SUMMARY AUDIT REPORT

GRUPO CINCA

Cyanide Transport Operation

For The

International Cyanide Management Code

May 2025

BP Cyanide Auditors

Content

Information on the audited operation

Name of the Transport Operation:	Grupo CINCA
Name of the Company Ownership	Grupo CINCA
Name of Operating Company:	Grupo CINCA
Name of Responsible Manager:	CP Matias Gonzalez
Operation Address:	General Mosconi s/n entre calles 5 y Progreso. Villa Krause CP 5425 - Rawson
State/Province:	San Juan Country: Argentina
Telephone: +54 9 264 567-3065	Email: matias.gonzalez@grupocinca.com

Location detail and description of operation

Grupo Cinca is located in the Province of San Juan, Argentina, on Calle General Mosconi s/n between Calles 5 and Progresso. Villa Krause, in the Rawson department. It has ample spaces and adequate facilities for the development of logistics and maintenance activities.

Grupo Cinca, is integrated by Cinca S.A. and PSA S.R.L., forming a group of companies in the Province of San Juan dedicated to the activities of transport services, logistics and provision of human resources.

Cinca S.A., is a company with a vast history in the international transportation of cargoes to different parts of South America (Bolivia, Brazil, Chile, Paraguay, Peru, Uruguay). Transportation of hazardous materials, lime, mercury, YPF fuel, general cargo, and oversized cargo.

PSA S.R.L. (PSA) is a company dedicated to the transportation of passengers, transportation of general and dangerous cargo, mechanical maintenance, logistics and provision of human resources.

Sodium cyanide is transported from Puerto Zarate in Buenos Aires port to the mining clients in convoy. Each truck carries a 20-foot sea container with 20 Intermediate Bulk Containers (IBCs) of approximately 1 tone of sodium cyanide in each IBC.

Semisa (now part of PSA S.R.L.) was audited pre-operationally in the International Cyanide Management Code (Cyanide Code) in 2020 achieving pre-operational certification. Ending year 2020 Semisa started its first shipments with cyanide currently carrying solid sodium cyanide in sea containers to Gualcamayo mine in San Juan (Argentina) in convoys of at least 5 to 6 trucks with a leading escort pick-up truck with

anti-spill kit and emergency response kit. If the convoys increased, the escort pick-up truck increased as well.

Occasionally, transportation of sodium cyanide is made to the Veladero mine in San Juan. Also, sodium cyanide is occasionally transported to Cerro Moro in Santa Cruz.

Sodium cyanide is usually supplied by Draslovka.

In the case of transportation in the province of San Juan, the regulation requires an additional escort vehicle with 3 firefighters per convoy, equipped with 2 self-contained breathing apparatuses.

For transportation to Cerro Moro, the regulation in the province of Santa Cruz mandates an additional HAZMAT escort vehicle in addition to the CINCA group's vehicle. This escort vehicle is hired by Pan American Silver, the owners of Cerro Moro.

Grupo Cinca is certified in ISO 9001: 2015, ISO 45001:2018, ISO39001:2012. Grupo Cinca headquarters include offices, workshop and personnel to perform predictive, preventive and corrective maintenance of all fleet units, spare parts warehouse, fuel supply tank, tire sector, sector of metallurgical for repairs of bodies and interiors of the units, carwash sector for cleaning of all fleet units, dining area for their drivers and training room for drivers.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

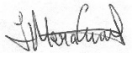
Auditor's Finding

This operation is

- ✓ in full compliance with — with the International Cyanide Management Code
- ☐ in substantial compliance with
- ☐ not in compliance with

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

Auditor's Information

Audit Company:	BP Cyanide Auditors SAC	
Lead Auditor:	Álvaro Fuentes Huanqui	Signature: 
Technical Auditor for transport:	Marcos Mera Escala	Signature: 
Date(s) of Audit:	December, 19 -20, 2024	

Auditor's Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, 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 Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the Cyanide Transportation Verification Protocol for the International Cyanide Management Code and using standard and accepted practices for health, safety and environmental audits.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

Transport Verification Protocol

1. *TRANSPORT:*

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

Standard of Practice 1.1

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

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

Grupo Cinca (Cinca) has implemented a process to select routes that minimize the potential for accidents and spills, the selection of routes is framed within the national regulations that regulate the authorized roads for transportation of hazardous materials, the selection defeats are given by an evaluation of risks and commercial requirements.

The route has been reviewed and authorized also by Gualcamayo mine, the route sheet that passes through route 8 where there are no bodies of water or fog on the route; approved by the logistics manager. The route sheets are reviewed at least once a year or when there are changes to the route.

The route sheet includes sector, way point, route, mileage, maximum speed, risk level, characteristic, associated risk, risk control and area photography. In the characteristic field, the population density, infrastructure condition, proximity to bodies of water, fog, slope are described.

Potential impacts due to spill accidents have been taken into account. Cinca identified the population density, any road construction, driving in the road infrastructure, inclination and slope, the existence of proximity of bodies of water and fog zones.

The roadmap includes a general guide map of the evaluated route, a guide map by main segments describing for each segment the distances, travel time, maximum speed allowed, the type and conditions of the road, the population centers and location of water bodies. It includes a list of the telephone contact numbers for emergencies, the segment conclusions, general recommendations and safe places to stop. Also includes a detailed risk assessment whereby means of photographs and

symbols identify the hazards of the route and the controls necessary to minimize them.

Cinca has developed and implemented the procedure Hazard Identification, Risk Assessment And Health And Safety Factors PGI-03 which has been applied to the road map in the selection of routes and had established the necessary controls. The route evaluation carried out for Gualcamayo mine has considered the characteristics that present a greater risk of accidents or potential impacts such as steep slopes, sharp curves, narrow or rough roads and proximity to surface water resources. The transporter has identified the areas that present increased risks and has documented these in their risk analysis performed such as reducing vehicle speed and also training drivers.

The auditors reviewed the route evaluation, route reports, and the procedure for hazards and risks identification.

The procedure for hazards and risks identification states to reevaluate risks in each service, for example due to a change in the route. After every cyanide shipment Cinca generates a trip report where any novelty and lessons actions learned are reported. Additionally, all personnel involved in the cyanide transport operation has a WhatsApp group where any news, including route conditions, are communicated.

Cinca management members and drivers were interviewed and confirmation was made that feedback regarding routes is discussed between them the current transport operations, with participation also of the cyanide consignor.

The transporter documents it's risk analysis where they have identified the risk and measures taken to control them. Road characteristics such as sharp curves, areas near waterbodies and high-density population are having special precautions to transit through.

Cinca personnel were interviewed, and confirmation was made that risks and risk mitigation measures are detailed for the route. They meet to discuss risks and risk mitigation measures before departing on each trip. Route evaluations for the transportation routes used for shipments were complete and records were available for review. Routes are evaluated separately for safety issues,

workers safety, environmental, nature risks and for cell phone coverage.

The route sheet includes controls such as respecting the traffic law, defensive driving, being aware of road conditions or not crossing the central axis of the road to avoid the risk of collision.

Cinca has the authorization of the National Road Safety to use the route currently in use to transport cyanide from the Argentinian port to Gualcamayo mine, which is a document reviewed biannually by the national transport authorities and authorize to circulate on national routes according to the type of cargo and vehicle used. This document issued is also reviewed by the firefighters.

Cinca is also in contact and interacts with CIPET (Spanish acronym for Transportation Emergency Information Center) which is a nationwide service of the Argentinian Chamber of Automotive Transport of Goods and Hazardous Waste together with the Secretariat of Civil Protection of the Ministry of National Security. CIPET, is the information center for emergencies in the road transport of general cargo and dangerous goods that operates uninterruptedly since 2008, 24 hours a day, 365 days a year throughout the national territory. Cinca informs CIPET at the beginning of each trip via WhatsApp.

Interaction with the communities in the surroundings of the mines are in charge of the mine, according to their request. Draslovka, the cyanide consignor, has also reviewed the route and authorizes its use to Cinca. The transporter has presented its contingency plan to the cyanide consigner and the mine site where it updates the risks evaluated on the route.

The auditors reviewed meeting minutes between Cinca, the cyanide consignor and the mine to share incidents, learned lessons, and action plans. Also reviewed the resolution of the National Road Safety that approves the route.

Cinca transports sodium cyanide to Gualcamayo mine in San Juan (Argentina) in convoys of at least 5 to 6 trucks with a leading escort pick-up truck with anti-spill kit and emergency response kit. If the convoys increased, the escort pick-up truck increased as well.

Occasionally, transportation of sodium cyanide is made to the Veladero mine in San Juan. Also, sodium cyanide is occasionally transported to Cerro Moro in Santa Cruz.

In the case of transportation in the province of San Juan, the regulation requires an additional escort vehicle with 3 firefighters per convoy, equipped with 2 self-contained breathing apparatuses.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

For transportation to Cerro Moro, the regulation in the province of Santa Cruz mandates an additional HAZMAT escort vehicle in addition to the CINCA group's vehicle. This escort vehicle is hired by Pan American Silver, the owners of Cerro Moro.

The convoy leader in the escort vehicle is trained in hazardous materials (HAZMAT). Cyanide transport is performed during daylight hours and only allowed to stop at previously authorized places due to their ample capacity for parking and availability of food and security. On every stop the convoy personnel passes inspection to the trucks to ensure that everything is in order. The auditor reviewed the standard working procedure PETC-03 Cyanide Transport, the convoys checklist controls and interview drivers and management personnel confirming all the controls mentioned above are in place to transport sodium cyanide.

Cinca does not contact other entities to transport the cyanide. All trucks are from Cinca and the drivers are employees of the company. This is also a requirement of the mine; the transporter cannot contract thirds to transport cyanide. Requirements pertaining to subcontractors are, therefore, not applicable to this organization.

Standard of Practice 1.2

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

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

Cinca only uses trained, qualified and licensed drivers to operate the transport vehicles. To be a truck driver in Cinca, certain hiring requirements must be met as to have a professional cargo driving license and experience on transportation of dangerous substances. Driving tests are carried out by a Lead Driver designated by the transporter due to his experience, which reports the results to human resources. Before working, driving drivers are trained by the company in defensive driving course which is also given annually to all drivers.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

The auditors reviewed the documents of human resources which indicate the requirements that must meet the truck drivers. Also reviewed training records and operator documents finding everything compliant. Cinca is certified in the ISO 39001 vehicle safety standard.

The operation does not performs cyanide loading and offloading activities. The Port takes care of loading the containers in port and client offload the containers at the end point. When the truck arrives at its destination, the operator positions the truck and the client is responsible for unloading, cutting the seals and final verification.

All personnel operating trucks in the cyanide transport operation are trained to perform their tasks safely and with environmental responsibility. The Integrated Management System department at CINCA is responsible for training the drivers. This training includes procedures for loading and unloading trucks, defensive driving, the use of spill kits, understanding product safety data sheets, the contingency plan, and the cyanide transport procedure, among other topics.

CINCA leverages Microsoft tools for remote training and administering tests to assess understanding but prioritizes face-to-face training whenever feasible.

Auditors confirmed that the training has been provided and includes content relevant to the transport's nature and the operator's responsibilities. They reviewed training materials, such as the cyanide transportation work procedure, and attendance records documented with signature sheets. Interviews with drivers also verified that they had received the necessary training. Training is periodically refreshed, and competency is assessed through testing.

The 2024 training program (RRH-28 rev00) includes various modules: induction for new employees, health, safety, environment, quality, warehouse management, fuel handling, the International Cyanide Code, first aid, emergency cyanide kit usage, spill response, and the cyanide transportation standards and emergency plan.

Cinca does not contact other entities to transport the cyanide. All trucks are from Cinca and the drivers are employees of the company. Requirements pertaining to subcontractors are, therefore, not applicable to this organization.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

The transporter maintains a fleet of Mercedes Bens, Iveco, Scania and Volvo trucks, along with semitrailers for cargo transport. All trucks allows adequate performance on the steep roads at the Andes Mountains. Each truck with its semi-trailer hauls only one 20-foot sea container with 20-ton solid sodium cyanide. Semitrailers are 14.5 meters long. The rated load capacity of the transport trailers is 28 tons, which is greater than the 22 tons gross weight of the loaded sea containers that Cinca transport.

The auditor reviewed the manufacturing specifications and the biannual RTO (mandatory technical review) from the Argentinian Ministry of Transport which specifies the maximum load the vehicle can transport. During this technical review, all elements related to cargo capabilities are evaluated, as the state of tires, axles and chassis, among others.

Vehicles maintenance, during its guarantee period, is only performed in the manufacturer authorized workshops. Cinca has their own maintenance workshops where all other maintenance is performed. Maintenance for each vehicle is tracked through an own developed software.

Vehicles are inspected by the driver prior to departure. Any concerns are addressed prior to the vehicle being permitted to depart. Records of these inspections are documented on pre-use check lists. Records were available and showed completion of a vehicle inspection checklist and sign-off by the driver.

The operation does not uses cyanide handling equipment, such as forklifts and cranes. It is not required since it does not carry out loading or unloading activities of materials.

Cinca has developed and implemented the procedure PETC 03 Cyanide Transport to stablish the activities, controls, registers and necessary indicators to execute the transport service, which includes

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

procedures to verify the adequacy of the equipment for the load it must bear.

The procedure details type of merchandise, the criteria to assign drivers, vehicles and load securing elements, load and quantity of containers to ensure the vehicle adequacy. With this information assigns the transport unit and the driver that would comply with the service requirement. Pre-trip inspections of the truck are formally performed by the transporters as part of this procedure.

Cinca manages standard amounts of cyanide in one 20-foot ocean containers, weighing 22 tons approximately, to load into its transporter's trailers.

The procedure Cyanide Transport indicates the drivers must check the vehicle to prevent overload and indicates the following: when excessive loads of products (hazardous materials) are identified, they should not start the trip. The supervisor in coordination with the escort must verify and ensure that the quantity of products to be transported must be in accordance with the payload capacity of the unit, as well as the capacity established by local regulations, which must be recorded in the format of weights and measures.

To prevent overloading of the transport vehicle, Cinca has established in the procedure that each platform is loaded with only one cyanide 20-foot sea container and that each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklists and was confirmed during the interviews.

The load made by the port operator is weighed to confirm the weight of the shipment and recorded in the shipping papers, allowing Cinca to ensure the weight of the shipment. Records of cyanide shipments were checked against weight capacities and weight limit regulatory information. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported.

Shipping paperwork and procedures were reviewed, and the transporter personnel interviewed to confirm that appropriate practices are used. Shipping records showed that cargo amounts and weights were within the normal weight capacity of the equipment in use.

It is verified that it is cyanide that will be loaded and that the container is not tampered with or opened. The cargo is verified through the consignment note, verifying that the weight of the cargo does not exceed the load. In case of excess load, the driver must inform the Logistics Chief and/or convoy leader. On the route there are State scales that verify that the weight corresponds to the consignment note and the B/L. (Bill of Landing)

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

Cinca do not contact other entities to transport the cyanide. All trucks are from Cinca and the drivers are employees of the company. Requirements pertaining to subcontractors are, therefore, not applicable to this organization.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Cinca´s procedure Cyanide Transport requires drivers to perform pre-trip inspections endorsed by the convoy leader to ensure that trailers are locked and secured, and the integrity of the door's security seals. Drivers inspects the cargo upon loading the truck at the port, then on each stop in the route and on the delivery to the client. The procedure describes the administrative, operational and safety measures for the proper transportation of sodium cyanide.

The transport procedure establishes that the load cannot be altered during the transportation process. To ensure this, security seals are placed in the sea container's locks at the manufacturing facility. These seals can only be removed at the mine. The procedure was found to be compliant with the International Cyanide Management Code requirements.

Cinca transports sodium cyanide in solid briquettes packed in 1-ton Intermediate Bulk Containers (IBCs) where cyanide is contained in polypropylene supersacks and polyethylene bags. Each sea container carries 20 IBC with sodium cyanide. For security purposes and to maintain integrity of the packaging the shipping containers remains sealed. Integrity of the seals is checked at designated points during transportation.

There is a PETC-03 rev04 cyanide transport procedure, which includes in the general rules for the transport of cyanide, it will be verified that the cyanide containers are perfectly packaged and have not been manipulated or opened.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

The Cyanide Transportation driver, upon receiving the sodium cyanide and before loading the vehicle that will transport it, will verify that the cyanide containers are perfectly packaged and have not been manipulated or opened.

• The Cyanide Transportation driver must not receive, for any reason, containers that are not perfectly sealed or those that show external signs of deterioration.

• The driver must verify in the Waybill that the weight of the Cargo transported does not exceed the Maximum Capacity of the Semi-trailer. If this situation occurs, the driver must inform the Head of Body Logistics and/or Convoy Leader.

Shipments of cyanide are identified with the plates and signage required by the Argentinian jurisdiction. The auditor inspected the plates and signs used to identify the presence of cyanide in transport vehicles and concludes that this provision is complied. The procedure Cyanide Transport requires all sea containers to have appropriate placards showing UN 1689 (solid sodium cyanide), and the skull and crossbones marker used for Class 6.1 toxic substances, along with the Marine Pollutant marker. Placards are displayed on all four sides of the sea containers and in the truck where visible. Also, it is required drivers visually inspect the containers prior to each movement. Drivers carry spare signaling in case of need it. The drivers and the convoy leader conduct pre-trip vehicle safety checks prior to departure of the truck. These checks also include confirmation that the cyanide placarding is displayed on all four sides of the vehicle.

The PETC-03 procedure refers to standard 779-1995 annex S where it is mentioned that transport units must have a UN number and hazard class. The cyanide billboard is included in the Documents.

Prior to the vehicle departure, inspections sheets RGI-57 Load Control, includes control of load adjustments, status of truck and semi-trailer units and dimensions. In addition, there is RGI-88 check control of Garita units. Includes unit documents, green card, route and insurance, driver's license, Safety Data Sheet, first aid kit, fire extinguisher, billboard, transport unit anti-spill kit, PPEs control. The driver also fills out the Registered Owner form with asset security, which includes the status of the vehicle, communication radio, among other items of the supervision pick-up truck. There is also RGI-72 rev 01 Inspection of the Spill Kit that includes an oxygen cylinder, and Inspection of the RGI-73 rev01 emergency kit that includes an oxygen resuscitator (AMBU) and a cyanide gas detector. The documents are completed and signed by the driver and the convoy leader. The procedure for cyanide transportation requires prior to departure of cargo, the driver and the convoy leader conduct a pre-trip

inspection of the vehicle and the semitrailer, to ensure the vehicle and shipment is in good operating condition. Any issues that could affect safety or the operation of the vehicle are resolved prior to departure.

Cinca implemented the procedure Maintenance Process and uses a maintenance software to provide on time preventive maintenance to its vehicles, including trucks and trailers. Maintenance for each vehicle is tracked through the software called EME Nube, which provide information regarding preventive and corrective maintenance, following up of required actions and alerts when next maintenance will be required. The system is fed by the vehicle pre-use inspections, where any needed corrective action is registered, including drivers' feedback.

Trucks that are within the manufacturer's warranty period are sent for preventive maintenance in authorized workshops. Scania and Volvo trucks are sent to their respective workshop, Iveco and Mercedes Benz vehicles receive preventive maintenance in Ficamen and Colcar workshops, respectively. The rest of the fleet that is outside the manufacturer's warranty period, receives preventive maintenance in the transporter workshops for which it has adequate facilities and personnel capacity.

Preventive maintenance is scheduled in general, to be performed each 7,500 km. This is also tracked by mean of the spreadsheet Preventive Maintenance, where a traffic light type system alerts regarding proximity of next maintenance. In addition, with the Evo Gestion software, Cinca tracks its vehicles tires life to replace them when the grooves are 2 mm, based on experience regarding its equivalence in kilometers. Each pneumatic has a code and can be tracked individually. The auditors reviewed examples of maintenance records performed as planned, Cinca was able to demonstrate complete vehicle service.

Drivers are limited to an "on-duty" workday of 12 hours. Driving activities for hazardous cargo is stablished to be between 5 am and 9 pm, during sunlight hours. Any activity detected outside of this range, will shut down an alarm in the 24-hour satellite tracking system Sitrack at the control room and reports will be automatically to supervisors. There is a document Rest Times PG-07, a procedure that includes a work-rest regime in accordance with current regulations, respecting a minimum of 12 hours of rest between one day and another. Activity in remote sites work regime 1 x 1 rest with 12-hour days. Assignment of personnel to the positions for which they were summoned. Tasks and jobs standardized through procedures. Planned and sequenced work. In remote sites, provision of complementary amenities to those provided by the client in order to improve recreation areas and bonds between colleagues.

GPS through Sitrack s includes alarm systems that include detention in authorized and unauthorized areas, detention zones for brake cooling and speeding.

The logistic area is in charge to assign the drivers according to their availability. The area manages a

spreadsheet where all drivers hours in cargo transport operations is registered as well as their resting period, ensuring they are having enough rest time according to that stablished.

Cinca' s procedure for cyanide transportation includes instructions for securing and blocking the cargo. It calls for the securing of the containers to the trailer bed using the twist locks mechanisms that are part of the trailer itself. The integrity of the twist locks mechanism and the attachment point on the container is checked during a pre-trip inspection prior to the departure of the truck or the cyanide convoy and on any stop in route. There are specific locations on the trailer that will accept the container, thereby eliminating the possibility of an unbalanced load.

In the procedures PETC-03 Cyanide Transport, indicates that transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered. During interviews with Cinca managers, convoy leader and drivers were aware of this practice showing Cinca empowers the driver and / or the convoy leader in coordination with the HSE Manager to suspend or to modify transportation if conditions to travel are not appropriate.

They are responsible for evaluating weather and road conditions and determining what actions should be taken. Convoy Leaders are senior personnel, experienced with weather and road conditions, and adept at making decisions regarding the need to suspend a shipment or to modify any convoy plans. In addition to weather forecasts, regular reports are received from the Monitoring Center, including cases of civil unrest.

Cinca empowers the driver and / or the convoy leader in coordination with the HSE Manager to suspend or to modify transportation if conditions to travel are not appropriate, as stated in the procedure for cyanide transportation. The Convoy Leader will oversee making the decision to modify and/or suspend the route of the trip in the event of any eventuality that may arise.

There is an alcohol and drug policy POL 05, which were reviewed during the audit. Before each trip, drivers must undergo alcohol testing and periodically disclose evidence of drug use. Violation of this policy could result in the separation of the worker from the organization. In the procedure Access Control, it is also required that alcohol test is registered on entrance control.

Cinca have two Draeger breathalyzers, one qualitative and the other quantitative.

Personnel entry control includes breathalyzer tests. If the qualitative test is positive, three samples are taken for quantitative analysis.

Annual occupational examinations include drug testing, specifically for cannabinoids, THC, (Tetrahidrocannabinol) and cocaine.

There is entry control with date, time on duty, name of the driver and equipment used for alcohol testing, positive or negative control, control of up to 3 samples and observations.

The company's servers store folders organized by department, containing all documentation, with

backups performed in the cloud.

They have Master Document List with code SGI – RGI 02. Also, they have the Information Safeguard Procedure PESI 01, which includes information storage activities on a daily, weekly and automatic basis through the system.

The operation retains records documenting its safety program, including procedures, inspections, preventive maintenance, driving hours and alcohol tests, among others.

Cinca does not contact other entities to transport the cyanide. Requirements pertaining to subcontractors are, therefore, not applicable to this organization.

Standard of Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

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

Cinca does not ships cyanide by sea. This section of the International Cyanide Management Code does not apply to the operation.

Standard of Practice 1.6:

Track cyanide shipments to prevent losses during transport.

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

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

All drivers and personnel involved in the transport operation are provided with cell phones and a contact list to communicate with the transport company, the cargo dispatcher and emergency responders. The transport operators have a communications group in WhatsApp application where any novelty or alert in the operation is reported. For emergencies, drivers are trained on who to call and what to say, according to that stated in the Emergency Response Plan, of which they carry a copy in the vehicle. All drivers wear a card with the emergency contact list.

All trucks are equipped with two-way radios to communicate between them and from specific sectors from the route to their main mining client. Trucks are also equipped with GPS that always allows Cinca to track their units all time, with periodic reporting to the operation and the client, according to settings. The auditors reviewed the trucks for communications equipment and interviewed the drivers to confirming this information.

There is a list of communication units, which includes BLU-VHF-TETRA-MOTOTURBO and satellite telephone.

There is an emergency response plan PEGI-01, Emergency response plan for cyanide PEGI-20, communication card is included.

The procedure PETC-03 Cyanide Transport includes the requirement that communications equipment must be tested every 6 months to assure it functions properly before the vehicle´s departure. The auditors reviewed completed pre-trip inspection records checking that these include fields allowing to review the correct operation of the communications equipment.

Cinca identifies communication blackout areas, or grey points, during the route risk assessments. In case of blackout areas, the convoy leader driver will report on entering and/or exiting from these areas, as stated in the cyanide transport procedure.

Cinca has the Sitrack GPS tracking system which allows, among other utilities, continuously monitoring of the location of the trucks. Communications with the base are performed upon dispatch, upon arrival at the customer sites, and after unloading is complete. Personnel at the Monitor Center was interviewed, the GPS system was demonstrated, and logs showing that shipment status, other

than cyanide, was being recorded.

It has a Cyanide Convoy Tracking format RTC 07, it includes convoy leader, driver, units and the container number and seal number of the container. Monitoring is carried out every 2 hours and the client is informed of the status of the tour.

Cinca has inventory controls and chain of custody documentation to prevent loss of cargo during shipment and keep these controls when transporting cyanide. Upon client's authorization for cargo, Cinca issues a consignment note called Remito, indicating the cargo weight, name of the product, class, quantity, origin, place of delivery, seal number, departure and arrival hour, signature and stamp of the client indicating that they received the cargo in conformance.

Other documentation required are shipping documentation, Material Safety Data Sheets (MSDS), packing list, customs declarations and producer invoice, among others. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer.

A consignment note is included during the cyanide transportation in Cinca, which includes chain of custody data such as container numbers, the amount of cyanide delivered and the MSDS, among others. The transport document, the MSDS, and emergency response information are carried by each driver. The drivers have an on-board file that includes copies of its licenses, and the sodium cyanide MSDS.

Cinca does not contact other entities to transport the cyanide. Requirements pertaining to subcontractors are, therefore, not applicable to this organization.

2. *INTERIM STORAGE*

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Standard of Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental releases.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

The operation is	✓ in full compliance with	Standard of Practice 2.1
	☐ in substantial compliance with	
	☐ not in compliance with	

Cinca do not operate cyanide trans-shipping depots or interim storage sites in its transport operation. If a delivery is interrupted, loaded cyanide trucks would be stored in a secure location. Principle 2, Interim Storage, does not apply to the operation

3. *EMERGENCY RESPONSE:*

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Cinca has the Cyanide Emergency Plan PEGI 20, and PETC-03, to respond to emergencies that may occur during its transport activities.

Cinca´s emergency response plan reflect the risks assessed on the transport route to Gualcamayo mine and also to other mining operations. The transport plan describes the method of transportation by trucks. The emergency scenarios described in the plan are specific to the delivery route taken, the state of the road, the physical form of sodium cyanide – solid in briquettes – the chemistry of the cyanide transported and the transport vehicles used 3-axle trucks with and trailers and a 20-foot sea container per trailer. The auditors reviewed the emergency response plan verifying that is adequate in identifying potential emergency scenarios and necessary response

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

actions.

Medium Transport: this is carried out by truck with a semi-trailer, on paved routes to the mines, each truck contains a 20-foot container, for 20 wooden boxes (IBCs), inside it contains 1 Polyethylene bag, which supports loading its contents, it contains polypropylene bags to avoid humidity and suspended dust.

Within the cyanide work plan, it includes the physical and chemical form of cyanide where it is linked to the sodium cyanide safety sheet. The safety sheet is also shared within the driver's and safety supervisor's folders.

A description of the units is included within the Unit Detail sheet, which includes unit type, patent, brand, model and year.

Cinca´s emergency response plan include action take on case of spill; describe in detail how the spill will be collected, and how the environment will be cleaned; define who will be in charge of the second emergency response. Also there is the response to a cyanide spill into water, indicating they must move away and to immediately warn the downstream populations; who will be in charge the second response and to describe what they will do in case of a cyanide spillage into wet soil.

The plan describes the nature of the response actions to be taken for the types of emergency situations identified. The level of detail is appropriate to the nature of the potential emergencies identified in the plan and the response capabilities available. In all cases, the immediate response – first response – will be carried out by transport personnel – drivers and escorts.

The carrier has included any details that may reasonably be presented in the event of possible leaks at locations on the route that have been identified as being of greatest risk. The response to a spill that occurs during the transport of cyanide to open water such as a river establishes notifying the authorities of the lower part of the river to alert the surrounding populations to refrain from using the water of the river.

The auditors reviewed the plan verifying that, to the extent possible, it outlines the specific response actions to be taken for the types of potential spill scenarios identified.

The following types of emergencies are identified in the plan:

1. Of technical accidental origin

- Fire
- Hazardous materials incidents

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

- Medical emergencies

2. Spill in port, warehouses or on route.

In the case of a threat of fire, they respond internally, for emergency cases in spills or those in which levels 2 and 3 cannot be controlled internally, CIPET is called.

EMERGENCY LEVELS:

Considering the degree of consequence of emergencies, it has been proposed to classify them into three levels in such a way that allows us to significantly improve communication, attention and speed of response, with emergency level ONE being the lowest and level THREE being the most gravity. It is also convenient to consider that an emergency can move to a higher or lower level according to its evolution over time.

Cinca considers in its emergency response plan, the participation of external response personnel to participate in the emergency response to spills that occur during the transport of cyanide for large-scale response cases along the transport route.

The emergency response plan includes entities such as the CIPET (Transportation Emergency Information Center), a service of the Argentine Chamber of Automotive Transport of Goods and Hazardous Waste together with the Secretariat of Civil Protection and Integral Approach to Emergencies and Catastrophes of the Ministry of Security of the Nation. Upon calling CIPET due to a transport emergency, they are in charge to contact with external emergency responders in the area, including commercial contractors for second response attending emergencies with hazardous materials.

Standard of Practice 3.2

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

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

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

Cinca provides emergency response training to drivers, convoy leaders and supervisors. Training on emergency response is given periodically according to an Annual Training Program. Personnel is trained in appropriate emergency response, in safe cyanide management (spill and intoxication), firefighting, first aid, hazardous materials. Training is provided by internal staff and external companies as workouts which are renewed annually complying with the training plan and verifying compliance with specific skills. The auditors reviewed several training records in hard copies, which include the persons trained, the nature and dates of the training. Administrative personnel, drivers and escorts supervisors were interviewed, and awareness of emergency procedures and documentation was confirmed.

The plan describes the emergency response duties and responsibilities of the transport personnel involved in this transport operation. The plan has detailed descriptions of the specific emergency response duties and responsibilities before, during and after an incident / accident or an emergency of situation for the managers, transport coordinator and the convoy leader, among others. The roles and responsibilities of relevant internal and external personnel are clearly described. The information in the Plan was found to be acceptable.

Cinca´s emergency response plan describes all the equipment and materials required for emergency response during transportation along the route, including spill response equipment. The emergency equipment and Personal Protection Equipment (PPE) includes Tyvek suits, leather and impermeable gloves, PVC boots, safety goggles, isolating tape rolls, HCN detector, disposable respirators, oxygen, shovels, sweeps, polyethylene bags, lime and empty containers. The HCN monitors have been calibrated and maintained according to the manufacturer's recommendations. The auditors considers that the equipment and materials are suitable for the activities required in the emergency response plans.

There is a format: RGI-72 Spill Kit Check

There is a format: RGI-73 Emergency Kit Check.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

The plan defines what equipment must be available in each truck and extra personal protective equipment available. Equipment is checked as part of the pre- trip inspection process. The auditors reviewed the completed emergency equipment checklists. Appropriate personnel were interviewed to verify compliance with this provision.

The Emergency Response Plan mentions the requirement for periodic inspections (not only before the departure of the convoy) of emergency response and first aid teams for cyanide exposure. The auditors reviewed records showing that inspections are being conducted.

Cinca has written provisions in its emergency response plans establishing that the emergency response equipment identified must be inspected and tested regularly so that they are available in good working order when needed for use. There pass through monthly inspections and before the departure of each convoy. The auditors reviewed these records and verified on site that the equipment is in good working order for the transport of cyanide.

Cinca ensures that Grupo Pelco is aware of its emergency response and remediation activities, as well as the contractor's responsibilities. Both parties have a signed contract, and their participation is observed in the drills.

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Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting

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

The emergency response plan includes procedures and flowcharts of communications for

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

emergencies, as well as updated contact information for the necessary internal notification and external notifications in case of a cyanide emergency during transport.

The auditors reviewed the notification procedures and the carrier's contact information telephone list verifying compliance with this provision. It is listed current emergency numbers for CIPET, fire, and environmental responders. Phone lists also included up-to-date contact information for the mine site, and the cyanide consignor, among others.

The emergency response plan states that an annual emergency drill will be conducted to verify the phone numbers and names listed in the contact directory.

The CINCA emergency response plan requires that internal and external emergency notification and reporting procedures are regularly updated.

An annual review of documents, including emergency response plans, ensures their content is up to date and telephone numbers are revised accordingly.

Cinca includes in the emergency response plan, the requirement to report any significant accident with cyanide to the International Cyanide Management Institute (from now ICMI).

No reports have been done to the ICMI as such significant cyanide incidents do not have occurred.

Standard of Practice 3.4

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

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

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

Within the PEGI-24 procedure Spill of dangerous substances, and the Emergency Response Plan include:

Cinca's emergency response plan describes how it will neutralize cyanide and the recovery will take, the decontamination of soils, or other contaminated media and how these wastes are managed. Descriptions of necessary action steps depending on the incident scenario are outlined in the documents. Cinca's convoy personnel will provide first response in case of small spills. The second response will be in charge of Grupo Pelco. The external remediation contractor, Grupo Pelco, has procedures for recovery or neutralization of solutions or solids, decontamination of soils other contaminated media, and management and/or disposal of spill clean-up debris.

If it is the case to contaminate a water source, the management to the competent authority to alert the population or downstream.

Management will determine the means to carry out a monitoring study of samples of the receiving source of water both upstream and downstream of the discharge point. Analytical Controls will be carried out (analyzing physical, chemical and biological parameters and characteristics) in such a way that the degree of contamination of the water will be verified, among other parameters, verifying the degree of contamination generated in the body of water and based on the results obtained, take the appropriate remedial actions.

In addition, the affected area will be monitored and the contaminant absorbed will be verified depending on the texture of the soil (silt, clay, grit, etc.). The results of the sampling will take the corresponding remedial actions.

In case of a small spill, as a preventive measure and in case of rain, immediate action should be taken by placing a tarp and/or blankets covering it. Lime will also be used to neutralize and reduce the PH.

Cinca´s emergency response plan specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water. The plan address that the use of these chemical substances in any incident for the treatment of solid sodium cyanide spilled in surface waters is prohibited. Neutralization chemicals are not allowed to be used in or near surface water bodies. Grupo Pelco procedures also prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide that has been released into surface water.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

Standard of Practice 3.5

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

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

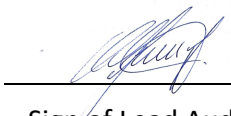
Cinca´s Integrated Management System (SIG) states all documents must be reviewed biannually. SIG staff performs internal audits twice a year to ensure documents have been updated. The plan also states to periodically review the emergency procedures and to evaluate the plan adequacy. The plan and procedures reviewed were maintained as latest versions and under formal document control. Records were available to show that this is done.

CINCA presented the reports from its annual emergency drill.

On October 15, 2024, CINCA conducted a spill and fire drill at its headquarters yard with seven participants. The scenario involved a spill and fire on a truck. The truck team drivers responded by containing the fire at its early stages to prevent it from spreading. The semi-trailer was unhitched from the truck as part of the response. No cyanide exposure occurred during the drill.

The detailed drill report included corrective actions, assigned responsibilities, and deadlines to address the required improvements.

On the same date, CINCA evaluated the spill and fire drill to assess the adequacy of response procedures, the appropriateness of equipment, and the training of personnel. Management has stated that the next drill will involve a cyanide exposure scenario.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date

The emergency response plan states that the plan will be revised to evaluate the plan's performance after its implementation.

In addition, the emergency response plan states that an annual emergency drill will be conducted to verify the phone numbers and names listed in the contact directory.

The CINCA emergency response plan requires that internal and external emergency notification and reporting procedures are regularly updated.

An annual review of documents, including emergency response plans, ensures their content is up to date and telephone numbers are revised accordingly.

Grupo Cinca		May 16, 2025
Name of Facility	Sign of Lead Auditor	Date