

ICMI Transportation Verification Protocol (Revision June 2025)

Summary Audit Report

Empire Express, Inc.

2025 Re-Certification Audit



Submitted to:

The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

www.mss-team.com



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Operation General Information

Name and location of Operation:	Empire Express, Inc. 999 Channel Avenue Memphis, TN 38106
Names and contact information for this facility:	John Phillips Chief Operating Officer Phone (901) 942-3300 ext 114 john@empireexpress.com

Operation Description

Empire Express has been an established trucking operation in Memphis, TN since 1985. The operation was audited and has consistently been found to be in full compliance to the International Cyanide Management Institute (ICMI) Cyanide Code in since its first Code certification in 2010. Empire Express is also a Responsible Care® Partner Company and has maintained a certified Responsible Care Management System® since 2008. Empire Express uses its management system to fulfill ICMI Cyanide Code and other environmental, safety, health, and security requirements and demonstrate its public commitment to operate in a safe, secure, and environmentally responsible manner.

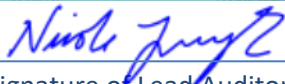
Empire Express transports solid sodium cyanide that is loaded into dry van trailers or ISO tanks by Draslovka, the Cyanide Producer, or its certified packaging operation, Lemm Services, Inc. (LSI) in Memphis, Tennessee, United States. Cyanide is transported from Memphis to locations in the USA, Canada, and to the U.S./Mexico border. The Mexican shipments are transported to final destinations by a Mexican carrier that has also been certified as compliant with the ICMI Cyanide Code.

Empire Express is responsible for route determination, shipment tracking, truck inspections, preventive maintenance, training, safety program management, and emergency response planning. All operations were reviewed during the re-certification audit. The ICMI-approved Lead Auditor verified that Empire Express operations are in Full Compliance with ICMI Cyanide Code requirements for transporters.

Audit Implementation and Conclusions

This re-certification audit was conducted through on-site observations, reviews of records and procedures, and interviews with senior management, operations management, engineering, and environmental, health & safety (EH&S) staff. Empire Express personnel across all functions were actively involved in the audit. The auditor used the ICMI *Cyanide Transportation Verification Protocol* to evaluate International Cyanide Management Code (Cyanide Code) compliance.

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Signature of Lead Auditor

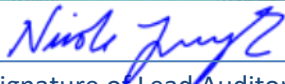
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Procedures, equipment condition and records were evaluated during this audit. The assessment was based on random samples of information and therefore deficiencies may exist which have not been identified. The depth to which records and data were sampled was typical of an environmental, health and safety (EH&S) management system audit. The scope of the review was the assessment of compliance with the ICMI Cyanide Code and did not include a review of federal, regional, or government regulations.

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

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

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Auditor's Finding

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

The Empire Express Inc. cyanide safety performance for the recertification period was excellent, there were no cyanide-related safety incidents, accidents, spills, or exposures. The cyanide management practices for the Empire Express transport operations were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol*. Empire Express internal standards, policies, practices, and procedures regarding the management of the cyanide operations were reviewed.

Significant improvement was noted in the areas of cyanide management-related training and documentation. 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 Empire Express cyanide-related transportation is in FULL COMPLIANCE with International Cyanide Management Code requirements.

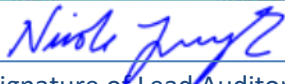
Compliance Statement

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
Date of Audit:	January 27-28, 2025

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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 Detailed 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.

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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.

Empire Express has implemented procedures to minimize the potential for accidents and releases during the transport of cyanide.

Empire Express maintains a formally documented "Cyanide Route Process" procedure. The process is owned by the Vice President of Safety and Risk Management and was last updated in 2025. The procedure addresses the selection of routes, route risk assessment, the review and re-approval of routes at least every three years (or as necessary), the Blackout Area Process, and winter considerations for risk control.

The auditor reviewed the routes used to transport cyanide with the Management Team and operations personnel during the audit. Empire Express uses computerized route planning software, PC Miler, and a documented procedure to determine routes. According to interviews, computer-recommended routes are evaluated to determine if comparable routes would be available that would reduce the risks associated with proximity to high population densities, poor road infrastructure (sharp turns), pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather resulting in poor driving conditions. Driver feedback and community input regarding designated hazmat routes are considered during the initial risk assessment and the re-evaluation every three years. Any changes to hazmat routing would be identified when the PC Miler software generated refreshed route information during each review cycle. Routing considerations were found to continue to be consistent with those required by the Code.

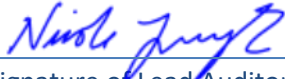
Route re-evaluation records, including refreshed data runs of the routes using the most current PC Miler software revision, and 2025 re-approvals were available for all 21 routes driven. The route information is maintained in designated electronic folders that are available to operations personnel. Information is printed out for drivers at the time of dispatch to ensure that route-specific considerations are available during transport. The electronic system in the trucks is also used to communicate certain information to drivers, such as mine requirements and route considerations.

A review of GPS records from recent dispatches was used to confirm that risk mitigation measures are being fulfilled.

The VP of Safety and Risk Management evaluates risks associated with routes when they are initially established and at least every three years thereafter. Records were available to demonstrate that this practice was implemented and is being effectively maintained. The routes are also reviewed and approved by Draslovka (the shipper). Risks occasionally include the presence of blackout areas. Security risks

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associated with U.S./Mexico border deliveries continue to be managed with increased security measures and the use of designated "safe" truck stops. Empire Express continues to maintain its CT-PAT certified status.

Interviews with a sampling of Empire Express Cyanide route drivers confirmed that driver feedback is obtained after each delivery. Feedback from the drivers is considered during the risk assessment process. Interviews with Drivers and Staff confirmed this process.

Risk mitigation measures focus primarily on the avoidance of high traffic times of day and the avoidance of roads that are dangerous in poor weather conditions. Drivers are authorized to stop driving if conditions are deemed to be unacceptable or dangerous. Dispatch personnel are notified immediately in such circumstances. Each route is documented, and risk mitigation measures are included. This information is made available to the driver in the shipping instructions for each delivery.

Community input regarding the transport of cyanide is incorporated into the route planning process using routing software, PC Miler with HazMat, that indicates whether communities have restricted use of specific roadways for the transportation of hazardous materials.

Additionally, the auditor observed other examples of route adjustments based on stakeholder (including mine sites) feedback to accommodate seasonal weather and road risk conditions. Mine route information is also attached to the route approval documentation. Some mines include community considerations in the route information. This information is printed out for the drivers, and they reported that they are aware of the need to adhere to community needs and expectations near the mine sites.

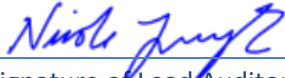
Empire Express has a formalized security plan and theft avoidance procedures in place.

Some mines require an escort along a portion of the routes. In these cases, the instructions are part of the route package and drivers call a phone number, the escort comes, stops all other traffic (as necessary), and the truck then proceeds. This is done to mitigate risks.

Empire Express does not subcontract any portion of their cyanide transportation operations.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.1
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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

Empire Express has implemented procedures to ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

All Empire Express drivers have a U.S. DOT Class A Commercial Driver's License (CDL) with a Hazardous Materials endorsement. The Cyanide Transport Process is documented in a procedure that was last updated in 2025. The procedure details that the qualification criteria for cyanide drivers include a minimum of 5 years holding a valid CDL and a minimum of 3 years holding a HAZMAT endorsement. Empire Express employs a computerized tracking system which blocks drivers from being assigned to loads for which they are not qualified or properly trained. The records for multiple drivers were reviewed. Drivers were interviewed and were found to have an appropriate level of knowledge and safety awareness.

All drivers must complete training and testing prior to being allowed to move cyanide. Empire Express demonstrated significant improvement regarding training this audit cycle. In addition to Draslovka training for drivers, Empire Express employees all receive in-house developed training. Personnel from across the organization and functions showed excellent awareness of Cyanide Code requirements, transportation routing requirements, cyanide safety, and risk management processes.

Training is given at defined intervals to ensure that all personnel operating, handling, and potentially needing to respond to a cyanide emergency execute their duties in a manner that minimizes the potential for cyanide releases and exposures. Drivers receive classroom, computer-based training, and on the job training with a road test prior to being authorized to transport cyanide.

Internal training records for Empire Express personnel were reviewed and found to be acceptable. Cyanide Safety training is given to each driver at orientation and is required again annually. Hazmat training is given annually as part of the employee annual review process.

Empire Express also utilizes the McLeod Management System. The Operations department is only able to dispatch drivers on a cyanide load when the "CYN" credential is present. The McLeod credential is valid for one year. The VP of Safety and Risk Management receives an email notification as a driver's certification is set to expire. Training awareness and records were exceptional during the audit.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.2
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

Empire Express ensures that transport equipment is suitable for the cyanide shipments.

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 label. Equipment labels were reviewed during the audit.

Truck inspections and preventive maintenance actions are performed regularly (at least quarterly) to ensure the adequacy of equipment to carry the specified loads. Inspections are scheduled, tracked and documented. Records show that maintenance activities are being performed as planned.

The procedure Equipment Maintenance Process is used to verify the adequacy of equipment for load bearing. Truck inspections and preventive maintenance actions are performed regularly (at least quarterly) to ensure the adequacy of equipment to carry the specified loads. Inspections are scheduled, tracked and documented. Records show that maintenance activities are being performed as planned.

The adequacy of all equipment is confirmed regularly through pre-trip inspections by the drivers and shop inspections by mechanics at defined frequencies that far exceed minimum regulatory requirements. In addition to regular maintenance and inspections, a specific "Mexico Trailer" inspection is performed for all trailers destined for Mexico. This heightened level of detailed inspection ensures that all aspects of the trailer safety (tires, breaks, lights, etc.) are in top working order prior to being sent across the border.

The ISO tanks inspections are managed by Draslovka. Confirmation was made directly with Draslovka during the audit that all ISO tanks observed during the audit were within inspection dates.

Weight tolerances were confirmed through the review of records and placards on trailers. The Driver Handbook requires that drivers confirm the weight of their trucks by driving onto scales. Interviews with Drivers confirmed that each truck needs to run across a scale in West Memphis after being loaded. Drivers also confirmed that if the truck and cargo are over the 80,000-pound legal limit they return to the shipper to resolve the issue. Draslovka ships standard loads with known weights and there is little to no risk that the trucks will be over the legal limit, which is much lower than the technical limit of the equipment used.

A review of shipping papers confirmed that loads have not exceeded the truck/chassis capacity ratings. Additionally, a review of McLeod Enterprise Software records showed that there have been no weight violations during the re-certification period involving Empire Express vehicles transporting cyanide.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.3
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.

Empire Express has developed and implemented a safety program for the transport of cyanide.

Cyanide packages are loaded by Draslovka. Draslovka uses a checklist to confirm that the blocking and bracing has been done properly. Empire has also made significant improvements in its processes this recertification cycle by developing and fully implementing a new "Hazmat Verification Process". Drivers now go through an electronic checklist prior to departure and record photos of proper cargo securement, locks on trailer doors, etc. Email notifications are sent back to the main office and electronic records are maintained. This process was noted as best practice during the audit for innovation and effectiveness of implementation. Records sampled during the audit were complete and compliant with process requirements.

Drivers are instructed to stop and call the Empire Express Safety office if there is concern regarding the shifting of the load. Interviews with drivers confirmed awareness.

Appropriate placards are displayed on the back and both sides of the trailers. The Hazmat Verification Process is used to confirm that placards are properly placed. Photo records maintained electronically demonstrated compliance with this requirement. Equipment was observed during the audit as having the proper placarding on all sides of the trailers and interviews with drivers confirmed their understanding and actions. HazMat Training content that reinforces these requirements provided to drivers was also reviewed during the audit and found to be acceptable.

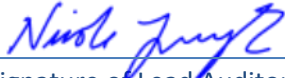
Pre-trip inspections, including the new Hazmat Verification inspection are done prior to every cyanide transport.

Empire Express employs full-time mechanics who perform preventive maintenance on all transportation equipment at regular intervals. The maintenance frequency is determined by mileage driven and the results of previous inspections. Every trailer is "touched" at least every 90 days. Regular checks of the equipment include checks of in-cab technology. Pre-defined checklists showing the required maintenance tasks are used to record actions. Trailers headed for Mexico receive an additional "Mexico Trailer" inspection to ensure that all safety equipment (tires, brakes, lights, etc.) are completely functional prior to the trip. The incoming and outgoing condition of the equipment is recorded on the checklists and associated repair orders. Equipment files for multiple tractors and trailers were selected for review during the audit. Empire Express uses best practice regarding the maintenance of equipment. The equipment is in excellent condition, as are the extensive equipment files.

The Safety Program includes limitations on drivers' hours in accordance with U.S. Federal Motor Carrier Safety Regulations (FMCSR). The current regulatory limits are: 11 hours a day maximum driving, maximum on-duty is 14 hours. 30-minute break in the first 8 hours. Drivers are informed of legal requirements and are encouraged to stop driving if they become too tired (empowerment). Electronic logs are used on each trip and drivers are monitored on a continuous basis to ensure compliance with regulations. Both the

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Fleet Manager and Safety Representative monitor this information.

Cyanide trailers and ISO tanks are loaded by Draslovka. Empire Express drivers confirm that the load has been properly secured after the cargo has been loaded. Draslovka and Empire use formal checklists and photo records to confirm that the blocking and bracing of the loads was done properly.

The Driver Policy and Procedures Manual details how drivers are empowered and directed to pull over whenever weather, fatigue or other conditions make it unsafe to continue trip. In such instances the driver is to call in to the office. Driver Fatigue awareness training is also given to drivers periodically during quarterly safety training. Drivers interviewed understand this procedure.

A drug abuse prevention program is in place. Pre-employment testing is required for all potential employees. The Driver Policy and Procedure Manual details the company drug and alcohol policy. Drivers are subject to random sampling on a quarterly basis. Records were available to demonstrate conformance to all safety program requirements. National Toxicology Specialists is the independent contractor used to manage and administer these tests. Procedures and records were reviewed with Empire Express personnel.

Records were available and reviewed to demonstrate that the Cyanide Code requirements had been fulfilled for the recertification period.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.4
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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

Empire Express does not transport cyanide by sea, nor does it deliver Draslovka cargo to ports.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.5
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.

Empire Express tracks cyanide shipments to prevent losses during transport.

Dispatchers maintain contact with drivers and are kept updated as to the location of the trucks. Each truck has GPS signaling Samsara, and a MobilComm communication system. The drivers also have cell phones. Empire Express uses GPS, MobilComm and cell phones to ensure that trucks are continuously tracked. If a truck or trailer is immobile for too long, the system sends an alert, and Dispatch will check in with the driver. Interviews with drivers, dispatchers, management personnel confirmed the practices and a review of records from shipments during the re-certification period were reviewed during the audit and found to be complete.

Problems with the communications and tracking equipment would become readily apparent because the equipment is used continuously each day. Drivers are responsible for equipment checks and reporting issues. Interviews confirmed drivers understand this process.

A communication equipment check is part of the regularly scheduled maintenance on the trucks. The equipment is also checked during the driver pre-trip inspections.

A risk assessment review of each route is conducted initially and at least every three years thereafter. This evaluation includes the identification of blackout areas along transport routes. Blackout areas do not present a significant problem for the majority of routes given today's tracking technology.

Empire Express does, however, maintain a satellite phone for the route with an identified blackout area. The Driver is given the satellite phone when he/she is leaving on the designated route. The auditor accepted the procedure.

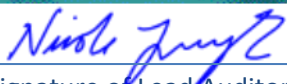
Empire Express uses several methods to ensure that trucks are continuously tracked using GPS. Interviews with drivers, dispatchers, and management personnel and a review of computer records from shipments made during the re-certification period were used to confirm that cyanide shipments are being tracked carefully.

Trailers and ISO tanks are closed and sealed by the driver upon loading at Draslovka. The trailers are also locked in addition to the seal being applied. Empire Express does not open the trailers or the ISOs thereafter. Shipping records and U.S./Mexico customs records were reviewed and the seal numbers on containers and the weight of the shipment are confirmed at the point of transfer of custody. Shipping paperwork, including bills of lading, was reviewed and found to be conformant to Code requirements, including chain of custody requirements.

Drivers have shipping documentation including the Bill of Lading with them during a shipment. Bills of Lading were reviewed. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment were found to have been entered consistently onto the Bill of Lading by the Shipper. Drivers also have the sodium cyanide SDS, Draslovka Transportation

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Emergency Sheet with emergency numbers and instructions, and the Emergency Response Guidebook with them during deliveries. This practice was confirmed through interviews with several drivers and a physical review of the shipping paperwork and Driver Manual that was available in the trucks during the audit.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.6
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> 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.

Empire Express stores cyanide in a manner that minimizes the potential for accidental releases.

Empire Express provides short-term storage of loaded trailers when business demands require it. To be compliant with ICMI Cyanide Code requirements, Empire Express developed a policy and internal requirements for interim storage.

Signs are posted in the solid cyanide interim storage area at the terminal and include statements that cyanide is present, and smoking, open flames, eating and drinking are not allowed in the area. The placards on the trailers also alert workers that cyanide is present. The placards are not removed from loaded trailers and interviews showed that all terminal personnel were aware of the contents of the trailers. Access to the storage area by unauthorized people is prohibited. The auditor determined the signage in the area to be sufficient and to comply with all ICMI interim storage requirements.

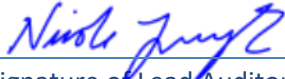
The trailers are not opened by Empire Express, and no personal protective equipment is necessary. Personnel who work at the terminal (drivers, maintenance, office workers) were interviewed to confirm that they understand that Cyanide is present in the designated area. Awareness was excellent.

Additionally, Empire Express files Tier II reports to ensure compliance with EPCRA Section 313 requirements. These are annual notifications of the storage on site of cyanide to the appropriate governmental authorities. This information is supplied for offsite emergency planning purposes. Reporting documents submitted by Empire Express were examined by the auditor and found to be complete.

Security on the lot includes electric fencing with razor wire, cameras, and a facility that is manned 24/7. Systems used to prevent unauthorized access to cyanide were found to be very robust and effective. Daily yard checks are performed. The security systems and processes were observed during the audit and were identified as being best practice for the trucking industry.

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The designated cyanide storage area is separated from other areas to ensure that the cyanide is not stored next to incompatible materials. Personnel interviewed confirmed understanding of material compatibility safety. The auditor found the Empire Express cyanide interim storage policy and storage area to be compliant. No other materials or trailers were stored near the cyanide storage area.

The loaded trailers are not opened by Empire Express personnel. The trailer itself and the packaging keep the material dry. The trailers are included in a regular inspection program, including integrity of each unit. There is a formal yard check in the morning. The inspection includes the placement of the materials and checking for any problems in the yard. There is also an informal yard check in the afternoon to ensure that materials are parked in the proper locations.

Empire Express exclusively stores cyanide outdoors in sealed original packaging in originally packed trailers to ensure adequate ventilation and prevent the build-up of hydrogen cyanide gas or dust.

The only material temporarily stored at the truck yard is solid cyanide briquettes in ISO tanks, multiple layers of packaging in 1-ton Eco-Pak or wood box, or in returnable containers (FLO-BIN®) that are manufactured to the Department of Transportation (DOT) specifications within sealed trailers. Empire Express does not transport or store sodium cyanide solution. The DOT approved ISO tanks and dry van trailers were determined by the auditor to fulfill ICMI containment requirements. Draslovka Eco-Pak and wood box packaging certifications (March 2024, and February 2024, respectively) were available for review during the audit. The ISO tank inspections and maintenance are managed by Draslovka. Three ISO tanks were observed on the truck yard. Draslovka readily provided complete records to demonstrate that the ISO tanks were within their inspection period.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 2.1
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

Empire Express has prepared detailed emergency response procedures for potential cyanide releases.

Empire Express maintains several documented Emergency Response Procedures that are part of the overall Driver Manual. The procedures were last updated in 2025. Empire Express drivers are to secure the scene and make emergency notifications. The response notification plan is included in the Driver's Manual. Empire Express also uses the Draslovka "Emergency Transportation Information" sheet that is published and maintained by Draslovka. Drivers showed that the emergency information sheet is part of their paperwork that they always maintain in the trucks during deliveries.

Empire Express only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, the type of trailer (dry van or ISO tank), and the roles of the different emergency responders are discussed in the planning information.

Empire Express drivers are to secure the scene and make several notifications in the event of an accident. The plan was found to be appropriate for the company and the type of cyanide shipments made by Empire Express. Detailed information regarding the chemical and physical forms is on a fact sheet provided by Draslovka. This document is part of the emergency response procedures and is kept in each truck during shipments.

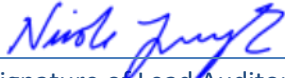
Empire Express provides interim storage of trailers containing solid sodium cyanide. Empire Express prepared emergency response plans for potential releases that could occur at the storage area on the Empire Express terminal yard. Information about response actions, including notifications to offsite authorities, was found to be complete and appropriate for the operation. Additionally, identification of roles of outside responders has been addressed in emergency response procedures for terminal emergencies. Furthermore, Empire Express has conducted training on this procedure. Records of training conducted during the re-certification period were reviewed by the auditor.

Empire Express has documented Emergency Response Procedures for transportation accidents and for the interim storage yard. Empire Express drivers are to secure the scene and make several notifications.

Empire Express only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging at the interim storage yard. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, the type of trailer (dry van or ISO tank), and the roles in the event of an incident at the truck yard. The roles of

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the different emergency responders are also discussed in the planning information.

Empire Express has adequately considered interim storage in its emergency plan as described above.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 3.1
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

Empire Express has designated response personnel and committed necessary resources for emergency response.

Training on the emergency response procedures was given to all employees, terminal office, maintenance shop and drivers initially and then periodically thereafter. Refresher training on many topics is given annually, and all topics are reviewed at least every three years. Formal computer-based training from Draslovka, including emergency response and first aid actions is assigned and completed by all Cyanide Qualified drivers annually. Operations personnel at the terminal interim storage area who may need to respond to a cyanide-related exposure or spill are trained to refer to Draslovka's Transportation Emergency Information sheet (emergency response plan) regarding preliminary First Aid procedures. This information is easy to locate in the Empire Express management system documentation in Empire's Driver Policy and Procedure Manual. In addition to initial first aid steps, employees are advised to call 911 and the Draslovka's Emergency Cyanide Hotline immediately. Emergency response training takes place initially during Employee Orientation and periodically through informal training sessions. Emergency response topics are also refreshed throughout the year during the distribution of weekly safety messages. Examples were available for review. Empire Express drivers, dispatchers, and office personnel were interviewed during the audit. Awareness of emergency response actions, including first aid for cyanide exposure, was confirmed to be appropriate.

Empire Express drivers are to secure the scene and make several notifications. The roles, responsibilities, and duties of office personnel are also included in the emergency procedures. The information found in the current emergency procedures, Driver's Manual, and Draslovka Emergency Information sheet was reviewed and found to be acceptable.

The emergency equipment list is part of the Driver's Manual and part of the training materials. The North American Emergency Response Guidebook (ERG), Material Safety Data Sheets, personal protective equipment and spill equipment (mats, gloves, Tyvek chemical suit, tarp, etc.) are maintained on the trucks. Interviews with drivers confirmed awareness. The check of the emergency equipment is part of the new

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Hazmat Verification process inspection by drivers when they pick up a cyanide load. Records were available for review. The maintenance group also checks the completeness and condition of the emergency response kit as part of the regular preventive maintenance inspections of the trucks. Equipment on the trucks observed during the audit was found to be complete and in good condition.

The Empire Express terminal (interim storage location) also has spill kits, first aid kits, personal protective equipment, shovels, tarps, empty drums to help with containment and immediate protection. Empire Express employees, however, are not trained or authorized to remediate or clean up a cyanide spill. In the event of a spill, Empire Express employees would notify Draslovka who then follow its emergency response procedures. Draslovka is in relatively close proximity to the Empire Express terminal and could reasonably deploy personnel to assist with a cyanide emergency at the interim storage yard.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 3.2
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

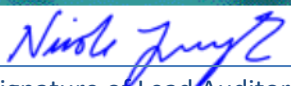
Empire Express regularly evaluates its emergency response procedures and capabilities and revises them as needed.

Empire Express procedures detail the company's role in an emergency, which is strictly one of notification. 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. Additional notifications, such as to Chemtrec and to the Empire Express VP of Safety and Risk Management, are also made by the Driver. Draslovka provides a Transportation Emergency Information sheet with each shipment. The telephone numbers that would need to be called by a Driver are on this sheet. Telephone numbers for hospitals, authorities, etc. were found to be up to date. The emergency procedures and telephone numbers are reviewed at least annually, and as necessary. The last updates to the plan were done in 2025. The information was up-to-date and complete.

Emergency procedures include the requirement to notify ICMI if a significant cyanide incident occurs. There were no significant cyanide incidents (spills or exposures) during the recertification period.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 3.3
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

Empire Express has developed emergency procedures that recognize the additional hazards of cyanide treatment chemicals in surface waters.

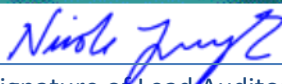
Empire Express procedures detail the company's role in an emergency, which is strictly one of notification. This was found to be acceptable by the auditor. Draslovka is immediately notified of any emergency via the Cyanide Hotline and would serve as a critical information point to advise on emergency response and remediation actions. Draslovka's emergency response plan would be used to manage a cyanide incident. Draslovka's ERP details immediate actions, cleanup and disposal procedures, and first-aid actions. All aspects of recovery and neutralization are addressed.

Empire Express procedures detail the company's role in an emergency. During road transport, Empire Express employees notify Draslovka and others if there is an incident. Although Empire Express would not physically remediate or respond to a cyanide spill, the emergency procedures do state that the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide is prohibited for spills into surface water. This statement was included in the event Empire Express personnel need to engage a third-party service provider following a cyanide release. There are no water bodies near the interim storage yard. Draslovka would be the lead decision-maker in the event of any incident involving cyanide. Draslovka's emergency response plan would be used to manage a cyanide incident.

Draslovka's ERP 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 Empire Express personnel confirmed awareness of the hazards of using de-contamination chemicals in surface waters.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 3.4
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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

Empire Express annually evaluates and tests its emergency response procedures and capabilities and revises procedures and plans, as needed.

The emergency procedures are reviewed annually and after emergency response drills. The last updates to the plan were done in 2025. The information was up-to-date and complete.

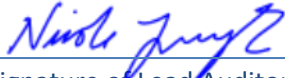
Empire Express conducts emergency drills to determine if response procedures are adequate, equipment is appropriate, and personnel are properly trained.

The hands-on emergency drills were conducted by Empire Express on in 2022, 20223, and 2024. Records of the drills were available for review. Results of the drills are shared with drivers during their annual hazmat training. The scenarios involved cyanide residue dripping from an ISO tank following a breach of the transportation container. Drill results were reviewed by the auditor and found to be acceptable.

Emergency procedures are reviewed every year and after mock drills. Records from the recertification period were available for review and found to be complete. The last review of the emergency procedures was conducted in 2025.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 3.5
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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Name of Operation


Signature of Lead Auditor

June 5, 2025
Date