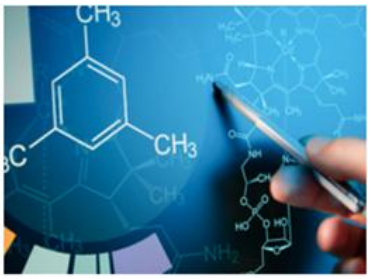
ICMI Transportation Verification Protocol (Revision June 2025)

Summary Audit Report

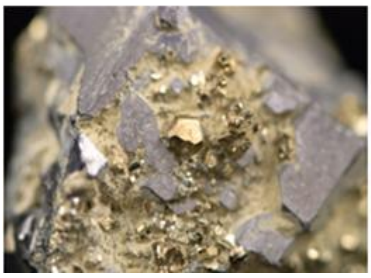
Draslovka a.s. – United States Supply Chain

2025 Re-Certification Audit

Draslovka




Submitted to:

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Code Certification Service

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Operation General Information

Name and location of Operation:	Draslovka – United States (U.S.) 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 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 the United States in the Memphis, Tennessee plant and the global headquarters for the company, and another cyanide production plant, is in Kolin, the capital of the Kolin District in the Czech Republic.

Draslovka Mining Process Solutions has been producing and shipping sodium cyanide since 1953. In the United States, the solid sodium cyanide briquettes are packaged at the Memphis Plant in Tennessee, at the LSI Terminal directly adjacent to the plant, and at the packaging terminal in Carlin, Nevada, USA. The Memphis Plant ships sodium cyanide in railroad hopper cars, bulk and semi-bulk packages. The bulk and semi-bulk packages are shipped from Memphis and its packaging terminals via rail and truck. Domestic shipments go coast to coast. International shipments go by rail to U.S. ports and to the U.S./Canadian and U.S./Mexican borders.

The Draslovka United States (U.S.) Supply Chain includes truck transportation that originates in the United States, rail transportation that crosses the U.S., rail transport that crosses from the U.S. into Canada, rail transport that originates in Memphis and goes to the Mexican border, and barge transportation that crosses from Seattle, Washington (U.S.) up to Alaska. The supply chain was previously certified as the “Draslovka US/Canada Rail & Barge Supply Chain”. The name of the supply chain was streamlined and the IMC trucking operation in the Memphis, Tennessee region was merged with this certification and audit process. IMC has been certified since 2010 and was previously listed as “Draslovka IMCG – Memphis”. The trucking company underwent a name change from IMCG to IMC and is now certified under this supply chain instead of being certified as an individual “supply chain”. The detailed results of the onsite audit of the IMC Logistics LLC (IMC) trucking operation in Memphis, Tennessee are also included in this audit report. The remaining transportation organizations are either Cyanide Code certified companies with their own posted audit results or are subject to Due Diligence reviews rather than onsite audits.

The Draslovka U.S. Supply Chain is used together with the Draslovka Mexico and Canada Supply Chains to safely deliver sodium cyanide to customers by rail, road, and barge throughout North America. In addition to these three certified supply chains, Draslovka also maintains a Global Ocean Supply Chain and several certified supply chains in other regions of the world.

Draslovka contracts with truck, rail, and barge carriers directly to transport their products between production facilities, warehouses, ports, and mines. Trucking movements in Canada are included in the Canada Supply Chain certification. Rail movements after crossing the U.S./Mexico border are addressed in the Draslovka Mexico Supply Chain Re-Certification Audit Report.

The rail and barge carriers manage and control all aspects of the rail and barge movements. Pursuant to their agreements with Draslovka, the carriers identified in this report operate in a manner that complies with applicable environmental, health, safety, and security regulations. These operations were determined, through Due Diligence evaluations, to be aligned with ICMI Cyanide Code requirements.

This Supply Chain recertification also includes the two ports used by the Alaska Marine Lines (AML) barge between Seattle and Alaska. These ports are also included in the Draslovka Global Ocean Supply Chain re-certification audit.

The following operations are in this Supply Chain:

1) IMC Logistics LLC – Detailed onsite audit results are included in this audit report
2) Empire Express – Certified Cyanide Code Signatory
3) Quality Carriers – Certified Cyanide Code Signatory
4) Alaska West Express – Certified Cyanide Code Signatory
5) Union Pacific Railroad (UP) – Due Diligence Review results included in this audit report
6) Canadian National Railway (CN) – Due Diligence Review results included in this audit report
7) Alaska Railroad Company (ARRC) – Due Diligence Review results included in this audit report
8) Alaska Marine Lines (AML) - Due Diligence Review results included in this audit report
9) CSX Corporation– Due Diligence Review results included in this audit report
10) Canadian Pacific Kansas City (CPKC) – Due Diligence Review results included in this audit report
11) Harbor Island (Seattle) Port, Washington – USA Due Diligence Review results included
12) Port of Whittier, Alaska – USA Due Diligence Review results included

Rail transport of the cyanide starting at the U.S./Mexican border crossings and within Mexico is addressed in separate Draslovka Mexico due diligence and re-certification audit report. The due diligence review of the ocean ports used by Draslovka is addressed in the Draslovka Global Ocean Supply Chain re-certification audit report.

At the time of the Draslovka re-certification audit and due diligence assessments, the following rail yards (start and end locations) and ports were being used by Draslovka in the United States and Canada:

Rail Terminals – Origin Loading Location	Destination / Interim Storage / Unloading Locations
• Marion, AR • Memphis, TN • Woodstock, TN (rail sidings within Draslovka and LSI facilities)	• Fairbanks, Alaska - USA • Laredo, Texas - USA • Nogales, Arizona - USA • Seattle, WA - USA • Vivian, NV (Carlin Terminal Siding) – USA • Malartic, QC (Octium Terminal Siding) - Canada • Harbor Island (Seattle) Port • Port of Whittier • U.S. and Canadian Ports, as listed in the Draslovka Global Ocean Supply Chain Re-Certification Audit Report

Audit Implementation and Conclusions

The re-certification audit of the Draslovka US Supply Chain was conducted onsite with Draslovka personnel at the Draslovka / LSI packaging operation and with IMC personnel at the IMC terminal from January 28-31, 2025. Due Diligence information was reviewed following the onsite audit. 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 Draslovka cyanide transportation management practices using trucking companies, rail carriers (including rail yards), and the AML Barge Operator (including ports) were evaluated against the ICMI Cyanide Code requirements documented in the ICMI Cyanide Code, ICMI Cyanide Code Transportation Protocol, and the ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol. The audit was conducted through on-site observations and discussions and interviews with multiple individuals in cross-functional roles in Draslovka Mining Process Solutions and one of its trucking carriers, IMC. Additionally, records regarding equipment maintenance, shipment tracking, cargo labeling practices, shipping documentation, and emergency response records were randomly sampled and found to be acceptable.

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

The results of this re-certification audit and the related due diligence investigations demonstrate that Draslovka and all portions of its U.S. Supply Chain are in FULL COMPLIANCE with ICMI Cyanide Code requirements.

Auditor's Finding

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

The Draslovka U.S. Supply Chain cyanide safety performance for the re-certification period was excellent. There were no cyanide-related safety incidents or accidents. The cyanide management practices using trucking companies, rail carriers (including rail yards), and the AML Barge Operator (including ports) were evaluated for Cyanide Code compliance using the ICMI Cyanide Transportation Verification Protocol. 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 U.S. Supply Chain is in FULL COMPLIANCE with International Cyanide Management Code requirements.

Compliance Statement

This operation 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 28-31, 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 U.S. Supply Chain		April 25, 2025
Name of Operation	Signature of Lead Auditor	Date

Draslovka U.S. Supply Chain		April 25, 2025
Name of Operation	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

Interviews were conducted with Draslovka Mining Process Solutions (Draslovka) personnel to confirm that before Draslovka initially qualifies a new U.S. or Canadian customer for sodium cyanide, they follow a standard practice which is called the “First Order Process”. Regional Field Technical Consultants evaluate the new customer for their ability to safely use and store material and they evaluate the possible modes of transportation that can be used to transport the cyanide from Draslovka to the customer site.

This First Order evaluation includes consideration of population densities, infrastructure issues, pitch and grade of roads, and prevalence and proximity of water bodies. The evaluation includes all transportation modes that would be needed 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. Trucking routes are determined by the trucking partner in coordination with Draslovka.

Draslovka’s Cyanide Code certified trucking partners are responsible for route risk assessments and re-approval of routes as necessary and at least once every three years.

The use of seals and locks on transportation containers and equipment is a part of the Draslovka standard security / product custody management process. On the U.S./Canada routes the primary risk that is managed is the risk of a late or lost delivery. Draslovka selects trucking carriers that have GPS tracking capability. Rail shipments are also tracked on a continual basis. The barge move between the U.S. and Canada is part of an overall rail move and would therefore also be tracked as part of the rail tracking process. Draslovka personnel were interviewed, and confirmation was made that shipments are tracked daily. Appropriate action is taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that the location of shipments can always be determined.

A review of First Order records and shipping records confirmed that the practices noted above are in place.

Regarding feedback from transportation partners, Draslovka maintains close relationships with all its transportation partners on topics of safety. Records reviewed show that dialogue and feedback from transportation partners in this supply chain was obtained and considered by Draslovka within the past three years.

Draslovka obtains necessary governmental approvals and export / import licenses for international

shipments. Records of community interactions / training sessions were reviewed and found to be acceptable. The most recent Draslovka-led training of local hospital staff in the area near the Memphis cyanide production facility was held in 2024.

Records were available to demonstrate that Draslovka processes for assessing routes, risks, and applying appropriate countermeasures continue to be effective.

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. Draslovka works closely with its transportation partners and ensures that transporters are either Cyanide Code Signatory companies or part of a Draslovka certified supply chain.

IMC

IMC Logistics LLC has been transporting solid sodium cyanide from the Memphis, Tennessee based cyanide production plant and packaging operation to nearby railheads in Memphis, Tennessee and Marion, Arkansas since October 2006. Processes for local shipments to railheads were evaluated as part of this audit. IMC uses computerized navigation planning software to assess the short routes the company drives to local railheads. IMC only drives three short routes from the Draslovka Plant to the CSX/CN Rail Yard and to the UP Rail Yard. There are limited options to drive the short trips that are less than 30 miles for each route. The trucks travel the shortest distance possible and travel on designated hazmat routes. Draslovka re-approved the three routes in 2025.

Driver input into the route determination is highly valued. Drivers provide feedback on the route at the quarterly safety meetings. If a driver needs to deviate from a route the driver notifies the dispatcher immediately. Drivers were interviewed during the audit and records show that this feedback process has been implemented and is being maintained.

Risk mitigation measures are detailed in the operating procedures. Drivers follow the established procedure and do not stop once they have a loaded, locked, and sealed load. The Operations Manager shuts down operations during inclement weather. If a delivery cannot be made safely drivers contact the dispatcher. The policy is to delay delivery until safe conditions return. This was confirmed during interviews with dispatchers and drivers.

Community input regarding the transport of cyanide is incorporated into the route planning through the use of routing software that indicates whether communities have restricted use of specific roadways for the transportation of hazardous materials.

There are no escort requirements on the defined routes used by Intermodal Cartage. The company uses electronic routing software, hands-free cell phones and GPS to keep in contact with drivers and keep updated on the location of the trucks. There are no blackout areas on the routes.

IMC does not subcontract any portion of their cyanide transportation operations.

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.

Draslovka

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.

Draslovka makes a computer-based training module available to its transportation partners. Training records were available to show that the cyanide safety and emergency response training is actively used across the Draslovka supply chains.

IMC

IMC drivers are authorized to operate vehicles that transport cyanide. The IMC computer dispatch system blocks the assignment of unauthorized drivers. This was confirmed during the audit. Cyanide Drivers have a U.S. DOT Class A Commercial Driver's License (CDL) with a Hazardous Materials endorsement. The records for drivers were reviewed. Hazmat training was conducted for all affected personnel during the recertification period, with the most recent annual training on cyanide transportation taking place in 2025. Certificates and a sign-in sheet were reviewed. Drivers were interviewed and were found to have an appropriate level of knowledge and safety awareness.

Records showed that drivers had also been trained on the hazards of cyanide, the use of established routes, pre-trip inspection procedures, and emergency notification procedures. Cyanide Safety training is given to drivers annually. Records were available to show that each Cyanide Driver received this training annually during the recertification period with the most recent training records being from 2025.

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.

Draslovka

Draslovka maintains a fleet of rail equipment to transport cyanide that includes hopper cars, box cars, rail cars, and ISO tanks. The equipment is designed and maintained to operate within the loads it will be handling. Draslovka maintains specific specifications for each type of equipment that is owns or leases. These specifications were reviewed in detail during the original ICMI Cyanide Code certification audit. Since then, the only new part of the fleet is the ISO tank. The systems used to ensure proper testing of this equipment were reviewed. The specifications of the ISO tanks were also reviewed and were found to be suitable for the transport of solid sodium cyanide briquettes. Inspection records for ISO tanks observed during the audit were checked and found to be current and complete.

Intermodal containers bound for international deliveries are generally owned and maintained by the ocean carriers.

Draslovka ensures authorized packaging is used for the solid sodium cyanide. Package specifications were reviewed during this audit. All specifications and testing records were found to be compliant and current.

The Memphis Plant maintains detailed cyanide loading procedures for loading boxcars, hopper cars, and ISO tanks. LSI maintains procedures for loading intermodal containers. Safety interlocks are used to prevent overfilling of hopper cars. The shipments of bulk and semi-bulk packages in railcars and inter-modal containers are standard weights and standard blocking and bracing configurations are used. Shipping paperwork was reviewed during the audit to confirm that shipment weights were consistent and acceptable.

IMC

Transportation equipment is designed by US manufacturer engineers to meet U.S. DOT weight rating standards. Gross Vehicle Weight Rating (GVWR) is certified by the manufacturer and documented on each vehicle with a data plate. Equipment labels were reviewed during the audit. All IMC tractors and trailers have been checked, and all are rated for weights that exceed maximum loaded weights. Furthermore, interviews with drivers confirmed that a “sixth wheel” system is used (and understood) to ensure effective distribution of load weight and reduce risk of an unbalanced load.

IMC is using tri-axle chassis that are approved for up to 90,000 Gross Weight. The bills of lading indicate that the loads are approximately 45,000 pounds of product. The day trucks weigh approximately 16,200 pounds. The standard chassis weighs approximately 6800 pounds.

Equipment, inspection records, and maintenance records for tractors and chassis used to transport cyanide were evaluated during the audit. The tractors and chassis were found to be mechanically sound and capable of carrying the loads for which they were being used.

Tractors and chassis used to transport the intermodal containers and ISO tanks have all been checked to confirm that the equipment specifications and data plates show that the equipment is capable of safely transporting the load it must bear. A chassis/container and tractor inspection report is completed prior to any load being received. This also verifies equipment adequacy for the load it must bear.

Regular inspections include checks to ensure that the equipment does not show signs of stress or overloading.

All loads are standard weights that do not have much variation. The shipper loads the intermodal containers with known and repeatable quantities. This was confirmed via a review of shipping records. Weight tolerances were confirmed through the review of equipment files and by reviewing the information on the manufacturer's data plates stamped on the bodies of the equipment. IMC performs pre-trip inspections to confirm that equipment is adequate for the loads it must bear and that it is not overloaded.

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

The Memphis Plant maintains detailed cyanide loading procedures for loading boxcars, hopper cars, and ISO tanks. LSI maintains detailed procedures for loading intermodal containers. Safety interlocks are used to prevent overfilling of hopper cars. The shipments of bulk and semi-bulk packages in truck trailers, railcars and inter-modal containers are standard weights and standard blocking and bracing configurations are used. The Lemm Services, Inc. procedure for box car loading and rail car inspection checklist were reviewed and records were sampled. The procedures are detailed and explain the process for properly closing the package, there is a diagram for how the material is to be properly loaded into a boxcar for weight loading considerations, and how the packages are to be blocked and braced. Several completed checklists used for the inspection of the rail cars and intermodal containers before and after loading were reviewed and were found to be appropriate.

The hopper car filling operating procedure was reviewed during the 2025 audit. The operating procedures for Hopper Car Preparation was also reviewed. The pre-ship inspection includes confirmation of placards, brakes, structural integrity (visual), gates, etc. are inspected. Similar procedures and inspection records are also maintained for boxcars, ISO tanks, and intermodal containers.

Appropriate placards are displayed on all sides of the transport vehicles, ISO tanks, and rail cars, as required by regulations. Additionally, there is an International Maritime Organization (IMO) requirement

for the marine pollutant signage to be posted on the containers. Placards marine pollutant signage was observed during the audit and found to be acceptable.

Draslovka uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that its transportation partners are either Cyanide Code Signatory companies or that they are audited as part of a supply chain certification. Draslovka performs Due Diligence Reviews of its transportation partners who are not otherwise subject to audit.

IMC

Pre-trip inspection checklists are used by drivers to confirm that the equipment is safe and in proper operating condition. The pre-trip inspection is also used to confirm that the intermodal container or ISO tank is properly secured to the chassis, and that the chassis is properly secured to the tractor.

The IMC material handler was interviewed during the audit at the LSI packaging operation. Drivers visually inspect trailer containers, including placards, prior to each movement. Interviews with material handlers and drivers confirmed these requirements and regulations are understood and verified that practices are implemented.

Drivers conduct a pre-trip inspection prior to departure. Mechanical defects are called to the attention of the on-site mechanic. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site. Pre-trip inspection checklists were reviewed during this audit and found to be acceptable.

A preventive maintenance policy is in place that states the frequency at which specific maintenance tasks are to be performed. Pre-defined checklists showing the required maintenance tasks are used to record actions. The incoming and outgoing condition of the equipment is recorded on the checklists and associated repair orders. Truck and chassis inspections are conducted monthly for equipment used to transport solid cyanide. The maintenance shop is located at the same facility as IMC. A complete preventive maintenance service is performed according to the manufacturer's recommendations. Annual inspections are also conducted per United States Department of Transportation requirements. Computer system controls are in place to prevent the dispatch of equipment for which critical inspection and/or preventive maintenance tasks have not been done. Records of equipment maintenance were reviewed during the audit and were found to be acceptable.

The Safety Program includes limitations on drivers' hours in accordance with Federal Motor Carrier Safety Regulations (FMCSR). Drivers are informed of legal requirements and are encouraged to stop driving if they become too tired (empowerment). Drivers maintain electronic logs which are monitored daily by the Safety and Operations groups. Drivers who fail to comply with requirements are sent a letter of reprimand and are counseled. No cyanide drivers were listed in the database as having had instances of noncompliance in the past three years. 11 hours of drive time per day are allowed (14-hour shift), there is a 34-hour restart every weekend using the 70-hour maximum on-duty time in 8 days.

Intermodal containers are loaded, blocked and braced by LSI employees (the Cyanide Manufacturer's

packaging operation in Memphis, TN). An IMC material handler assigned to this location observes the packaging process and was able to confirm during interview that blocking and bracing practices are consistently used by LSI employees.

Pre-trip inspection checklists are used by drivers to confirm that the equipment is safe and in proper operating condition. The pre-trip inspection is also used to confirm that the intermodal container is properly secured to the chassis and that the chassis is properly secured to the tractor. Drivers interviewed understood how to adjust a chassis to accommodate safe movement of a load.

Drivers were interviewed and they confirmed that the IMC policy allows them to suspend a trip if conditions are unsafe. The driver would contact the dispatcher, who would then contact the Safety department.

A drug abuse prevention program is part of the company's overall safety compliance program. Drivers are randomly required to undergo drug and alcohol random sampling on a regular basis. Records were reviewed showing that Cyanide drivers were tested regularly during the recertification period. A qualified third party administers this program. IMC maintains a formally documented drug and alcohol testing program entitled "Driver Information Concerning Drug and Alcohol Testing".

Records demonstrating compliance with all ICMI Cyanide Code safety program requirements were available for review during the audit. The maintenance records for the tractors and chassis that were observed during the audit and used during the recertification period for shipping cyanide were reviewed during the audit and were found to be complete.

Records were available to demonstrate that Cyanide Code requirements have been fulfilled.

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

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.

IMC

A qualified IMC material handler located at the Lemm packaging facility applies placards and appropriate marine pollutant markings to containers that will eventually be shipped by ocean carrier. The placards are supplied by Draslovka. Additionally, the IMC drivers confirm that containers are compliant before transport. The IMC material handler and drivers responsible for placarding the sea containers were audited to verify practices are compliant with the Dangerous Goods Code of the International Maritime Organization.

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

Draslovka selects trucking carriers that have GPS tracking capability. Rail shipments are also tracked on a continual basis. The barge move between the U.S. and Canada is part of an overall rail move and would therefore also be tracked as part of the rail tracking process. Shipment tracking records were available to show that this practice is in place. Draslovka is also monitoring on-time delivery of all shipments from a customer satisfaction perspective. If a shipment delivery date were missed, interviews confirmed that this would be investigated and resolved immediately.

Shipping paperwork was reviewed and was found to be conformant to ICMI Cyanide Code requirements, including chain of custody requirements.

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. Rail companies maintain databases with SDS information for the products they carry. This aspect of rail transportation is regulated and inspected by the U.S. Federal government.

IMC

A qualified IMC material handler located at the Lemm packaging facility applies placards and appropriate marine pollutant markings to containers that will eventually be shipped by ocean carrier. The placards are supplied by Draslovka. Additionally, the IMC drivers confirm that containers are compliant before transport. The IMC material handler and drivers responsible for placarding the sea containers were audited to verify practices are compliant with the Dangerous Goods Code of the International Maritime Organization.

GPS equipment and an onboard fleet management computer system are used for tracking shipments. The equipment is used daily and any problems with the equipment would be identified as part of the pre-trip inspection process. The IMC tablets are checked for functionality during the pre-trip inspections and by IMC staff as part of the computer network maintenance process. Pre-trip inspections are required and interviews with drivers confirmed that these are being performed.

Black out areas are not a problem on the routes. All routes are on public roadways and the drivers have multiple tracking and communication systems available to them. Interviews with Cyanide drivers and IMC staff confirmed the absence of blackout areas on the approved routes.

Truck location is tracked continuously by GPS. Truck shipments are tracked by the dispatcher who is in contact with drivers throughout each shift. Each truck is also equipped with an onboard fleet management

system that tracks the trucks' location and a live 24-hour video feed. The tracking is accessible to the fleet manager and senior staff of IMC. Additionally, there are on-board event recorders.

All IMC deliveries are made to either rail heads or ports. The chain of custody paperwork involved in the drop of a shipment at a rail head or port is called "in gate" paperwork. Confirmation was made during the audit that drivers were aware of the importance of this paperwork in demonstrating that chain of custody requirements are met. The chain of custody paperwork is scanned into the computer following the delivery. Shipping papers were sampled for the recertification period. Chain of custody records were found to be complete.

Bills of lading (BOLs) provided by the shipper show the number of packages and the weight of the cargo. A copy of each BOL is made and maintained by IMC. A sample of BOLs were reviewed during the audit. Safety Data Sheets are included with every shipment and are part of the record. Additionally, each driver has always detailed information with him/her regarding cyanide hazards (provided by Draslovka) and emergency response instructions.

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

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.

Draslovka

Aside from ports, there is only one interim storage location within the scope of this supply chain, the Alaska West Express (AWE) truck yard in Fairbanks, Alaska. AWE is a Cyanide Code Signatory company that was originally Cyanide Code certified in 2012 and has maintained its certification since. Ports and railheads undergo a Due Diligence review.

IMC

IMC does not provide Draslovka with interim storage services and no cyanide was observed at the facility.

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

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 used by Draslovka and for interim facilities. The Draslovka Transportation Emergency Information Fact Sheet is distributed to each transporter, and specifically to each driver for each delivery. The information sheet has quick, but complete information available with each truck shipment.

The Transportation Emergency Information Fact Sheet is designed to address solid briquettes. There is no cyanide solution transported in this supply chain.

Details regarding the method of transportation are included in the emergency plans of the transportation partners. The Draslovka emergency plans are general and universally applicable to all types of emergencies. The Transportation Emergency Information Fact Sheet has details of action steps for transporters. This was deemed appropriate by the auditor.

Professional emergency responders together with technical guidance from Draslovka would be responsible for addressing issues involving the way in which the structure of the vessel should be managed after an emergency. This was accepted by the auditor as a reasonable response.

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.

The plans clearly outline the roles and responsibilities of internal and external responders. Records of community interactions were reviewed and found to be acceptable. The most recent interactions with the local hospital in the Memphis area were in 2025. The Draslovka Canadian ERAP also details which emergency response companies will respond to emergencies in Canada. Draslovka trained its emergency responders during the recertification period. Records for the most recent training sessions were in 2025. Response personnel from each of the companies listed in the ERAP have been trained.

IMC

IMC has documented emergency response procedures (ERPs) for transportation accidents on local deliveries. There are no long-distance routes. The ERP document last updated in 2025 is the "Cyanide Transportation Emergency Response Plan". The Draslovka "Transportation Emergency Information for Solid Cyanide" fact sheet is also part of the IMC cyanide emergency plans. It is kept in the office and in each truck during shipments. Records were available to show that all cyanide drivers were trained on the ERPs and that they understand their roles in case of an emergency.

The IMC ERPs were found to be appropriate for the transportation routes, the solid sodium cyanide being transported via truck, the infrastructure of the local route, and the design of the transportation equipment. IMC only transports the cyanide short distances from the Memphis Plant to rail heads and ports. All parts of the routes are within normal city limits with U.S. typical emergency response services.

Detailed information regarding the chemical and physical forms of Cyanide is in the Draslovka fact sheet. The Cyanide Transportation Emergency Response Plan is always maintained in the truck and contains detailed information about response actions. The IMC drivers are to secure the scene and make notifications. Additionally, the Draslovka fact sheet is also always maintained in the truck and lists out the notification telephone numbers that a Driver is to call if there is an emergency. The necessary response actions for the drivers are listed out in a clear and concise manner. IMC only transports cyanide via truck and anticipated emergency situations addressed in the emergency procedures were deemed appropriate.

The IMC cyanide transportation emergency response procedures list out the notification telephone numbers. Phone numbers were last updated in 2025. IMC is located near Draslovka in Memphis and IMC would coordinate any emergency response very closely with Draslovka personnel, as necessary. The emergency planning documents identify the roles of local responders (Fire and Police) and Draslovka. As a registered U.S. Department of transportation (DOT) Pipelines and Hazardous Material Safety Administration (PHMSA) hazardous materials transporter, IMC also relies on the national network of trained emergency responders from the communities through which they travel.

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.

Draslovka

Draslovka trains emergency responders at its production plant. Records of community interactions / hospital training from 2025 were reviewed and found to be acceptable. The Draslovka Canadian ERAP also details which emergency response companies will respond to emergencies in Canada. Draslovka trained its emergency responders during the recertification period. Records for the most recent training sessions were in 2025. Response personnel from each of the companies listed in the ERAP have been trained.

The roles and responsibilities of Draslovka personnel are clearly described in the Draslovka Global Emergency Response Plan.

IMC

The roles and responsibilities of relevant internal personnel are described in IMC's procedures. Training records were reviewed for all cyanide drivers. Records were complete. The Draslovka online cyanide training includes emergency response procedures. This training is done initially and annually and a review of records from the recertification period showed that training was completed as required.

IMC drivers are to secure the scene and make several notifications. Route assignments for IMC drivers are only local (no long-distance routes) and their responsibilities are limited. All necessary information is noted on the Draslovka fact sheet, which is given to the drivers each time a shipment is made. A review of records and interviews with drivers confirmed this practice. The information was reviewed and was found to be acceptable.

IMC maintains emergency equipment in trucks used for Cyanide shipments. There is a list of emergency equipment that includes, among other things, duct tape, fire extinguisher, warning triangles, a tarp, shovel, and personal protective equipment (Tyvek suit, goggles, gloves, hard hat, etc.). A plastic tote is maintained in each truck. There is a written checklist of equipment that is checked on a quarterly basis during the safety meetings.

Route assignments for IMC drivers are only local (no long-distance routes) and their responsibilities are limited. Tractors used to transport solid cyanide containers are dedicated to this task.

Emergency equipment was available for review. It is checked during the pre-trip inspection process and at safety meetings. The completeness of the equipment in the tote is checked on a quarterly basis during the safety meetings. Equipment is refreshed at the safety meeting, as necessary. Drivers confirm that the equipment is onboard the truck during the pre-trip inspection.

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.

Draslovka

The notification procedures and emergency telephone numbers are described in the Draslovka Global Emergency Response Plan. Emergency contact information is also contained in the Transportation Emergency Information fact sheet. The emergency numbers are checked on at least an annual basis, most recently in 2024. 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.

IMC

Notification procedures are listed in the emergency plan and include contact information for notifying the shipper, receiver/consignee, regulatory agencies, outside response providers (fire and police), medical facilities and potentially affected communities through approved channels. The emergency response documents have the following emergency numbers listed: Safety Risk Management number, after hours number, Draslovka emergency cyanide hotline number, and Chemtrec. This document was last updated in 2025. Draslovka maintains a contract with Chemtrec that defines the telephone notifications to be done in case of an emergency involving a Draslovka product.

The ERP includes internal and external notification and reporting instructions. It is to be reviewed in its entirety at least annually. Records were available for review. The review and test of the phone numbers were done during safety meetings.

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

The operation is:	☒ in Full Compliance with

	☐ In Substantial Compliance with	Standard of Practice 3.3
	☐ Not in Compliance with	

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.
Draslovka The Draslovka Global Emergency Response Plan details immediate actions, cleanup and disposal procedures, and first-aid actions. All aspects of recovery and neutralization are addressed. The plan specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water. **IMC** IMC would employ the services of a professional emergency response team to address an emergency and provide remediation as necessary. The contracted emergency response company would perform remediation and/or clean-up areas. Additionally, Draslovka is immediately notified of any emergency via the Cyanide Hotline and would serve as a critical information point to advise on emergency response and remediation actions. The Draslovka emergency response plan would be used to manage a cyanide incident. The Draslovka ERP details immediate actions, cleanup and disposal procedures, and first-aid actions. All aspects of recovery and neutralization are addressed. In the event of an emergency involving Cyanide release or potential for release, technical support would be provided by Draslovka. Drivers are instructed by procedure and training to call the Draslovka Cyanide Hotline immediately should an emergency occur. The Draslovka emergency response plan would be used to manage a cyanide incident. The Draslovka ERP 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	Standard of Practice 3.4
	☐ Not in Compliance with	

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

Draslovka

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 phone list were last updated in 2024.

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. The drills were in 2022, 2023, 2024, and 2025. The 2025 drill was done together with IMC.

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.

IMC

The emergency procedures were last updated in 2025. Procedures are reviewed at least annually**.**

Routine drills are conducted to determine if response procedures are adequate, equipment is appropriate**,** and personnel are properly trained. Records were available to show that drills were conducted during the recertification period. The most recent hands-on drill was conducted together with Draslovka in 2025.

The emergency procedures are reviewed after deployment of the plan and after emergency response drills. There were no cyanide-related emergency situations during the recertification period. The procedures were reviewed for adequacy during safety meetings and following the emergency response drill that was held in 2025. Revisions to phone numbers and updating of information occurred after the 2024 review cycle. No changes to the procedures were deemed necessary following the 2025 drill.

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

Rail Carrier, Rail Yard, Barge Operator, and Port Due Diligence Investigation Results

The Due Diligence portion of this evaluation included a review of information available for the U.S. Supply Chain. 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 confirmation of formal environmental, health, and safety (EHS) programs, safety performance, external certifications (like Responsible Care®), Dangerous Goods training, emergency response planning and drills, cyanide storage practices, and security. The Draslovka information was confirmed and supplemented with additional publicly available information during this recertification audit process.

The rail partners are all American Chemistry Council (ACC) Responsible Care® Partner companies and go through a rigorous third-party audit process every three years. Confirmation was made that the rail companies are all current with the ACC Responsible Care requirements.

The Sustainability and Environment, Social and Governance (ESG) reports from the rail partners were also used to confirm that the rail partners have very mature environmental, health, safety, and security management systems in place. The Alaska Railroad, AML barge, and the two ports listed below are not Responsible Care partners, but they have been used by Draslovka for decades and were most recently evaluated in 2025 by Draslovka personnel. Due diligence information was found to be sufficient to conclude that the Draslovka U.S. Supply Chain, as described in this report, is compliant with ICMI Cyanide Code requirements. The following audits / due diligence reviews of partners and ports were conducted during this re-certification cycle:

1)	Canadian National Railway Company (CN)	Responsible Care Third-Party Audit	2022
2)	Union Pacific Railroad (UP)	Responsible Care Third-Party Audit	2022
3)	CSX Corporation	Responsible Care Third-Party Audit	2022
4)	Canadian Pacific Kansas City Railway (CPKC)	Responsible Care Third-Party Audit	2022
5)	Alaska Railroad Company (ARRC)	Onsite Review by Draslovka	2025
6)	Alaska Marine Lines (AML)	Assessed onsite by Draslovka	2025
7)	Harbor Island (Seattle) Port, Washington	Assessed onsite by Draslovka	2025
8)	Port of Whittier, Alaska	Assessed onsite by Draslovka	2025

The rail heads and ports listed below were included in the due diligence evaluations of the rail partners and barge operator.

Rail Terminals – Origin Loading Location	Destination / Interim Storage / Unloading Locations
• Marion, AR • Memphis, TN • Woodstock, TN (rail sidings within Draslovka and LSI facilities)	• Fairbanks, Alaska - USA • Laredo, Texas - USA • Nogales, Arizona - USA • Seattle, WA - USA • Vivian, NV (Carlin Terminal Siding) – USA • Malartic, QC (Octium Terminal Siding) - Canada • Harbor Island (Seattle) Port • Port of Whittier • U.S. and Canadian Ports, as listed in the Draslovka Global Ocean Supply Chain Re-Certification Audit Report

Information was available for all rail carriers to demonstrate that they have formal environmental, health, and safety programs that are aligned with ICMI Cyanide Code requirements. The CN, UP, CPKCS, and CSX railroads have continued to be certified Responsible Care® Partner companies for more than a decade. As such, their rail management system, including rail yards and interchange point safety and security, has been audited every three years by a 3rd – party auditing firm and has been found to be suitable and effective. According to interviews, Draslovka maintains close relationships with their rail partners on topics of safety. Information available for CSX shows that this rail partner also maintains a formal Public Safety and Environmental management system that includes the performance of frequent auditing and inspections.

The CN, UP, CPKCS, and CSX are all part of the TRANSCAER® (Transportation Community Awareness and Emergency Response) organization. Records regarding safety performance and the commitment to safe transportation through communities were reviewed and found to be consistent with ICMI Cyanide Code requirements. Rail transport is generally understood to be safer than truck transport. For this, and other reasons, Draslovka ships via rail rather than truck when possible.

For cyanide transport to destinations in Alaska, Draslovka contracts the Union Pacific Railroad (UP) to move cyanide to Harbor Island port in Seattle. The railcar / chassis with the cargo is driven onto the AML barge, transported to the port in Whittier, Alaska. In Whittier, the railcars are rolled back onto the rails and are brought to the Alaska West Express (AWE) yard in Fairbanks by ARCC. AWE stores the cyanide and then it to mines in Alaska. The audit and ICMI re-certification audit of Alaska West Express operations are the subject of a separate audit report and are not discussed further here.

The Alaska Railroad Corporation (ARRC) is owned by the State of Alaska, but it is incorporated and runs like a private business. The railroad operates year-round passenger service and freight train service from Seward to Fairbanks-North Pole. Draslovka initially conducted an on-site Due Diligence assessment of ARRC and

repeated this process in 2025. According to information provided by ARRC and information available on the company website, ARRC has a strong safety, security and environmental program. Formalized policy statements for safety and environmental stewardship are in alignment with Code requirements.

Alaska Marine Lines (AML) is part of the Lynden family of companies; with Corporate headquarter offices in Anchorage, Alaska and Seattle, Washington. A formalized policy statement for environmental stewardship posted on the company website is in alignment with Cyanide Code requirements. AML operations were also evaluated during the onsite Draslovka assessment. Draslovka tracks accidents and incidents involving their product shipments and no accidents or incidents have been reported for either ARRC or AML since these companies were initially used in 1996.

Draslovka has confirmed through its interactions and due diligence reviews that its Alaska transportation partners operate in a manner that is consistent with ICMI Cyanide Code requirements.

Principles and Standards of Practice - Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

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

The railway that services Draslovka out of the Woodstock, TN location is the Canadian National Railway (CN), which is privately owned. The rail cars are interchanged to the Union Pacific Railroad (UP) at the Memphis, TN interchange yard for shipments destined for Nevada, USA and Hermosillo, Mexico. Rail cars destined for San Luis Potosi, Mexico are interchanged with the Canadian Pacific Kansas City (CPKC) railroad in Jackson, Mississippi. Rail cars destined for Malartic, Canada go directly using the CN Railway. There are no other choices of rail partners for the moves out of Woodstock, TN because the railroads own the track that is used.

The point of introducing rail boxcars, hopper cars, and ISO tanks into the rail system is from within the Draslovka plant site perimeter. The operation was evaluated during the Cyanide Code production audit. The rail sidings are within the secure fence-line of the facility and there is no storage of loaded rail cars outside the secure point of loading. The railroads maintain control over routing and employ specific safety measures to ensure the safest transit of hazardous materials possible.

The points of introducing cargo into the intermodal (rail) network are Marion, Arkansas and Memphis, Tennessee. The intermodal containers are trucked by IMC to the Union Pacific, or CSX/CN railheads, at which point they are loaded onto the rail. Truck drivers must be registered for each individual rail yard and entry into rail yards, including the ones used in this Supply Chain, is strictly controlled.

The current route transporting sodium cyanide to Alaska was originally evaluated and chosen in 1996. Although a remote and very extensive routing over highways could be used to reach customers in Alaska,

the more direct and safer routing that was chosen to transport cyanide to the Fairbanks, Alaska area is a combination of rail to Harbor Island port in Seattle, ocean rail barge (AML), Alaska Railroad (ARCC) to Whittier Port, and ARCC rail to Fairbanks (to interim storage), and highway to the mine. Alaska West Express, an ICMI Signatory company, operates its certified interim storage and truck transport operations in Fairbanks.

According to the United States Code of Federal Regulations (CFR) Part 172.820, each railroad operating in the United States must perform an extensive risk assessment and route analysis each calendar year. The safety and security risks present along the routes must be analyzed for the rails and railroad facilities. According to the regulation, railroad facilities are railroad property including, but not limited to, classification and switching yards, and storage facilities. In performing the analysis required by the regulation, the rail carrier must seek relevant information from state, local, and tribal officials, as appropriate, regarding security risks to high-consequence targets along or in proximity to the route(s) utilized. If a rail carrier is unable to acquire relevant information from state, local, or tribal officials, then it must document that in its analysis.

The management of Rail and Barge Transport is:	☒ Consistent 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.

Confirmation was made that all railroads have formal environmental, health, and safety (EHS) programs in place that include internal and/or external auditing programs. The CN, UP, CPKC, and CSX railroads have continued to be certified Responsible Care® Partner companies for more than a decade. As such, their training programs and employee qualification processes have been audited by a third – party auditing firm and have been found to be suitable and effective. The fulfillment of required training is a specific environmental, health, safety, and security (EHS&S) requirement of the Responsible Care Management System (RCMS). The CN, UP, CPKC, and CSX are part of the TRANSCAER® (Transportation Community Awareness and Emergency Response) organization. Records regarding safety performance and the commitment to safe transportation through communities were reviewed and found to be consistent with ICMI Cyanide Code requirements.

As part of the initial Due Diligence review of ARRC and AML it was determined that employees are trained annually in the transportation of hazardous materials. According to information provided by ARRC, it regularly trains its employees in the safe handling of hazardous materials and conducts regular emergency response drills – including drills involving sodium cyanide. Draslovka reviewed this information in 2025 and concluded that ARRC and AML practices continue to be acceptable.

Information publicly available for CSX shows that the railroad has a very good safety performance and formal Public Safety and Environmental management system in place. The CSX 2023 ESG report was used to confirm that it is in compliance with U.S. Federal requirements for rail operations and that a formal risk assessment of all routes and rail facilities was performed within the past calendar years, as required by regulations. Draslovka confirmed through its Due Diligence evaluations that the barge operation AML and both ports used in this Supply Chain (Harbor Island – Seattle and Whittier) have personnel who are properly trained to handle hazardous materials.	
The management of Rail and Barge Transport is:	☒ Consistent with Transport Practice 1.2 ☐ Substantially consistent

Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.	
The CN, UP, CPKC, and CSX railroads have maintained Responsible Care Management Systems for years and undergo a full external, independent audit once every three years which includes a review that the preventive maintenance program for transportation equipment is suitable, adequate and effective. The proper maintenance of rail equipment is also heavily regulated and inspected by the U.S. Federal government, which helps to ensure fulfillment of rail equipment preventive maintenance and inspection requirements by all railroads used in this Supply Chain. Additionally, Draslovka tracks transportation incidents for all transportation modes used throughout the world. The incident tracking database was reviewed during the audit. No significant rail transportation incidents involving sodium cyanide shipments have occurred in this supply chain during the re-certification period. Draslovka ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during this audit and were found to be compliant. Checklists and procedures used by Draslovka and its packaging operations require an inspection of the cargo, containers, and rail equipment to ensure that all equipment is deemed to be safe for transport.	
The management of Rail and Barge Transport is:	☒ Consistent with Transport Practice 1.3 ☐ Substantially consistent ☐ Not consistent

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.	
Limitations on worker hours in the U.S. rail industry are strictly regulated and enforced by the U.S. Government. Draslovka contracts require transportation partners to adhere to all applicable regulations. There is therefore no need for Draslovka to impose additional worker hour limitations in its contractual agreements. Detailed procedures, blocking and bracing diagrams, and checklists are used by Draslovka and the LSI packaging operation during the loading of rail cars and inter-modal sea containers. U.S. Federal regulations require that railroads conduct random drug and alcohol testing and that drug abuse prevention programs are maintained. Draslovka also has these requirements are part of its contractual standard terms and conditions. Records were available to demonstrate that the applicable ICMI Cyanide Safety Program requirements had been fulfilled. Sea-Pac, Port, and Barge operations, including worker safety programs are regulated through a number of U.S. regulatory agencies including the U.S. Occupational Health and Safety Administration and the U.S. Coast Guard.	
The management of Rail and Barge Transport is:	☒ Consistent with Transport Practice 1.4 ☐ Substantially consistent ☐ Not consistent

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.	
To confirm that the barge shipments to Alaska are compliant to ICMI Cyanide Code requirements, The Mining Process Solutions Field Technical Consultants initially performed on-site Due Diligence investigations of Alaska Rail (ARCC), Alaska Marine Lines (AML), the Harbor Island port in Seattle, and the Port of Whittier. Draslovka revisited the operation in 2025 and confirmed that Cyanide Code requirements are still being met. ARCC is contractually responsible for the barge move and the subsequent offloading of the railcars in Whittier, Alaska. Draslovka concluded that ARRC, AML, Sea-Pac, and port operations are conducted in compliance with all ICMI, international, and U.S. Department of Transportation (DOT) requirements. Specific information regarding this practice is addressed in the Draslovka evaluation section 1.5 of this report.	
The management of Rail and Barge Transport is:	☒ Consistent with Transport Practice 1.5 ☐ Substantially consistent ☐ Not consistent

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.	
Draslovka uses a secure web-based rail car tracking system to track the movement of its rail cars. The movement of cyanide rail cars is tracked regularly. Interviews were conducted and personnel stated that appropriate actions are taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that location can always be confirmed. Shipping paperwork was reviewed and was found to be conformant to Cyanide Code requirements, including chain of custody requirements. 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. Rail companies maintain databases with SDS information for the products they carry. This aspect of rail transportation is regulated and inspected by the U.S. Federal government. Barge movements are managed by ARCC. If there are questions as to the location of a shipment that is under ARCC / AML control, Draslovka has ready access to this information through ARCC.	
The management of Rail and Barge Transport is:	☒ Consistent with 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.	
There are no interim storage facilities in this supply chain other than the two ports used for the barge operation. Harbor Island Port (the Seattle Port) and the port in Whittier were both reviewed onsite by Draslovka personnel in 2025. Draslovka concluded that operations continue to be acceptable. A more detailed evaluation of the ports is included in the Draslovka Global Ocean Supply Chain audit report.	
The management of Rail and Barge Transport is:	☒ Consistent with 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.	
CN, UP, CPKC, and CSX have formal Responsible Care® management systems which include emergency response planning. As such, emergency response plans audited by a third-party auditing company at least once every three years. U.S. Federal regulation CFR 172.820 also requires that each railroad have sufficient risk assessment and emergency plans for routes and rail yards in place. In Canada, emergency plans are filed with the government. This was confirmed during the Canada Supply Chain certification audit. CSX reported that it complies with all U.S. Federal requirements, including those for risk assessment and emergency planning. Mining Process Solutions initially confirmed through Due Diligence evaluation that ARCC, AML, and the ports involved in this supply chain maintain sufficient emergency planning information. This information was refreshed in 2025 and Draslovka concluded that operations continue to fulfill Cyanide Code requirements.	
The management of Rail and Barge Transport is:	☒ Consistent with Transport Practice 3.1 ☐ Substantially consistent ☐ Not consistent

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.	
The transportation partners included in the scope of this report have designated appropriate response personnel and committed necessary resources for emergency response. In the U.S., emergency response planning, resource allocation, and emergency response training requirements for transporters of hazardous materials are governed by the U.S. Code of Federal Regulations (CFR) 172, Subpart G, H, and I. Rail carriers are strictly regulated and inspected by the U.S. Federal Railroad Administration. Rail carriers are required to update their emergency safety and security plans for rail yard and in-transit emergencies annually and ensure that the emergency response plans are resourced and that personnel are trained in the emergency planning procedures. Additionally, most of the railroads are members of TRANSCAER - a voluntary U.S. national outreach organization of railroads that is dedicated to emergency response planning and community outreach. The barge operator (AML) and U.S. Ports are governed by the U.S. Coast Guard and U.S. Federal Department of Homeland Security requirements. Applicable legislation, namely the Federal Water Pollution Control Act (1990), the Coast Guard and Maritime Transportation Acts of 2004 and 2006, and the Department of Homeland Security Rule - September 2013 (33 CFR, Parts 151, 155, and 160) require that ports and maritime transporters perform risk assessment and develop spill response plans to ensure that there is an immediate and appropriate response to a hazardous materials or oil spill emergency. Requirements within the regulations call for competent personnel to be trained and available to coordinate emergency response actions and internal or contracted personnel to be available to respond to the emergency. Compliance with the resourcing requirements of these U.S. regulations is confirmed by government agencies. Draslovka also offers immediate technical assistance for any cyanide spill. Draslovka contracts with CHEMTREC to ensure that appropriate notifications and emergency response is initiated if there is an incident.	
The management of Rail and Barge Transport is:	☒ Consistent with Transport Practice 3.2 ☐ Substantially consistent ☐ Not consistent

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.	
The CN, UP, CSX, and CPKC are part of the TRANSCAER® (Transportation Community Awareness and Emergency Response) organization which helps with notification requirements. Draslovka contracts with CHEMTREC to ensure that appropriate notifications and emergency response is initiated if there is an incident on any rail or barge move.	
The management of Rail and Barge Transport is:	☒ Consistent with 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.	
CN, UP, CPKC, and CSX are Responsible Care® Partner companies. As such, each railroad is required to have a formal emergency response program. Although the emergency response plans were not reviewed during the due diligence review, Mining Process Solutions does have procedures in place for the remediation of a cyanide spill and Appendix C of the Draslovka Global Emergency Response 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. 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 Draslovka Global Emergency Response Plan .	
The management of Rail and Barge Transport is:	☒ Consistent with Transport Practice 3.4 ☐ Substantially consistent ☐ Not consistent

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.	
Cyanide Hotline personnel are periodically involved in drills performed by sites and transportation partners. As part of the rail carrier safety programs such as TRANSCAER® *(Transportation Community Awareness and Emergency Response)*, drills and exercises (not necessarily cyanide specific) are conducted to test response capabilities. According to the initial ARRC due diligence investigation, ARRC and AML perform annual drills, as required by the State of Alaska. Mining Process Solutions has participated in these drills in the past. Draslovka refreshed this information and re-affirmed in 2025 that operations fulfill requirements. CN, UP, CPKC, and CSX are all Responsible Care® Partner companies. As such, each railroad is required to regularly conduct emergency response drills and maintain up-to-date emergency response information. This practice is confirmed at least every three years by a third-party auditing firm.	
The management of Rail and Barge Transport is:	☒ Consistent with Transport Practice 3.5 ☐ Substantially consistent ☐ Not consistent