requirements.

The transporters showed completed shipping records indicating the amount of cyanide transported in each truck. The procedure for cyanide transportation requires this documentation must accompany every cyanide shipment. All shipments of cyanide are accompanied by shipping papers identifying the amount of cyanide in the load and by Safety Data Sheets describing the necessary precautions for handling of cyanide. The auditor reviewed the transporter's procedure confirming that this information accompanied each cyanide shipment and verified its implementation by interviewing operators and reviewing this documentation from performed cyanide shipments.

Cyplus Idesa as the consignor, exercises control over its subcontractors. Cyplus Idesa annually sends the trucking companies a questionnaire on Code-compliance, based on the ICMI Transportation Verification Protocol, including questions to ensure track cyanide shipments to prevent losses during transport. The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance. The transporters do not subcontract any 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
	☐	in substantial compliance with	
	☐	not in compliance with	

Interim storage activities in this cyanide supply chain, as defined by ICMI, do not take place. Cyanide shipments are sent directly from the producer, ports or warehouse to the mine sites. Within the scope of this supply chain audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. This Transport Practice does not apply to this transport operation.

Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Cyplus Idesa has developed the written emergency response plan Highway Contingency Plan (ERP) for responding to emergencies that may occur during its cyanide transport activities, a specialized document addressing cyanide only. This plan also serves as an umbrella plan for the plans of the individual trucking companies. Degam and Nieto have their own ERPs. These are detailed document that includes, among other information, the emergency response team organization chart, emergency phone directory, communication channels guidelines, emergency scenarios, and instructions to attend specific and general emergency scenarios.

The ERPs for Cyplus Idesa, Degam and Nieto reflect the issues presented by the particular transport route and the method of transport. Emergency scenarios have been identified as result of the route assessment matrix and emergency response actions have been addressed.

The emergency scenarios described in the ERPs are specific to the physical and chemical form of the cyanide handled, and the transport vehicles used. In all cases, the physical form

is solid cyanide as briquettes. The physical properties are described, such as density, solubility, and color. In all cases, the chemical form is sodium cyanide.

The ERPs consider road conditions via the route assessments. Port conditions are addressed separately in the due diligence evaluation.

All emergency scenarios developed are related to ground transportation: incidents without injuries, mechanicals problems, collision, rollover with and without spill, fire during transportation, fall of the load and collision with hurt persons. The ERPs provide information regarding the packaging and transportation characteristics of the product, the container and the transportation unit.

The ERPs consider the design of the transport vehicle, although the design is not considered a significant additional factor. The transport vehicles are trucks pulling isotanks or sea containers. The isotanks are top- loading and the sea containers are rear loading.

The design of the transport vehicles has been considered in the Cyplus Idesa warehouse operation in Ciudad Obregon, Sonora. This facility is separately Code-certified under the Production Protocol.

The auditor reviewed the ERPs verifying that appropriately considers these factors in identifying potential emergency scenarios and necessary response actions. The documents were found to be up-to-date and appropriate for this solid sodium cyanide transportation operation.

The ERPs describe the nature of the response actions to be taken for the types of emergency situations identified to land transport, such as mechanical failure, fire, roll-overs, releases (dry or wet, over asphalt/concrete or soil), roadblocks, protests, and theft. In general, the truck operators are to call the appropriate authorities, isolate the area, keep people away, don personal protective equipment (PPE), and if possible, to do so safely, cover spilled cyanide with a tarp. The appropriate authority for initial notification is the Mexican agency in charge of the Emergency Transportation System for the Chemical Industry (SETIQ). The level of detail is adequate to the nature of the potential emergencies identified in the Plans and the available response capabilities

The transporters included detailed actions, particularly for potential releases in locations along the route that have been identified as presenting increased risks, including notifications to downstream authorities for a release that occurs as cyanide is transported near a river. The auditor reviewed the Plans verifying that they describe specific response actions to be taken for the types of potential release scenarios identified.

The ERPs for Cyplus Idesa, Degam and Nieto describe the roles of external entities in response actions. The roles of the external entities are their standard duties, as directed by SETIQ. SETIQ is responsible for directing which other entities should be involved, including police, military, firefighters, red cross, and hospitals. For chemical response actions with specialized equipment, the Cyplus Idesa brigades stationed in Ciudad Obregon are noted in

the ERPs has having a significant role depending on whether other entities near the incident have similar specialized capabilities. The auditor reviewed the ERPs verifying these external responders are identified.

Transport Practice 3.2

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

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

Appropriate personnel at Cyplus Idesa, Degam and Nieto have received emergency response training during the recertification period.

Cyplus Idesa has provided training on safe cyanide management and antidote use to Degam and Nieto, as well as to the Cyplus Idesa brigade members. In addition, Cyplus Idesa brigade members in Ciudad Obregon, and México City have taken specialized two-day courses in cyanide first aid, management, and emergency response from the National Association of the Chemical Industry (ANIQ) during the recertification period. The auditor reviewed the training program and certificates to verify compliance.

The two transporters have also provided other emergency response training to their own staff. Degam has a training program that includes emergency responses for robbery, theft, rollovers, and roadblocks, as well as their ERP. Nieto has a training program that includes the ERP for cyanide transportation, which in turn contains information on cyanide risks, symptoms, first aid, scenarios, decontamination, and others. The auditors reviewed training programs/matrices, attendance lists, and certificates to verify compliance.
The auditor reviewed complete training records in the ERPs provided to their personnel. The training addresses all anticipated response activities including calling for assistance, use of personal protective equipment and first aid for cyanide exposure. The elements of these training are documented in training materials, and records including the individuals trained and the nature and date(s) of training are retained. The training materials were a PowerPoint presentation and a Cyplus Idesa handout with detailed information. The auditor reviewed this documentation and interviewed designated response personnel verifying compliance with this provision. Training records were available and complete.

The specific duties and responsibilities of response personnel are identified in the ERPs. The expectations are clear for the consignor and the transporters and there is a basis for training of these personnel. In the event of an emergency, accident or breakdown en route, the manufacturer and the carrier will provide support and provide the clarifications requested

by the public authorities, as required by local regulations. The duties and responsibilities for Cyplus Idesa are broader than the trucking companies in that Cyplus Idesa provide emergency response brigades with the typical structure for incident commanders, brigade members, coordinators, etc. For the three trucking companies, the duties and responsibilities for cyanide emergency response are similar. The truck keeping people away, and if safe to do so, covering spilled materials with a tarp.

The transporters have complete list of the emergency response equipment in their respective ERP and checklists inspections forms for inventorying the equipment, which include all the necessary emergency equipment that must accompany the cyanide load along the transport route.

The Cyplus Idesa brigades in Ciudad Obregon transloading and warehouse facility, have developed checklists for the emergency response equipment and PPE. Degam and Nieto have prepared equipment lists for safety and emergency response equipment carried in their trucks during cyanide transport. Degam has created a checklist, while Nieto ERP contains a list of safety and emergency response equipment carried in their trucks. In all cases, the lists are divided into three categories: normal operations, PPE for emergencies, and equipment and materials for emergencies.

The transporters Degam and Nieto has available and document that the necessary emergency equipment is ready to use for each cyanide shipment by mean of a checklist, which is required in the ERPs emergency equipment and materials to be checked prior to each cyanide delivery. The auditor reviewed completed emergency equipment checklists, observed the equipment and interviewed the transporters personnel as a driver, the planning responsible and the health and safety responsible, verifying compliance with this provision.

The lists include among others, chemical resistant suits/gloves, rubber boots, half-face respirators, goggles, tarp and cords, plastic bags, shovel and pail, bag of lime, dry chemical fire extinguisher, absorbent materials, tape, traffic cones, flares, first aid kit, and a highway emergency response guide. They also have provided their operators with portable hydrogen cyanide gas (HCN) monitors. Degam has 13 HCN units, and Nieto has 8. Each transporter has maintained, tested, and calibrated their HCN monitors every 6 or 12 months as recommended by the manufacturers for the various brands in use. Depannage Laboratory have calibrated the monitors; a laboratory accredited by the Mexican Entity for Accreditation (EMA). The auditor reviewed calibration certificates for the recertification period to verify compliance.

The emergency equipment and PPE list for the Cyplus Idesa brigades in Ciudad Obregon, include the same items as the transporters, plus specialized equipment such as self-contained breathing apparatus (SCBAs), sampling supplies (pH strips, cyanide test kits),

portable shower, oxygen tanks, cyanide antidotes, tools, etc. Brigade members also have portable HCN monitors that have been calibrated as described above.

The emergency response equipment identified in the transporters ERPs is inspected and tested regularly so that it will be available in good working order when needed for use. Both Nieto and Degam ERPs require to check emergency equipment as part of the pre-trip inspection process. Among the control measures adopted, the ERPs addresses to perform inspections to the emergency equipment before loading the truck. Checklists are used to verify that it is available prior the shipment departure and it is kept in the operation file. The auditor reviewed these records verifying that they check the equipment to be in good working order during transport of cyanide.

The Cyplus Idesa brigades in Ciudad Obregon have implemented inspections of their emergency response equipment to ensure it is available when required. The auditor reviewed examples of inspections from the recertification period to verify compliance.

Cyplus Idesa as the consignor, exercises control over its subcontractors. Cyplus Idesa annually sends the trucking companies a questionnaire on Code-compliance, based on the ICMI Transportation Verification Protocol, including questions to related to emergency response personnel and the necessary resources for emergency response. The auditor reviewed examples of these questionnaires from Degam and Nieto verifying compliance.
The transporters do not subcontract any cyanide handling or 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
	☐	in substantial compliance with	
	☐	not in compliance with	

Cyplus Idesa, Degam and Nieto have procedures and current contact information in their ERPs for necessary internal notification and external notifications in the event of a cyanide emergency during transport. Current contact information lists include names and telephones number of the transporter's personnel, the shipper, the receiver (mining clients), regulatory agencies, medical facilities, ambulances, police, firefighters and potentially affected community's information. The operators for each trucking company carry their respective ERPs with the contact procedures and lists.

In case of an emergency, the driver will immediately communicate with the transporter´s headquarters, who in turn will give notice to the consignor. Likewise, they will communicate SETIQ who will coordinate with Cyplus Idesa, external responders' agencies such as firefighters, hospitals and police delegations, and communities. The auditors reviewed the

transporters notification and contact information verifying compliance with this provision.

The transporters have systems in place to ensure that emergency contact information is kept current. These are provisions in the Emergency Response Plan for annual or more frequent review of the entire Plans, and a specifical requirement to periodic updating of contact information by mean of testing each contact number on a regular basis. The auditor reviewed the ERPs verifying its implementation through review of documentation as updated telephone list and by mean of interviews with the transporter's personnel.

Cyplus Idesa, Degam and Nieto ERPs require to notify the ICMI in case of cyanide emergency that constitutes a "significant cyanide incident" as defined in the Code's Definitions and Acronyms document.

On January 10, 2022, on the Yecora - Chihuahua highway kilometer 360, on the Las Gallinas bridge, a Degam van with 12 tons of sodium cyanide overturned, leaving the vehicle on the side of the river. Most of the product was spilled onto the truck's platform.

The carrier reported the incident indicating that the operator was injured and that there was a spillover without reaching the river. Operators placed a tarp over the material to prevent moisture and the river from causing the cyanide to react, in addition to cordoning off the area 50 meters around.

The emergency was attended by the Cyplus Idesa brigades based in CDO and the transporter Degam, who collected the spilled product and decontaminated the place. During the work that lasted three days, they also received support from Temosachi Municipal Civil Protection, State Civil Protection and Pineda Cranes. Cyplus Idesa was in permanent communication with Civil Protection and the Federal Attorney for Environmental Protection (PROFEPA). The ICMI was notified regarding this incident.

Transport Practice 3.4

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

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

The ERP for Cyplus Idesa includes procedures for the brigades stationed in Ciudad Obregon to remediate spilled cyanide. Remediation consists only of recovery of product and removal of impacted soils; no chemicals would be mixed or used.

Impacted soils are to be excavated until spilled material is no longer encountered based on testing with a field test. Recovered product and/or removed soils are to be placed in proper

labelled containers and then disposed at a mine or in accordance with environmental regulations.

The ERPs for Degam and Nieto role to notification, isolation of the area, keeping people away, and if safe to do so, covering spilled materials with a tarp. SETIQ would oversee overall response coordination, and once the Cyplus Idesa brigade arrives, that brigade would be responsible for remediation as described above.

The ERPs for Cyplus Idesa, Degam and Nieto explicitly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The auditor reviewed the transporter's ERPs and interviewed its supervisors, confirming their knowledge with this provision.

Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed

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

The ERPs for Cyplus Idesa, Degam and Nieto requires to review, evaluate and update the ERP as necessary to account for changes in potential release scenarios and necessary response actions that can vary over time for a variety of reasons, including changes to transport routes, changes to the form of cyanide transported, and changes to the types of transport equipment used. The auditor evaluated the processes and its implementation reviewing the ERPs past versions. All changes are documented and confirmed through interviews with the transporter's supervisors.

All the ERPs states to perform periodically mock emergency drills, with the purpose of evaluating the effectiveness of the Plan and correcting the anomalies found. Requires a report to be issued for each drill describing the exercise itself, who participates, the type of scenario, the basic actions taken, strengths and weaknesses. Within the same report, a sequence of actions will be made based on the time recorded, serving this report as a means of continuous improvement of the ERP.

The Cyplus Idesa ERP does not include a provision for periodically conducting mock drills; however, Cyplus Idesa has in fact held mock drills as explained below. The auditor reviewed the following reports for drills as evidence. Cyplus Idesa evaluated all drills where findings were followed with corrective actions until closed.

Mock drill with sodium cyanide during the loading of Degam transport units in Cyplus Idesa Obregón Warehouse (CDO), in February 2019, with the participation of 14 workers from Cyplus Idesa and Degam. They simulated the forklift punch a cyanide box, which activates the emergency response plan for spill and exposure with cyanide to a Degam operator.

Report of the cyanide drill in the port of Mazatlán on November 27, 2020. A truck hits a cyanide container, causing HCN gas emanations, evacuating 42 workers from the maritime terminal. At the same time, the operator is injured and intoxicated.

Report of the cyanide drill in the port of Salina Cruz in September 2021 with six participants. The simulation with sodium cyanide was carried out in the port, where a truck hit a container, spilling 50 kilograms of solid sodium cyanide. The port department notifies its emergency response brigades to carry out the spilled cyanide collection activities. The collected material is treated according to the indications of Cyplus Idesa for proper final disposal. After decontaminating the brigades, the drill ends.

The ERPs for Cyplus Idesa and Nieto states they should be reviewed and evaluated following any incident that triggers its activation. No revision has been done in this regard as no cyanide transportation emergency was reported to in this recertification period.

Review of Due Diligence Reports

Exhibit A - Port of Mazatlán

Review of Due Diligence Report for Port of Mazatlán

This review of the due diligence report prepared on March 1, 2022, by Cyplus Idesa for the Port of Mazatlán, as required by the ICMI. The Port of Mazatlán is part of the Cyplus Idesa México Supply Chain.

Bruno Pizzorni, Cyanide Code lead auditor and transportation technical specialist, reviewed the due diligence report prepared by Mr. Fernando Rodriguez, the Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain.

This review was performed in accordance with ICMI Auditor Guidance for the Use of Cyanide Transportation Protocol from June 2021.

Port of Mazatlán

The Port of Mazatlán is located on the west coast of México in the State of Sinaloa. According to the website at http:// https://www.puertoMazatlán.com.mx, the port can service containers, as well as bulk and general cargo. Facilities include six berths with a length of 1,300 meters and a total facility area of 16.6 hectares. Equipment involved in cyanide handling includes two fixed cranes and reach stackers. The port holds certification on ISO 9001:2015, ISO 14001:2015, *Distintivo de Garantía de Sustentabilidad* (Sustainability Guarantee Badge), *Igualdad Laboral entre Hombres y Mujeres* (Labor Equality between Men and Women), and on *Calidad Ambiental Turística* (Tourism Environmental Quality)

Please refer to Exhibit A of this report for the Due Diligence Report for the port of Mazatlán performed by Cyplus Idesa.

Conclusion

Based on the evidence provided by CyPlus, this due diligence review did not find significant issues of concern regarding the Port of Mazatlán handling of sodium cyanide product. The review was based on information provided by CyPlus Idesa from their inspection of the port, as well as publicly available information.

Exhibit B - Port of Salina Cruz

Review of Due Diligence Report for Port of Salina Cruz

This review of the due diligence report prepared on March 9, 2022, by Cyplus Idesa for the Port of Salina Cruz, as required by the ICMI. The Port of Salina Cruz is part of the Cyplus Idesa México Supply Chain.

Bruno Pizzorni, Cyanide Code lead auditor and transportation technical specialist, reviewed the due diligence report prepared by Mr. Fernando Rodriguez, the Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain.

This review was performed in accordance with ICMI Auditor Guidance for the Use of Cyanide Transportation Protocol from June 2021.

Overview of the Port of Salina Cruz

The port of Salina Cruz, Oaxaca, is located in the northern part of the Gulf of Tehuantepec, in the Pacific Ocean. It is listed as a port of height and cabotage. The port has infrastructure and equipment for handling containerized cargo, agricultural bulk, mineral bulk and oversized general cargo. Classified as an operating port, it is through its facilities that commercial cargo is mobilized from the south and southeast region of the country.

According to the website at https://www.puertosalinacruz.com.mx, the port can service containers, as well as bulk and general cargo. Equipment involved in cyanide handling includes three fixed cranes and one reach stacker. The port can service containers, as well as bulk and general cargo. Equipment involved in cyanide handling includes fixed cranes and one reach stacker. The Port holds the following certificates: ISO 14001, ISO 9001, ISSP (International Ship Security Certificate) and *Igualdad Laboral* (Labor Equality).

Please refer to Exhibit B of this report for the Diligence Report for the port of Salina Cruz performed by Cyplus Idesa.

Conclusion

Based on the evidence provided by CyPlus, this due diligence review did not find significant issues of concern regarding the Port of Salina Cruz handling of sodium cyanide product. The review was based on information provided by CyPlus Idesa from their inspection of the port, as well as publicly available information.

Exhibit C - Navemar Maritime Carrier

Review of Due Diligence Report for Maritime Transporter Navemar

This review of the due diligence report prepared on November 29, 2021, by Cyplus Idesa for the shipping agent Navemar, as by the ICMI. Navemar is part of the Cyplus Idesa México Supply Chain.

Bruno Pizzorni, Cyanide Code lead auditor and transportation technical specialist, reviewed the due diligence report prepared by Mr. Fernando Rodriguez, the Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain.

This review was performed in accordance with ICMI Auditor Guidance for the Use of Cyanide Transportation Protocol from June 2021.

Maritime Transporter Navemar

Navemar operates since 1962, with activities as a port shipping agent in Veracruz. It currently has offices in the main ports of Mexico with nationwide coverage. Navemar provides diverse types of services such as regular shipping services, maritime chartering, ground services, port agency and integrated logistics.

Maritime transport of solid cyanide in 1-ton Intermediate Bulk Containers (IBC) along the west coast of México begins at the Port of Salina Cruz, Oaxaca, and terminates at the Port of Mazatlán. The IBCs are wooden with interior polypropylene sacks. Isotanks are not shipped by sea. The trip between Salina Cruz and Mazatlán takes several days. CyPlus Idesa has contracted to Navemar to arrange shipping with a dedicated service of a single ship.

Please refer to Exhibit C of this report for the Diligence Report for Navemar performed by Cyplus Idesa.

Conclusion

Based on the evidence provided by CyPlus, this due diligence review did not find significant issues of concern regarding Navemar sea carrier handling of sodium cyanide product. The review was based on information provided by CyPlus Idesa from their due diligence report, as well as publicly available information.

Exhibit D – Addendum: Ferromex Rail Carrier

Review of Due Diligence Report for Rail Transporter Ferromex

Operational and Audit Information for Rail Carrier Ferromex

Cyplus Idesa started transporting cyanide by railroad with Ferromex on January 14, 2023. A due diligence Investigation of rail Ferrocarril Mexicano S.A de C.V. (Ferromex) was conducted on March 2, 2023, by the Environmental Health, Safety and Quality (EHSQ) chief of Cyplus Idesa Mexican Supply Chain (Cyplus Idesa), as Ferromex railroad transportation was included into this cyanide supply chain.

Ferromex was formed in 1997 by a group which includes Grupo Mexico and the Union Pacific Railroad. Ferromex is a private rail consortium that operates the largest (by mileage) railway in Mexico and is part of the North American Class I railroads.

At the time of this due diligence, cyanide shipments in sea containers through Ferromex rail were being routed from Diselo rail terminal at Coatzacoalcos, Veracruz, until Ferromex terminal at Ciudad Obregón, Sonora.

Excellence Freights, an ICMI certified trucking company, transports cyanide from the production plant to Diselo rail terminal, about 50 km away. Then comes the route section by rail of approximately 683 km to Ciudad Obregón Ferromex terminal, where cyanide is unloaded directly onto the truck platforms of Nieto or Degam for unloading in Cyplus Idesa Distribution Center at Obregón (CDO).

Cyplus Idesa EHSQ chief conducted the due diligence investigation for Ferromex on March 2, 2023, at Ciudad Obregon rail terminal with participation of the safety officer and the commercial representative from Ferromex, and on March 20 at Diselo terminal in Coatzacoalcos. As part of that investigation, the rail partner was asked to fill out a questionary customized Cyanide Code Due Diligence protocol and participate in interviews held.

According to information provided by the EHSQ chief of Cyplus Idesa Mexican Supply Chain in both rail terminals, cyanide transfer in sea containers from truck to train and vice versa, take place within a brief period of time (hours); the cyanide shipments depart before 24 hours on its arrival to the rail terminals. Therefore, as stated in the ICMI Guidance for Use of the Cyanide Transportation Verification Protocol from June 2021, none of these rail terminals are “trans-shipping depot”.

The information contained in this section of the report was gathered from the filled-out protocols, a review of information from Cyplus Idesa´s due diligence for Ferromex and interviews with Cyplus Idesa personnel. Transport Practices 1.2 through 1.6, 2.1 and 3.1

through 3.5, as appropriate, have been applied to evaluate the Cyplus Idesa due diligence report conducted for Ferromex.

Conclusion

The due diligence investigation has been performed so that it can reasonably be concluded that Ferromex rail carrier used by Cyplus Idesa for sodium cyanide shipments are in full compliance with the International Cyanide Management Code.

Ferromex - Cyanide Transport Practices Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

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

Ferromex maintains a mapping of the railway network, has route options for social situations that impede the advance of the railway. These options are based on decision making at the time of the contingency. Due to local regulations, the transport of hazardous materials has priority of advance.

Transport Practice 1.2:

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

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

Interviews with Cyplus Idesa EHSQ chief confirmed that Ferromex provide employees with hazardous material training, chemical compatibility training, and emergency response training. Although no railroad training files are maintained by Cyplus Idesa, information in the form of completed Code surveys / audit protocols regarding the safety practices of the

Ferromex is maintained on file. Cyplus Idesa contacted the rail partner in March 2023 to confirm information and update the completed Cyanide Code protocol maintained on file.

Ferromex has a policy of zero tolerances in substance consumption, in case of occurrence, the employee will be definitively separated from the company.

Ferromex' s operational staff has received training in hazardous materials, emergency plans with hazardous materials and training involving the authorities. In September 2022 Cyplus Idesa delivered training in sodium cyanide, they have scheduled a training in cyanide for 2023.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Ferromex loads two 20-foot sea containers with cyanide on each rail platform, which have been designed to transport sea containers and are maintained periodically. Ferromex does not open sealed containers during transport. Ferromex physically and remotely monitors rails and wagons to detect anomalies through instruments located along the tracks. Rails and wagons are periodically inspected and taken out of service when necessary. Cyplus Idesa ensures authorized packaging is used for the solid sodium cyanide.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Cyplus Idesa has confirmed that Ferromex maintains suitable safety programs. Ferromex confirmed during the due diligence evaluation that the railroad provide its employees with hazardous material training, chemical compatibility training, and emergency response training. The railroad also has programs for checking rail condition to ensure safe transportation of goods.

Cyplus Idesa supervises cyanide shipments for which it applies its cargo securing

procedures, placing UN 1689 signs on containers in case any are missing. In the employment contract with Ferromex, as indicated in the due diligence evaluation, it is indicated that Ferromex must comply with local regulations NOM-087-SCT-2-2017 section Railway and Multimodal Development, which establishes driving times and breaks for drivers of federal motor transport services.

Ferromex carries out cargo inspections before leaving the Diselo terminal to ensure compliance. Ferromex performs preventive maintenance on its equipment in accordance with its equipment maintenance program. It has procedures that indicate the monitoring activities of roads where social disturbances and weather conditions can be identified. Its staff undergoes periodic medical and drug screening examinations.

By review of the completed Cyanide Code protocol information, the auditor confirmed that the railroad is in compliance with governmental regulations.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Cyplus Idesa reviews all shipping papers for rail transportation including the equipment type used. Seal numbers are recorded on the bills of lading and other shipping papers. This enables personnel along any portion of the segment to confirm that the containers have not been opened. When the warehouse receives the product, the seal numbers are verified against the packing list. Quality inspection also takes place at the destination, at which point any discrepancies or damages would be noted.

Ferromex monitors cargo using GPS and tracks railcars using web-enabled tracking web sites. Cyplus Idesa is able to monitor railcar status, tracking information is available at any moment.

Ferromex has radio communication, in addition to cellular telephony. They have the telecommunications area who guarantee the operation of this equipment.

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
	☐	in substantial compliance with	
	☐	not in compliance with	

Interim storage activities in this railway route, as defined by ICMI, do not take place. According to information provided by the EHSQ chief of Cyplus Idesa Mexican Supply Chain in both rail terminals, cyanide transfer from truck to train and vice versa, take place within a brief period of time (hours); the cyanide shipments depart before 24 hours on its arrival to the rail terminals. Therefore, as stated in the ICMI Guidance for Use of the Cyanide Transportation Verification Protocol from June 2021, none of these rail terminals are "trans-shipping depot".

There is no planned interim storage of cyanide on the rail segments. Trans-shipping depots and rail yards are maintained by the railways. An interview with the EHSQ chief of Cyplus Idesa confirmed that hazardous cargo is moved from point to point as quickly as possible and that personnel have received training in the segregation of hazardous materials.

All Cyplus Idesa package types used for solid sodium cyanide conform to International Maritime Organization (IMO) and US DOT requirements. Seals are checked upon arrival and any instances of a security breach would be detected at that point.

This Transport Practice does not apply to this transport operation.

Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Cyplus Idesa has an Emergency Response Plan that applies to all transportation incidents. Ferromex representatives have participated in Cyplus Idesa safety meetings. Cyplus Idesa has also transmitted its emergency response information to the railroad.

Ferromex has a general safety program that includes accident prevention plans, emergency plans and remediation plans. According to the due diligence questionary reviewed, Ferromex has a documented risk management system; they have an overall emergency plan for the company which is available to all employees; they confirm that employees are trained to respond to accidents; employees are familiar with the emergency plan; they have emergency equipment for personal protection and accident control and are frequently reviewed; safety data sheets related to the substances they transport are available and easily accessible; have designated key persons who will lead an emergency; and have a crisis management plan.

Cyplus Idesa would be contacted immediately to jointly address the contingency based on experience and knowledge of sodium cyanide. If necessary, the authority and its relief agencies are involved in accordance with what is indicated in the procedure.

Transport Practice 3.2

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

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

Ferromex reported that they contract with a professional remediation firm that would assist

in the case of a spill needing remediation. Ferromex has an agreement with Grupo Hesca, which is a contractor company specialized in dealing with chemical emergencies nationwide. Cyplus Idesa and Ferromex will conduct training with Grupo Hesca as soon as possible on the safe handling of cyanide.

Cyplus Idesa personnel confirmed that they would travel immediately to any site where Cyplus Idesa material had been spilled. Cyplus Idesa has established its confidence in the Ferromex' s abilities to respond to an emergency through interacting with them through safety communications and meetings. Cyplus Idesa and the railroad interact on a regular basis in regard to environmental and safety matters.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Cyplus Idesa ensures emergency contact information (telephone number), and initial response information is clearly identified on every shipping paper for each shipment of sodium cyanide. Interviews confirmed that contact information, notification, and reporting requirements are kept up-to-date and apply to emergencies that may occur during a rail incident.

Ferromex is affiliated to ANIQ (National Chemical Industry Association) and to SETIQ (Transportation Emergency System for the Chemical Industry) and participates in the hazardous materials committee of Sonora. There is an emergency care committee. The customer service area will be the one who contacts the owner of the merchandise. The relief agencies would be contacted by the committee based on the diagnosis of the situation.

Transport Practice 3.4

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

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

Cyplus Idesa product stewardship personnel and environmental personnel are involved in developing comprehensive environmental plans in the event of an on-site spill. In the event of an off-site spill, Cyplus Idesa emergency response personnel will be sent to the scene. Cyplus Idesa coordinates clean-up efforts with professional remediation services. Ferromex has an agreement with Grupo Hesca, which is a contractor company specialized in dealing with chemical emergencies nationwide. Cyplus Idesa cyanide experts will coordinate any remediation with the remediation service.

Ferromex has an environmental insurance policy. In case of carrying out remediation work, these works will be coordinated with PROFEPA (Federal Attorney for Environmental Protection) in accordance with current national legislation.

The Cyplus Idesa emergency response procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The cyanide safe handling training provided to Ferromex indicates that these chemicals should not be used. Cyplus Idesa experts are very aware of the additional hazards of cyanide treatment chemicals and they would communicate these hazards to necessary personnel in the event of a spill.

Transport Practice 3.5

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

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

Cyplus Idesa emergency plans are practiced and reviewed at least annually. Ferromex emergency response plan is reviewed periodically and if there is any contingency situation, any area for improvement or drills. Annual drills are conducted for the different hazardous materials. Ferromex drills are also held in cooperation with the government. The results of the drills are reviewed and improvements are made, as necessary. Safety conferences are

held with the rail carrier periodically. The adequacy of emergency preparedness plans is one of the topics discussed at these conferences.

Exhibit E - Port of Veracruz

Review of Due Diligence Report for Port of Veracruz

As required by the ICMI, the auditor assessed the due diligence report performed by the ESHQ Chief of Cyplus Idesa Mexican Supply Chain to the Port of Veracruz in February 2024. The Port of Veracruz is part of the Cyplus Idesa Mexican Supply Chain. This review was performed in accordance with the ICMI Guidance for Use of the Cyanide Transportation Verification Protocol from June 2021.

Solid sodium cyanide packed into intermodal shipping containers is shipped from the Port of Veracruz in Mexico using the ocean carriers Hapag-Lloyd by mean of the shipper agency ROVESA. The cyanide is received at the Port of Cortez in Honduras, where picked up by transportation companies that have either contracted to the mine site to which they are delivering. The port in Honduras and road transportation in the destination country is outside the scope of this certification audit activity.

Cyplus Idesa and ROVESA, its shipping agency, performed a formal on-site ICMI Code due diligence investigation of the Port of Veracruz .

The port evaluation process involves an on-site review of environmental, health, safety, and security practices. Road infrastructure to and from the port, as well as port experience with handling dangerous goods is also evaluated.

The auditor concluded that Cyplus Idesa demonstrated and planned due diligence activities are appropriate for confirming that the port has appropriate safety, security, and road infrastructure prior to being approved by Cyplus Idesa for dangerous goods shipments.

In addition to Cyplus Idesa efforts to ensure that ICMC requirements are fulfilled, there are many agencies charted with the task of confirming 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, new 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. In the United States the Port Facility Security Plans are filed with, and monitored by the United States Coast Guard, the U.S. authority with jurisdiction over U.S. Ports.

Port of Veracruz

The port of Veracruz is located on the east coast of México in the state of Veracruz. The port is located at Avenida Marina Mercante No 210 C. P 91700. Col. Centro. Latitude: 19° 12′ 30" North. Longitude: 096° 08′ 00" West.

According to the website at https://www.puertodeveracruz.com.mx/, the Port can service containers, as well as bulk and general cargo. The facility has a capacity of more than 34,000 TEUS (Twenty-foot Equivalent Unit), a measurement unit used in foreign trade to calculate the carrying capacity of containers. This seaport is considered the best and busiest in Mexico. The Port has more than 30 cranes.

The Port is administrated by the National Port System Administration (ASIPONA Veracruz). It began operations on February 1, 1994. The federal government granted it a concession to manage the port facilities for 50 years, which has already extended for another 50 years. It is a Variable Capital Corporation. It Operates under a Master Port Development Program and an Annual Operational Program.

The facility has implemented the International Standardization Organization (ISO) standards 9001-2015 Quality management; ISO 14001-20015 Environmental management; ISO 28000 Security and resilience, and ISO 45001 Occupational health and safety, among others.

The facility has implemented the International Ship and Port Facility Security (ISPS) Code, which went into effect on 1 July 2004. The concept of this 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. In the United States the Port Facility Security Plans are filed with, and monitored by the United States Coast Guard, the U.S. authority with jurisdiction over U.S.

Ports.

The internal influence area of the port covers about 19 states in the country; externally they serve more than 27 shipping lines that travel 54 maritime routes around the world, connecting with the rest of the American continent and the European, Asian and African continents. The strategical location of the Port of Veracruz enables it to have connectivity with the country´s primary consumer centers through road and railroad transportation. It is the only port in Mexico that has two railway lines within its premises: Canadian Pacific Kansas City and Grupo México Transportes which includes Ferrosur and Ferromex.

Conclusion

Based on the evidence provided by Cyplus Idesa, this due diligence review did not find significant issues of concern regarding the Port of Veracruz handling of sodium cyanide product. The review was based on information provided by CyPlus Idesa from their inspection of the port, as well as publicly available information.

Exhibit F – Hapag-Lloyd Shipping Company

Review of Due Diligence Report for Hapag-Lloyd Shipping Company

Cyplus Idesa by mean of its shipping agency ROVESA, ships its solid sodium cyanide on main line ocean carrier Hapag-Lloyd that meets recognized Environmental, Health, and Safety (EHS) standards and that is experienced in the handling of dangerous goods. The ocean routes are chosen by the ocean carrier. According to Cyplus Idesa, the ocean carrier used for cyanide shipments undergo a Due Diligence review of their ability to fulfill ICMI Code requirements.

A due diligence assessment was conducted for the ocean carrier Hapag-Lloyd and Port of Veracruz included in the scope of the Cyplus Idesa Mexican Supply Chain.

Hapag-Lloyd - Cyanide Transport Practices Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

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

Ocean routes are chosen by the ocean carrier and are regulated by a number of international organizations. When Cyplus Idesa plans a specific shipping route to an ICMI Signatory Mine, it evaluates the route that will be taken from production to mine site. This route evaluation includes the selection of the most appropriate destination port and then the selection of an ocean carrier with hazardous material handling capabilities.

According to interviews, Cyplus Idesa gives strong preference to ocean carriers that have already found to be compliant with ICMC requirements through an ICMC Due Diligence assessment. Preference is also given to direct shipping lanes that do not involve a transfer of the cargo to a different ship. Ports that have been found to be acceptable are chosen based on proximity to end customer, experience handling hazardous materials safely,

security of the port, emergency response capabilities, and road infrastructure to the port. Only in cases where a closer port has unacceptable infrastructure or security is the shipment routed using a longer over-the-road segment.

Transport Practice 1.2:

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

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

According to the responses to a questionnaire modeled after the ICMC Transportation Protocol, the ocean carrier reported that it complies with International Maritime Organization (IMO) requirements and is in compliance with International Maritime Dangerous Goods (IMDG) and U.S. 49 Code of Federal Regulations (CFR) requirements concerning the transportation of the hazardous materials, including the training of employees.

Intermodal moves once the shipment reaches the port are controlled by the ocean carrier. The ocean carrier reported they train their personnel on hazardous materials handling. Information from the carrier also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Cyplus Idesa has a contractual agreement with ROVESA, its shipment agency who in turn has contractual agreement with all of its ocean carriers that require that they comply with the regulations regarding the safe and appropriate shipping of dangerous goods. Part of the U.S. Department of Transportation Hazardous Materials Registration and Safety of Life at Sea regulatory processes addresses the use of safe and appropriate equipment.

Cyplus Idesa ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during this audit and were found to be compliant. Intermodal shipping container loading procedures and inspection checklists were reviewed during the audit. Cyplus Idesa personnel ensure that all equipment is safe for transport prior to shipment of the cargo. Employees showed good awareness of requirements for ocean shipments.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

The ocean carrier reported they train their personnel on hazardous materials handling. In their response to the ICMC Due Diligence protocol, they reported that they have safety programs which are mandated by international laws. Formal safety, environmental, emergency response, and auditing programs apply to all employees aboard ocean vessels.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

Cyplus Idesa ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance. Hapag-Lloyd was asked for information regarding fulfillment of ICMC requirements using a customized ICMC transportation protocol. Responses and information provided by the carrier was deemed to be appropriate by the ICMC Lead Auditor.

The ocean routes are chosen by the ocean carrier. The destination ports are evaluated via an on-site evaluation when the port is under consideration to receive cyanide by an ICMI Signatory Mine. Records were available during the audit to demonstrate that all ports within the supply chain had undergone such an on-site evaluation and had been found to be compliant with ICMC Due Diligence requirements.

As recommended by the ICMI Guidance for the Use of the Cyanide Transportation Verification Protocol, specific information regarding this practice is addressed below:

a) The Cyplus Idesa packaging specifications were reviewed as part of the ICMC audit and were found to be conformant to the packaging requirements of the IMDG Code.

b) Packaging was reviewed during the audit of Cyplus Idesa operation, responsible for loading intermodal shipping containers. Packages and shipping containers were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.

c) Packaging was reviewed during the audit of Cyplus Idesa operation responsible for loading intermodal shipping containers. Packages and shipping containers were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.

d) Loaded intermodal shipping containers were evaluated and were found to be marked and placarded in accordance with the IMDG Code.

e) Shipping documents were reviewed for sample of cyanide. All information required by the IMDG Code is required as standard practice on Cyplus Idesa shipping paperwork.

f) The container packing certificates shipments were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMDG Code requirements.

g) Cyplus Idesa confirmed through its due diligence assessment that the ocean carrier use detailed stowage plans for the placement and safe transportation of all hazardous materials, including sodium cyanide shipments.

h) Cyplus Idesa confirmed through its due diligence assessment that the ocean carrier has cyanide emergency response information available on board of each vessel, as required by Section 5.4.3.2 of the IMDG Code.

i) Cyplus Idesa confirmed through its due diligence assessment that the ocean carrier complies with stowage and separation requirements of Part 7 of the IMDG Code. This includes the requirement that sodium cyanide be stored separately from acids, strong oxidizers, and explosives.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

The ocean carrier reported that they have computer systems that are used for the tracking and management of all freight containers within their system. The management systems provide among other items the date, time, location, and carrier involved in the last interchange, transport action, or gate move. Cyplus Idesa freight forwarder has access to this information via the internet web sites. Cyplus Idesa can request this information at any time. This was confirmed through a sampling approach during the audit.

The sodium cyanide shipments for this segment are containerized loads of bag-in-box packages shipping containers. All shipping containers are sealed. Shipping papers were reviewed. The auditor confirmed that seal numbers are recorded on the bills of lading. This enables personnel along any portion of the segment to confirm that the containers have not been opened.

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
	☐	in substantial compliance with	
	☐	not in compliance with	

Both the ocean carrier and the shipping agency s reported that during transport, the storage of cyanide both on land and on vessels is in accordance with the applicable stowage and segregation requirements in the IMDG and the Coast Guard 33 CFR regulations when in the United States. The terminal must segregate containers similar to the segregation onboard vessels.

Safety checklists and seals are used by Cyplus Idesa personnel when the shipping containers are loaded. The seal enables verification that the container was not opened during transit.

The Port of Veracruz is within the scope of this Addenda and has been evaluated for its ability to handle hazardous materials safely. The port is confirmed to be secure with appropriate roadway and rail infrastructure into the port. Completed port due diligence checklists and reports were reviewed. Records were complete and acceptable.

Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

The ocean carrier reported that they have emergency response plans in place which include the prompt notification of all involved parties. Cyplus Idesa provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carrier confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. The ocean carrier provided information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. The ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

Transport Practice 3.2

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

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

The ocean carrier contract with professional emergency response contractors for landside emergencies. Onboard vessels, the emergency response would be conducted by trained

crew members with shore side support and guidance.

Cyplus Idesa offers immediate technical assistance for any cyanide spill and offers emergency resources for spills that might occur near a Cyplus Idesa site in Mexican territory. Cyplus Idesa contracts with a global emergency response service provider to ensure that appropriate notifications and emergency response is initiated if there is an incident.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

The ocean carrier has emergency response plans in place which include the prompt notification of all involved parties. Cyplus Idesa provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carrier confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. The ocean carrier is certified by third-party auditing organizations for environmental, health, and/or safety programs. The ocean carrier response confirmed that emergency response planning is an integral part of these programs.

Transport Practice 3.4

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

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

The ocean carrier response confirmed that they would communicate with Cyplus Idesa cyanide experts in the event of a spill. Cyplus Idesa bans the use of cyanide destruction chemicals for cyanide spills into 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
	☐	in substantial compliance with	
	☐	not in compliance with	

The due diligence questionnaire response from the ocean carrier confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. The ocean carrier provided information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. The ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

Exhibit G – Third Addendum - Puerto Cortés, Honduras

Mr. Eric Schwamberger
International Cyanide Management Institute (ICMI)
1400 Street, NW – Suite 550 Washington DC 20005 United States of America

August 11, 2024

Addenda for the CyPlus Idesa Mexican Supply Chain: Inclusion of Puerto Cortés in Honduras

Dear Sir

On behalf of CyPlus Idesa, Cyanide Auditors S.A. was commissioned to review the due diligence (DD) assessment report carried out on Puerto Cortés, Honduras. The port, operated by Operadora Portuaria Centroamericana S.A. de C.V. (OPC), performs stevedoring activities for Cyplus Idesa Mexican Supply Chain receiving solid sodium cyanide in 20 feet sea containers, for Aura Minerals' San Andrés Mine in Copán Honduras.

This letter is to confirm that Bruno Pizzorni, Cyanide Code registered auditor, reviewed the DD assessment report which will be used as a basis for the addition of OPC to ICMI certified Cyplus Idesa Mexican Supply Chain. The report concluded that the port operation is in alignment with the ICMI Cyanide Code requirements.

The DD assessment was carried out by Cyplus Idesa on Puerto Cortés by Mr. Fernando Rodriguez, the Environmental, Safety, Health and Quality (ESHQ) Chief from Cyplus Idesa Mexican Supply Chain, after his site in Puerto Cortés on July 17, 2024, performed in accordance with the requirements of the ICMI´s Cyanide Transportation Protocol.

The DD assessment resulted positive and the auditor confirms that OPC´s operations at Puerto Cortés are suitable for the receipt and dispatch of solid sodium cyanide transported in sea containers. The results of the DD questionary from Cyplus Idesa are included in Appendix A.

Should you require any additional information, please do not hesitate to contact me.

Best regards,

Bruno Pizzorni
Lead Auditor / Senior Consultant
Cyanide Auditors S.A.

Due Diligence Assessment Contact Information

Fernando Rodriguez	Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain.
Contact information	C: + 55 3139 8107 E-mail: frodriguezr@cyplusidesa.com

Review of the Due Diligence Assessment Report on Puerto Cortés, Honduras and Conclusion

A due diligence (DD) assessment was prepared by Mr. Fernando Rodriguez the Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain, based on his visit to Puerto Cortés, Honduras, on July 17, 2024, as required by the International Cyanide Management Institute (ICMI), because Puerto Cortés is included in the Cyplus Idesa Mexican Supply Chain.

Bruno Pizzorni, Cyanide Code Lead Auditor and Transportation Technical Auditor registered in the ICMI´s List of Approved Auditor reviewed the due diligence report. This review was performed in accordance with the ICMI´s Auditor Guidance for the Use of Cyanide Transportation Protocol from June 2021.

Based on the evidence provided by CyPlus Idesa, this due diligence review did not find significant issues of concern regarding Puerto Cortés handling of sodium cyanide product. The review was based on information provided by CyPlus from their inspection of the port, as well as publicly available information.

The data evaluated from the due diligence resulted positive and the Auditor is confident that Puerto Cortés operations and infrastructure are suitable for the receipt and dispatch of solid sodium cyanide transported in sea containers. The port is authorized to receive dangerous goods. Equipment, security, and safety practices were found to be aligned with the Code requirements.

Personnel are trained in safe handling and operational practices such as the need to segregate incompatible materials and the need to carefully manage chain of custody paperwork and truck dispatch. Personnel have experience with handling sodium cyanide and this cargo is currently handled at the port. Dangerous chemical including sodium cyanide handling process, has been established and implemented in an effective manner. The port handles sodium cyanide along with other various types of chemicals. Personnel have been trained on general chemical safety.

The port is certificated in ISO 9001:2015, ISO 14001:2015, ISO 45001:2018. They have sufficient infrastructure to carry out maneuvers, including fixed cranes, mobile cranes, spreaders and forklifts among other equipment.

Puerto Cortés in addition to ISO´s certifications, maintains the certification of the International Ship and port Facility Security Code (ISPS Code), created by the International Maritime Organization IMO. This certification provides a regulatory and consistent frame to evaluate risks and avoid terroristic situations by using shipment.

According to the DD report, the road infrastructure to and from the port was found to be acceptable. The sea containers are not open and no specialized personal protective equipment is necessary at this location. The port is fenced and manned always. The solid sodium cyanide is packed in multiple layers of packaging within sealed sea containers.

The information that served as the basis for these conclusions is detailed below.

Puerto Cortés

Puerto Cortés is in the northwest and along the Atlantic coast of Honduras. It is the main port of the country with a capacity more than 1.8 million TEUS (twenty-foot equivalent unit) per year. The port handles 85% of shipment to Honduras, 10 % to El Salvador and 5% to Nicaragua.

It has the advantage of being in a well-protected natural bay of deep waters where the variation of the tides is insignificant, with a maximum fluctuation of 0.3 m. Northeast winds and shifting currents.

Puerto Cortés is located 40 minutes from the highway to the industrial city San Pedro Sula and 2 hours with the border of Guatemala, towards Puerto Barrios and Santo Tomas de Castilla. It has one of the most complete terminals of containers in the region.

It has six dock berths, of which docks 4, 5 and 6 have been concessioned to the Philippine ICTSI (International Container Terminal Services Inc.), which formed a partnership with Operadora Portuaria Centroamericana S.A. de C.V. (OPC).

Operadora Portuaria Centroamericana (OPC)

OPC - https://www.opc.hn/ is a group company of International Container Terminal Services, Inc. (ICTSI), a Philippine, multinational company in the business of acquiring, developing, managing and operating container ports and terminals worldwide.

On February 2013, ICTSI won the international bid for design, financing, construction, maintenance, operation, exploration of the specialized container and cargo terminal in Honduras. ICTSI was awarded a 30-year concession and established Operadora Portuaria Centroamericana S.A de C.V. to operate the terminal.

OPC has an integrated management policy in quality, environment, and health and safety, where among others it is committed to:

- "To prevent injuries, incidents and illnesses among its employees, customers, suppliers and visitors.
- Develop a strategy to ongoing identification of risks to the environment and occupational health and safety, through increased awareness, skills and competence of our staff culture.
- Respect the environment by preventing pollution and responsibly managing emissions to water, soil and air.
- Create an environment of communication, participation and consultation, integrating the entire company.
- Encourage staff participation in implementing CSR activities through the implementation of policies of social investment for the benefit of the environment, community and health."

Solid sodium cyanide is received at Puerto Cortés in 20 feet sea containers, and OPC crew directly loads the containers into trucks, one container per truck. No cyanide is stored at the port.

Infrastructure

Terminal area: current: 800 m lineal deck / 10.5 m depth. Future: 1,100 m lineal deck, 400 m general cargo + passengers, 14-15.50 m depth. Annual Capacity: circa 650,000 TEUS (2013), 1.8 Million TEUS (upon completion).

Equipment

- 4 Mobile harbor cranes
- 6 Spreaders (end 2014)
- 1 Ship to shore crane
- 3 Straddle carriers
- 29 Forklifts
- 58 Terminal tractors
- 62 Chassis
- 18 Reach stackers / 1 front loader

Puerto Cortés OPC Detailed Assessment Findings

Topic	Assessment Results
Port Security	• The port is surrounded with a fence and access to the port is strictly controlled. Security of the port was found to be consistent with ICMC requirements. • No public access is allowed. Gate pass system in place. Whole port vicinity fenced with controlled entrance - including access to office building. • Confirmation was made that the following practices are in place: 24/7 manned security; complete fence line; no public access; sealed (locked storage containers); security cameras. International Ship and port Facility Security Code ISPS certificate was verified. • Sea containers remain sealed and they are not open while at the port. • Truck driver credentials are checked and the driver's authority to receive cargo is confirmed prior to dispatch of the cargo. Material chain of custody records are maintained. The port uses a checklist and a defined process to dispatch cargo.
Safety & Training	• The port currently handles sodium cyanide. The auditor observed the discharge of 5 cyanide containers from the ship Blackpool Tower. • Personnel receive dangerous goods training on a recurring basis. Testing is done after the training to confirm understanding. IMDG (International Maritime Dangerous Goods) training is given to all operations personnel who handle hazardous cargo. • Forklift drivers and crane operators are trained each year to ensure safe equipment operations. Testing and refresher training are a part of the program. Records are maintained. • The port maintains a strict alcohol policy. This is communicated to all personnel and random alcohol testing is conducted regularly. • Confirmation was made during the audit that no eating, smoking, or open flames are allowed in areas where cargo is handled and stored. • OPC has a risk analysis program and take the appropriate operational controls. The managers and middle managers are responsible to detect unsafe acts and conditions. Risk analysis is performed for each job. • OPC maintains strict speed limits and controls.
	• Material handling equipment and handling practices were found to be excellent. Equipment appeared to be well-maintained. • Forklifts and cranes are rated for weights more than the typical 20 feet cyanide containers. Confirmation was made using data plates on the equipment versus shipping paperwork showing sea container weights. OPC standard is to use equipment only until its 80% of

Topic	Assessment Results
Material Handling & Storage **Material Handling & Storage**	load capacity. Cranes have an operation range due to bad weather and windy conditions. • Equipment is regularly maintained with a defined preventive maintenance program. Preventive maintenance is performed according to manufacturer's specifications. • All sea containers observed had appropriate UN (United Nations) labeling and cautionary markings. OPC does not allow cyanide containers in the port. • Dangerous goods cargo is stored using standard chemical compatibility management practices. • port personnel ensure that the truck driver inspects the truck prior to dispatch; port personnel check to make sure the container is securely loaded onto the trailer and that the container is sealed. Customs paperwork and a port checklist are used as part of the dispatch process. • OPC inspects containers to ensure their integrity and proper signaling. • The operation has procedures to manage risks such as falls to water, suspended cargo, containers doors opening during cargo, loading, stowage and lashing, and crane turning radiuses.

Emergency Response	• A written Emergency Response Plan (ERP) was available for the audit. It is reviewed and revised at defined frequencies. The ERP was maintained as a latest version and is under formal document control. • The roles and responsibilities of the Emergency Response Team are defined in the ERP. The ERP addresses actions to be taken in response to many different emergencies including spill, fire, and medical incidents. Contact information is kept up-to-date and revised as necessary. Emergency contact information is included for the Emergency Response Team members, local hospitals, and the local fire department. The information in the ERP was found to be acceptable. • OPC has permanent contact with the local fire department as they report in anticipation about any dangerous good arriving to the port. Fire fighters have complete emergency response equipment including self-contained breathing apparatus, spills containment material and proper training in emergency response. Firefighters will arrive in 6 minutes to the port. • OPC has a clinic that is open 24 hours a day, 7 days per week. They have an ambulance, a doctor and 3 paramedics. • Evacuation routes are clearly identified in maps posted along the port. They have 7 safe meeting points. • Emergency responders are trained at defined frequencies. Emergency drills are conducted regularly with all necessary

Topic	Assessment Results
	personnel (all people who would be expected to respond to the emergency). OPC performs periodically emergency response drills regarding falls to water, fire, general port evacuations and gas leaks and spill of dangerous goods, among others. • Appropriate emergency response equipment was available at the port as fire extinguishers and spill containment materials among others.

Exhibit H – Fourth Addition – Port of Guaymas, Sonora, México

Mr. Eric Schwamberger - Senior Vice President
ICMI
1400 I Street, NW
Suite 550
Washington DC 20005 USA

March 26, 2025

Fourth Addenda for the CyPlus Idesa Mexican Supply Chain: Inclusion of Port of Guaymas

Dear Sir

Cyanide Auditors S.A. was tasked with reviewing the Due Diligence (DD) Investigation report for the Port of Guaymas, Sonora, Mexico, on behalf of CyPlus Idesa. The port, operated by *Transferencias Portuarias del Pacífico S.A. de C.V.* (TPP), handles stevedoring activities for the Cyplus Idesa Mexican Supply Chain, receiving solid sodium cyanide in 20-foot sea containers.

This letter confirms that Bruno Pizzorni, a Cyanide Code registered auditor, reviewed the DD Investigation report for adding TPP to the ICMI certified Cyplus Idesa Mexican Supply Chain. The report concluded that the port operation meets the ICMI Cyanide Code requirements.

Cyplus Idesa's Fernando Rodriguez, ESHQ Chief, and Mario Martínez conducted a DD Investigation at the Port of Guaymas on October 29, 2024. The visit complied with ICMI's Cyanide Transportation Protocol requirements.

The DD Investigation was positive, and the auditor confirms that TPP's operations at Port of Guaymas can handle solid sodium cyanide in sea containers.

Should you require any additional information, please do not hesitate to contact me.

Best regards,

Bruno Pizzorni - Lead Auditor
Cyanide Auditors S.A.
Phone: +51 231-7317 | Cel: +51 947-259-440
E: bpizzorni@cyanideauditor.com

Due Diligence Assessment Contact Information

Fernando Rodriguez	Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain.
Contact information	C: + 55 3139 8107 E-mail: frodriguezr@cyplusidesa.com

Review of the Due Diligence Assessment Report on Port of Guaymas and Conclusion

A due diligence (DD) assessment was prepared by Mr. Fernando Rodriguez, the Environment, Safety, Health and Quality (ESHQ) Chief for Cyplus Idesa México Supply Chain, based on his visit to Port of Guaymas on October 29, 2024, as required by the ICMI. This port is being included in the Cyplus Idesa Mexican Supply Chain.

Bruno Pizzorni, registered as a Cyanide Code Lead Auditor and Transportation Technical Auditor on the ICMI's List of Approved Auditors, has reviewed the due diligence report. This review was conducted in accordance with the ICMI's Auditor Guidance for the Use of Cyanide Transportation Protocol from June 2021.

Based on the evidence provided by CyPlus Idesa, this DD review did not identify significant issues of concern regarding the Port of Guaymas handling of sodium cyanide product. The review was based on information provided by Fernando Rodriguez of CyPlus Idesa from the visit to the port, alongside publicly available information.

The evaluated data from the DD were positive, and the Auditor concluded that the operations and infrastructure at the Port of Guaymas are suitable for the receipt and dispatch of solid sodium cyanide transported in sea containers. The port is authorized to receive dangerous goods. Equipment, security, and safety practices were found to comply with the Code requirements.

Personnel are trained in safe handling and operational practices, such as segregating incompatible materials and managing chain of custody paperwork and truck dispatch diligently. Personnel have experience handling sodium cyanide, and this cargo is currently managed at the port. The handling process for dangerous chemicals, including sodium cyanide, has been established and implemented effectively. The port handles various types of chemicals. Personnel have received general chemical safety training.

The port is certified under ISO 9001:2015 and ISO 14001:2015 standards. It has adequate infrastructure for maneuvers, including fixed cranes, mobile cranes, spreaders, and forklifts, among other equipment.

The Port of Guaymas holds ISO certifications and the ISPS Code certification by the International Maritime Organization (IMO), ensuring a framework to assess risks and prevent terrorism via shipments.

According to the DD report, the port's road infrastructure is acceptable. Sea containers remain sealed, requiring no specialized protective equipment. The port is continuously fenced and guarded. Solid sodium cyanide is securely packed in multiple layers within sealed containers.

Details supporting these conclusions are provided below.

Port of Guaymas

Port of Guaymas is located on the Gulf of California in Sonora on Mexico's Pacific coast. The port, sheltered by an inside bay with minimal tidal variation and rainfall, is one of the safest in the Pacific. Its strategic location offers a competitive advantage for moving various goods within the logistics chain.

The Port of Guaymas is 1.8 km (1.1 miles) from Federal Highway No. 15 and part of the CANAMEX Corridor, 400 km (248.55 miles) away. It is close to Nogales on the U.S. border. Connected via the Guaymas-Arizona and Guaymas-Mexicali corridors, it serves markets in northwest Mexico and southeast U.S.

As an international port with access through the Pacific Ocean and Sea of Cortez, Guaymas influences Sonora, Baja California Sur, Chihuahua, Sinaloa, and Arizona. The port spans 67 hectares of land and 77 hectares of water, with a capacity of 7,644,606 tons. Facilities include 6 berths (360 m south, 900 m east), 12,000 m^2 of covered spaces, and 146,000 m^2 of open cargo handling areas.

The port can accommodate up to six vessels simultaneously, with docks at a depth of 14.7 meters. It is equipped to manage large cargo volumes. The primary business is mineral bulk, handling four million tonnes annually, with plans to expand capacity by an additional two million tonnes.

The port also supplies fuel to production and consumption centers in northwestern Mexico. It maintains efficiency in moving agricultural bulk due to its infrastructure and specialized equipment.

The containerized cargo business line shows steady growth.

Competitive advantages include:

- Railway circuit operating 24 hours a day, every day.
- Logistics activity area located 10 km from the port.
- Operation of containerized cargo with double stowage.

The Port of Guaymas uses the landlord port management model and is managed by API Guaymas, a Mexican public company that received a concession title in 1994 for an initial period of 50 years, which can be renewed.

The Port of Guaymas has diverse infrastructure that supports safe navigation of deep-draft vessels, including an access channel, docks, and berthing positions maintained through regular maintenance and dredging to keep them in optimal conditions.

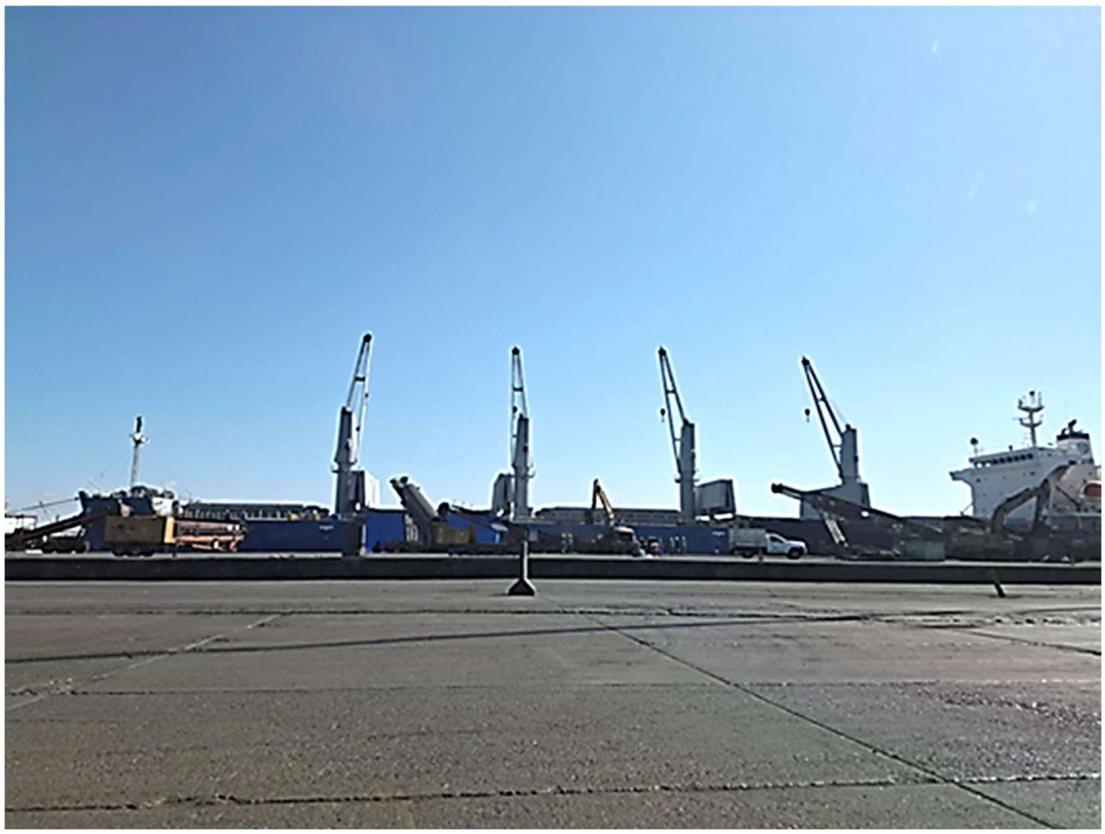
Within the port area, there are terminals and specialized facilities for the movement of goods in cabotage, export, import, and international transit traffic.

The port's geographical characteristics provide natural protection for navigation areas by *Isla de Pájaros and Punta Baja*, eliminating the need for protective structures like breakwaters. The navigation areas experience tidal variations of only 2 to 3 meters, and the access channel is 4.6 km long with a depth of 14 m. The average tidal variation is about three feet (0.884 m).

Port of Guaymas Location

Port of Guaymas Views


PLANO MAESTRO 2025
Marina
Secretaría de Marina
T1 -16m
T2 -16m
T3 -16m
T4 -16m
CRUCEROS -11m
CEMEX -11m
T6 -15m
T5 -15m
Granel mineral
Cruceros
Astillero SEMAR
Carga general
Fluidos
Granel agrícola
Contenedores
Fertilizantes



Port Operator - Transferencias Portuarias del Pacífico S.A. de C.V. (TPP)

Transferencias Portuarias del Pacífico S.A. de C.V. (TPP) provides stevedoring services at the Port of Guaymas, specializing in loading and unloading ships. Located in the Port Area, Zona Franca, S/N, Col. Punta Arena, C.P. 85430, Guaymas Sonora, TPP offers services for:

- Mineral bulk
- Agricultural bulk
- Sea Containers
- Oversized items
- General cargo
- Fluids

Solid sodium cyanide arrives at the Port of Guaymas in 20-foot sea containers. The container yard can hold over 100 containers.

TPP adheres to a zero alcohol and drug policy, follows a code of conduct and ethics, is certified in ISO 14001:2015 Environmental Management, ISO 9001:2015 Quality Management, and complies with the safety regulations of ASIPONA (Administrations of the National Port System).

Transferencias Portuarias del Pacífico S.A. de C.V. (TPP) Detailed Assessment Findings

Topic	Assessment Results
Site and locality factors	The port is fenced and access is strictly controlled, meeting International Cyanide Management Code (ICMC) requirements. North and west of the port are residential areas, while the east is industrial. Cyanide is stored 1 km from the discharge site with no public access allowed. A gate pass system controls entrance, and the entire vicinity is fenced. Sea containers remain sealed at the port. The Internal Civil Protection Plan covers natural disasters like earthquakes and hurricanes. Operating Rules of the Port of Guaymas include risk analysis and emergency response plans. Hazardous materials in the port are segregated, with separate storage for sodium cyanide containers, PEMEX fuel tanks, and ammonium nitrate unloading operations.
Cyanide handling - experience, qualification and permits.	TPP has been enhancing its compliance in the handling of sodium cyanide, beginning with services for Evonik, followed by Cyanco, Orion, and currently Cyplus Idesa. The port has demonstrated considerable experience in managing this product, having handled it for other distributors and utilized this port for its import operations. The operation rigorously trains its employees on cyanide handling procedures, supported by documented safety instructions specific to cyanides. Cyplus Idesa has provided comprehensive training in safe cyanide handling, with annual or semi-annual sessions scheduled for personnel involved in these activities. The operation is well-versed in the legal requirements related to the transportation, handling, storage, and protection of sodium cyanide. Processes are in place to ensure continuous knowledge and updates regarding existing legislation. Compliance with current legislation is maintained as part of the ISO 14001:2015 standards. Regarding the qualifications of personnel responsible for stevedoring activities, a dangerous goods safety advisor has been appointed in accordance with legal requirements. The staff is adequately trained and receives annual refresher courses. There are written procedures for routine operations, ensuring the safe loading, unloading, and storage of dangerous goods, including cyanide. Procedures for equipment cleaning, inspection, and the use of personal protective equipment (PPE) are established. Although first aid equipment specifically related to cyanide is not present on-site, safety measures for the

Topic	Assessment Results
	loading and unloading of cyanide containers are in place within designated areas. Staff is equipped with PPE for routine operations, and emergency response equipment is managed by the Administrations of the National Port System (ASIPONA).
Emergency response plans	The operation has a documented risk management system, including a general emergency plan accessible to all employees. Employees are trained to respond to accidents and are familiar with the emergency plan. TTP has a crisis management document. Emergency equipment for personal protection and accident control is inspected regularly to ensure availability during emergencies. Product safety data sheets and other informational bulletins, including the sodium cyanide safety data sheet and information on the International Maritime Dangerous Goods (IMDG) code, are accessible to personnel. The emergency response plan specifies the responsibilities of those in charge and includes a contact list with the firefighters, ambulances, police, and cyanide suppliers. This plan aligns with the operational rules of the Port of Guaymas. Regular emergency drills are conducted, involving two key individuals who manage emergencies and direct operations, with the capability to communicate and access external information sources. Annual emergency response training is provided. During staff induction, employees receive emergency response plans; they in emergency mock drills. Cyplus Idesa will coordinate a cyanide drill with TTP within the next year. The emergency responders team understands the required reaction time for medical treatment in case of cyanide exposure, with danger information available at the cyanide storage yard. Medical personnel from ASIPONA are informed about potential health risks and prepared for emergencies, although they do not have cyanide antidotes on-site. Cyplus Idesa has provided cyanide handling training, though specific training for medical personnel on poisoning and antidote application is necessary.
Material handling & storage	The operation reviews and maintains equipment according to manufacturer guidelines and regulations, keeping records of inspections. Cyanide containers are stored sealed in dry, well-ventilated areas, with access restricted to authorized personnel. The storage area, located far from water

Topic	Assessment Results
	surfaces and drains, is in a dedicated section of the sea containers yard. The sewage system is at the opposite end. In case of rain, runoff is diverted away due to the pavement slope. Cyanide is stored separately from acids and flammables, per IMDG code chapter seven. The local fire department knows how to handle these dangerous goods in an emergency.
Environmental, health and safety	The container yard is separated from the sea, no other open water is in the proximity. Cleanup procedures prohibit unauthorized discharges into water, with dikes and sumps to retain water. For spill cleanup, there are analysis tools, spill kits, containment equipment, and emergency response protocols per the emergency plan. The port has functional safety showers, eyewash stations in the cyanide storage area, standard personal protective equipment, and emergency response gear provided by relief agencies.
Asset Security	Access to the port facilities, warehouses, and terminals is controlled and secured with locked gates. Inspections ensure compliance with security regulations, with a designated person responsible for overall security. The security program includes periodic reviews and measures to mitigate risks. Any threats or incidents are reported to the authorities. Security personnel from the Navy Secretariat manage entry, requiring a two-day advance process and a QR code for access.
Fire Protection	The fire department is near the port premises with an available water supply in the port. Firefighters are well-trained, and access for emergency responders is coordinated with the Navy Secretariat, ensuring quick entry during emergencies. Alkaline extinguishing agents are avoided; only foaming agents, PQS, and CO2 extinguishers are used. Firefighting equipment is adequate, regularly inspected according to procedures, and inspection records are maintained. Monthly reviews and verifications of fire extinguishers on site were shown.
Security of port facilities and terminals	The port and terminal are ISPS certified with an approved infrastructure protection plan. Operations, including the handling and storage of dangerous goods, are monitored by video and supervised by facility personnel. The port is secured by a guarded gate, fenced perimeter, and CCTV surveillance provided by the Marina Secretariat. Visitors must schedule access days in advance, present official ID, and receive a visitor pass upon arrival.

Exhibit I – Excellence Freights de México - Transport Operation

Cyplus Idesa - Excellence Freights de México

Transport Operation

Summary Audit Report

for the

International Cyanide Management Code

March 2025

Author: Bruno Pizzorni - Lead Auditor

Cyanide Auditors

Parque Federico Blume 142, Miraflores, Lima
Tel +51 947 259 440 | Email bpizzorni@cyanideauditor.com | Web CYANIDEAUDITOR.COM

Operation General Information

Transport Operation:	Cyplus Idesa - Excellence Freights de México, S.A. de C.V.
Name of the Owner:	Excellence Freights de México, S.A. de C.V.
Name of Operator:	Excellence Freights de México, S.A. de C.V.
Responsible Manager:	Luis Fernando Rodriguez - Quality Assurance Manager
Address:	Claveles #14, Col. Bello Horizonte, Coatzacoalcos
State / Province:	Tultitlán 54948
Country:	México
Telephone:	+52 55 3139 8107
Email:	frodriguezr@cyplusidesa.com

Operation Location Detail and Description

Excellence Freights de México, S.A. de C.V. (Excellence Freights), was stablished in 2007 as a transportation company from Grupo IDESA, one of the largest business groups in the country in the production, storage, distribution and transformation of hydrocarbons. Excellence Freights specializes in the transportation of petrochemical products, fuels, and other hazardous materials across the Mexican Republic. The company employs 218 drivers and 60 administrative staff. For cyanide transport operations, they have allocated five trucks and six employees. Excellence Freights holds the "Responsabilidad Integral" certification.

Excellence Freights initially received preoperational certification with the Cyanide Code on January 5, 2017, with confirmation in September 2017. The transporter was subsequently recertified in August 2021. As of mid-2024, Excellence Freights is no longer part of Grupo IDESA and has informed ICMI that it will not maintain its individual certification with the Code. Instead, it will be integrated into the supply chain of Cyplus Idesa Mexico, which Cyplus Idesa Mexico confirmed through communication with ICMI.

This audit, covering the period from September 2021 to December 2024, aims to facilitate the incorporation of the carrier into Cyplus Idesa Mexico's supply chain, which will hold the Code certification moving forward.

The transporter operates one ground route in Mexico for cyanide transport, from the production facility Cyplus IDESA in Coatzacoalcos, Veracruz, to the port of Salinas Cruz, Oaxaca on the Pacific Ocean coast, and occasionally to mine sites. This route covers a distance of 344 km and takes 8 to 9 hours to complete, including two authorized stops

with the cyanide shipment.

Each truck hauls two trailers, each containing a 20-foot sea container with 20 Intermediate Bulk Containers (IBC) of 1,000 kg each. The precise arrangement of boxes within each container prevents lateral movement. All containers are securely locked and tagged upon receipt, with tags removed only at the destination site. Cyanide is delivered to the port preferably by two vehicles at a time, not in convoy.

Cyanide is transported in a solid state within sea containers; isotanks are not used for this purpose. There are no interim cyanide storage facilities along the route managed by Excellence Freights, and the company does not subcontract any transport operations. A specific group of drivers and vehicles has been designated for cyanide transport, and a hiring/designation procedure has been established for these activities.

Auditor's Finding

This operation is

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

with the International Cyanide Management Code**.**

Compliance Statement

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

Auditor Information

Audit Company:	Cyanide Auditors S.A.
Lead Auditor:	Bruno Pizzorni
Lead Auditor Email:	bpizzorni@cyanideauditor.com
Transport Technical Auditor:	Bruno Pizzorni
Dates of Audit:	December 3 and 4, 2025

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 (ICMI) 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.

BRUNO PIZZORNI - LEAD AUDITOR

Transport Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

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

Summary of the basis for this Finding/Deficiencies Identified:

Excellence Freights de México (Excellence Freights) has established and implemented executed the procedure PAC-916 Route Identification, Evaluation, and Selection. This process aims to reduce the likelihood of accidents and releases, as well as mitigate their potential impacts during transportation. According to the procedure, the transporter takes into account the following, among others:

- Schedule limitations
- Overnight hours, meals, hygiene, and personal grooming
- Estimated time to complete the route based on total mileage
- Cellphone and GPS coverage areas
- Seasonality for departures and arrivals during daylight
- Road conditions, construction zones, and risk levels
- Urban areas and population density
- Slope and incline
- Water and fog concentration areas

Routes with the highest risk levels are discarded based on assessments. Federal regulations allow hazardous materials to travel only on authorized routes. The route is then categorized as high, medium, or low risk by sections.

Once approved, a "Route Instruction Letter" (*Carta de Instrucciones de Rutas* or CIR) is generated for drivers and monitoring staff. For example, the auditor reviewed the CIR for the Coatzacoalcos to Salina Cruz route, covering 344 km in 8 to 9 hours. The analysis includes sector-specific road risks, population density, water bodies, and critical kilometers. Rest stops and meal locations are also marked. This data is entered into Google Maps and updated regularly via the "Operators Incidences" WhatsApp group by truck drivers.

The transporter procedure for route identification, evaluation, and selection involves identifying hazards and evaluating routes, establishing control measures to manage identified risks.

Risk assessment considers population density, road conditions, slopes, curves, bridges, repairs, detours, travel estimates, and proximity to hospitals, schools, or crowded areas. It also accounts for water bodies, fog zones, authority presence, Civil Protection, phone, and GPS coverage.

Measures are implemented to mitigate high or intolerable risks. The annual route evaluation, reviewed by an auditor, confirmed compliance with the Code requirements.

The transporter procedure for Identification, Evaluation, and Selection of Routes states that route reevaluation will be conducted using the initial analysis methodology and will be updated annually or as needed. Additionally, drivers are required to inform the Chief Operating Officer and Operations Coordinator or Monitoring of any situation that may cause a risk or deviation on the route, whether temporary or permanent. Based on the feedback received, the Monitoring and Traffic Supervisor must review the information in conjunction with the Security Headquarters to manage the route update process according to the criteria outlined in this procedure and inform the involved parties.

The auditor confirmed implementation by reviewing the route reevaluations performed from Coatzacoalcos to Salinas Cruz version 10 and Coatzacoalcos to Ciudad de México version 5. They have been updating their route evaluations annually within a three-month margin during this recertification period.

Both in the "Route Instruction Letter" (CIR) and through continuous updates via WhatsApp, the transporter documents the measures taken to address risks identified with the selected routes. Based on the route assessment, routes presenting the highest level of risk are discarded; measures are taken to mitigate risks identified as high or intolerable.

To address the risks associated with selected routes, the transporter prepares or updates the Route Instruction Letter, considering risk evaluations, trip data, and customer specifications for unit transits, such as authorized driving hours, schedule restrictions, overnight times, and other control measures. This includes a brief route description, road sections and types with indicated risk levels, speed controls, authorized stops, fuel loading places, special instructions for the operator, and a route map.

Once the route is selected, the Monitoring and Traffic Supervisor submits the Route Instruction Letter to the Head of Security for authorization. The generated document serves as support for drivers on route and for Monitoring and Operations staff.

The auditor reviewed examples of the Route Instruction Letters used by drivers during cyanide transport operations from Coatzacoalcos to Puerto Salinas and Ciudad de México.

The transporter seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. As

required in the procedure for route evaluations, during the route assessment process, the Director of Logistics and/or Land Transport Manager, or their delegate, should consult with the necessary communities, stakeholders, and government agencies to obtain feedback that allows Excellence Freights to assess routes more accurately. This consultation and comments should be supported by the necessary evidence, such as minutes or memoranda. It is important to note that it may not be advisable to interact freely with some security forces en route due to the country's insecurity conditions.

The carrier consults the Mexican National Guard website for information on the state of different roads nationwide; they also obtain information from CANACAR (National Chamber of Freight Transport), an association of carriers that interacts with authorities and announces the status of routes or upcoming events on its website. The carrier maintains continuous communication with Cyplus Idesa, the freight dispenser, to coordinate the route and ensure product delivery.

The auditor reviewed records of stakeholder outreach meetings held during this certification period with SEMEDIS (Southeast Comprehensive Medical Service), the Red Cross, the Fire Department, the Cyplus-Idesa production plant, and Excellence Freights de México, S.A. de C.V., within the framework of CLAM (Local Committee for Mutual Aid).

The transporter does not use convoys or escorts for safety and security purposes, as local regulations prohibit the use of convoys on federal highways. The carrier only utilizes convoys upon request when joining a mining convoy. The carrier employs detailed tracking through the unit monitoring center via GPS (Ground Positioning System) and has an emergency plan in place should the vehicle fail to appear on the tracking screen regularly. Additionally, alternate routes are available in case of any route blockages.

Identified risks are mitigated by implementing a series of measures, including limiting operations to diurnal driving hours, utilizing communication systems, and GPS tracking with a panic button. Designated stop locations and speed control mechanisms are also employed. Furthermore, drivers use the Waze application to monitor the route proactively.

For example, to determine a safe stopping location, the site must meet the following requirements: be located on flat ground that does not cause tilt to the unit or its trailer, thus avoiding damage or spillage of the product or its packaging; have security measures, preferably closed circuit television system; guards; have access and exit preferably by a single road, avoiding places that connect to gaps or roads; must have a safety fence; have enough space for the unit to leave without problems; preferably have a food room or convenience store, bathrooms, showers and fuel refueling.

The transporter does not subcontract any part of their cyanide transportation operations. Excellence Freights own all transport vehicles, and the drivers are employees of the transport company. Therefore, the International Cyanide Management Code (ICMC) requirements related to subcontractors do not apply to the organization.

Transport Practice 1.2

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

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

Summary of the basis for this Finding/Deficiencies Identified:

The transporter employs qualified and licensed drivers. To become a driver at Excellence Freights, candidates must pass evaluations that cover experience, driving tests, police records, and medical examinations, among other criteria. According to the PAC-821 Contracting Procedure and an interview by the Human Resources Manager, the specifications for hiring drivers include those who transport sodium cyanide. The transporter requires previous work references, home visits, and assessments of medical status, including evaluations of the spine, diabetes, and hypertension, although these conditions are not necessarily disqualifying. They also conduct sensory, toxicological, and psychological evaluations.

The transporter requires a minimum of 2 years of experience in handling hazardous materials (hazmat). Additionally, drivers must pass an internal driving test and hold a type E driver's license, which authorizes them to transport hazmat. The auditor reviewed the licenses of three drivers, confirming they were type E and current.

Once hired, drivers must complete a defensive driving course and hazmat training with the *Escuela Nacional de Autotransporte* (National School of Motor Transport or AENA). Drivers are required to undergo continuous training to maintain their credentials. For instance, hazmat training needs to be refreshed every two years.

Operational training on safe cyanide handling is provided upon hire, with a skills evaluation ensuring drivers' competence before their first delivery. Then, regular safety training ensures personnel can minimize cyanide release and exposure risks.

The auditor reviewed Annual Training Programs for the recertification period. Excellence Freights uses the AENA, certified by the Ministry of Labor and Social Prevention (STPS), for driver training. The auditor checked the Training Matrix tracking progress and missing training, LSP-010 Transportation Safety Induction, and training records from 2022 to 2024 in the Transportation Manual, safety protocols, Emergency Response Plan, and policies on alcohol and drug prevention.

Following the audit, the carrier provided refresher training records on the sodium cyanide

transport procedure, use of the hydrogen cyanide (HCN) gas monitor, proper use of half-face masks and N95 masks, as well as training in oxygen supply and AMBU (Artificial Manual Breathing Unit) equipment. Cyplus Idesa Plant health and safety personnel conducted this training. The driver's training records for the period from 2022 to 2024 were also shared.

The transporter does not subcontract any aspect of the cyanide transportation operations. Excellence Freights own all transport vehicles, and the drivers are employees of the transport company. Therefore, the Code requirements related to subcontractors do not apply to the organization.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Summary of the basis for this Finding/Deficiencies Identified:

Excellence Freights maintains its vehicles to handle appropriate loads. The transporter has 5 vehicles for cyanide transport, with 4 in use and one backup. A technical study determined necessary vehicle characteristics, including engine power, haul capacity, and transmission.

CAP-912 Identification and Traceability ensures load identification and transport traceability. The Operations Coordinator assigns the appropriate transport based on shipment presentation, volume, and weight. Dedicated trucks have double articulated trailers with container chassis, carrying 2 marine containers of 20 feet, each weighing around 22 tons. The trucks are Freightliners Cascadia DD15 from year 2017, with 475 horsepower and towing capacity of 75 tons. The container chassis trailers have a load capacity of 26 tons and are of the Transtools Manufacturing brand.

During the audit, the available tractors and trailers were reviewed and verified to handle weights exceeding maximum loaded weights. The platform load capacity is greater than the gross weight of a sea container fully loaded with cyanide (approximately 22 tons). Chassis loading capacities were also checked and confirmed to meet specifications.

The transporter has implemented the ETR-001 Transport Specification guidelines to verify the adequacy of the equipment for the loads it must bear. These guidelines outline the company's minimum requirements for terrestrial transportation, applicable to both

receipt and delivery of all types of shipments. The specification describes the appropriate type of vehicle for the load and details the vehicle's characteristics, including load clamping mechanisms, tarps, flooring, walls, ceilings, suspension, dimensions, equipment presentation, and nominal load capacity.

These guidelines, complemented by procedure CAP-912 Identification and Traceability, are excellent tools to ensure that the vehicle is suitable for the cargo to be transported. Prior to loading and usage, trucks are inspected by the transporter to ensure there are no deviations that could affect operations. Inspections are guided by the load capacity of the equipment, and load weights are recorded both before departure and during the trip.

The ETR-001 Transport Specification and CAP-912 Identification and Traceability guidelines require preventing truck overloading when handling cyanide. Excellence Freights ensures each chassis carries only one cyanide container, with each truck hauling two articulated chassis. This aligns with inspection checklists and interviews.

The cyanide production facility uses scales to verify shipment weight. Loads are consistent and do not vary in weight. Records confirm compliance with weight capacities and regulatory limits. The equipment can handle loads exceeding maximum shipped amounts, but truck weight regulations limit the amount of cyanide transported. Office personnel and drivers are aware of these regulatory requirements and weight limits.

The transporter manages all aspects of their cyanide transportation operations internally and does not use subcontractors. As a result, ICMC requirements related to subcontractors do not apply to the organization.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summary of the basis for this Finding/Deficiencies Identified:

Excellence Freights transports solid cyanide in sealed sea containers. Safe driving and unloading procedures ensure that the truck and trailer are not damaged during transit. The transport procedure specifies that the load cannot be altered during transportation. Seals are placed in the sea container's locks at the manufacturing facility and can only be removed at the final destination. Containers received at the production facility are placed on platform trailers hauled by trucks without altering the packaging. According to

personnel, the load is not removed from the container.

The procedure PAC-936 Emergency Care Plan defines in section 5.11 Preventive Actions the requirement to inspect cyanide shipments in transport vehicles using a checklist called Daily Eye Inspection. This ensures the integrity of the packaging, the condition of the doors, the seals, and the container. The auditor reviewed examples of completed inspections performed during this recertification audit.

Placards showing United Nations (UN) 1689 for solid cyanide are displayed on all four sides of the containers. Drivers inspect the containers before each movement. Equipment markings meet adequacy and conformity standards.

The transport procedure requires placards with cyanide's UN number and poison signs on the container, verified through a vehicle inspection checklist. Operation files confirm that the presence of placards was checked via the checklist.

Excellence Freights has a safety program for cyanide transport. Drivers perform a pre-trip inspection documented through a checklist. Mechanical issues are addressed by approved mechanics before departure. The driver interviewed understood the pre-trip inspection process, and checklists were acceptable.

The transporter has a compliant Maintenance Program for preventive and corrective activities.

The route from Cyplus Idesa in Coatzacoalcos to Salinas Port is 344 km and takes 8-9 hours, including two authorized stops. Drivers transporting sodium cyanide work no more than twelve discontinuous hours a day, only during daylight.

The load shifting within the container is not considered possible as all containers are filled with 20 boxes and blocking and bracing are applied at the cyanide production plant to prevent load movement. Additionally, trailers are equipped with pins where the container is embedded, preventing it from shifting, as defined in the procedure "Emergency Care Plan", section 5.11 Preventive Actions, which requires the verification of properly secured trailers lock twists to the shipping container. This requirement is reflected in the checklist format associated with the Daily Eye Inspection in the field.

According to the transporter's procedure PAC-917 Reception and Delivery of Packaged Material and the Operational Work Instruction IOT-002T Reaction in Delivery Against Hazard Events on Cyanide Transport Safety Standards 2023 from Cyplus Idesa, transportation can continue only if the convoy leader has confirmed the relevant conditions are met. The convoy supervisor is responsible for informing the state of progress of the operation and any incidents at each point indicated in the itinerary, as well as any events necessitating a stop. If conditions are unfavorable for the convoy to reach its destination, it will be parked in an appropriate location.

Before each trip, employees are required to undergo alcohol testing and periodic drug testing. Any violation of this policy has led to the termination of the employee from the

organization. Upon entering the Cyplus Idesa production plant, operators must pass a breathalyzer test as per carrier procedure PAC-918 regarding Alcohol and Drug Use Prevention and Medical Examinations. Drug tests are conducted every six months on a scheduled basis or randomly at the Cyplus Idesa production plant facilities; the occupational doctor maintains these records.

Documentation is available to demonstrate compliance with each of the aforementioned controls. Records are kept in both electronic and hard copy formats at the office for a designated period.

The transporter does not subcontract any part of their cyanide transportation operations, so Transport Practice 1.4 is not applicable to them.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

Summary of the basis for this Finding/Deficiencies Identified:

Excellence Freights do not transport cyanide by sea; therefore, Transport Practice 1.5 does not apply to the transporter.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Summary of the basis for this Finding/Deficiencies Identified:

Operators are equipped with company cell phones to facilitate communication with the carrier's Operations Supervisor, who coordinates with the Cargo Shipper. They also utilize a WhatsApp group named Cyplus Idesa for communications, which includes drivers, cyanide transport operation personnel from Excellence Freights, representatives at the

port cyanide destination, the cyanide producer Cyplus Idesa, and safety personnel from both companies. Prior to embarking on a trip, operators must contact the Monitoring Center to ensure they have the necessary communications equipment as per the PAC-915 Monitoring procedure. Drivers are required to report their departure from the cyanide production plant, any stops made for rest or meals, and their arrival and delivery of the cyanide shipment. Any incidents encountered on the road are communicated via this WhatsApp group. All cell phones provided to drivers come pre-loaded with an emergency contact list, and operators also carry a printed copy of this list.

Cyanide shipments are monitored using a GPS tracking system, which is supervised by both the transporter and the cyanide production facility. Additionally, there is bidirectional communication available within the cabin through GPS equipment. In the event of an emergency, the operator can press the panic button, activating a 60-second "spy mode" during which the system listens without transmitting to avoid exposing the operator to danger. This system allows drivers to notify the transport supervision directly and, if necessary, contact emergency responders.

According to procedure PAC-915 Monitoring and work instruction IOT-004T GPS Checking, the GPS must be tested before delivering the cyanide shipment to ensure it functions properly. This includes verifying if the GPS is operational, the audio system in the cabin, and the vehicle's remote shutdown system is functional. The carrier uses the GPS equipment provided by external contractor ADS Logic and its monitoring platform, equipment is replaced every two years.

Communications blackout areas are identified in each route risk assessment, according to procedure PAC-916 Route Identification, Evaluation, and Selection. Any blackout area is noted in the monitoring system where they configure the expected time for the signal to be recovered and keep track of this. The GPS tracking system has set geofences identifying these locations, and communication with the convoy is expected to resume after an established time.

If the vehicle's signal does not reappear after the established time, an emergency protocol is activated at the Monitoring Center in accordance with PAC-915 Monitoring. They are supported by the National Guard and the security protocol of the Emergency Response Plan, PAC-936 Plan for Emergency Attention in the Transportation of Sodium Cyanide, is initiated.

The transporter has a GPS tracking system which allows continuous monitoring of the convoy's location. According to procedure PAC-915 Monitoring, drivers communicate by cellphone with their base upon dispatch, upon arrival at the port site, and after unloading it is complete. Personnel responsible for tracking shipments at Coatzacoalcos were interviewed, the GPS system was demonstrated, and logs showing that shipment status was being recorded were reviewed and found to be complete. Excellence Freights' procedure for tracking shipment status was reviewed during the audit and found to follow

current practices. Its monitoring center in Tultitlán operates 24/7 with three employees per shift.

The transport documents show the cyanide delivery amount, documenting custody with signatures upon delivery. The delivery is monitored by the driver and remotely by the dispatch office. Containers are locked and tagged at the manufacturing site, with tags removed only at the final destination. The auditor verified that the trucks' shipment bills matched the production facility and port scale reports.

Each driver carries the transport document, Safety Data Sheets (SDS), and emergency response information. They also have an on-board file with copies of licenses and the cyanide SDS.

The transporter does not subcontract any part of their cyanide transportation operations, so Transport Practice 1.6 is not applicable to them.

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
	☐	in substantial compliance with	
	☐	not in compliance with	

Summary of the basis for this Finding/Deficiencies Identified:

Excellence Freights does not operate any cyanide trans-shipping depots or interim storage sites. Consequently, Principle 2 regarding Interim Storage is not applicable to the transporter.

Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Summary of the basis for this Finding/Deficiencies Identified:

Excellence Freights has implemented the Emergency Response Plan (referred also in this document as the ERP or the Plan) PAC-936 Plan for Emergency Care in the Transportation of Sodium Cyanide Rev. 05, dated October 15, 2024. This plan outlines the communication procedures and emergency response guidelines, addressing scenarios with a focus on transportation accidents.

The Plan is tailored for the circumstances and addresses potential issues during transportation from IDESA – Cyplus in Coatzacoalcos, Veracruz, to Salinas Cruz, and eventually to mine sites. It identifies emergencies like sodium cyanide release on the road, land, water, and robbery. The transporter does not operate an interim storage facility.

Section 8 of the Plan covers the physical and chemical characteristics of sodium cyanide: a toxic white solid in briquet or granule form. Emergency response procedures focus on solid sodium cyanide spills. The Plan includes the SDS with details about the hazardous material.

Transport involves trucks with double-articulated units and 20-foot container chassis per configuration. No other transport methods are used. The Plan covers emergency actions and uses its own trucks.

The Plan considers transportation infrastructure identified in the route risk analysis, including road conditions, slopes, curves, bridges, repairs, exits, and potential hazards like rivers, lakes, fog zones, and landslides. Phone and GPS coverage are also addressed.

The ERP details the design of transport vehicles, specifying 20-foot sea containers hauled by trucks with two trailers. Cyanide is received in sealed 20-foot containers, each holding 20 IBCs of 1,000 kg.

Section 6 of the Plan emphasizes the importance of unit design based on the transporter

specification ETR-001T detailing requirements for ground transportation. Transport vehicles are double articulated trucks with two trailer chassis. The document also describes cargo fastening, floor, pneumatic suspension, vehicle presentation, and load capacity.

The Plan outlines response actions for transportation emergencies, including vehicle collision without spill; rollover with product exposure and cyanide intoxication; truck overturn or collision with spillage and water contact; fire; and robbery, assault or kidnapping. It also details required actions for drivers facing irregularities like civil commotion, adverse conditions, bad weather, traffic congestion, and unplanned stops during sodium cyanide transport.

The transporter provided a reviewed version 6 of procedure PAC-936 Plan for Emergency Care in the Transportation of Sodium Cyanide Rev. 06, dated January 30, 2025. Item 6.5.6 specifies that in the event of spills of sodium cyanide briquettes, the driver must form containment barriers using absorbent cords in the shape of a diamond to prevent rainwater from spreading the material. Item 6.5.3 states that in case of cyanide exposure, communication with Medical Services of the Cyplus Idesa Plant should be prioritized for first aid care with oxygen. This item also indicates that the external contractor Hesca Environmental Services (Hesca) will handle the second response if necessary, including their contact number in the emergency contacts list. Additionally, the N95 dust mask was included in the Personal Protective Equipment (PPE) list.

The responsibilities of other external responders and medical facilities in emergency response procedures are clearly defined. The police will support and ensure the safety of transport units as they pass through cities and towns and will manage traffic routes in the event of an accident. The transporter provided version 6 of procedure PAC-936 Plan for Emergency Care in the Transportation of Sodium Cyanide Rev. 06, detailing the roles of SEMEDIS and Hesca external emergency responders. After contacting the Medical Services of the Cyplus Idesa Plant, if necessary SEMEDIS will be dispatched to the accident scene to provide medical assistance and facilitate the transfer of victims to hospitals. Hesca, a company contracted by Excellence Freights, specializes in handling emergencies involving hazardous materials in accordance with standards established by the OSHA (Occupational Safety and Health Administration) and DOT (Department of Transportation). Hesca will manage the secondary response, including collecting a major spill, contaminated waste, environmental remediation, and final disposal of contaminated material. The procedure for remediation of the contaminated environment and final disposal of debris was provided by Hesca.

Transport Practice 3.2

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

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

Summary of the basis for this Finding/Deficiencies Identified:

The transporter provides initial and refresher emergency response training to appropriate personnel. Drivers and supervisors receive annual training in emergency response as part of the Annual Training Program, which includes the ERP, firefighting, first aid, and hazardous materials including sodium cyanide, conducted by both internal staff and external companies. The ERP mandates annual training for all personnel involved in cyanide transport. Excellence Freights drivers receive comprehensive training to ensure they are capable of fulfilling their roles in emergency response effectively

Interviews confirmed that drivers are knowledgeable about emergency procedures and documentation. Training records covering topics such as hazardous materials (sodium cyanide) and first aid were reviewed by the auditor during the recertification period.

The ERP delineates the emergency responsibilities of managers, transport coordinators, control room staff, convoy leaders, and drivers before, during, and after an incident. It specifies roles for the Terrestrial Transport Manager, Safety Transport Supervisor, drivers, monitoring personnel, Excellence Freights emergency team, and external responders, including the cyanide manufacturer Cyplus Idesa emergency team.

As a recommendation for improvement, the auditor advised Excellence Freights to add to the Operators' Job Description the duty of acting as first responders in the event of a sodium cyanide spill, as stipulated in the emergency response plan.

The transporter has listed emergency response materials and equipment in the ERP. Each transport vehicle and the emergency response pick-up vehicle have their own lists. The emergency and PPE include Tyvek suits, air equipment, encapsulated suits, various gloves, PVC (Polyvinyl Chloride) boots, safety goggles, isolating tape, HCN detector, respirators, oxygen, shovels, brooms, polyethylene bags, empty containers, and lime.

The updated PAC-936 Rev. 06 emergency response procedure specifies that N95 masks are to be provided for drivers. Additionally, the emergency equipment and materials inventory now includes commercial bleach at a 5% concentration, as confirmed by the auditor's observation of its availability in stock.

Each truck has the necessary emergency response and health and safety equipment. The auditor confirmed the presence of gloves, aprons, rubber boots, leather gloves, reflective vests, safety cones, half-face masks with HCN filters, shovels, peaks, dry powder fire extinguishers, battery-powered lanterns, Tyvek and Tychem suits, canvas, lime, HCN detectors, cords, basic first aid kits, black plastic bags, brushes, goggles, absorbent material, and repair tape.

The transporter provided N95 dust masks to its drivers as part of its standard EPP equipment. They equipped the emergency pickup truck with two oxygen bottles, reservoir masks, and an AMBU bag.

The emergency response plan mandates inspecting emergency equipment before truck loading, upon arrival at CyPlus Idesa's plant, and during monthly reviews by the traffic supervisor. Regular inspections are also done during vehicle maintenance. A checklist verifies equipment availability, and records are kept in the operation file. The audit confirmed the material's availability and inspection records. The transporter submitted the records of biweekly inspections for the emergency pickup trucks and completed the drivers' equipment checklists, including all required inspection fields.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Summary of the basis for this Finding/Deficiencies Identified:

The ERP has up-to-date contact information for notifying the shipper, receiver/consignee, regulatory agencies, outside response providers, medical facilities, and potentially affected communities of an emergency. It includes a detailed communications flow chart indicating that in case of a transport emergency, the driver should communicate with the Transport Supervisor or vehicle monitoring personnel, who will then contact the Terrestrial Transport Manager and the Health and Safety Manager. These managers will subsequently notify the client and other relevant parties. Additionally, the ERP contains a flowchart for communications in case of robbery, assault, or kidnapping.

The plan also maintains current contact information for internal and external emergency communications. The phone contact list for External Emergency Agencies includes SETIQ (Transport Emergency System for the Chemical Industry), which provides technical and

specific information by telephone to manage emergencies and incidents involving chemical products throughout Mexico, operating 24 hours a day, 365 days a year.

The external communications list also includes Cyplus Idesa (the cyanide producer), SEMEDIS medical services, CLAM (Local Mutual Aid Committees) for handling emergencies related to chemical substances, Hesca Environmental Services (Hesca) for emergency response management, Civil Protection, CENACOM (National Communications Centre / National Civil Protection System), and PROFEPA (Federal Attorney's Office for Environmental Protection).

The Plan mandates that the contact list for internal and external emergency notifications be updated annually. Additionally, the Plan undergoes an annual review. As part of this process, each contact's phone number is verified for accuracy to ensure that the internal and external emergency notification contacts remain current. Records are maintained to demonstrate compliance with these requirements.

The revised version 06 of procedure PAC-936 on page 26 includes the requirement to notify Cyplus Idesa to alert ICMI in the event of a significant incident involving cyanide, as stipulated by ICMI's document. During this recertification period, no significant cyanide incidents have occurred, thus there was no need to report to the Cyanide Institute.

Transport Practice 3.4

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

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

Summary of the basis for this Finding/Deficiencies Identified:

Excellence Freights submitted its revised version Rev. 06 of the PAC-936 Emergency Response Plan, providing clear details on the remediation procedures. They specified that the neutralization of solid cyanide would be performed using lime to raise the pH, thereby preventing the generation of HCN gas. They also stated that they would use commercial leach at a 5% concentration to destroy any remaining cyanide, applying it with a liquid sprayer. The auditor found that procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris are in place.

The ERP prohibits using sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to

treat cyanide in surface water. It also bans these chemicals for treating solid sodium cyanide spills in surface waters.

Transport Practice 3.5

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

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

Summary of the basis for this Finding/Deficiencies Identified:

The ERP is scheduled for annual review. Records confirmed that this was done. The auditor examined the Plan PAC-936 Plan for Emergency Care in the Transportation of Sodium Cyanide Rev. 05, dated October 15, 2024, along with previous versions from the recertification period, and found it to be compliant.

The ERP establishes that mock emergency drills must be carried out every year. Also, the practices will be scheduled in coordination with the client, to keep the personnel permanently prepared for an emergency. The auditor reviewed the drills reports.

In December 2022, the transporter performed an emergency mock drill related to a truck transporting cyanide rollover without exposure and without intoxication, focused on communications during the emergency and on evaluating the capacity of response and attention to the emergency by the carrier's personnel. The scenario was overturning due to a collision of a transport unit with sodium cyanide at the Morelos Petrochemical Complex. For the mock drill, the transporter invited authorities, institutions and the following federal agencies, without the need to support in the emergency: Local Committee of Mutual Aid (CLAM) Coatzacoalcos and Municipal Civil Protection, as well as Transit of the State of Coatzacoalcos. The participating response groups were Excellence Freights emergency response brigade, medical service and brigade members of Idesa Petroquimica S.A de C.V., first responders from CLAM, and the CLAM's aid subcommittee for the inter-production area plants.

The auditor reviewed the drill report, with 12 participants and 2 evaluators, finding that among the areas of opportunity for improvement found needed to train he excellence Freights emergency response brigades incident command and chemical emergency response in transportation; they observed that the emergency unit lacks PPEs and specific equipment for the care of a chemical emergency; and the need to train first aid brigade personnel in risk scenario recognition. All task were accomplished and closed.

In December 2021 Excellence Freights simulated an emergency mock drill simulating a truck collision while transporting a cyanide shipment, without exposure and without intoxication, similar as the one described above.

The transporter was required to conduct an emergency mock drill involving cyanide exposure. Following the audit, on February 12, 2025, a drill was conducted in sodium cyanide transport. The scenario simulated a rollover resulting in product exposure and intoxication. This exercise took place at Boulevard Morelos Km. 3.2, Morelos Petrochemical Complex, Coatzacoalcos, near the Cyplus Idesa Plant. The drill involved seven workers, including the emergency brigade of Excellence Freights, along with two observers.

The drill report identified several areas for improvement. These include training the emergency brigade personnel on incident command and chemical emergency response, particularly as many personnel are recent entrants. There was also a noted deficiency in PPEs and specific equipment for handling chemical emergencies. Another recommendation was training first aid brigade personnel to recognize risk scenarios and correctly use the HCN detector, which was not utilized during the drill. Additionally, it was observed that the emergency care equipment storage area was not freely accessible.

The Plan stipulates that following an emergency that necessitates its implementation, as well as subsequent to mock drills, an analysis of any observations or deficiencies identified must be conducted. This includes preparing a schedule of actions and courses to be taken by personnel to address these observations and to ensure necessary equipment or information is completed. As of the date of the audit, there had not been an activation of the Plan; therefore, no revisions were made for this reason.