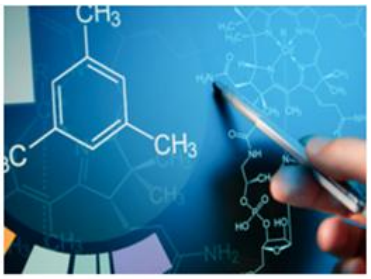
ICMI Transportation Verification Protocol (Revision June 2025)

Summary Audit Report

Draslovka a.s. – Global Ocean Supply Chain

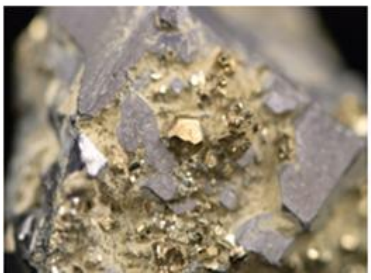
2025 Re-Certification Audit

Draslovka








Submitted to:

The International Cyanide Management Institute
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USA

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Code Certification Service

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Operation General Information

Name and location of Operation:	Draslovka a.s. – Global Ocean Supply Chain Memphis, Tennessee USA
Names and contact information for this Supply Chain:	Joaquín Corres Barragán Product Stewardship & Technical Manager Draslovka Mining Process Solutions Email: Joaquin.Corres@draslovka.com

Supply Chain Description

Draslovka Mining Process Solutions (Draslovka) produces sodium cyanide for the gold mining sector in the United States and in the Czech Republic. It is a fully owned subsidiary of Draslovka Holdings, a.s.. The company is a chemical technologies, products and services company that serves the mining, agricultural, and manufacturing sectors. Cyanide is produced in both the United States in the Memphis, Tennessee plant and at Kolin Plant which, together with Draslovka headquarters, is in the capital of the Kolin District in the Czech Republic.

All Draslovka global ocean moves of sodium cyanide produced in the United States and in the Czech Republic are within the scope of this re-certification audit. The Draslovka processes used to manage the ocean transport of its products were evaluated through interviews, a review of process descriptions, company standards, policies, shipping records, and due diligence records. During the re-certification period, Draslovka visited new ports, evaluated port due diligence information for ports and ocean carriers, and confirmed the safety performance of the ports already in use. During this audit process additional due diligence information was reviewed. The results of the comprehensive due diligence evaluations of five (5) ocean carriers are contained within this report.

The five ocean carriers used by Draslovka and are in the scope of this Global Ocean Supply Chain certification are listed below. The one ocean carrier that is new to this supply chain certification is CMA-South America.

1. Maersk
2. Mediterranean Shipping Co. (MSC)
3. ONE Line
4. Hapag Lloyd
5. CMA-South America

Due Diligence Investigations were conducted for U.S. and international ports being used at the time of the audit. Records were sampled to confirm that Draslovka had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by Draslovka for hazardous material shipments. The list of ports in the table below are within scope of this supply chain re-certification.

The Draslovka port evaluation process involves an onsite initial evaluation and then a remote review of information at least once every three years. Records were on file and available for review for the ports included in this recertification audit. The port evaluation process includes a comprehensive evaluation of infrastructure, procedures, and personnel preparedness in alignment with international best practices such as the International Cyanide Management Code (ICMI).

At the time of the audit, the ports listed in the table below were in use by Draslovka for sodium cyanide shipments to gold mine customers. The ports in bold are new to this supply chain certification with this audit cycle.

Name of Port	Country
Abidjan	**Ivory Coast (Côte d'Ivoire)**
Angamos (Mejilliones)	Chile
Antofagasta	Chile
Arica	Chile
Balboa	Panama
Becancour, Quebec	Canada
Belem (Vila do Conde)	Brazil
Bremerhaven	**Germany**
Buenos Aires	Argentina
Callao	Peru
Caucedo	**Dominican Republic**
Colon	Panama
Corinto	Nicaragua
Cortes	Honduras
Dar Es Salaam	Tanzania
Deseado	Argentina
Everglades, Ft. Lauderdale	United States
Guayaquil	Ecuador
Hamburg	**Germany**
Iquique	Chile
Port of Izmir	**Turkey**

Name of Port	Country
Kingston Port	Jamaica
Long Beach / San Pedro, CA	United States
Los Angeles, CA	United States
Manzanillo	Mexico
Mobile, Alabama	United States
Mombasa	Kenya
Montreal	Canada
New Orleans, LA	United States
Punta Arenas	Chile
Rio Haina	Dominican Republic
Salvador	Brazil
San Antonio	Chile
Santos	Brazil
Seattle, WA	United States
Savannah, GA	United States
Valleyfield	**Salaberry-de-Valleyfield, Canada**
Valparaiso	Chile
Veracruz	Mexico
Wilhelmshaven	**Germany**
Zarate	Argentina

Draslovka contracts with ocean carriers to transport their products from the Memphis Plant and the Kolin Plant to international ports. The rail segments between Memphis and U.S. ports are included in the scope of the U.S. Supply Chain audit report. The transportation segments from the Kolin production facility to the European ports are included in the Draslovka certified supply chain #1 (Kolin Plant to European Ports of Departure).

Audit Implementation and Conclusions

The re-certification audit of the Draslovka Global Ocean Supply Chain was held on January 30-31, 2025.

The on-site portion of the audit was performed at the Memphis, Tennessee Draslovka LSI packaging facility, adjacent to the Memphis production facility. The audit was performed by an independent third-party auditor who is pre-approved by the ICMI as a Lead Auditor for all types of Cyanide Code audits and as a technical expert for Cyanide Code audits of cyanide transportation and production operations.

The re-certification audit of Draslovka Global Ocean Supply Chain was conducted on-site with additional reviews of due diligence information following the on-site audit activity. The audit of the supply chain management processes and the due diligence reviews of ocean carriers and ports were conducted in accordance with the agreed upon audit plan and due diligence documentation requirements.

Draslovka internal Standards, Policies, Practices, and Procedures regarding the management of the Global Ocean Supply Chain were reviewed. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at Draslovka. Additionally, records regarding incident tracking, port evaluations, shipment tracking, cargo labeling practices, shipping documentation, and emergency response records were randomly sampled and found to be acceptable. Draslovka refreshed its due diligence evaluations of each ocean carrier during the recertification period. The information from the Draslovka evaluations was confirmed and supplemented with relevant publicly available information in this audit report.

Auditor's Finding

This supply chain is in **FULL COMPLIANCE** with the International Cyanide Management Code.

The Draslovka Global Ocean Supply Chain cyanide safety performance for the re-certification period was excellent, there were no cyanide-related safety incidents, accidents, or spills. The cyanide management practices for the Draslovka Global Ocean Supply Chain were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol.* Draslovka internal standards, policies, practices, and procedures regarding the management of the cyanide operations were reviewed.

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

The results of this re-certification audit demonstrate that the Draslovka Global Ocean Supply Chain is in **FULL COMPLIANCE** with International Cyanide Management Code requirements.

Compliance Statement

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

Auditor Information

Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Dates of Audit:	January 30-31, 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 for Code Verification Auditors.

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

Draslovka Global Ocean Supply Chain		April 25, 2025
Name of Supply Chain	Signature of Lead Auditor	Date

Draslovka Global Ocean Supply Chain		April 25, 2025
Name of Supply Chain	Signature of Lead Auditor	Date

Principles and Standards of Practice - Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.

Draslovka maintains formal standards, policies, guidelines, and procedures for ensuring Distribution Safety. Corporate standards exist for Incident Prevention, Emergency Response, Transportation Risk Assessment, Distribution Regulatory Compliance, and Training, and Distribution Handling & Storage.

Draslovka evaluates new customers for their ability to safely use and store material and they evaluate the possible routes that can be used to transport the cyanide from Draslovka to the customer site. This evaluation of the route includes consideration of population densities, infrastructure issues, pitch and grade of roads, and prevalence and proximity of water bodies.

The route evaluation includes an evaluation of all portions of the route including rail transport, origination and destination rail yards, ocean carrier transport, ports, and barges, when applicable. In some cases, there are limited or no choices available for the selection of alternative routes.

Due diligence reviews were performed by Draslovka personnel for all parts of this supply chain during the recertification period. The due diligence review process is done at least once per recertification period, or when changes to the supply chain are implemented. The review includes consideration of environmental, health, and safety (EHS) programs, safety performance, external certifications, training, emergency response planning and drills, and security. The Draslovka due diligence information was confirmed and supplemented with additional publicly available information during this recertification audit process.

The risks associated with the route used to bring cyanide from Draslovka to a customer are evaluated when a customer is first approved to receive cyanide shipments. Any necessary risk-mitigation measures are identified and defined during this process.

The primary risks with the ocean transportation supply chain relate to the possibility of losing track of a shipment or the risk of having a container opened en-route by a person who has not been trained in cyanide safety. Draslovka contracts with a third-party logistics provider (freight forwarder) to arrange and track shipments closely. Shipment tracking records were sampled during the audit and was found to be suitable for mitigating the risk of losing track of a specific shipment. To reduce the chance that an unauthorized or untrained person opens an ISO tank or inter-modal container, the containers are sealed. The International Maritime Organization (IMO) Dangerous Goods shipping document, the Bill of Lading, and the Sea Packing List all have the container seal numbers. Records that included the information on container seals were reviewed for each of the ocean carriers for the re-certification period. Records were

complete and readily retrievable.

Overall routes are re-evaluated periodically, usually during customer visits and at least once every three years. Draslovka maintains very close relationships with all its transportation partners on topics of safety. This feedback is considered during the re-evaluation of routes.

The risk mitigation measures of tracking shipments and sealing containers are documented in procedures and inspection checklists that are used to load the containers.

Draslovka obtains necessary governmental approvals and export licenses for international shipments. Examples of such licenses were reviewed and found to be acceptable. The routes selected by ocean carriers for their journeys consider maritime regulations and the input from governments at the shipping and receiving ports. This was accepted by the auditor.

Information regarding the Draslovka ability to track ocean shipments was sampled during the audit and was found to be suitable for mitigating the risk of losing track of a specific shipment. To reduce the chance that an unauthorized or untrained person opens an inter-modal container, the containers are sealed. Records that included the information on container seals were reviewed for each of the ocean carriers for the re-certification period. Information on the shipping records was appropriate and readily available for review.

Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 1.1

Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform theirjobs with minimum risk to communities and the environment.

This requirement does not apply to the Draslovka area of responsibility within this supply chain. Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:	☒ In Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 1.2

Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.		
Inter-modal containers used for international shipments are owned and controlled by the ocean carriers that will carry the containers to international destinations. ISO tanks are managed by Draslovka. Records for shipments and ISO tank inspections and specifications were reviewed for the recertification period. Draslovka uses standard configurations for the packing of intermodal containers and for ISO tanks. These standard configurations have standard weights. This was also confirmed through the sampling of shipping paperwork from each ocean carrier within the scope of this assessment. Confirmation was made during the audit that containers can safely be used for cargo weights that are well above those shipped by Draslovka. Draslovka packaging operation (LSI) checklists and procedures require an inspection of the cargo and containers to ensure that all equipment is deemed to be safe for transport. The loading procedures and a sample of filled out loading checklists for the loading of cyanide were evaluated and were found to be appropriate. Draslovka maintains procedures for loading intermodal containers and ISO tanks. The shipments of bulk and semi-bulk packages in inter-modal containers are standard weights. Standard blocking and bracing configurations are used. Shipping paperwork was reviewed to confirm that shipment weights were consistent and acceptable.		
The operation is:	☒ In Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 1.3

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.
Draslovka ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during the audit and were found to be compliant. The test results for the bag in plywood with inner flexible bag package were acceptable and were last tested in 2024. The Composite Intermediate Bulk Container (IBC) EcoPak packaging testing was also done in 2024. The testing was done in accordance with the following regulations: U.S. Department of Regulation (DOT) Regulation 49 Code of Federal Regulation (CFR) for vibration (178.819), bottom lift (178.811), stacking (178.815), and drop (178.810). The test results are renewed annually. The wooden box packaging certifications for shipments from the Kolin production facility were current and demonstrated that the packaging is compliant with regulations. The certifications are valid until 2028. Checklists and procedures used to load inter-modal containers and ISO tanks require an inspection of the cargo and containers to ensure that all equipment is deemed to be safe for transport. LSI maintains procedures for loading intermodal containers. The shipments of bulk and semi-bulk packages

in inter-modal containers are standard weights. Standard blocking and bracing configurations are used. Shipping paperwork was reviewed to confirm that shipment weights were consistent and acceptable.

Appropriate placards are displayed on all sides of the intermodal containers and ISO tanks. Intermodal containers and ISO tanks were available for review during the audit. Additionally, the International Maritime Organization (IMO) requirement for the marine pollutant signage to be posted on the container was also observed as being properly placed on the inter-modal container. Memphis Plant and LSI operational procedures and checklists for loading were also reviewed for this requirement during the production certification and re-certification audits. All documentation (procedures and checklists) requires proper placarding to be confirmed prior to the containers being released. These procedures and practices were evaluated during this and other ICMI Cyanide Code evaluations of the operation.

Draslovka standard contracts with its transportation providers, including ocean carriers, require compliance with all environmental, health, and safety (EHS) regulations. Multiple government regulations exist to ensure that ocean carriers and ports maintain robust safety programs. Government regulators regularly conduct inspections of ocean carriers and ports to verify compliance.

The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 1.4

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.

The Draslovka packaging specifications were reviewed as part of the re-certification audit and were found to be conformant to the packaging requirements of the International Maritime Organization (IMO) Dangerous Goods (DG) Code.

Packaging reviewed during the audit was appropriately marked and labeled and was found to be compliant with Chapters 5.2 and 5.2.2 of the IMO DG Code requirements.

Loaded inter-modal containers were evaluated during the audit and were found to be marked and placarded in accordance with the IMO DG Code.

Shipping documents were reviewed for a sample of ocean cyanide shipments. All information required by the DG Code is required as standard practice on Draslovka shipping paperwork.

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

Draslovka maintains records which show that the ocean transport is conducted in compliance with all international ocean and U.S. Department of Transportation (DOT) requirements.

Draslovka confirms that ocean carriers comply with stowage and separation requirements of Part 7 of the DG Code as part of its due diligence review process. Records were available for review during the audit.	
The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with Standard of Practice 1.5 ☐ Not in Compliance with

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.
Draslovka works together with its freight forwarder BDP to track shipments using a secure web-based shipment tracking system. Appropriate action is taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that location can always be confirmed. Email communications containing database tracking information were reviewed during the audit and confirmation was made that shipments are being tracked continuously. Draslovka has access to "real-time" information through the BDP portal regarding the location and status of its shipments of cyanide. Customer Service at Draslovka tracks on-time deliveries and Regional Supply Chain personnel also track the status of orders. Shipping paperwork was reviewed and was found to be conformant to Code requirements, including chain of custody requirements. The use of seals is part of the Draslovka standard security / product custody management practices for hazardous materials. All shipping containers are sealed. The auditor confirmed that seal numbers are recorded on the bills of lading. This enables personnel along any portion of the journey to confirm that the containers have not been opened. The following documentation is used to track inventory and movement of cyanide: bills of lading and shipping papers indicating the number of packages and amount of material. The abovementioned documents were reviewed during the audit. Ocean carriers maintain databases with SDS information for the products they carry. Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with Standard of Practice 1.6 ☐ Not in Compliance with

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.		
This requirement does not apply to the Draslovka area of responsibility within this supply chain. See Port Due Diligence Section of this report.		
The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 2.1

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.
Draslovka has several key documents that were reviewed as part of this audit: 1) Draslovka Global Emergency Response Plan ; 2) Transportation Emergency Information fact sheet for Solid (Sodium or Potassium) Cyanide; and 3) the Canada Emergency Response Assistance Plan (ERAP) last issued in 2025 and valid until 2028. Together, the documents provide detailed plans, procedures and information to address all ICMI Cyanide Code emergency response requirements, including transportation related emergencies. The Draslovka emergency response plans are appropriate for all modes of transportation. The Draslovka emergency plans are general and universally applicable to all types of emergencies. Ocean ports are very tightly access limited and ocean carriers are self-sufficient during transport. Draslovka emergency procedures are detailed enough to support Draslovka personnel if they needed to provide expert emergency guidance to a transportation partner in this supply chain. The response plans describe the different levels of response actions for anticipated emergency situations. The Draslovka Global Emergency Response Plan describes the steps that are to be taken by Cyanide Hot Line and other Cyanides Business personnel. Draslovka details the roles and responsibilities of personnel in their emergency procedures, but most ports and ocean carriers will be very self-sufficient in the response to any emergency within their own operation. Ocean carriers and ports are responsible for interacting with local emergency responders and for maintaining current emergency plans.

The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 3.1

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.		
The roles and responsibilities of relevant Draslovka personnel are clearly described in the Transportation Emergency Information fact sheet and the Draslovka Global Emergency Response Plan. Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.		
The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 3.2

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.
The notification procedures are described in the Draslovka Global Emergency Response Plan. The Draslovka Global Emergency Response Plan Phone List (last updated in 2024) has emergency telephone numbers. Emergency contact information is also contained in the Transportation Emergency Information fact sheet. The emergency numbers are checked on at least an annual basis. Information was found to be current and accurate. The Draslovka Global Emergency Response Plan requires procedural review and reauthorization at least every three years. Drills are conducted on an annual basis to ensure notification and reporting procedures are kept current. The Guidelines for Handling Cyanide Emergency Calls section of the Draslovka Global Emergency Response Plan requires the notification of ICMI of any significant sodium cyanide incident within 24 hours. This supply chain has not had any cyanide incidents that would require reporting during the re-certification period.

The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 3.3

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanidetreatment chemicals.		
The Draslovka Global Emergency Response Plan, entitled Sodium Cyanide Spill Requirements, details immediate actions, cleanup and disposal procedures, and first-aid actions. All aspects of recovery and neutralization are addressed. The plan also specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water.		
The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 3.4

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.
According to the Draslovka Global Emergency Response Plan, emergency plans are checked at least every three years and notification numbers are checked at least annually. The Draslovka Global Emergency Response Plan and the phone list were last updated in 2024. Many emergency drills are conducted at Draslovka on an on-going basis. Emergency response drills at the Memphis Plant, for example, are conducted quarterly. According to the Draslovka Global Emergency Response Plan, the plan is to be tested by conducting drills at least annually**.** If an actual emergency response event occurs, an evaluation of the actual response may be used in lieu of an emergency response drill. Several drill critiques from the re-certification period were available for review. Records were available for each year between 2022-2025. The Draslovka Global Emergency Response Plan requires drills to be documented, and improvement actions tracked. Several drill critiques from the re-certification period were available for review. Actions were identified and improvements made.

The operation is:	☒ in Full Compliance with ☐ In Substantial Compliance with ☐ Not in Compliance with	Standard of Practice 3.5

Ocean Carrier and Port Due Diligence Investigation Results

All Draslovka global ocean moves of sodium cyanide produced in the United States and in the Czech Republic are within the scope of this re-certification audit. The Draslovka processes used to manage the ocean transport of its products were evaluated through interviews, a review of process descriptions, company standards, policies, shipping records, and due diligence records. During the re-certification period, Draslovka visited new ports, evaluated port due diligence information for ports and ocean carriers, and confirmed the safety performance of the ports already in use. During this audit process additional due diligence information was reviewed. The results of the comprehensive due diligence evaluations of five (5) ocean carriers are contained within this report.

The five ocean carriers used by Draslovka and are in the scope of this Global Ocean Supply Chain certification are listed below. The one ocean carrier that is new to this supply chain certification is CMA-South America.

6. Maersk
7. Mediterranean Shipping Co. (MSC)
8. ONE Line
9. Hapag Lloyd
10. CMA-South America

Due Diligence Investigations were conducted for U.S. and international ports being used at the time of the audit. Records were sampled to confirm that Draslovka had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by Draslovka for hazardous material shipments. The list of ports in the table below are within scope of this supply chain re-certification.

The Draslovka port evaluation process involves an onsite initial evaluation and then a remote review of information at least once every three years. Records were on file and available for review for the ports included in this recertification audit. The port evaluation process includes a comprehensive evaluation of infrastructure, procedures, and personnel preparedness in alignment with international best practices such as the International Cyanide Management Code (ICMI).

At the time of the audit, the ports listed in the table below were in use by Draslovka for sodium cyanide shipments to gold mine customers. The ports in bold are new to this supply chain certification with this audit cycle.

Name of Port	Country
Abidjan	**Ivory Coast (Côte d'Ivoire)**
Angamos (Mejilliones)	Chile
Antofagasta	Chile
Arica	Chile
Balboa	Panama
Becancour, Quebec	Canada
Belem (Vila do Conde)	Brazil
Bremerhaven	**Germany**
Buenos Aires	Argentina
Callao	Peru
Caucedo	**Dominican Republic**
Colon	Panama
Corinto	Nicaragua
Cortes	Honduras
Dar Es Salaam	Tanzania
Deseado	Argentina
Everglades, Ft. Lauderdale	United States
Guayaquil	Ecuador
Hamburg	**Germany**
Iquique	Chile
Port of Izmir	**Turkey**

Name of Port	Country
Kingston Port	Jamaica
Long Beach / San Pedro, CA	United States
Los Angeles, CA	United States
Manzanillo	Mexico
Mobile, Alabama	United States
Mombasa	Kenya
Montreal	Canada
New Orleans, LA	United States
Punta Arenas	Chile
Rio Haina	Dominican Republic
Salvador	Brazil
San Antonio	Chile
Santos	Brazil
Seattle, WA	United States
Savannah, GA	United States
Valleyfield	**Salaberry-de-Valleyfield, Canada**
Valparaiso	Chile
Veracruz	Mexico
Wilhelmshaven	**Germany**
Zarate	Argentina

Ocean Carrier and Port Background Information

Draslovka ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance.

Draslovka contracts with ocean carriers to transport their products from United States ports (Memphis production) and from the European ports (Kolin production) to international ports. The ocean carriers determine the U.S. ports of departure and manage and control all aspects of the rail movements from Memphis to the U.S. ports. IMC (a drayage trucking partner) and U.S. railroads used for transport to U.S. ports are included in the Draslovka U.S. Supply Chain certification. Kolin transports the cyanide to the European ports using its European certified supply chain.

In addition to the Draslovka efforts to ensure that ICMI Cyanide Code requirements are fulfilled, there are many agencies that govern maritime shipments and ensure 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. Each of the five ocean carriers noted in this report must comply with SOLAS requirements. According to information reviewed during the due diligence investigation, the provisions of SOLAS include: fire protection, life-saving equipment, radio communications, safety of navigation, transportation of dangerous goods, management of safe operations of ships, and maritime security.

Regarding 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. 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 ocean routes are chosen by the ocean carriers. The destination ports are evaluated by Draslovka. Each U.S. and international port and each ocean carrier within the scope of this report underwent a due diligence evaluation to confirm that sounds EHS practices and systems are in place in alignment with Cyanide Code requirements. Reviews and investigations included a review of emergency response capabilities, environmental policies, security practices, and adherence to Maritime Transportation Security Act requirements. Draslovka also concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist U.S. ports regarding security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

Maersk

A.P. Moller – Maersk (Maersk) is a global integrated logistics company and one of the world's largest container shipping lines, operating in over 130 countries with a fleet of more than 700 vessels. Headquartered in Denmark, Maersk offers end-to-end supply chain solutions, with ocean transportation serving as the core of its global operations. The company plays a pivotal role in the transport of goods—including hazardous materials—across major international trade routes spanning Asia, Europe, the Americas, Africa, and Oceania.

Maersk's 2023 ESG report underscores its strong commitment to safety and environmental stewardship in ocean carrier operations, particularly concerning the transportation of hazardous cargo. While the report doesn't isolate hazardous materials performance data, the company's robust Environmental Health and Safety (EHS) framework encompasses all cargo types, including dangerous goods. Initiatives such as the "Protected by Maersk" campaign and the "Essential 8" safety program target critical risks in warehousing and ocean operations, while high-potential incidents trigger mandatory Learning Teams to foster a culture of continuous safety improvement.

In 2023, Maersk maintained a zero-incident record for large oil spills and reduced SOx emissions by 10%, signaling improved environmental performance during ocean voyages involving hazardous cargo. Safety leadership was further reinforced through upskilling 98% of senior leaders in safety principles and enhancing incident reporting transparency—measures crucial to minimizing risk in high-stakes cargo handling. The company's governance framework, anchored by its board and the Risk and Compliance Committee, ensures ESG risks related to hazardous materials are centrally managed and embedded into operational decision-making.

Maersk's EHS commitment is reinforced through internationally recognized certifications. Maersk Supply Service and Maersk A/S Co. KG (Germany) hold ISO 45001:2018 for occupational health and safety, ISO 14001:2015 for environmental management, and ISO 9001:2015 for quality management. These certifications cover activities including vessel operations, freight forwarding, warehousing, and the management of hazardous materials—affirming Maersk's adherence to globally respected safety and environmental standards.

Maersk demonstrates strong compliance with the International Maritime Organization's (IMO) regulations, including the International Convention for the Safety of Life at Sea (SOLAS) and the International Maritime Dangerous Goods (IMDG) Code. The company enforces strict protocols to ensure the accurate declaration, documentation, and handling of hazardous materials in line with IMDG requirements. Maersk also supports SOLAS-mandated Verified Gross Mass (VGM) regulations, offering digital platforms to facilitate compliant

weight submissions. These efforts reflect Maersk's broader commitment to maritime safety, regulatory adherence, and protecting life at sea.

As part of the Draslovka due diligence effort, Maersk was asked to perform a self-evaluation against the EHS / ICMI Cyanide Code Transportation Protocol requirements. The results from this evaluation were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that Maersk is an authorized carrier for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid. Maersk also reported that it maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis.

Mediterranean Shipping Co. (MSC)

Mediterranean Shipping Company S.A. (MSC), headquartered in Geneva, Switzerland, is one of the world's largest container shipping line, operating a fleet of approximately 900 vessels and serving over 500 ports across 215 trade routes. Founded in 1970, MSC has expanded its global presence with 524 offices in 155 countries and employs over 200,000 people worldwide. The company offers a comprehensive range of logistics services, including ocean freight, inland transportation, and port terminal operations, making it a pivotal player in global trade.

MSC's 2023 Sustainability Report highlights its commitment to environmental health and safety (EHS) in its ocean carrier operations, particularly concerning the transportation of hazardous materials. To ensure the safe handling and transportation of hazardous materials, MSC adheres to stringent safety protocols and invests in advanced technologies. The company utilizes a data-driven vessel management system employing machine learning and AI to optimize energy use and enhance operational safety. Additionally, MSC's Ocean Learning Platform delivered over 42,000 hours of online training in 2023, including vessel- and equipment-specific courses, to upskill seafarers and ensure compliance with safety standards.

MSC's dedication to maintaining high EHS standards is further evidenced by its attainment of several key certifications across its global operations. The company holds ISO 45001:2018 for occupational health and safety management systems, ISO 14001:2015 for environmental management, and ISO 9001:2015 for quality management. Additionally, MSC has achieved ISO 28000:2007 for security management systems, among others. These certifications show MSC's commitment to upholding rigorous EHS standards across its diverse operations, including the ocean transportation of hazardous materials.

MSC (Mediterranean Shipping Company) adheres to IMO regulations, including the SOLAS Convention and the International Maritime Dangerous Goods (IMDG) Code. The company ensures that all hazardous cargo is properly declared, documented, and handled according to international standards, minimizing risks during ocean transport. MSC also facilitates compliance with SOLAS Verified Gross Mass (VGM) requirements through digital tools and streamlined processes for shippers.

As part of the Draslovka due diligence effort, MSC was evaluated using a standard checklist of requirements

related to the ICMI Cyanide Code Transportation Protocol. The results from this evaluation were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that MSC is an authorized carrier for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid. MSC also reported that it maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis.

ONE Line

Ocean Network Express (ONE), headquartered in Singapore, is a leading global container shipping company formed through the integration of the container businesses of Japan's "K" Line, MOL, and NYK. Operating a fleet of over 240 vessels, ONE provides reliable and efficient container shipping services to over 120 countries worldwide.

In its 2024 Sustainability Report, covering the period from January 1, 2023, to March 31, 2024, ONE emphasizes its commitment to environmental health and safety (EHS) in its ocean carrier operations. To ensure safe and efficient operations, particularly in the handling and transportation of hazardous materials, ONE has implemented comprehensive safety protocols and training programs. The company reported zero large-scale or fatal accidents during the reporting period, highlighting its focus on operational excellence and safety. Additionally, ONE's digitalization efforts, such as the rollout of Live Chat services across all offices and the implementation of a cloud-first infrastructure policy, contribute to enhanced service quality and operational efficiency.

ONE's commitment to maintaining high EHS standards is further evidenced by its adherence to internationally recognized frameworks. The company aligns its sustainability reporting with the Global Reporting Initiative (GRI) standards and the principles of the United Nations Global Compact (UNGC).

To facilitate compliance with maritime regulations, ONE employs advanced digital tools such as the Hazcheck Web Service and Hazcheck Gateway, which integrate dangerous goods validation into their cargo booking and handling systems. Additionally, ONE provides comprehensive IMDG Code e-learning courses for shore-side staff, ensuring that personnel involved in the handling and transport of dangerous goods are adequately trained. These initiatives underscore ONE's dedication to upholding the highest safety standards in the transportation of hazardous materials.

As part of the Draslovka due diligence effort, ONE was evaluated using a standard checklist of requirements related to the ICMI Cyanide Code Transportation Protocol. ONE Line reports on its publicly available website that it is certified to ISO 14001, ISO 9001, and CT-PAT. The results from the evaluation were reviewed by the auditor and were found to be acceptable.

Hapag Lloyd

Hapag-Lloyd, headquartered in Hamburg, Germany, is one of the world's leading container shipping companies. With a fleet of 266 modern container ships, the company operates 113 liner services connecting more than 600 ports across the globe. Hapag-Lloyd employs approximately 13,500 people in its Liner Shipping segment and maintains a presence in 140 countries through 403 offices. Additionally, the company holds equity stakes in 20 terminals worldwide, further enhancing its global logistics capabilities.

In its 2023 Sustainability Report, Hapag-Lloyd emphasizes its commitment to safety in the transportation of hazardous materials. The company has a dedicated Dangerous Goods department, established over 50 years ago, which oversees the approval and compliance of all declared dangerous goods shipments. To enhance safety measures, Hapag-Lloyd employs the Hazcheck Detect cargo screening tool, developed by the National Cargo Bureau, to identify misdeclared or undeclared dangerous goods in containerized shipments. This proactive approach helps prevent potential incidents by ensuring that hazardous materials are accurately declared and handled appropriately.

Hapag-Lloyd strictly adheres to the International Convention for the Safety of Life at Sea (SOLAS) regulations, including the Verified Gross Mass (VGM) requirement. The company offers multiple digital solutions for VGM submission, such as the webVGM tool and integration with the INTTRA eVGM Service, facilitating efficient and compliant weight verification processes for shippers. Furthermore, Hapag-Lloyd enforces a container seal policy that mandates the use of High Security Seals (HSS) compliant with ISO 17712 standards, ensuring cargo integrity and security throughout the supply chain.

The company ensures that all hazardous cargo is properly declared, documented, and handled in accordance with these international standards, minimizing risks during ocean transport. To facilitate compliance, Hapag-Lloyd employs advanced digital tools such as the Cargo Patrol software, which systematically searches for non-declared dangerous goods based on keywords, enabling the identification and refusal of improperly declared shipments. Additionally, Hapag-Lloyd provides comprehensive IMDG Code training for shore-side staff and seafarers, ensuring that personnel involved in the handling and transport of dangerous goods are adequately trained. These initiatives underscore Hapag-Lloyd's dedication to upholding the highest safety standards in the transportation of hazardous materials.

As part of the Draslovka due diligence effort, MSC was evaluated using a standard checklist of requirements related to the ICMI Cyanide Code Transportation Protocol. Hapag Lloyd reported that they are certified to ISO 14001 and ISO 9001 as well as CT-PAT. This information was reviewed by the auditor and was found to be acceptable. Additionally, the auditor reviewed records on file that showed that Hapag Lloyd is an authorized carrier for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid.

CMA CGM

CMA CGM, headquartered in Marseille, France, is a leading global shipping and logistics company. Operating a fleet of over 580 vessels, the company serves more than 420 ports across 160 countries, offering comprehensive ocean freight services and integrated logistics solutions.

In its 2023 Sustainability Report, CMA CGM discusses its commitment to safety and compliance in the transportation of hazardous materials. The company has established Dangerous Cargo Offices (DCOs) in strategic locations, including Marseille, Le Havre, Norfolk, Hong Kong, and Melbourne. These DCOs are responsible for the acceptance and approval of dangerous goods shipments, ensuring adherence to the International Maritime Dangerous Goods (IMDG) Code, national and local regulations, and CMA CGM's internal policies. No dangerous goods are permitted on board CMA CGM vessels without prior approval from a DCO, which issues an acceptance number for each shipment.

CMA CGM strictly complies with the International Convention for the Safety of Life at Sea (SOLAS), particularly concerning the Verified Gross Mass (VGM) requirement. Shippers are mandated to provide accurate weight declarations for all containers, including those containing hazardous materials. The company offers digital tools and platforms to facilitate the submission of VGM information, ensuring compliance with SOLAS regulations. Additionally, CMA CGM enforces documentation requirements, including the submission of a Dangerous Goods Declaration and packing certificate, to guarantee the safe handling and transport of hazardous cargoes.

To reinforce its safety culture, CMA CGM has implemented comprehensive training programs and safety management systems across its operations. The company conducts regular audits and inspections to assess compliance with safety protocols and identify areas for improvement. Furthermore, CMA CGM has received awards for its commitment to safety and compliance, including recognition from port state control authorities for the exemplary condition and operation of its fleet. These initiatives demonstrate CMA CGM's dedication to maintaining the highest standards of safety in the transportation of hazardous materials.

As part of the Draslovka due diligence effort, MSC was evaluated using a standard checklist of requirements related to the ICMI Cyanide Code Transportation Protocol. The results from this evaluation were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that CMS CMG is an authorized carrier for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid. CMS CMG also reported that it maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis.

Principles and Standards of Practice - Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.	
All Ocean Carriers: Ocean routes are chosen by the ocean carriers and are regulated by a number of international organizations. When Draslovka plans a specific shipping route and chooses an ocean carrier, it evaluates safety performance, availability of direct shipping lanes, and authorizations for the transport of hazardous materials. All carriers undergo regular safety performance reviews. Information was reviewed in the Draslovka incident tracking database and was found to be acceptable. According to interviews, Draslovka gives strong preference to ocean carriers that have been evaluated as part of a Cyanide Code due diligence investigation. Ports that have been found to be acceptable are chosen based on proximity to end customer. Only in cases where a closer port has unacceptable infrastructure or security is the shipment routed using a longer over-the-road segment.	
The Supply Chain is in:	☒ Full Compliance with Transport Practice 1.1 ☐ Substantially consistent ☐ Not consistent

Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform theirjobs with minimum risk to communities and the environment.
All Ocean Carriers: According to the responses to a questionnaire modeled after the Cyanide Code Transportation Protocol, all ocean carriers appear to be in compliance with IMO requirements and 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. Inter-modal moves once the shipment reaches the port are controlled by the ocean carrier. Ocean carriers self-reported that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel.

The Supply Chain is in:	☒ Full Compliance Transport Practice 1.2 ☐ Substantially consistent ☐ Not consistent

Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.	
All Ocean Carriers: Draslovka has contractual agreements 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. Draslovka ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during this audit and were found to be compliant. Draslovka checklists and procedures require an inspection of the cargo and containers to ensure that all equipment is deemed to be safe for transport.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 1.3 ☐ Substantially consistent ☐ Not consistent

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.	
All Ocean Carriers: Ocean carriers self-reported that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel. In their response to the ICMI Cyanide Code due diligence protocol, ocean carriers reported that they have robust safety programs which are mandated by international laws. All safety programs apply to all employees.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 1.4 ☐ Substantially consistent ☐ Not consistent

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.	
All Ocean Carriers: Draslovka ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance. The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable regulations and have "organized safety programs." Contracts were reviewed during the audit. Information was reviewed for each carrier regarding fulfillment of Cyanide Code requirements using a customized EHS checklist. The Draslovka Ocean Carrier contracts require that all transportation is conducted in accordance with all regulatory requirements. This includes U.S. Department of Transportation and IMDG requirements. The ocean routes are chosen by the ocean carriers. The destination ports are evaluated by Draslovka. Records were reviewed and were found to be acceptable. See the Draslovka Section 1.5 of this report above for additional details regarding Draslovka packaging.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 1.5 ☐ Substantially consistent ☐ Not consistent

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.	
All Ocean Carriers: Ocean carriers 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. The Draslovka freight forwarder has access to this information via the internet web sites. Draslovka can request this information at any time. Real-time tracking information was reviewed during the audit and was found to be acceptable. The sodium cyanide shipments for this segment are containerized loads and ISO tanks. All shipping containers are sealed. Shipping papers were reviewed. Auditors 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.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 1.6 ☐ Substantially consistent ☐ Not consistent

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.

All Ocean Carriers:

Ocean carriers are required to stow cyanide on vessels is in accordance with the applicable stowage and segregation requirements in the IMDG and the Coast Guard 33 CFR regulations.

The packaging used for solid cyanide conforms to International Maritime Organization (IMO) and US DOT requirements.

Certifications and approvals were reviewed during the audit. As part of the ocean carrier due diligence audit, documentation was reviewed that confirmed that ocean carriers must contractually adhere to regulatory requirements and maintain formal safety programs. Additionally, safety checklists and seals are used by the Draslovka packaging facility after the containers are packed. The seal enables verification that the container was not opened during transit.

All Ports:

The Draslovka port evaluation process involves an onsite initial evaluation and then a remote review of information at least once every three years. Records were on file and available for review for the ports included in this recertification audit. The port evaluation process includes a comprehensive evaluation of infrastructure, procedures, and personnel preparedness in alignment with international best practices such as the International Cyanide Management Code (ICMI). Auditors assessed whether the port has cranes with adequate lifting capacity and whether a preventive maintenance program is in place to ensure reliability during cyanide container transfers. The condition of lifting accessories and whether they undergo regular safety inspections is considered. Access control and port security are also reviewed to ensure the area is restricted to authorized personnel only.

Storage practices are reviewed, including the number of storage areas, presence of warning signs, safety procedures, and the type of personal protective equipment (PPE) in use. The assessment protocol is used to confirm whether cyanide is stored securely—locked and segregated from acids, oxidizers, flammables, and water sources—and evaluate the surface material (e.g., concrete, asphalt) and presence of containment or drainage systems.

A core part of the assessment is examining the port's training and emergency preparedness programs. The assessment protocol asks how often cyanide safety training is provided, whether port operators are

trained in cyanide management and emergency response, and if refresher training is conducted at least annually. The robustness of the emergency response plan is evaluated through an initial review of documentation and drills, when possible. Auditors are prompted to ask: *Are periodic emergency drills conducted? Is the plan practiced regularly? Are systems in place to handle a cyanide-related incident on site?* These questions help determine if the port is prepared for hazardous material emergencies. The audit protocol also asks whether firefighting equipment is readily available, what other products are stored nearby, and whether the overall storage environment minimizes the risk of a reactive or accidental spill. By covering these critical areas, the auditor found that the Draslovka assessment process represents an appropriate level of due diligence performed to ensure that cyanide is handled, stored, and managed at ports with systems in place to safely manage cyanide and minimize risk to workers, communities, and the environment.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 2.1 ☐ Substantially consistent ☐ Not consistent

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.	
All Ocean Carriers: Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. Draslovka 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 carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. All ocean carriers reported information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Emergency response planning is an integral part of maritime compliance programs.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 3.1 ☐ Substantially consistent ☐ Not consistent

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.	
All Ocean Carriers: Onboard vessels, the emergency response would be conducted by trained crew members with shore side support and guidance. Draslovka offers immediate technical assistance for any cyanide spill and offers emergency resources for spills that might occur near a Draslovka site. Draslovka contracts with CHEMTREC to ensure that appropriate notifications and emergency response is initiated if there is an incident.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 3.2 ☐ Substantially consistent ☐ Not consistent

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.	
All Ocean Carriers: Draslovka provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration. Emergency response planning and the performance of frequent emergency drills are required by international laws. All ocean carriers reported information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 3.3 ☐ Substantially consistent ☐ Not consistent

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.
All Ocean Carriers: In the event of a cyanide spill at sea, ocean carriers are required to follow stringent international protocols to ensure environmental and human safety. The International Maritime Organization (IMO) mandates that any discharge of hazardous substances, including treatment chemicals like sodium hypochlorite, ferrous sulfate, or hydrogen peroxide, must be pre-approved and conducted under strict regulatory oversight. MARPOL and other IMO conventions prohibit the discharge of hazardous substances unless explicitly authorized under emergency response protocols. The use of chemical agents for spill treatment is restricted to government-approved substances and procedures, especially in marine environments. Chemical dispersants can only be used with the approval of the relevant coastal state's authority. The London Convention / Protocol prohibits dumping harmful substances, including chemicals, unless explicitly permitted. Part of the permitting process would be an investigation and involvement of the chemical shipper. The Draslovka Global Emergency Response Plan specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water. Interviews with Draslovka personnel during this and previous Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. All aspects of recovery and neutralization are addressed in the Mining Solutions Global Emergency Response Plan.

The Supply Chain is in:	☒ Full Compliance Transport Practice 3.4 ☐ Substantially consistent ☐ Not consistent

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.	
All Ocean Carriers: Emergency response planning and the performance of frequent emergency drills are required by international laws. All ocean carriers provided information demonstrating that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs. Draslovka cyanide safety meetings with its ocean and rail carriers also provide a forum for the discussion and updating of response procedures and expectations. As part of the ocean carrier safety programs, drills and exercises (not necessarily cyanide specific) are conducted to test response capabilities.	
The Supply Chain is in:	☒ Full Compliance Transport Practice 3.5 ☐ Substantially consistent ☐ Not consistent